



United States
Department of
Agriculture

Forest
Service

August 2013



APPENDICES

Final Environmental Impact Statement

For the Revised Land Management Plan

Idaho Panhandle National Forests



Cover Photo: Orville Mountain

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Appendix A – Cumulative Effects

Cumulative effects are those impacts on the environment that result from the incremental effects of an action when it is added to other past, present, and reasonably foreseeable future actions, regardless of which agency or person undertakes them (see 40 CFR 1508.7).

Analysis and disclosure of cumulative effects alerts decision-makers and the public to possible environmental implications of interactions among known and likely management programs and activities. A programmatic FEIS, such as this one, considers large areas that encompass a wide array of environmental interactions, not all of which occur on the national forests. Many of these environmental interactions will be most accurately disclosed as cumulative effects in site-specific environmental analyses; they can neither be confidently predicted nor credibly estimated for inclusion in this document. In such cases, these cumulative impacts are discussed to the extent data and information allow. Wherever possible, cumulative impacts of the alternatives have been identified and estimated, even when the impacts are estimated with limited degrees of certainty.

A program document, such as this one, needs to consider compatibility and conflicts with programs plans and institutional arrangements at national, regional, and state levels that have implications to environmental consequences and influence of successful implementation. The following past, present, and reasonably foreseeable programmatic actions have affected or could affect the various resources in the Idaho Panhandle National Forest (IPNF). There is additional discussion of cumulative effects within the various resource area sections of chapter 3 of the FEIS.

Existing Forest Plan, as Amended

The baseline of effects is from the 1987 Land and Resource Management Plan. The effects of this Plan have previously been determined and disclosed in appropriate National Environmental Policy Act (NEPA) documents.

Past Policy Decisions

Forest Service NEPA Procedures

On July 24, 2008, the Agency issued a procedural rule to guide its implementation of the NEPA (36 CFR 220). While the new rule includes some changes, most of the Agency's NEPA procedures were moved to regulation unchanged. No cumulative effects are expected from these actions because these are intended to be procedural requirements that do not cause effects on the human environment.

Idaho Roadless Rule

The Idaho Roadless Rule (36 CFR 294 Subpart C) designated a system of lands called Idaho Roadless Areas. These lands are managed within a spectrum of five management themes: Wild Land Recreation; Primitive; Special Areas of Historic and Tribal Significance; Backcountry/Restoration; and General Forest, Rangeland and Grassland (36 CFR 294.28 (d)). The provisions set forth in this subpart shall take precedence over any inconsistent land management plan component. Land management plan components that are not inconsistent with this subpart will continue to provide guidance for projects and activities within Idaho Roadless

Areas, as shall those related to protection of threatened and endangered species. This subpart does not compel the amendment or revision of any land management plan. (e) The prohibitions and permissions set forth in the subpart are not subject to reconsideration, revision, or rescission in subsequent project decisions or land and resource management plan amendments or revisions undertaken pursuant to 36 CFR parts 219.

The National Travel Management Final Rule

In November 2005, the Forest Service published a new travel management rule governing motor vehicle use on national forests and grasslands (36 CFR parts 212, 251, 261, and 295 (travel management)). Under the final rule, each national forest or ranger district designated those roads, trails, and areas open to motor vehicle use by class of vehicle and, if appropriate, by time of year. Motor vehicle use off the designated system is prohibited. Designated routes and areas have been identified on a motor vehicle use map (MVUM). Motor vehicle use outside of designated routes and areas are provided for fire, military, emergency, and law enforcement purposes, and for use under Forest Service permit. Valid existing rights are honored. The rule also maintains the status quo for snowmobile use.

The travel management rule has no effect on fire management, forest management, grazing, transportation systems, mineral and energy development, winter recreation, or land acquisition because it does not affect permits or valid existing rights.

As stated in chapter 3 of the FEIS, none of the alternatives would have a measurable impact on access to NFS lands.

The Roads Policy

In January 2009, new directives (FSM 7700 and FSH 7709) regarding travel management were put into effect to make them consistent with and to facilitate implementation of the agency's final travel management rule. This direction gives managers a scientific analysis process to inform their decision-making. It directs the agency to maintain a safe, environmentally sound road network that is responsive to public needs and affordable to manage but that call for unneeded roads to be considered for decommissioning or conversion to other uses, such as trails.

These final directives consolidate direction for travel planning for both NFS roads and NFS trails in Forest Service Manual (FSM) 7710 and Forest Service Handbook (FSH) 7709.55. The final directives rename roads analysis "travel analysis" and streamline some of its procedural requirements. In addition, for purposes of designating roads, trails, and areas for motor vehicle use, the final directives expand the scope of travel analysis to encompass trails and areas being considered for designation.

National Fire Plan

The National Fire Plan (NFP) was developed in August 2000, following a landmark wildland fire season, with the intent of actively responding to severe wildland fires and their impacts on communities while ensuring sufficient firefighting capacity and safety for the future. The NFP addresses five key points: firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability (USDA Forest Service and USDI 2000).

The NFP established an intensive, long-term hazardous fuels reduction program in response to the risks posed by heavy fuels loads; the result of decades of fire suppression activities; sustained drought; and increasing insect, disease, and invasive plant infestations. Hazardous fuels

treatments are accomplished using a variety of tools, including prescribed fire, wildland fire use, mechanical thinning, timber harvest, herbicides, grazing, or combinations of these and other methods. Treatments are being increasingly focused in the expanding wildland urban interface (WUI) areas.

Various sections of chapter 3 of the FEIS, particularly the “Vegetation and Fire/Fuels,” discuss the interaction of the four alternatives with the NFP. A discussion of cumulative effects can be found there as well.

Healthy Forests Initiative

In August 2002, the President issued Healthy Forests: An Initiative for Wildfire Prevention and Stronger Communities. The intent of the initiative is to better protect people and natural resources by lowering the procedural and process hurdles that impede the reduction of hazardous fuels on public land. The initiative includes:

- Improving procedures for developing and implementing fuels treatment and forest restoration projects in priority forests and rangelands;
- Reducing the number of overlapping environmental reviews by combining project analyses and establishing a process for concurrent project clearance by federal agencies;
- Developing guidance for weighing the short-term risk against the long-term benefits of fuel treatment and restoration projects; and
- Developing guidance to ensure consistent NEPA procedures for fuel treatment activities and restoration activities.

One outcome of the Healthy Forests Initiative was the Healthy Forests Restoration Act of 2003 (HFRA).

Various sections of chapter 3 of the FEIS, particularly the “Vegetation and Fire/Fuels Management” sections, discuss the interaction of the four alternatives with the Healthy Forests Initiative. A discussion of cumulative effects can be found there as well.

Healthy Forests Restoration Act of 2003 (P.L. 108-148, HFRA)

The Healthy Forests Restoration Act, approved by Congress in December 2003, applies to the Forest Service and Bureau of Land Management (BLM). The act contains a variety of provisions to expedite hazardous-fuel reduction and forest-restoration projects on specific types of federal land that are at risk of a wildland fire or insect and disease epidemics. The act helps rural communities, States, Tribes, and landowners restore healthy forest and rangeland conditions, on state, tribal, and private lands.

Even though they do not specify outcomes, the direction set forth in these documents (the NFP and HFRA) was considered in the effects analysis. The analysis evaluates the relative ability to treat hazardous fuels primarily within the WUI and municipal watersheds. The prohibitions and permissions for road construction/ reconstruction and timber cutting, sale, or removal influence the ability to treat hazardous fuels.

Timber cutting and associated road-building projections portrayed in the FEIS reflect activities anticipated to be implemented within each of the alternatives, in response to the NFP, Healthy Forests Initiative, and HFRA. Various sections of chapter 3 of the FEIS, particularly “Vegetation and Fire/Fuels Management,” discuss the interaction of the four alternatives with the HFRA. A discussion of cumulative effects can be found there as well.

Woody Biomass Utilization Strategy

This 2008 strategy describes how Forest Service programs can better coordinate to improve the use of woody biomass in tandem with forest management activities on both federal and private lands. Although the focus is on the use of woody biomass, the primary broader objective is sustaining healthy and resilient forests that will survive an environment of natural disturbances and threats, including climate change. One of four goals of the strategy is facilitating a reliable and predictable supply of biomass. The strategy does not prescribe any specific outcomes.

Each of the alternatives would result in a different level of biomass being available for use, commensurate with the levels of tree harvest predicted in table 158 (see “Timber” section of the FEIS).

Energy Implementation Plan

The 2001 Forest Service Energy Implementation Plan was written to implement elements of Executive Order 13212, Actions to Expedite Energy Related Projects, also called the National Energy Plan (USDA Forest Service 2001). The National Energy Plan encourages agencies to “...expedite their review of permits and/or take other actions necessary to accelerate the completion of such projects, while maintaining safety, public health, and environmental protections...”

No priority areas were identified in Idaho. The Energy Implementation Plan does not prescribe any specific outcome and is not a programmatic decision. It merely identifies actions that should be taken to respond to the National Energy Plan.

Energy Policy Act of 2005

Recognizing the fundamental importance of the delivery of energy supplies to the Nation’s economic well-being, Congress passed section 368 of the Energy Policy Act of 2005 to require certain federal agencies to designate energy corridors on federal lands in 11 western States, including Idaho, and to coordinate with each other to create a cooperative, efficient process for applicants to apply for rights-of-way in such corridors. Congress stated in section 368 that the agencies should incorporate the designated corridors into their respective land use or resource management plans. Congress also directed the agencies to conduct environmental reviews that are required to designate corridors and add the designated corridors to the plans.

As directed by Congress in section 368 of the Energy Policy Act of 2005, the Forest Service participated in preparing a programmatic EIS and issued a ROD (USDA Forest Service 2009) designating energy corridors on land it administers for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities in 10 contiguous western States and incorporated these designations into affected agency land use plans. The decision amended the IPNF 1987 Forest Plan and is retained as a decision in the final Forest Plan. Energy corridors not addressed in the programmatic analysis would be subject to a separate environmental analysis.

Potential development of energy resources in Idaho Roadless Areas was considered in developing the Idaho Roadless Rule (36 CFR 294 Subpart C).

Forest Service Open Space Conservation Strategy

The Forest Service announced its Open Space Conservation Strategy on December 6, 2007. This strategy establishes goals and priority actions to conserve open space across private and public

land and underscores the importance of the conservation of open space to the mission of the Forest Service (USDA Forest Service 2007a).

Each day 6,000 acres of open space are lost in the United States as more people choose to live at the urban fringe and in scenic, rural areas. Between 1982 and 2001, approximately 34 million acres of open space (an area the size of Illinois) were developed. Considering forestlands specifically, more than 10 million acres were converted to houses, buildings, lawns, and pavement between 1982 and 1997, and another 26 million acres of forests are projected to be developed by 2030 (USDA Forest Service 2007a).

Development of open space affects the Agency's ability to manage national forests and grasslands, as well as the ability to help private landowners and communities manage their land to maintain private and public benefits and ecosystem services. At stake is the ability of private and public forests and rangelands to provide clean water, scenic beauty, biodiversity, outdoor recreation, and natural resource based jobs, forest products, and carbon sequestration.

The Open Space Conservation Strategy establishes four priority actions for the Forest Service, which can be broken down into 13 supporting actions:

- Convene partners to identify and protect priority open space.
 - Conduct a rapid science-based assessment of open space change to inform priorities;
 - Convene partners and stakeholders to identify regional priority lands; and
 - Protect regional priority lands through partnerships and mechanisms such as land acquisition and conservation easements.
- Promote national policies and markets to help private landowners conserve open space.
 - Identify where changes in tax and other federal policies could provide economic incentives and remove barriers for open space conservation;
 - Support the development of emerging ecosystem service markets to encourage private investments in open space conservation;
 - Encourage natural-resource-based industries to provide economic incentives for landowners to retain working lands;
 - Support recreation and tourism uses to generate revenue for landowners and communities from open space lands; and
 - Provide and encourage landowner assistance and incentives to help keep working lands working.
- Provide resources and tools to help communities expand and connect open space.
 - Provide urban forestry assistance to communities to enhance and restore open space within cities, suburbs, and towns; and
 - Develop tools to help communities strategically connect open spaces to build a functioning green infrastructure.
- Participate in community growth planning to reduce ecological impacts and wildfire risks.
 - Support and participate in local, regional, and transportation planning to conserve open space and retain ecosystem benefits;
 - Work with communities to plan for and reduce wildfire risks.

All four of the alternatives considered for the Plan revision are consistent with the actions identified in the Open Space Conservation Strategy. The management approaches of the alternatives include different combinations of active and passive land management

Recreation Facility Analysis

National forests use the Recreation Facility Analysis to provide the best recreation opportunities in the right places. It is an analysis process (USDA Forest Service 2007b); used nationally, to assist forests in creating a sustainable program that aligns their recreation sites with visitors' desires and use. FSM ID 2310-2003-1 requires facility master plans be developed for all facilities.

Recreation Facility Analysis identifies actions proposed for the short-term and sets the stage for long-term recreation sites planning. The Recreation Facility Analysis goals are to:

- Improve customer satisfaction;
- Provide recreation opportunities consistent with the Forest recreation "niche;"
- Operate and maintain a financially sustainable recreation sites program to accepted quality standards; and
- Eliminate deferred maintenance at recreation sites.

Under each of the four alternatives, decisions on the use of recreation sites and resources would still be made through other forest-level decision making processes. Since the Plan revision will have no effect on the Recreation Facility Analysis, there is no interaction between the two sets of regulations, and no cumulative effects to consider.

The Idaho Comprehensive Wildlife Conservation Strategy (2005)

The Idaho Comprehensive Wildlife Conservation Strategy (Idaho Department of Fish and Game 2005) provides a foundation for sustaining Idaho's fish and wildlife and the habitats on which they depend. The strategy provides general directions for wildlife conservation and a stimulus to engage partners in conservation of Idaho's wildlife resources. In addition, there are several species-specific recovery plans and conservation strategies for species occurring in Idaho. Close cooperation with the state of Idaho occurred during the revision process. The Idaho Comprehensive Wildlife Conservation Strategy, as well as other recent state species management plans, have been reviewed, and where appropriate, considered in the development of the final Forest Plan.

Non-native Invasive Species

Non-native invasive species are a problem throughout Idaho. Several current state and federal activities and authorities address some invasive species, their prevention, and control, namely the Idaho Invasive Plan 2005 (Idaho Department of Agriculture 2005) and the National Strategy and Implementation Plan for Invasive Species Management (USDA Forest Service 2004). Of particular concern is that the presence or spread of invasive species could potentially limit the effectiveness of habitat improvements or efforts to recover species. Roads often provide vectors for spread of invasive species. In general, areas with fewer roads have a lower risk of having invasive species populations established. The Idaho and national invasive plans provide guidance to reduce and/or limit the spread of noxious weeds. Overall, these guiding documents would beneficially affect ecological processes, wildlife, fisheries, and roadless characteristics by identifying actions to reduce or limit the spread of noxious weeds.

Executive Order 13514 – Federal Leadership in Environmental, Energy, and Economic Performance

Executive Order 13514 directs each agency to not only develop a sustainability strategy and reduce greenhouse gas emissions but to develop policies and practices to support the Federal Adaptation Strategy. Executive Order 13514 challenges the federal government to set sustainability goals for federal agencies. These goals include the ability to increase energy efficiency; measure, report, and reduce their greenhouse gas emissions from direct and indirect activities; conserve and protect water resources through efficiency, reuse, and storm-water management; eliminate waste, recycle, and prevent pollution; leverage agency acquisitions to foster markets for sustainable technologies and environmentally preferable materials, products, and services; design, construct, maintain, and operate high performance sustainable buildings in sustainable locations; strengthen the vitality and livability of the communities in which federal facilities are located; and inform federal employees about and involve them in the achievement of these goals. In July 2010, the Chief of the Forest Service announced the National Roadmap for responding to climate change and the performance scorecard.

Executive Order 13443: Facilitation of Hunting Heritage and Wildlife Conservation

In part, Executive Order 13443 directs the Secretaries of Agriculture and the Interior to facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitats by evaluating the effect of Agency actions on trends in hunting participation and, where appropriate, to address declining trends and implement actions that expand and enhance hunting opportunities for the public. The analysis evaluates the potential effect on wildlife and hunting and shows that the alternatives would not affect the ability to expand or enhance hunting opportunities on NFS lands in Idaho.

USDA Forest Service Strategic Plan 2007-2012

This Plan provides the strategic direction that guides the Forest Service in delivering its mission. This Plan addresses the core principles by which the Forest Service works; major issues currently important to natural resources management and to the strategic goals upon which the agency will focus for fiscal years (FY) 2007 through 2012. Forest Service programs and budget are aligned with the goals and objectives in this strategic plan and as well as with the focus areas of the Agency.

The Strategic Plan is a framework strategy under which the revised Plan fits. There are no direct cumulative effects in connection with the Strategic Plan and this FEIS since the Strategic Plan does not lead to any direct action on the ground or compel any policy development or implementation. The revised Plan EIS with its emphasis on vegetation, fire, wildlife, watersheds/aquatics, access and recreation, and integration of science (e.g., climate change) will complement the Strategic Plan.

Reasonably Foreseeable Policy or Programmatic Decisions

Proposed Planning Rule

On February 10, 2011, the USDA Forest Service unveiled its proposed Forest Planning Rule which would establish a new national framework to develop land management plans that protect

water and wildlife and promote vibrant communities. The proposed rule is the result of an open, collaborative rulemaking process that began in December 2009.

This proposed planning rule seeks to conserve our forests for the benefit of water, wildlife, recreation and the economic vitality of our rural communities,'said Agriculture Secretary Tom Vilsack. The proposed rule will provide the tools to the Forest Service to make our forests more resilient to many threats, including pests, catastrophic fire and climate change. Healthy forests and economically strong rural communities form a solid foundation as we work to win the future for the next generation."

Publication of the proposed planning rule in the *Federal Register* (February 2011) kicked off a 90-day public comment period, ending May 16. The Forest Service will use comments to develop a final rule.

Highlights of the proposed planning rule include:

- A more effective and efficient framework that would allow adaptive land management planning in the face of climate change and other stressors;
- Increased requirements for public involvement and collaboration throughout all stages of land management planning;
- Improved ability to respond to climate change and other stressors through provisions to restore and maintain healthy and resilient ecosystems;
- Increased protections for water resources and watersheds;
- More effective and proactive requirements to provide for diverse native plant and animal species;
- Provisions to guide the contributions of a National Forest or National Grassland to social and economic sustainability;
- Updated provisions for sustainable land, water, and air-based recreation;
- Requirements to provide for integrated resource management of a range of multiple uses and values including outdoor recreation, range, timber, water, wildlife, wilderness, energy, mining, and ecosystem services; and
- New requirements for a local and landscape-scale monitoring program that are based on the latest science.

The proposed rule would update planning procedures that have been in place since 1982, creating a modern planning process that reflects the latest science and knowledge of how to create and implement effective land management plans. There are no direct cumulative effects in connection with the Proposed Planning Rule and this FEIS since the Proposed Planning Rule would not lead to any direct action on the ground. The revised Plan EIS with its emphasis on vegetation, fire, wildlife, watersheds/aquatics, access and recreation, integration of science (e.g., climate change), and collaborative learning groups/workgroups over the past 10 years complement the proposed Planning Rule.

Federal Land Assistance, Management, and Enhancement (FLAME) Act of 2009

The Federal Land Assistance, Management, and Enhancement (FLAME) Act of 2009 requires the Secretary of Agriculture and the Interior and to submit to Congress a report that contains a “cohesive wildfire management strategy.” The Wildland Fire Leadership Council, therefore, directed the development of the National Cohesive Wildland Fire Management Strategy

(Cohesive Strategy). The Cohesive Strategy utilizes a collaborative, “from-the-ground-up” approach built through active involvement of all levels of government and non-governmental organizations, as well as the public, to seek national, all-lands solutions to wildland fire management issues.

The Cohesive Strategy will address the nation’s wildfire problems by focusing on three key areas:

1. **Restore and Maintain Landscapes** – Landscapes across all jurisdictions are resilient to disturbances in accordance with management objectives.
2. **Fire Adapted Communities** – Human populations and infrastructure can survive a wildland fire. Communities can assess the level of wildfire risk to their communities and share responsibility for mitigating both the threat and the consequences.
3. **Response to Fire** – All jurisdictions participates in making and implementing response decisions.

The National Cohesive Wildland Fire Management Strategy is an ongoing project that is being planned in three phases. Thus far, only the first phase has been completed and it is too early in the planning process of this national strategy to know with much detail or certainty how the strategy may influence programs and activities that occur on the IPNF. However, many of the elements that emphasize items in the FLAME Act as well as the cohesive strategy report have already been considered and incorporated into the Forest Plan components and are discussed in the action alternatives and/or the effects analysis. For example, the three key wildfire problem areas that were noted in the strategy report (i.e., Restore and Maintain Landscapes, Fire Adapted Communities and Response to Fire), are very similar to a number of the Forest Plan revision topics that were identified and used to revise forest plan direction. In addition, a number of other elements in the Flame Act (i.e., using a full range of management responses to wildfires, allocating hazardous fuel reduction funds based on priorities, assessing impacts of climate change on wildfires) were considered in the Forest Plan revision process. Thus, when the national strategy is complete, it is likely that revised Forest Plan direction (which is contained in all the action alternatives) will be consistent with the national strategy. No cumulative effects are anticipated as a result of this national strategy.

Other Reasonably Foreseeable Actions

Cumulative Effects and Consideration on Other Lands

Other lands (lands outside the NFS) include lands owned or managed by: (1) federal agencies other than the Forest Service; (2) state, county, and other agencies; (3) individuals and corporations; and (4) American Indian tribes. The Forest Service does not have authority to regulate any activity or its timing on other lands. However, when an action takes place in national forests, it may cause direct, indirect, or cumulative effects on other lands. Conversely, the actions of others can influence both conditions on the national forests and the course of action taken by the Forest Service in managing the national forests.

The IPNF contain portions of ten counties in three states. More than 90 percent of the IPNF are located within Bonner, Boundary, Kootenai, and Shoshone counties in Idaho. Shoshone County contains the highest acreage of national forest land, with 69 percent of the county administered by the IPNF.

Within the analysis area, Shoshone and Boundary counties have the largest percentage of land under federal ownership at 74 and 61 percent respectively. Bonner County has the next largest at 44 percent. Kootenai County is 32 percent federally owned. Benewah County has the least amount of federally owned land, at 10 percent. For all counties, most of the federal ownership is NFS lands. Benewah County has the largest percentage under tribal ownership, at 44 percent.

Appendix B – Description of the Analysis Process

Introduction

The basic analytical framework for the revision of the IPNF Forest Plan is prescribed in the NEPA process. A set of alternative scenarios, representing different approaches to the identified needs for change and issues, was simulated over time to provide information to compare and contrast those alternatives in terms of their ability to achieve the desired conditions in cost-effective and least-risk ways. Analyzing the effects of the alternatives included development of the historic range of variability; identification of lands suitable for timber production; evaluation of movement towards vegetation desired condition and timber harvest levels; rangeland capability and suitability; and social and economic analysis.

Development of the Historic Range of Variability (HRV)

Vegetation desired conditions were the result of developing a historic range of variability for vegetation composition, structure, and landscape pattern. As described in the “Vegetation Methodology” section of chapter 3 of the final EIS, the HRV analysis used a wide variety of sources and methods to assess historic conditions.

Vegetation Composition and Structure

The IPNF used dominance type and size class to describe vegetation composition and structure. Historic records were reviewed and compared to existing data to develop classes that could be assessed. The historic and existing data had to be cross-walked to a set of common terms and classes for use in the analysis. Because vegetation conditions and responses to disturbance vary by ecological or biophysical setting, the HRV analysis was completed by three biophysical settings for the IPNF: warm/dry, warm/moist, and subalpine.

Dominance type classes were defined by reviewing historic and current records to determine which species were/are relatively abundant. The following dominance types by biophysical group were used in defining HRV:

- **Warm/Dry:** Ponderosa pine, Douglas-fir, lodgepole pine, and western larch.
- **Warm/Moist:** Douglas-fir, western larch, grand fir/cedar/western hemlock mix (termed grand fir mix), and white pine.
- **Subalpine:** Lodgepole pine, western (and subalpine) larch, white pine, and spruce-fir mix.

Size class was used as a proxy for describing vegetation structure. Size class can be cross-walked to stand age and structure. Size classes were chosen based on historic and existing data classifications, the ability to crosswalk the data to common classes, and information needed for wildlife habitat modeling. The following size classes were used for each biophysical group and forestwide:

- Seedling/sapling (0-5 inch DBH)
- Small (5-10 inch DBH)
- Medium (10-15 inch DBH)
- Large (>15 inch DBH)

For comparing historic and existing data and for modeling purposes, age classes were developed for each of the size classes. On the IPNF, age is generally correlated to size class as follows:

- Seedling/sapling = 0 – 35 years
- Small = 35 – 60 years
- Medium = 60 – 100 years
- Large = 100 plus years

The HRV analysis resulted in a mean value for each dominance type and size class by biophysical group. See table 1 and table 2 for the mean HRV value by biophysical class for dominance type and size class. To complete the HRV analysis, a range was built around the means, based on percentages, using plus or minus 33 percent of the mean. This range around the median (0-33 percent) is consistent with the range used in defining departure from natural fire regime of intensity and frequency (Hann and Bunnell 2001, Hardy et al. 2001, and Schmidt et al. 2002). The resulting HRV is displayed in table 3 and table 4. A weighted average was then calculated for the Forest, resulting in the ranges found in the vegetation desired conditions in the revised Forest Plan.

Table 1. HRV Mean Value for Dominance Type on the IPNF

Dominance Type	Warm/Dry %	Warm/Moist %	Subalpine %
PP	48		
DF	39	21	
LP	5		17
WL	8	19	12
GF/C/WH mix		15	
WP		45	10
SF mix			61

Table 2. HRV Mean value for Size Class on the IPNF

Size Class	Warm/Dry %	Warm/Moist %	Subalpine %
Seed/Sap	21	22	21
Small	14	12	15
Medium	15	20	20
Large	49	46	44

Table 3. HRV for Dominance Type for the IPNF

	Warm/Dry		Warm/Moist		Subalpine		FS Lands	
	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit
PP	32	64					5	10
DF	26	52	14	28			12	25
LP	3	7			11	23	3	6
WL	5	11	13	25	8	16	10	21
GF/C/WH mix			10	20			6	12

	Warm/Dry		Warm/Moist		Subalpine		FS Lands	
	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit
WP			30	60	7	13	20	39
SF mix					41	81	10	20

Table 4. HRV for Size for the IPNF

	Warm/Dry		Warm/Moist		Subalpine		FS Lands	
	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit	Lower Limit	Upper Limit
Seed/Sap	14	28	15	29	14	28	14	29
Small	9	19	8	16	10	20	9	17
Medium	10	20	13	27	13	27	13	26
Large	33	65	31	61	29	59	31	61

It is important to recognize the limitations of using historic forest inventories to compare historic to current forest conditions. To be meaningful, raw tree data is always summarized into forest categories (such as forest cover type, forest size classes, and forest age classes). Over time, there may be changes both in category definitions, and in methodologies for gathering data and computing category membership. It is necessary to research changes in inventory definitions and methods over time, and important to build crosswalks so that common terms are used across time periods. However, crosswalks are never perfect, and this inevitably results in some noise in the data. Further, hard data across inventory periods may not be available for all items of interest, and to address these items it is necessary to use informed inference from related information.

Because of the inevitable noise in comparing current and historic forest conditions, caution is necessary in how this information is used. We cannot be sure that small differences between current and historic vegetation categories are real, rather than the result of the inevitable noise. On the other hand, even in the face of some noise we can be more confident about large changes from historic to current that are found in some forest categories. We strengthen confidence about findings of changes from historic to current forest conditions when similar changes are found from different studies, or through different methods of historic analysis. The most robust finding about changes from historic conditions occurs when the magnitude of the change is large, and a similar trend is found through a variety of different analysis methods, and through several different studies.

Landscape Pattern

For landscape pattern, past assessments were reviewed and an analysis of existing fragmentation completed. The IPNF completed assessments of landscape pattern in developing geographic assessments in the 1990s.

A quantitative analysis of changes in landscape pattern from the mid-1930s to the mid-1990s was performed on three large sample landscapes (120,000 to 160,000 acres each); two on the northern zone of the IPNF; and one in the Coeur d'Alene (central zone). All three of these landscapes are primarily mountainous, forested lands that were never subject to significant direct human occupancy, and relatively isolated from human settlements. These landscapes are broadly representative of the range of condition on the IPNF as a whole. For all three landscapes, this

analysis was based on aerial photo determined forest stand characteristics. The mid-1930s aerial photos, the mid-1990s IPNF timber stand atlas, and 1991 aerial photos were used to delineate and characterize forest stands for the two time periods. Stand delineation and characterization was completed by experienced ranger district personnel, utilizing common criteria and categories to characterize the current and 1935 landscapes. From these delineations, map layers were created in GIS and a spatial pattern analysis was completed.

To quantitatively assess the existing and mid-1930s landscape pattern, the FRAGSTATS model (McGarigal and Marks 1995) was used. FRAGSTATS is a spatial pattern analysis program for mapped data. The program quantifies the real extent and spatial configuration of patches within a landscape. A summary of comparisons between the historic and current forest conditions findings are as follows.

- In general, older forests dominated by large trees (mature and old growth forests) tend to occur in smaller, and more uniformly sized patches; with smaller and more uniformly sized core areas; and higher contrast-weighted edge density (more hard edges); essentially they are more fragmented than historically.
- In general, very young seedling/sapling sized forests tend to occur in smaller and more uniformly sized patches; with smaller and more uniformly sized core areas; they are also more fragmented than historically.
- In general, patches of medium sized forest tends to occur in much larger patches; with more core area, although contrast-weighted edge density has increased somewhat; indicated more hard edges. These medium sized forest patches are less fragmented and create more landscape scale homogeneity than was historically present.

As part of the forest plan revision effort, an analysis was conducted using the FRAGSTATS model to assess existing fragmentation for the entire KIPZ. For this analysis, size classes (from the VMP coverage) were grouped into patch classes. Table 5 displays the classification used in completing the FRAGSTATS analysis. Two sets of runs were made with different classifications of size class:

Table 5. Classifications for FRAGSTATS Analysis

Classification 1	
Size Class from Updated VMAP	Patch Class for Analysis
Seedling/sapling, grass/forbs, shrubs, sparsely vegetated (0-5" dbh)	Open
Small (5-10" dbh)	Small
Medium, Large, Very Large (10+")	Medium Large
Water	Background
Classification 2	
Size Class from Updated VMAP	Patch Class for Analysis
Very Large (20+")	Very Large
All other size classes and non-tree vegetation	Other
Water	Background

Resulting polygons were kept to a minimum size of five acres. The polygon coverage was converted to grid using a 30 meter cell size. Runs were made for each GA and for each forest. The following indices from FRAGSTATS were used to assess fragmentation:

- Percent of the landscape in a particular patch class (class metric - PLAND) equals the sum of the areas (m²) of all patches of the corresponding patch type, divided by total landscape area (m²), multiplied by 100 (to convert to a percentage); in other words, PLAND equals the percentage the landscape comprised of the corresponding patch type. Note: total landscape area (A) includes any internal background present.
- Area weighted mean patch area (class metric - AREA_AM) - equals the sum, across all patches of the corresponding patch type, of the corresponding patch metric value multiplied by the proportional abundance of the patch.
- Patch size standard deviation (class metric - AREA_SD) - equals the square root of the sum of the squared deviations of each patch metric value from the mean metric value of the corresponding patch type, divided by the number of patches of the same type; that is, the root mean squared error (deviation from the mean) in the corresponding patch metric. Note: this is the population standard deviation, not the sample standard deviation.
- Contrast-weighted edge density (class and landscape metrics - CWED) - use only with Classification 1. It is the ratio of edge to patch area for each patch class, with each segment of edge weighted based on how much contrast there is in that edge type. The following weights were used:
 - Open to small = 0.5
 - Open to med/large = 1.0
 - Small to med/large = 0.5
- Edge density (class and landscape metrics - ED) - use only with Classification 2. It is the sum of the lengths (m) of all edge segments involving the corresponding patch type, divided by the total landscape area (m²), multiplied by 10,000 (to convert to hectares).
- Landscape shape index (class and landscape metrics - LSI) -compares the amount of edge per unit area for a given patch class to the amount of edge per unit area that would be present if that patch class was one large circular patch. Shape index becomes larger as patches become more irregular in shape, are internally fragmented, or become long skinny strips rather than wide polygons.
- Total core area (class and landscape metrics - TCA) - the amount of core area present within the class or landscape.
- Core area percentage of landscape (class metric - CPLAND) - the percent of the entire landscape that is in core area (interior habitat) of a particular patch class based on a 90m edge width.
- Area weighted mean of core areas (landscape metric - CORE_AM).
- Area weighted mean Euclidean nearest-neighbor (class metric - ENN_AM) - the sum of the distance to the nearest patch of the same type, based on nearest edge-to-edge distance, for each patch in the landscape with a neighbor, divided by the number of patches with a neighbor multiplied by the proportional abundance of the patch type.
- Euclidean nearest-neighbor coefficient of variation (class metric - ENN_CV) - the standard deviation in nearest neighbor distances divided by the mean nearest neighbor distance multiplied by 100.
- Area weighted mean fractal dimension (class metric - FRAC_AM) - two times the logarithm of patch perimeter (m) divided by the logarithm of patch area (m²); the perimeter is adjusted to correct for the raster bias in perimeter divided by the number of patches and multiplied by the proportional abundance of the patch type.

- Interspersion and juxtaposition index (class and landscape metrics - IJI) - the observed interspersion over the maximum possible interspersion for the given number of patch types.
- Clumpiness index (class and landscape metric - CLUMPY) - equals the proportional deviation of the proportion of like adjacencies involving the corresponding class from that expected under a spatially random distribution.

Results of this fragmentation analysis indicate the landscape pattern on the KIPZ in some areas is more fragmented than what probably occurred historically.

Identification of Lands Suitable for Timber Production

The National Forest Management Act (NFMA) directs forests to identify lands which are not suited for timber production. The act states at sec. 6, (k) “the Secretary shall identify lands within the management area which are not suited for timber production, considering physical, economic, and other pertinent factors to the extent feasible, as determined by the Secretary, and shall assure that, except for salvage sales or sales necessitated to protect other multiple-use values, no timber harvesting shall occur on such lands for a period of 10 years.”

The assessment of suitable timberlands was accomplished using a geographic information system (GIS). Use of GIS resulted in consistent identification of each step in determining suitability.

The 1982 Rule procedures identify criteria to apply in determining timber suitability, as follows:

- Start with all lands administered by the IPNF, using the latest land status data.
- Subtract Non-forested Lands: 219.14(a) (1). These are lands that do not have the potential to support 10 percent or more forest canopy cover. Species, roads, and streams were used to identify these areas;
- Subtract lands that have been withdrawn from timber production: 219.14(a) (4). This includes wilderness, wilderness study areas, and wild river corridors;
- Subtract lands that have the potential for irreversible resource damage: 219.14(a) (2). Land types and habitat types were used to identify high water table areas or areas prone to mass failure, or sites with poor growing conditions or inadequate response information; and
- Subtract lands that cannot be adequately restocked: 219.12(a) (3). Land types, habitat types, elevation, and species were used to identify harsh, rocky, or dry sites.

The results are *Lands Tentatively Suitable for Timber Production*. These areas are the same for all alternatives.

By alternative, subtract out *Lands Not Appropriate for Timber Production*, composed of:

- **Lands where management objectives limit timber harvest to the point where the management requirements of 219.27 cannot be met: 219.14(c) (2).** This includes areas with wildlife or aquatic management concerns, such as grizzly bear core areas, riparian areas, or old growth. It also includes areas for fuel breaks (initial attack areas that will not be regenerated). These areas are the same for all alternatives.
- **Lands where the management area (MA) precludes timber production: 219.14(c) (1).** This is based on the management area allocation by alternative. Only MA6 is suitable for timber production and contributes towards the allowable sale quantity (ASQ). Under MA6, timber management is a goal and timber would be managed on a rotation or scheduled basis. Timber harvest may occur on other MAs, but it is not a goal and would not be managed on a rotation basis. For Alternative A, management direction under the Idaho Roadless Rule (36

CFR 294 Subpart C) was also used in determining lands where management precludes timber production.

- **Lands that are not cost-efficient in meeting timber production objectives: 219.14(c) (3).**
This varies based on the timber market. No lands were removed at this step, but may be removed during project level analysis.

The results are *Lands Suitable for Timber Production*. All other lands are *Not Suitable for Timber Production*. Table 6 displays the acres for each step in determining lands suitable for timber production by alternative. Figures 1 through 4 display lands suitable for timber production for each alternative

Table 6. Timber Suitability by Alternative (Acres)

Timber Suitability	Alternative A	Alternative B Modified	Alternative C	Alternative D
National Forest land	2,497,700	2,497,700	2,497,700	2,497,700
Non-forest land	-75,600	-75,600	-75,600	-75,600
Withdrawn lands	-23,300	-23,300	-23,300	-23,300
Irreversible damage potential	-271,400	-271,400	-271,400	-271,400
Restocking not assured	-50,500	-50,500	-50,500	-50,500
Tentatively Suitable	2,076,900	2,076,900	2,076,900	2,076,900
Areas where management objectives limit timber harvest where management requirements cannot be met	-699,200	-699,200	-699,200	-699,200
Areas where Management precludes timber production as an objective	-448,800	-426,700	-471,100	-395,300
Suitable for Timber Production	989,200	950,900	906,500	982,300

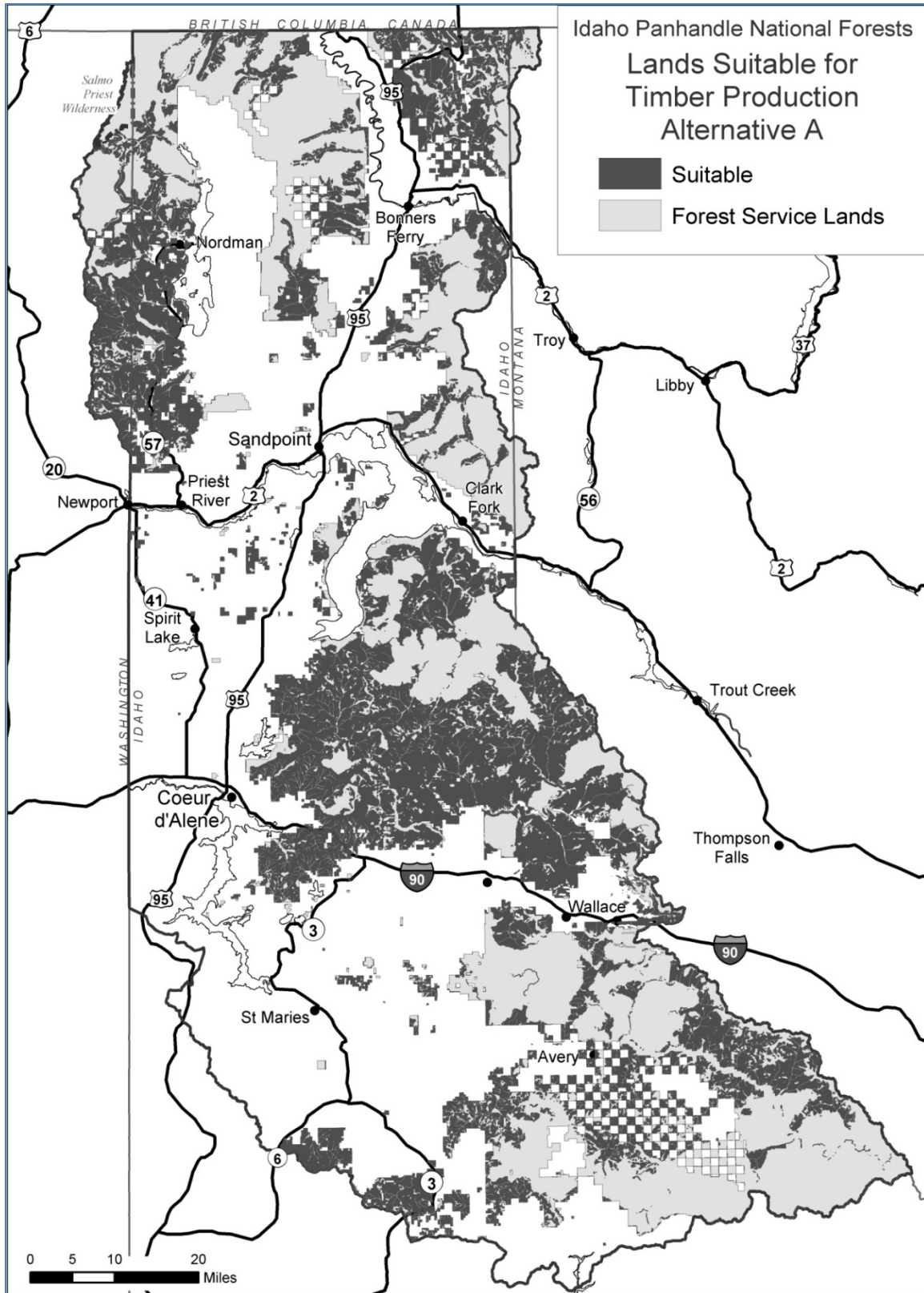


Figure 1. Lands Suitable for Timber Production – Alternative A

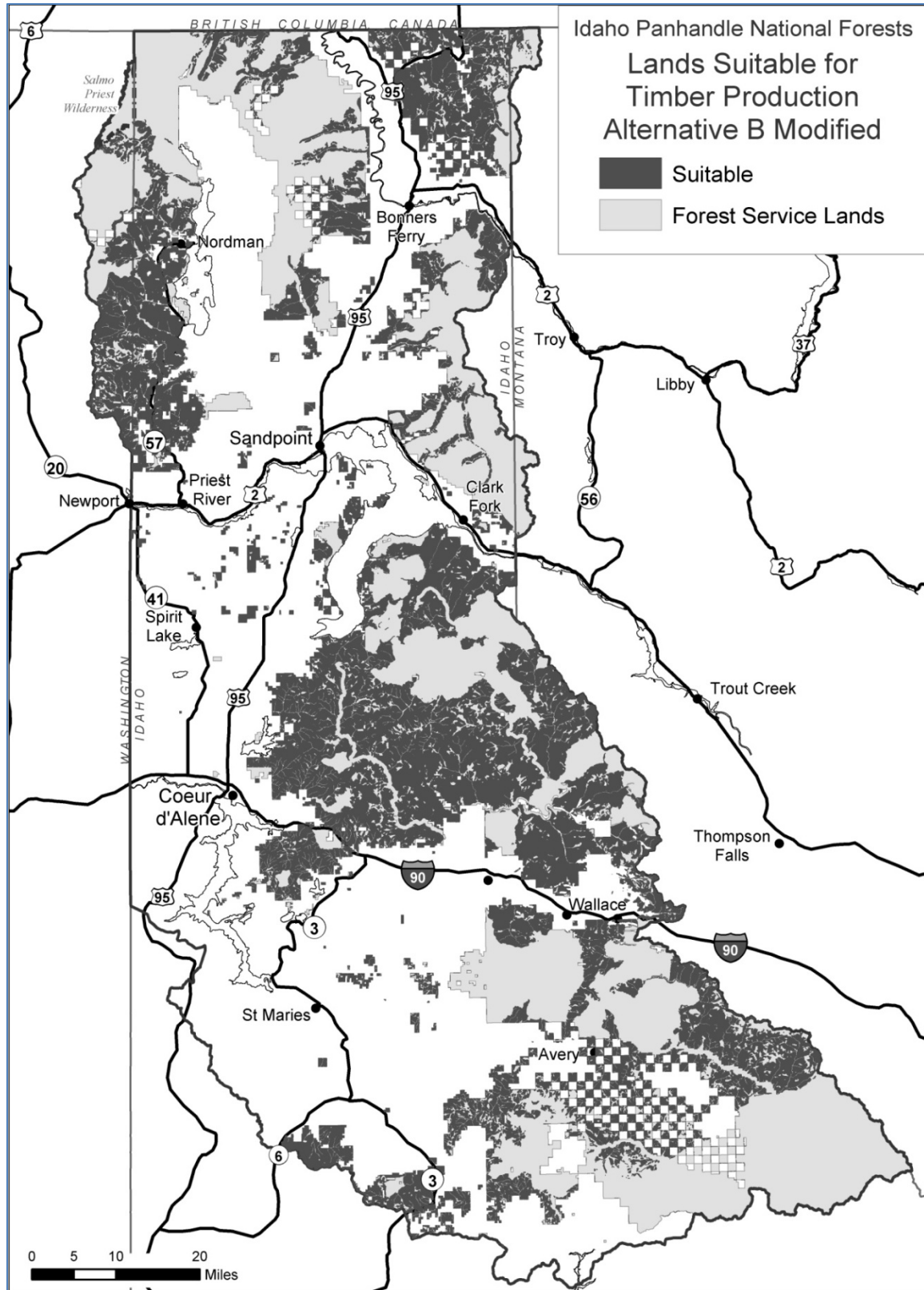


Figure 2. Lands Suitable for Timber Production – Alternative B Modified

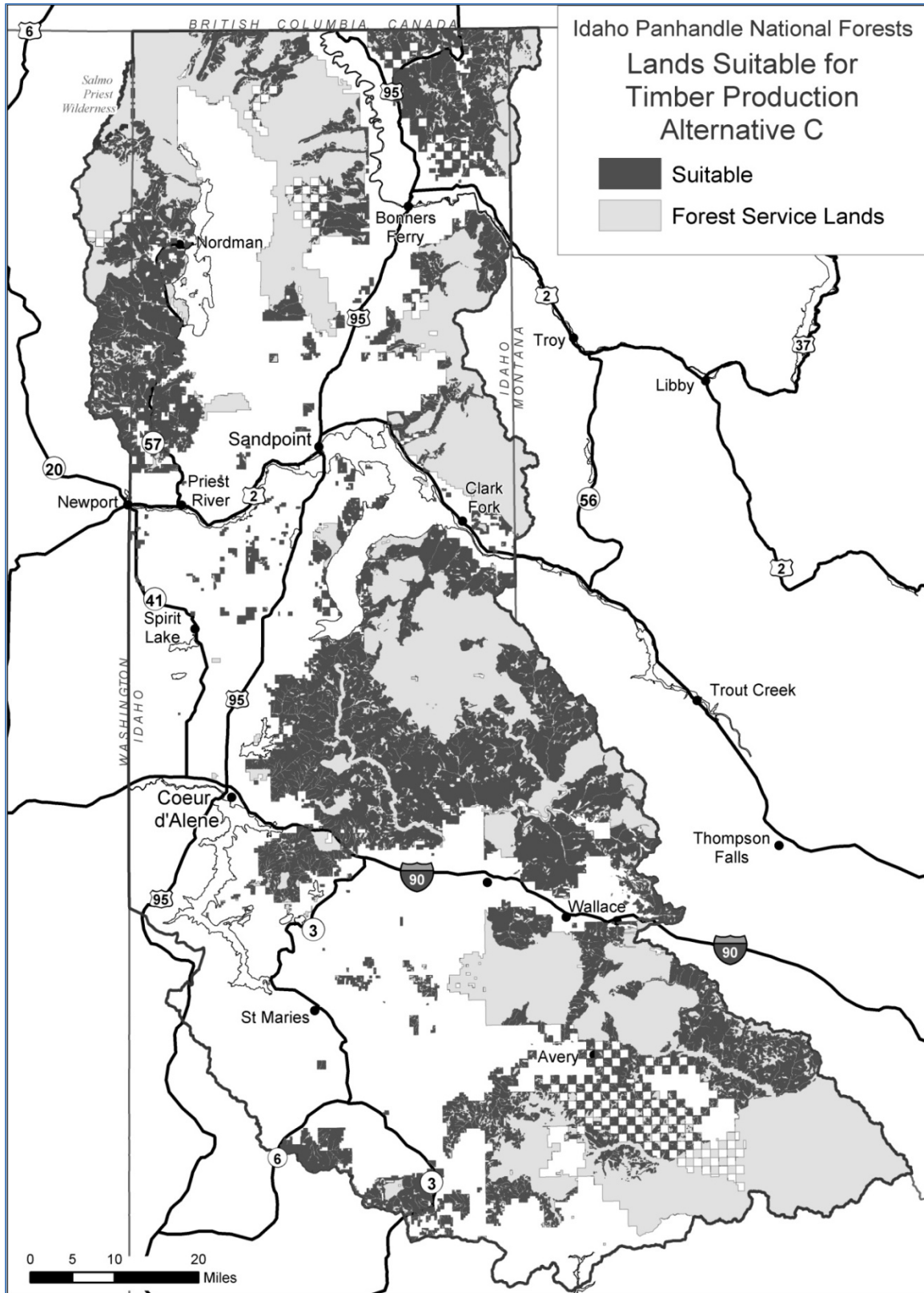


Figure 3. Lands Suitable for Timber Production – Alternative C

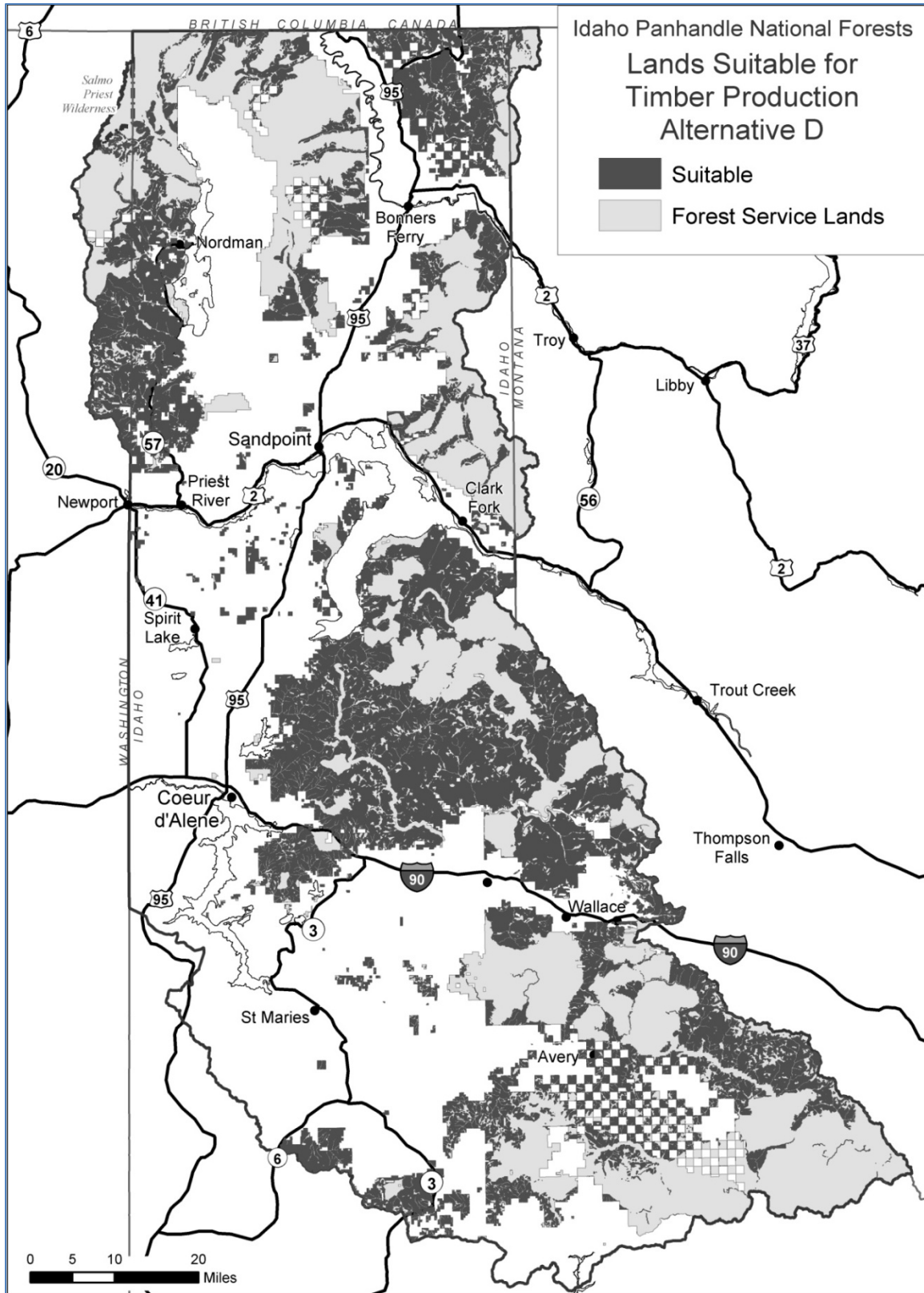


Figure 4. Lands Suitable for Timber Production – Alternative D

Evaluation of Movement towards Vegetation Desired Conditions

The vegetation management strategy for the IPNF is to manage the landscape to trend towards vegetation desired condition. The final EIS indicates the IPNF has too many acres of the medium size class and not enough acres of small and large size classes. To achieve vegetation desired conditions, some of the medium size class needs to be converted to seedling/sapling and some managed to provide for future old growth. In addition, the Forest Plan desired condition indicates some species are at reduced levels from those desired, including ponderosa pine and white pine. Type conversion of regenerated stands will be used to achieve an increasing composition of these (and other) species. Management to move towards vegetation desired conditions will also provide for conditions that are more in line with historic fire levels. Several analytical tools and models were used to predict changes to vegetation over time and evaluate movement towards vegetation desired conditions.

The vegetation treatment modeling for the Plan was accomplished using the following suite of tools and models:

- **Geographic Information System** – This tool was used to compile vegetation and other data, stratify the land, and summarize conditions. GIS is both an analysis and a display technology, meaning it can be used to both track information and display it in a variety of graphic formats.
- **SIMulating Patterns and Processes at Landscape scaLEs (SIMPPLLE)** – This model was used to provide a means of understanding succession and disturbance activities and to summarize fire behavior.
- **Forest Vegetation Simulation (FVS)** – This forest growth simulation model was used to estimate timber growth and yield.
- **Spectrum** – This model was used to project alternative resource management scenarios and schedule vegetation treatments in response to vegetative desired conditions.

Individual descriptions for each of the above-mentioned tools/models are provided below.

Geographic Information System (GIS)

Many summaries and assessments of vegetation condition were developed using GIS. As explained earlier in this appendix, this tool was used in determining timber suitability. This tool was also used to build the acre summaries needed for Spectrum analysis areas and spatial data for the SIMPPLLE model. The spatial existing vegetation information used in completing the SIMPPLLE and Spectrum analysis was generated from the R1 Vegetation Mapping Project (R1-VMP) layer that was developed in 2004. The R1-VMP layer was appended with activity data from the Timber Stand Management Record System (TSMRS), recent wildfires, old growth, and vegetation response units (VRUs). The resulting coverage of existing vegetation was utilized in the SIMPPLLE and Spectrum models and various wildlife habitat GIS models. See the project record for more information on data used in the forest planning process.

SIMPPLLE

SIMPPLLE (SIMulating Patterns and Processes at Landscape scaLEs) is a model that simulates changes in vegetation on landscapes in response to both natural disturbances and management activities. This model was used to determine the amount of fire disturbance expected on the landscape.

Successional pathways were edited for the Forest using the Westside Region One zone as a base (this zone was already developed in SIMPPLLE, based on input from several forest and district silviculturists. See documentation at <http://www.fs.fed.us/rm/missoula/4151/SIMPPLLE/> for more information). Disturbance pathways were those in the Westside Region One zone. A SIMPPLLE area file was built for each geographic area (GA) on the Forest. The existing vegetation layer was the primary data used for describing the landscape in the model, along with information on insect and disease disturbances, owner, and management area.

Simulations using current fire suppression success and fire starts over the last 10 years were run for each GA. Twenty simulations for five decades were made to estimate the amount of acres with fire disturbance. The resulting amount of acres burned is an average of all simulations and decades by species and size class and was used as input to the Spectrum model. This analysis was updated between draft and final EIS to more accurately portray the amount of wildland fire on the landscape. The fire logic was adjusted in the SIMPPLLE model to better reflect suppression efforts and fire spread. Acres of stand replacing fire were then input into the Spectrum model.

Forest Vegetation Simulator (FVS)

Growth and yield tables for the Spectrum model were developed using the FVS. The FVS is a family of forest growth simulation models. The basic FVS model structure has been calibrated to unique geographic areas to produce individual FVS variants. Since its initial development in 1973, it has become a system of highly integrated analytical tools. These tools are based upon a body of scientific knowledge developed from decades of natural resources research. Data from the forest inventory and analysis (FIA) were used in developing the growth and yield tables. The use of FVS on the IPNF and the timber prescriptions are documented in the report *Construction of Vegetative Yield Profiles for Forest Plan Revision*, April 2005, by Don Vandendriesche, USDA Forest Service, Forest Management Service Center. The resulting yield tables were used in modeling timber harvest levels in the Spectrum model.

SPECTRUM Model

Vegetation treatments were modeled using Spectrum, a software modeling system designed to assist decision makers in exploring and evaluating multiple resource management choices and objectives. Models constructed with Spectrum apply management actions to landscapes through a time horizon and display resulting outcomes. Management actions are selected to achieve desired goals while complying with all identified management objectives and limitations.

Spectrum makes it possible to display management actions to landscapes at multiple spatial and temporal scales. It is very effective for modeling alternative resource management scenarios in support of strategic and tactical planning. Examples of this include scheduling vegetation manipulation activities to achieve desired conditions; modeling resource effects and interactions within management scenarios; exploring “tradeoffs” between alternative management scenarios; and analyzing minimum habitat requirements to ensure species viability and diversity.

With regard to the alternatives, Spectrum was used to model vegetation treatments on the IPNF. Based upon these results, the IDT was able to establish a means of achieving the desired condition for vegetation in conjunction with a schedule of activities. Specifically, the Spectrum model was formulated to provide answers to the following questions:

- What are the vegetative treatments and how should they be scheduled to move us toward the desired condition for vegetation?

- What is the sustainable level of regulated harvest from these treatments?
- How can we reduce fire hazard?
- What is the level of vegetative treatments, with and without budget limitations?
- What is the long-term sustained yield capacity (LTSYC)? What is the allowable sale quantity? What is the predicted volume sold under a constrained budget?
- How does carbon sequestration vary by alternative?

The Spectrum model is comprised of the following components:

- **Planning Horizon** – A specified time frame broken down into periods of an equal number of years. The horizon may be as short or long as desired. Long planning horizons are used to investigate the sustainability of long-term management actions, such as long rotations.
- **Land Stratification and Analysis Units** – The planning area is subdivided into areas that facilitate analyzing land allocation and management scheduling analysis. The subdivision is largely a function of two determinants: (1) how managers want the forest subdivided to answer planning questions, and (2) how specialists need the forest subdivided to estimate resource response to management scenarios.
- **Management Actions and Outputs** – A Spectrum model consists of a set of management actions applied to specific land units. Management actions consist of activities, outputs, treatments, and land conditions.
- **Economic Information** – Basic activity cost and output revenues.
- **Transition Pathways** – The Forest developed pathways to model how vegetation type and size varies over time based on different management actions. These pathways are used to measure movement towards desired conditions.
- **Management Constraints** – These are limits defined to model resource thresholds, relations between and among activities and outputs, policy requirements, or monetary limitations.
- **Objective Function** – Optimization models, such as Spectrum, minimize or maximize an objective function subject to a set of constraints. An objective function is defined in terms of its type (maximize or minimize), discount rate (if applicable), duration, and contributing activities and outputs.

Following is a description of the components of the IPNF Spectrum model.

Changes Between Draft and Final EIS

The Spectrum model was edited between draft and final EIS. The major changes were as follows:

- Acres with natural disturbance (stand replacing wildfire) were re-analyzed and changed in the final Spectrum model. This resulted in more acres of disturbance in the FEIS model than was found in the DEIS.
- Constraints for watersheds were adjusted to more accurately reflect management on the ground. In the DEIS, the amount of openings allowed within watersheds varied by watershed condition. In the FEIS, the limit on openings is the same for all watersheds, which better reflects management direction in the revised Forest Plan.
- The goals to move towards vegetation desired condition were applied forestwide, rather than applying different goals for lands suitable for timber production and lands not

suitable for timber. This more accurately reflects the desired condition and tools that can be used to move towards this goal.

These updates in the model resulted in revised numbers for ASQ, predicted volume sold, long-term sustained yield capacity, and acres harvested for all alternatives.

Planning Horizon

Spectrum was used to schedule vegetation treatments for the next 25 decades. This extended planning horizon was for modeling a sustainable yield into the future.

Land Stratification and Analysis Units

Land stratification is the process of identifying a set of attributes, or strata, to use in defining the land base. This is done to organize the forest land base into logical subunits that respond similarly to management actions. In Spectrum, each stratum is a layer and combining these layers results in an “analysis area.” Six layers of information are used to describe analysis areas, and while analysis areas are usually homogenous, they are not always contiguous. The attributes used in developing analysis areas are based on the issues to be addressed by the model, differences in resource response, and the reliability of the data.

The six Spectrum land stratification layers identified for the Plan are defined as follows:

Layer 1 – Roadless Status and Helicopter Logging

Layer 2 – Timber Suitability

Layer 3 – Not Used in FEIS – in the DEIS, this layer contained watershed condition (properly functioning, functioning at risk, and not properly functioning). In the DEIS, the constraint on openings within watersheds varied by watershed condition. For the FEIS, the constraint does not vary by watershed condition. This change was made to better reflect forest plan direction.

Layer 4 – Wildlife Condition

Layer 5 – Cover Type

Layer 6 – Size Class

Table 7 defines the classification for each layer, listing the layer’s codes and descriptions. Analysis areas are developed by combining the six layers in GIS and calculating the amount of acreage for each combination that was present.

Table 7. Spectrum Land Stratification

Layer 1 – Roadless Status	Layer 1 Description
IRA	Inventoried Roadless Area or Helicopter logging system required
NOIRA	Not Inventoried Roadless Area
Layer 2 – Timber Suitability	Layer 2 Description
NsuitN	Not Suitable – No mgmt MAs 1a, 1b, 1c, 3a, 4a, 4b, and All not suitable lands
SuitH	Suitable – Timber management Lands suitable for timber production in MA 6 and 3b
Layer 4 – Wildlife Condition	Layer 4 Description
Bmucmu	Bear and caribou management units outside griz core (griz core is unsuitable)
Wntrng	Winter range outside of bmu or cmu
Lynxhb	Lynx habitat outside bmu or cmu and outside winter range
Nowldl	No bear, caribou, or lynx requirements
Layer 5 – Cover Type	Layer 5 Description
DF wet	Douglas-fir – moist habitat type
DFPP	Douglas-fir/ponderosa pine mix
LP	Lodgepole Pine
GF mix	Grand fir/western redcedar/western hemlock/ white pine
Larch	Western larch
SF mix	Engelmann spruce/subalpine fir/mountain hemlock
Layer 6 – Size Class	Layer 6 Description
Seedsp	Seedling/Sapling (0" to 5")
Small	Small (5" – 10")
Medium	Medium (10" – 15")
Large	Large (15" – 20")
V Large	Very Large (20"+)

Layer 1 – Roadless status was developed using the most recent forest inventoried roadless area (IRA) layer, as documented in the analysis of the management situation (AMS) for the draft Land Management Plan. Potential helicopter logging areas were identified as those areas more than one-half mile from a road.

Layer 2 – Timber Suitability was based on the analysis of lands suitable for timber production.

Layer 4 – Wildlife Condition reflects areas with special management concerns for wildlife. It includes grizzly bear and caribou management units outside of core (because core grizzly bear areas are not suitable for timber production), big game winter range, or lynx habitat.

Layer 5 – Cover Type is from the existing vegetation layer, collapsed to the cover types used in the Spectrum model. Cover types for the model were chosen based on classifications used in the vegetation desired condition and for differences in growth and response to management.

Layer 6 – Size Class is from the existing vegetation layer. Size classes for the model were chosen based on classifications used in the vegetation desired condition, existing volume, and growth.

Management Actions and Outputs

The management actions in the model were developed to reflect management areas, standards, and guidelines in the Forest Plan. Silvicultural prescriptions, timing choices, and constraints defined in the model are for modeling purposes only and do not create standards or guidelines for Plan implementation.

Silvicultural prescriptions were defined by cover type and other resource conditions. Table 8 describes the silvicultural prescriptions by cover type. These defined the analysis area management prescriptions. Silvicultural prescriptions were developed to manage vegetation towards desired condition. See the report *Construction of Vegetative Yield Profiles for Forest Plan Revision*, by Don Vandendriesche (2005), for further information on the silvicultural prescriptions.

Table 8. Silvicultural Prescriptions by Cover Type

Cover Type	No Management ¹	Even-Aged Regen Harvest ²	Individual Tree Selection	Group Selection	Prescribed Fire	Natural Disturbance (wildfire) ³
DFPP	yes	yes	yes	yes	yes	yes
DF wet	yes	yes	no	yes	yes	yes
LP	yes	yes	no	no	no	yes
Larch	yes	yes	no	yes	yes	yes
GF mix	yes	yes	no	no	no	yes
SF mix	yes	yes	no	yes	no	yes

¹ No management. All analysis areas were given the option of no management

² Even-aged regeneration harvests with reserves (includes clearcut, seedtree and shelterwood with reserves). Includes commercial thinning where appropriate

³ Stand replacing fire

As described earlier, natural disturbance amounts were determined by the SIMPPLLE model. Acreages for each decade were input by the desired condition class. The acres of natural disturbance (i.e. stand replacing wildfire) were updated between draft and final EIS.

The use of silvicultural prescriptions was also defined by Layer 2 (timber suitability) of the Spectrum model land stratification (refer to table 7) as follows:

- *SuitH* – all prescriptions in table 8.
- *NsuitN* – natural disturbance or no management only.

Pre-commercial thinning was included in all even-aged regeneration harvest prescriptions except for those in lynx habitat. For lynx habitat, yield tables were built without pre-commercial thinning if the stand was above 4,500 feet and in a cover type other than DFPP.

To meet the Forest Plan standard that does not allow vegetation treatments that may modify existing old growth, all very large size classes were limited to natural disturbance or no

management. The single exception to this was the DFPP cover type, where individual tree selection was allowed in the very large size class.

Several timing choices were also applied to the silvicultural prescriptions. Timing choices are defined by specifying (within the model) the range of ages in which an existing stand and a regenerated stand may be harvested. The earliest point at which a stand could be regeneration harvested was based on culmination of mean annual increment (CMAI). The age at which CMAI is attained was determined by FVS. Existing stands containing medium or large size classes have met CMAI and are ready to harvest at the beginning of the planning horizon. Based on varying constraints and the specified management goals or objectives, the Spectrum model determines the management prescription to apply to an analysis area as well as the timing of the implementation.

Yield tables included the following coefficients:

- Merchantable MCF (thousand cubic feet);
- Merchantable MBF (thousand board feet);
- Diameter of removals and residual volume;
- Fire risk;
- Snags - delineated by diameter classes of 10 to 20 inches and 20+ inches; and
- Insect risk (composite rating of insect risk).

Carbon sequestration was modeled based on growing-stock volume, the amount of wood products generated, and the acres of forest burned in wildfire. The amount of carbon sequestered in growing-stock volume and contained in wood products came from relationships described in the publication *Methods for Calculating Forest Ecosystem and Harvested Carbon with Standard Estimates for Forest Types of the United States* (Smith et al. 2006). Coefficients were built in the model and total metric tons (tonnes) of carbon calculated. Decay functions were applied to the carbon sequestered in wood products and burned acres.

Costs for Management Activities

Costs were developed for sale preparation and sale administration (combined) reforestation, timber stand improvement, prescribed burning, and road construction and reconstruction. A cost for watershed restoration was also developed to track restoration activities in certain watersheds. Table 9 describes the activity, units, cost, and production coefficient (relationship for incurring the cost based on a particular activity).

Table 9. Costs for the Spectrum Model

Activity	Units	Timing	Cost	Production Coefficient
Sale Prep and Admin ¹	ccf	With harvest	\$60	1 per ccf harvest
Reforestation ²	Acre	With harvest	\$1040	1 per acre regen harvest, 0.2 per acre select harv
TSI (pre-commercial thin) ³	Acre	Two decades after regen harv or two decades after selection harv	\$251	0.35 per acre regen harv, 0.2 per acre select harvest
Prescribed Burning ⁴	Acre	Timing for Presc. Burn rx	\$433	1 per acre burned
Road cons/recons ⁵	ccf	With harvest	\$15	1 per ccf harvest

¹ Sources: based on three-year average final budget allocation for FY08 – FY10; includes NEPA, litigation, sale prep, and sale admin; includes NEPA support from WFHF

² Source: based on three -year average final budget allocation for FY08 – FY10

³ Source: based on three -year average final budget allocation for FY08 – FY10

⁴ Sources: based on three -year average final budget allocation for FY08 – FY10

⁵ Sources: based on unit cost information from WO

All costs except prescribed burning and road construction/reconstruction, are part of the budget constraint (see discussion below on management requirements). The three-year average of actual costs used in developing most of the activity costs did not include any harvest within IRAs or helicopter logging. To reflect these higher unit costs, all activity costs within an IRA or helicopter logging area (Layer 1 code of IRA), except road construction and reconstruction, were increased by 20 percent. This increase was to reflect the increased access and analysis costs for these areas.

Timber Values

Stumpage values for timber were developed by the regional economist and regional timber program budget manager for the Northern Region, USDA Forest Service. Values were delineated by species and logging system. Values were based on the average delivered log price by species for 1989 to 2009. The average delivered log price was reduced by 12 percent to account for profit to loggers. Costs by logging system were then applied to determine average stumpage price by species. Value by species was then cross-walked to Spectrum species groups. Values for tractor and cable logging systems were averaged for the amount of tractor and cable logging that has occurred on the Forest over the past several years. Helicopter logging values were applied to inventoried roadless areas and helicopter logging areas (Layer 1 code of IRA). Table 10 displays the average stumpage value for the model.

Table 10. Stumpage Value by Species and Logging System

Average Stumpage Value for Tractor and Cable Logging Systems (averaged)		
Spectrum Species Strata	Non-saw	Sawtimber
DFPP	\$1.00	\$90.37
DF wet	\$1.00	\$76.50
LP	\$1.00	\$81.04
Larch	\$1.00	\$76.71
GF mix	\$1.00	\$57.58
SF mix	\$1.00	\$71.11

Average Stumpage Value for Helicopter Logging Systems		
Spectrum Species Strata	Non-saw	Sawtimber ¹
DFPP	\$1.00	\$3.00
DF wet	\$1.00	\$3.00
LP	\$1.00	\$3.00
Larch	\$1.00	\$3.00
GF mix	\$1.00	\$3.00
SF mix	\$1.00	\$3.00

¹ Used base rates because sawtimber values are currently negative

Transition Pathways

Pathways were developed to indicate how species and size class would be expected to change over time, given the silvicultural prescription. Pathways for cover types are displayed in table 11 and pathways for size classes in table 12. These pathways were used to model movement towards vegetation desired condition. The treatment designation of “Natural Growth” is the silvicultural prescription equivalent of no management, “Even-aged Harvest” is the silvicultural prescription equivalent of regeneration, and “Uneven-aged Management” is the individual tree and group selection silvicultural prescriptions. Pathways were developed by the silviculturist on the KIPZ interdisciplinary team.

Table 11. Spectrum Cover Type Transition Changes

Treatment	Spectrum Species	Age	Species
Natural Growth	DFPP	Always	DF
	DF wet	0-160	DF
		161+	GF mix
	L	0-90	L
		91-160	DF
		161+	GF mix
	GF mix	Always	GF mix
	LP	0-120	LP
		121+	SF mix
	SF mix	0-350	SF mix
		350+	LP
Even-aged Harvest	DFPP	0-30	DF
		30-70 (PCT)	80% DF, 20% PP
		70-110 (CT)	50% DF, 50% PP
		At regen harvest	100% PP
	DF wet	Same as natural growth until regen, then L	
	L	Always L	
	GF mix	Always GF mix until regen, then WP	
	LP	Always LP	
	SF mix	0-70	Same as natural growth
		70-110 (CT)	25% L, 25% DF, 50% SF mix
		At regen harvest	50% L, 25% DF, 25% SF mix

Treatment	Spectrum Species	Age	Species
Prescribe Burn	DFPP	0-30	DF
		31+	20% PP, 80% DF
	DF wet	0-30	DF
		31+	20% L, 80% DF
	L	Always L	
Uneven-aged Management	DFPP	1 st entry	20% PP, 80% DF
		2 nd entry	40% PP, 60% DF
		3 rd entry	60% PP, 40% DF
		4 th entry	80% PP, 20% DF
		5 th entry	100% PP
	DF wet	1 st entry	20% L, 80% DF
		2 nd entry	40% L, 60% DF
		3 rd entry	60% L, 40% DF
		4 th entry	80% L, 20% DF
		5 th entry	100% L
	L	Always L	
	SF mix	1 st entry	10% L, 5% DF, 85% SF mix
		2 nd entry	20% L, 10% DF, 70% SF mix
		3 rd entry	30% L, 15% DF, 55% SF mix
		4 th entry	40% L, 20% DF, 40% SF mix
		5 th entry	50% L, 25% DF, 25% SF mix

Table 12. Spectrum Size Class Transition Changes

Treatment	Spectrum Species	Age	Size
Natural Growth	DFPP	0-30	SS
		31-80	Small
		81-120	Med
		121-160	Large
		161+	Very Large
		400	Cycle back to SS
	DF wet, GF mix, L	0-30	SS
		31-70	Small
		71-110	Med
		111-150	Large
		151+	Very Large
	DF wet	250	Cycle back to SS
	GF mix	400	Cycle back to SS
	L	350	Cycle back to SS
	LP	0-30	SS
		31-80	Small
		81-120	Med
		121-180	Large

Treatment	Spectrum Species	Age	Size
		181+	Very Large
		200	Cycle back to SS
	SF mix	0-40	SS
		41-80	Small
		81-120	Med
		121-160	Large
		161+	Very Large
		350	Cycle back to SS
Even-aged Harvest	DFPP	0-30	SS
		31-70	Small
		71-100	Med
		101-140	Large
		141+	Very Large
		400	Cycle back to SS
	DF wet	0-20	SS
		21-60	Small
		61-100	Med
		101-140	Large
		141+	Very Large
		250	Cycle back to SS
	GF mix	0-20	SS
		21-60	Small
		61-90	Med
		91-130	Large
		131+	Very Large
		400	Cycle back to SS
	L	0-20	SS
		21-60	Small
		61-90	Med
		91-140	Large
		141+	Very Large
		350	Cycle back to SS
	LP	0-20	SS
		21-70	Small
		71-100	Med
		101-160	Large
		161- 200	Very Large
		200	Cycle back to SS
Even-aged Harvest	SF mix	0-30	SS
		31-70	Small
		71-110	Med
		111-160	Large

Treatment	Spectrum Species	Age	Size
Uneven-aged Harvest		161+	Very Large
		350	Cycle back to SS
	DFPP, DF wet, L, SF mix	1 st entry	20% SS, 80% Med (or L, VL if entered)
		2 nd entry	20% SS, 20% Small, 60% Med (or L, VL if entered)
		3 rd entry	20% SS, 20% Small, 20% Med, 40% Large (or VL if entered)
		4 th entry	20% SS, 20% Small, 20% Med, 20% Large, 20% Very Large
Prescribed Burn*		All subsequent entries	Continue size class distribution after 4th entry
	DFPP – Seedling/Sapling	Entry 1, age 30	100% SS
		Entry 2, age 60	20% SS, 80% Small
		Entry 3, age 90	20% Small, 80% Med
		Entry 4, age 120	20% Med, 80% Large
		Entry 5, age 150	20% Large, 80% Very Large
		400	Cycle back to SS
	DFPP – Small	Entry 1, age 60	20% SS, 80% Small
		Entry 2, age 90	20% Small, 80% Medium
		Entry 3, age 120	20% Medium, 80% Large
		Entry 4, age 150	20% Large, 80% Very Large
		400	Cycle back to SS
	DFPP – Medium	Entry 1, age 90	100% Medium
		Entry 2, age 120	100% Large
		Entry 3, age 150	100% Very Large
		400	Cycle back to SS
	DFPP – Large	Entry 1, age 120	100% Large
		Entry 2, age 150	100% Very Large
		400	Cycle back to SS
	DFPP – Very Large	Entry 1, age 150	100% Very Large
		400	Cycle back to SS
	DF wet, L – Seedling/Sapling	PCT only until size small/medium – then follow pathway below for small/medium	
	DF wet, L – Small/Medium	Entry 1, age 60	20% SS, 80% Small
		Entry 2, age 120	20% Small, 40% Med, 40% Large
		Entry 3, age 180	20% Med, 40% Large, 40% Very Large
		Entry 4, age 240	20% Large, 80% Very Large
	DF wet	250	Cycle back to SS
	L	350	Cycle back to SS
	DF wet, L – Large	Entry 1, age 120	100% Large
		Entry 3, age 180	100% Very large

Treatment	Spectrum Species	Age	Size
		Entry 4, age 240	100% Very large
	DF wet	250	Cycle back to SS
	L	350	Cycle back to SS
	DF wet, L – Very Large	Entry 1, age 240	100% Very large
	DF wet	250	Cycle back to SS
	L	350	Cycle back to SS

* For prescribed burn, pathways are after burning sequence has been initiated; use natural growth pathways prior to burning sequence

Management Constraints

The following discussion provides a description of the various constraints that were incorporated into the Spectrum model in response to Forest Plan direction, regulations, and as a means of improving the model's ability to simulate actual management of NFS lands. Constraints as defined in the model were for modeling purposes only and do not create limitations for Plan implementation.

Harvest Policy

Harvest policy includes non-declining yield, long-term sustained-yield and ending inventory constraints. These constraints ensure that the timber yield is sustainable and will not decline in any decade.

Budget Constraint

The model included a budget constraint in order to assess effects under current budget levels for timber management and reforestation activities. For the model's planning horizon, the annual budget constraint was \$6,780,000 and included all timber sale activities (timber sale preparation, timber sale administrations, timber stand improvement, and reforestation). The model was run with this constraint to develop the predicted timber volume sold under current budget levels for each alternative. A separate run was made with this constraint released to determine the ASQ and the LTSYC for each alternative independent of budget levels.

Snag Retention

The silvicultural prescriptions for regeneration harvest provided retention of trees for snag recruitment. Reserves of trees were required and the snag quantities were tracked in the yield tables. Numbers of snags were reported for two diameter classes (10 to 19.9" and 20"+) for three densities (see table 13).

Table 13. Snag Density by Diameter Class

Diameter Class	Snag Density		
10 to 20-inch snags	0 to 5.9 snags/acre	6 to 9.9 snags/acre	≥10 snags/acre
20+ inch snags	0 to 0.9 snags/acre	1.0 to 3.9 snags/acre	≥4 snags/acre
Total Snags	0 to 5.9 snags/acre	6.0 to 9.9 snags/acre	≥10 snags/acre

Old Growth

For Alternative A, no harvest was allowed in the existing old growth areas (Layer 6 - code of *vlarge*). For the action alternatives, individual tree selection was allowed in existing old growth in the DFPP cover type and no other harvest allowed in Layer 6 (code of *vlarge*).

Watershed Constraints

Watershed objectives were met by limiting the amount of area that could be in an opening at one time. To protect watershed resources, the amount of area in openings is limited to not more than 20 percent of a watershed. Openings were modeled as follows:

- For regeneration harvest or natural disturbance, one acre of opening is created for each acre of harvest.
- For group selection, 0.2 acres of opening is created for each acre of harvest.
- For commercial thinning, 0.2 acres of opening is created for each acre of thinning.

An opening remains an opening over 60 years, with a decay function over time. During the first decade of harvest, the opening equals 1.0, diminishing to 0.75 in decade 2, 0.55 in decade 3, 0.4 in decade 4, 0.3 in decade 5, and 0.2 in decade 6.

Wildlife Constraints

Wildlife requirements were met through various means. Grizzly bear core areas, old growth, and riparian areas were not suitable for timber production (Layer 3 - code of *NsuitN*).

For grizzly bear and caribou management units located outside grizzly bear core areas (Layer 3 - code of *bmucmu*), an opening was considered an opening for 30 years. Wildlife openings were limited to no more than 8 percent of the area over a decade.

For lynx habitat (Layer 3 - code of *lynxhb*), vegetation treatment was limited to no more than 15 percent over a decade.

For winter range or other areas with no wildlife condition (Layer 3 - code of *wntrng* or *nowldl*), openings were limited to no more than 25 percent of the area.

Limits on Silvicultural Prescriptions

Due to limitations of appropriate sites for uneven-aged management, this prescription was limited to no more than 5,000 acres per decade for all decades.

As a result of operational and logistical limitations on the amount of prescribed burning the Forest can perform, prescribed burning in the action alternatives was limited to no more than 5,000 acres per year. There was no prescribed burning in the Alternative A model, since this model did not have an objective function to move towards vegetation desired condition.

Because of operational and logistical limitations on the amount of thinning the Forests can do, thinning was limited to no more 5,000 acres per year for the first three decades.

Natural Disturbance (Wildfire)

The amount of natural disturbance (stand replacing wildfire) was determined using SIMPPLLE. Acres of natural disturbance (wildfire) were input into the Spectrum model, requiring a certain number of acres to undergo stand replacing wildfire every decade. The amount varies by cover

type and size class. As discussed previously, the acres of stand replacing wildfire was updated between draft and final EIS to more accurately portray expected wildfire behavior.

Table 14 displays the acres themed to stand replacing fire over each decade.

Table 14. Natural Disturbance (Stand Replacing Wildfire) by Layer

Spectrum Layer	Acres Stand Replacing Fire by Decade					
Layer 5 - Cover Type	Decade 1	Decade 2	Decade 3	Decade 4	Decade 5	Dec 6-25
DFPP	442	409	1,074	1,388	1,498	962
DFwet	2,792	1,648	2,788	4,439	4,004	3,134
GFmix	7,564	10,271	15,365	18,997	18,694	14,178
Larch	3,966	4,530	4,430	5,777	4,608	4,662
LP	1,661	1,091	896	1,532	1,051	1,246
Sfmix	7,688	13,773	14,248	23,501	23,482	16,538
Total	24,113	31,721	38,801	55,634	53,337	40,721
Layer 6 - Size Class	Decade 1	Decade 2	Decade 3	Decade 4	Decade 5	Dec 6-25
Large	8,280	10,283	16,062	25,589	19,892	16,021
Medium	9,699	11,202	7,364	6,772	7,358	8,479
SeedSap	913	1,122	2,348	2,428	1,981	1,759
Small	1,367	3,012	5,187	8,904	7,642	5,223
VeryLarge	3,854	6,102	7,840	11,940	16,464	9,240
Total	24,113	31,721	38,801	55,634	53,337	40,721

Management Objectives

Linear programming models, such as Spectrum, optimize an objective function subject to a set of constraints. An objective function is defined in terms of its type, discount rate (if applicable), duration, and contributing activities and outputs. The constraints in the model were described in the previous section. The following discussion provides a description of the objective functions that were used for solving the model.

Objective to move towards Desired Condition

For the action alternatives, the objective function for the model was to move towards the desired condition for vegetation, as defined in the revised Forest Plan. The desired condition was defined by cover type and size class and then goals were developed to achieve desired condition.

Table 15 and table 16 display the goals for species and size class, respectively, based on the desired condition ranges for vegetation in the revised Forest Plan. These goals did not vary by alternative. In the model, every acre that is not within the desired condition minimum and the desired condition maximum is assigned a “penalty point.” The objective is to minimize total penalty points. Thus, alternatives with lower overall penalty points do a better job of moving vegetation towards desired conditions than those alternatives with higher penalty points.

In the draft EIS, this objective was run separately for lands suitable for timber production and lands not suitable. The desired condition minimums and maximums were prorated, based on number of acres. In the final EIS, this objective was run forestwide, and did not separate out lands suitable for timber production from the not suitable lands. This adjustment was made to more accurately portray opportunities for moving vegetation towards desired conditions.

Table 15. Species Composition – Percent of all forested National Forest Acres

Veg Type	Desired Condition Minimum %	Desired Condition Maximum %
PP	5	10
DF	12	25
LP	3	6
WL	10	21
GF/WRC/WH Mix	6	12
WP	20	39
SAF/ES/WBP, MH, AL Mix	10	20

Table 16. Successional Stage (Size Class)

Veg Type	Desired Condition Minimum %	Desired Condition Maximum %
Seed/Sap	14	29
Small	9	17
Medium	13	26
Large	13	26
Very Large	18	35

Objective to Maximize Timber

For Alternatives A and D, the model was run with an objective function to maximize timber output levels in the first decade. For Alternative D, the results were then 'rolled over' (first decade harvest levels input as a constraint) and the model re-run with the objective to move towards vegetation desired condition.

Objective to Maximize Present Net Value

After the alternatives were run with the objective function to move towards vegetation desired condition or the objective to maximize timber only (Alternative A), the solutions were input into the model as constraints and the model re-run with an objective to maximize present net value using a 4 percent discount rate. This run was to ensure the model was being cost efficient in management choices.

Results

Table 17 displays the objective functions used to run each alternative and some key outputs: production of timber in both MMBF and MMCF in the first decade; long-term sustained-yield; present net value; timber budget in the first decade; and the number of acres managed for timber production over the planning horizon.

Table 17. Results by Alternative by Run

Alternative Run	Objective Functions	MMBF/Yr	MMCF/Yr	LTSY	PNV	Budget	Timber
		Decade 1	Decade 1	MMCF/Yr	MM\$	Decade 1	Mgmt ¹
						MM\$/Yr	Acres
A – with budget constraint	Max Timber, Max PNV	46.8	8.6	9.4	-33	6.78	336,817
A – without budget constraint	Max Timber, Max PNV	124.9	22.3	22.3	-190	19.54	670,872
B Modified– with budget constraint	Desired Condition, Max PNV	44.6	8.3	11.0	-109	6.78	336,911
B Modified– without budget constraint	Desired Condition, Max PNV	120.3	22.1	22.1	-227	20.12	685,246
C – with budget constraint	Desired Condition, Max PNV	43.3	8.3	11.0	-106	6.77	337,844
C – without budget constraint	Desired Condition, Max PNV	115.9	21.2	21.2	-225	19.54	653,185
D – with budget constraint	Max Timber, Desired Condition, Max PNV	46.3	8.5	10.7	-115	6.78	328,438
D – without budget constraint	Max Timber, Desired Condition, Max PNV	131.3	23.4	23.4	-262	20.86	709,084

¹ Acres scheduled for timber management over the modeled 250 year planning horizon

Sensitivity Analysis

Sensitivity analysis is conducted to examine the trade-offs caused by the constraints and determine if the Spectrum model is working correctly. For the sensitivity analysis, 10 runs were made. The first run had no constraints on the model. Subsequent runs included a set of constraints added to the previous run until the last run included all constraints. The analysis shows the effect of adding each set of constraints to the model. Except for Run 1, all sensitivity analysis runs were made on lands suitable for timber production common to all alternatives. These lands did not include the management area determination for timber suitability. All runs were made with the objective to move towards vegetation desired condition (minimize penalty points).

Table 18 displays several model outputs for each sensitivity analysis run: vegetation desired condition in terms of penalty points; production of timber in both MMBF and MMCF in the first decade; timber production in MMCF over the model's planning horizon; long-term sustained-yield; present net value; timber budget in the first decade; number of acres managed for timber over the planning horizon; thousands of acres of prescribed burning; million metric tons of carbon sequestered (this is a cumulative number over 25 decades, and does not reflect carbon sequestration at a point in time); and acres with high fire hazard. Following is a brief description of each sensitivity analysis run and general effects:

- **Run 1 – All Lands Available:** This run is made with all lands going to some kind of management. This run does not consider timber suitability, harvest policy, or any resource or operation constraints. This is the maximum for moving towards vegetation desired condition without any constraints. This run has the lowest penalty points for not meeting vegetation desired condition and shows the greatest possible movement towards vegetation desired condition.
- **Run 2 – All Suited Lands Available:** This run is made with all lands suitable for timber production going to some kind of management. No harvest policy, resource or operation constraints are included except those used in determining timber suitability. This is the maximum for moving towards vegetation desired condition when all lands suitable for timber production are managed. This run results in more than a 250 percent increase in penalty points (movement away from vegetation desired condition) and a 17 percent decrease in timber harvest (MMBF) in the first decade.
- **Run 3 – Sustainable Harvest:** This is the same as Run 2 but includes the harvest policy constraints of non-declining yield, long-term sustained-yield, and ending inventory constraints. No resource or operation constraints are included. This is the maximum for moving towards vegetation desired condition and providing sustainable harvest levels. This run results in an increase (28 percent) to desired condition penalty points and a 74 percent decrease in timber harvest in the first decade.
- **Run 4 – Watershed Openings:** This is the same as Run 3 but includes constraints for watershed openings. This run results in a 42 percent increase in desired condition penalty points and a 23 percent decrease in first decade timber harvest.
- **Run 5 – Wildlife Openings:** This is the same as Run 4 but includes constraints for wildlife openings. This run results in a very slight increase in desired condition penalty points and a slight decrease in first decade timber harvest.
- **Run 6 – Old Growth:** This is the same as Run 5 but includes limits on management in old growth. This run has similar results to Run 5, showing little increase in penalty points and little decrease in timber harvest.

- **Run 7 – Rx Burn Limits:** This is the same as Run 6 but includes limits on the amount of prescribed burning that can occur. This run results in a 15 percent increase in desired condition penalty points and a slight increase (6 percent) in first decade timber harvest.
- **Run 8 – Unevenage Harvest Limits:** This is the same as Run 7 but includes constraints on the amount of unevenaged management that can occur. This run results in an 11 percent increase in desired condition penalty points and a 10 percent decrease in first decade timber harvest.
- **Run 9 – Thinning Limits:** This is the same as Run 8 but includes constraints on the amount of thinning that can occur. This run is very similar to Run 8, resulting in similar levels for desired condition penalty points and first decade timber harvest.
- **Run 10 – Budget Constraint:** This is the same as Run 9 but includes the budget constraint. This run is similar to the runs for the alternatives except that it includes lands suitable for timber production that the management area may deem unsuitable. This run has significant effects on achieving vegetation desired condition and timber harvest, resulting in a 66 percent increase in desired condition penalty points and a 72 percent decrease in first decade timber harvest.

Results of the sensitivity analysis indicate the opening constraints and the budget constraints have a large impact on achieving vegetation desired condition. These constraints also limit timber harvest. Because the constraints were added sequentially for the sensitivity analysis, it is not known how limiting any one constraint may be. However, the change in key outputs shows the effects the constraints have as a whole on the solution.

Sensitivity analysis was not re-run for the revised Spectrum model. Except for the updates to the watershed openings, all other constraints remained the same as in the DEIS model.

Table 18. Sensitivity Analysis

Run - Description	Desired Condition	MMBF/Yr	MMCF/Yr	MMCF	LTSY	PNV	Budget	Timber	Rx Burn	Carbon	High Fire
	Penalty Points	Decade 1	Decade 1	Decade 1-25	MMCF/Yr	MM\$	Decade 1	Mgmt ¹	Decade 1	Decade 1-25 ²	Decade 1-25 ²
							MM\$/Yr	Acres	M Ac.	MM tonnes	MM Ac.
1 - All Lands Available	6,390,368	982.0	181.49	18,149	56.79	-1,447.8	154.94	1,867,962	0	5,938	15.2
2 - All Suited Lands Available	16,526,712	819.4	152.83	12,845	29.41	-1,144.2	129.84	1,177,515	160	6,043	21.7
3 - Sustainable Harvest	21,138,390	209.8	38.91	9,727	38.91	-682.9	34.38	1,140,298	287	6,095	23.3
4 - Watershed Openings	30,016,088	161.4	30.52	7,629	30.52	-545.1	25.94	1,019,537	292	6,147	26.9
5 - Wildlife Openings	30,286,588	160.5	30.07	7,518	30.07	-538.7	25.84	1,004,604	288	6,153	27.3
6 - Old Growth	30,559,908	158.3	29.71	7,428	29.71	-539.9	25.53	993,297	294	6,155	27.3
7 - Rx Burn Limits	35,023,804	168.4	32.10	8,025	32.10	-434.7	25.74	1,083,867	50	6,177	33.2
8 - Unevenage Harvest Limits	39,022,460	150.9	28.04	7,056	29.43	-396.8	24.93	931,216	50	6,216	35.6
9 - Thinning Limits	39,036,776	151.4	28.03	7,048	29.39	-400.0	25.16	931,284	50	6,217	35.6
10 - Budget Constraint	64,963,180	43.1	8.34	2,162	11.47	-122.9	6.63	352,108	50	6,394	46.7

¹ Acres scheduled for timber management over the modeled 250 year planning horizon.

² These are cumulative totals for 25 decade.

Benchmarks

Benchmarks analysis is conducted to understand the limits on production levels and outputs from the Spectrum model based on achieving certain objectives. The benchmark analysis determined maximum and minimum production levels and movement towards vegetation desired condition. The benchmark analysis was conducted on the same land base as the sensitivity analysis (lands suitable for timber production common to all alternatives) and included all resource and operability constraints except for the budget constraint. All benchmark runs were made without a budget constraint. Six benchmarks were run:

- **Benchmark to Maximize Timber** – This run was made with an objective to maximize timber in the first decade. Results were then rolled over and the run made to maximize timber harvest over the entire planning horizon. The maximum timber benchmark results in a first decade harvest of 175.9 MMBF. The penalty points for moving towards desired condition are not known, since this run was not made with any goal to move towards desired condition.
- **Benchmark to Maximize Present Net Value (PNV)** – This run was made with an objective to maximize the PNV. Because timber market conditions are currently depressed, resulting in very low timber values, the PNV is negative in most runs of the model. To maximize PNV, the result is only 4.7 MMBF in decade one. Again, penalty points for moving towards desired condition are not known, since this run was not made with any goal to move towards desired condition.
- **Benchmark to Maximize Desired Condition** – This run was made with a goal to move towards vegetation desired condition, given the land base and constraints of the model. The result was total of approximately 30 million penalty points and a first decade harvest level of 158.3 MMBF.
- **Benchmark to Maximize Carbon Sequestration** – This run was made with an objective to maximize carbon sequestration over the planning horizon. The result was a cumulative total of carbon sequestered over 25 decades and does not reflect a point in time. The cumulative total of carbon sequestered over 25 decades was 6,542 million metric tons and a first decade harvest of only 43.3 MMBF.
- **Benchmark to Minimize Fire Hazard** – This run was made with an objective to minimize acres with high fire hazard potential over the planning horizon. The result was 24 million acres with high fire hazard (cumulative for the total 25 decades) and a first decade harvest level of 140 MMBF.
- **No Management Benchmark** – This run was made with a goal to move towards vegetation desired condition but with no management allowed on any acres. This resulted in almost tripling the penalty points from the maximum desired condition benchmark run and no timber harvest in any decade.

All benchmarks were re-run with the updated model for the FEIS. Table 19 displays the results of the benchmark runs and includes a summary of the following outputs for each run: production of timber in both MMBF and MMCF in the first decade; long-term sustained-yield; present net value; timber budget in the first decade; number of acres managed for timber over the planning horizon; million metric tons of carbon sequestered (cumulative total for 25 decades); and acres with high fire hazard (cumulative total for 25 decades).

Table 19. Benchmark Analysis

Benchmark	MMBF/ Yr	MMCF/Yr	LTSY	PNV	Budget	Timber	Carbon	High Fire
	Decade 1	Decade 1	MMCF/Yr	MM\$	Decade 1	Mgmt ¹	Decade 1-25 ²	Decade 1-25 ²
					MM\$/Yr	Acres	MM tonnes	MM Ac.
Max Timber	179.7	33	33	-378	32.7	987,966	5,846	32.4
Max PNV	8.9	1.8	7.6	1	1.3	224,163	6,098	50.2
Max Desired Condition	153.5	28	28	-498	28.9	862,230	5,854	25.3
Max Carbon Sequestration	4.6	0.8	0.8	-9	0.9	38,569	6,179	52.5
Min High Fire Hazard	125.1	23.9	23.9	-525	20.2	749,532	5,777	23.2
No Management	0.0	0.0	0.0	0.0	0.0	0	6,155	55.3

¹ Acres scheduled for timber management over the modeled 250 year planning horizon.

² These are cumulative totals for 25 decade.

Efficiency Analysis for Prescriptions

An analysis was conducted to estimate the most profitable timber prescription for each analysis area. The analysis consisted of sorting through economic information that is generated for use in Spectrum and finding the highest present net value for each part of the Forest. Results from the analysis can be found in the project record.

Rangeland Capability and Suitability

The NFMA requires the identification of the suitability of lands for resource management. An analysis to determine lands suitable to produce forage for grazing animals (suitable for rangelands) was completed as part of the Forest Plan revision. Although an area may be deemed suitable for use by livestock in the Forest Plan, a project-level analysis evaluating the site-specific impacts of the grazing activity, in conformance with NEPA, is required in order to authorize livestock grazing on specific allotment(s).

The assessment of suitable rangelands was accomplished using GIS. Use of GIS resulted in consistent identification of each step in determining suitability.

The first step in determining suitability was to identify lands capable of providing forage for grazing animals. Capability is defined under the 1982 rule procedures as “The potential of an area of land to produce resources, supply goods and services, and allow resource uses under an assumed set of management practices and at a given level of management intensity. Capability depends upon current conditions and site conditions such as climate, slope, landform, soils, and geology, as well as the application of management practices, such as silviculture or protection from fire, insects, and disease” (36 CFR 219.3 1982 Rule Procedures).

The following steps determined capable rangelands:

- Begin with all lands that are NFS lands;
- Subtract soil types that are dominated by a large percentage of rock outcrop and rubble land, loose granitic or highly erosive soils, very wet and boggy soils, and sites with high mass movement risk;
- Subtract soil types that are not inherently capable of producing more than 200 pounds of forage per acre within their potential natural community (such as nutrient-poor or shallow soils);
- Subtract areas that consist of lakes, reservoirs, ponds, or major rivers;
- Subtract streams by buffering perennial streams by six feet and intermittent streams by three feet on either side; and
- Subtract slopes greater than 40 percent.

The remaining area is capable rangeland. There are 365,700 acres of capable rangeland on the IPNF.

The following steps were utilized to determine suitable rangelands:

- Subtract areas determined to be not capable;
- Subtract all areas outside of range allotments;
- Subtract areas that currently have an overstory of tree canopy cover greater than 60 percent. Transitory range is normally considered as a special short-term instance where suitability occurs because of the removal of the overstory vegetation (i.e., by fire or harvest). However, since the long-term site potential is normally a moderate to dense canopy with little understory production, these areas are generally considered to be suitable for grazing only until the tree canopy cover returns to 60 percent or greater. Changes to suitability due to changes in transitory forage (i.e., becomes available through timber harvest or wildfire or unavailable because of growth of overstory vegetation) will be considered at the project scale. The IPNF used the Vegetation

Mapping Project coverage to determine tree canopy cover. All areas with a canopy cover of greater than 60 percent were subtracted; and

- Subtract MAs where livestock grazing is generally not suitable. For the action alternatives, all MAs except 5 and 6 were subtracted. Grazing is not part of the desired condition for all other MAs. Based on Forest Plan guidelines, also subtracted riparian areas.

The remaining area is considered suitable rangeland. Table 20 displays total suitable rangeland by alternative.

Table 20. Rangeland Suitability by Alternative (Acres)

Rangeland Suitability	Alternative A	Alternative B Modified	Alternative C	Alternative D
Capable Rangeland	365,700	365,700	365,700	365,700
Outside Allotment	-326,550	-326,550	-326,550	-326,550
>60 percent Canopy	-18,100	-18,100	-18,100	-18,100
Riparian Area	-2,730	-2,730	-2,730	-2,730
Management Area not suitable	0	-30	-30	-30
Suitable Rangeland	18,320	18,290	18,290	18,290

Social and Economic Analysis

Social and economic impacts and economic efficiency were analyzed for each alternative. Social and economic impacts were measured in terms of changes to jobs and income. Economic efficiency was measured based on changes in present net value.

Economic Impacts

Introduction

Economic effects to local counties were estimated with input-output analysis using the IMPLAN (Impact analysis for PLANning) modeling system (MIG 2003) and FEAST (Forest Economic Analysis Spreadsheet Tool) (Alward et al. 2010). The IMPLAN modeling system allows the user to build regional economic models of one or more counties for a particular year. The model for this analysis used the 2008 IMPLAN data. FEAST is a spreadsheet modeling tool that serves as an interface between user inputs and imported data from an existing IMPLAN model.

Input-output analysis is a means of examining relationships within an economy, both between businesses and between businesses and final consumers. It captures all monetary market transactions for consumption in a given time period. Economic contribution analysis is defined as “the gross change in economic activity associated with an industry, event, or policy in an existing regional economy” (Watson et al. 2007). By using Forest Service expenditure data, resource output data, and other economic information, IMPLAN can describe, among other things, the jobs and income that are supported by NFS management activities. The direct employment and labor income benefit employees and their families, and therefore, directly affect the local economy. Additional indirect and induced, multiplier effects (ripple effects) are generated by the direct activities. Together the direct and multiplier effects comprise the total economic contribution to the local economy. The data used to estimate the direct effects from timber harvest is information provided by University of Montana’s Bureau of Business and

Economic Research. The economic effects tied to other Forest Service programs and the multiplier effects were estimated using IMPLAN. Resource specific data (recreation visits, range head months, timber volume harvested, etc.) were collected and input into FEAST. For current management levels, a three-year average using 2007 to 2009 data was calculated for resources to eliminate the year to year variability inherent in the data.

Procedures

To estimate the economic impacts to the IPNF area economy, one IMPLAN model covering five counties was developed. The counties included Boundary, Bonner, Kootenai, Shoshone, and Benewah counties in Idaho. This area defines the functional social and economic planning area. Labor flows between towns and counties are generally contained within these five counties. Flows of labor, goods, and services between this area and other counties are not captured in the model, but considered as exports or imports.

Impact analysis describes what happens when a change in final sales (i.e., to non-residents — or exports — and governments) occurs for goods and services in the model region. Changes in final sales are the result of multiplying production data (i.e., cubic feet of timber or recreation visits by non-locals) times sales. Economic impacts were estimated using the best available production and sales data.

Impacts to local economies are measured in two ways: employment and labor income. Employment is expressed in jobs. A job can be seasonal or year-round, full-time or part-time. Jobs represent the annual average of 12 monthly estimates. There is no seasonality in this measure. The income measure used was labor income expressed in 2009 dollars. Labor income includes both employee compensation (pay plus benefits) and proprietor income (e.g., self-employed).

The planning area model was used to determine total consequences of dollar, employment, and income changes in selected sectors. Because input-output models are linear, multipliers or response coefficients need only be calculated once per model and then applied to the direct change in final demand. A specially-developed spreadsheet entitled “FEAST” (Forest Economic Analysis Spreadsheet Tool) was used to apply the model results to each alternative. Methods for developing response coefficients and levels of dollar activity are explained below.

Data and Assumptions

Timber production

Current levels were developed from a three-year average of actual harvest for 2007 to 2009. Products were broken out by sawtimber (which includes house logs), pulp, posts, and fuelwood. For the alternatives, timber production levels were derived using the Spectrum model. First decade output levels were used for sawtimber. It was assumed that the predicted timber sold in the model would be harvested in the same timeframe. Pulp was not broken out separately for the alternatives, but included with sawtimber. Posts and fuelwood were assumed to remain near current levels, with a small decrease for all alternatives.

The data used to estimate the direct effects from timber harvest was developed by University of Montana's Bureau of Business and Economic Research. The indirect and induced effects were generated by the IMPLAN model.

Recreation and Wildlife

Recreation visitor days were calculated using the most recent National Visitor Use Monitoring (NVUM) data. The current level was based on the most recent data collection, which occurred in fiscal year 2009. The proportion of recreation that was wildlife related was generated based on White and Stynes (2009), using case weighted averages.

For the alternatives, a 13 percent increase was applied to the 2009 recreation levels to reflect the projected change in population over the next decade. Recreation figures were held constant for all alternatives.

The direct, indirect, and induced effects from changes in recreation levels were generated by the IMPLAN model.

Grazing

The current level is a three-year average of authorized use from 2007 to 2009. This figure was not expected to change by alternative, and based on desired conditions, kept constants at current levels.

The direct, indirect, and induced effects from changes in grazing levels were generated by the IMPLAN model.

Minerals

The current level for saleable minerals is based on a three-year average of mineral material production for 2007 to 2009 (source data was IWEB report, MMGS017L, Mineral materials - forest summary by commodity). These outputs were proportioned to IMPLAN sectors 25 (crushed stone, dimensional stone) and 26 (sand and gravel). Locatable minerals were based on production at the Montana Troy mine. A three-year average for 2007 to 2009 was developed for silver and copper production at the mine. Saleable and locatable mineral levels were held constant at current levels for all alternatives.

The direct, indirect, and induced effects from minerals were generated by the IMPLAN model.

Federal Expenditures and Employment

Total employment and salaries paid by the Forest Service was based on a three-year average for 2007 to 2009. Total Forest expenditures were based on a three-year average (2007 to 2009). These levels were held constant for all alternatives.

The direct, indirect, and induced effects from forest expenditures and employment were generated by the IMPLAN model.

Revenue Sharing

Two IMPLAN models were developed to predict the change in jobs and income associated with continuance of the Secure Rural Schools and Community Self-Determination Act or a return to payments under the 25% Fund. A three-year average of actual payments under the Secure Rural Schools and Community Self-Determination Act was input into one of the models. This level was held constant for all alternatives. A second model used the three-year average of payments that would have been made under the 25% Fund. This amount varied by alternative based on the size of revenues generated by resource output levels.

The direct, indirect, and induced effects from revenue sharing were generated by the IMPLAN model.

Output Levels

Table 21 displays the output levels that were used to perform the impact analysis.

Table 21. Output Levels for Impact Analysis

Activity	Units	Current Level	Alt A	Alt B Modified	Alt C	Alt D
Timber - Sawtimber	CCF	27,184	85,716	83,849	83,423	85,710
Timber – Pulp	CCF	1,090	0	0	0	0
Timber - Posts	CCF	23	20	20	20	20
Timber - Fuelwood	CCF	18,086	17,500	17,500	17,500	17,500
Recreation - Nonlocal Day Trips	Visits	120,078	135,688	135,688	135,688	135,688
Recreation -Nonlocal Overnight on NF	Visits	104,950	118,594	118,594	118,594	118,594
Recreation -Nonlocal Overnight not on NF	Visits	34,038	38,463	38,463	38,463	38,463
Recreation -Local Day Trips	Visits	563,517	636,774	636,774	636,774	636,774
Recreation - Local Overnight on NF	Visits	50,111	56,626	56,626	56,626	56,626
Recreation -Local Overnight not on NF	Visits	5,673	6,410	6,410	6,410	6,410
Wildlife & Fish - Nonlocal Day Trips	Visits	42,190	47,674	47,674	47,674	47,674
Wildlife & Fish -Nonlocal Overnight on NF	Visits	36,874	41,668	41,668	41,668	41,668
Wildlife & Fish -Nonlocal Overnight not on NF	Visits	11,959	13,514	13,514	13,514	13,514
Wildlife & Fish -Local Day Trips	Visits	197,992	223,731	223,731	223,731	223,731
Wildlife & Fish - Local Overnight on NF	Visits	17,607	19,896	19,896	19,896	19,896
Wildlife & Fish -Local Overnight not on NF	Visits	1,993	2,252	2,252	2,252	2,252
Range – Cattle	Head Months	3,707	3,700	3,700	3,700	3,700
Minerals – Dimension Stone	Short Tons	469	469	469	469	469
Minerals – Construction Sand & Gravel	Short Tons	695	695	695	695	695
FS Expenditures	M\$	36,147	36,147	36,147	36,147	36,147
Secure Rural Schools Payment	M\$	8,099	8,099	8,099	8,099	8,099
25% Fund Payment	M\$	1,321	1,587	1,701	1,922	1,515

Economic Efficiency

Economic efficiency is defined as how well the dollars invested in each alternative produce benefits to society. Present net value was used as an indicator of economic efficiency.

To calculate present net value, a spreadsheet was used which tracks revenues, costs, and benefits for a fifty-year period. Built into the spreadsheet were predicted increases and decreases to output levels over time. A 4 percent discount rate was used.

Table 22 displays the economic values that were used for each resource. All values were input as 2008 dollars. The values were derived from different sources. Timber revenues were those reported by the Spectrum model. Range values were based on the rate for private grazing fees for 2008 in the state of Idaho. Mineral materials values were based on actual prices from the Forest. Values for silver and copper were from the 2008 Mineral Yearbooks at USGS. Recreation, fish and wildlife values were based on an analysis of the National Visitor Use Monitoring data (Bowker et al. 2009) and a draft report on Resource Planning Act non-market values (Retzlaff 2010).

Costs were a three-year average of actual expenditures by program area for fiscal years 2008 to 2010. The budget by program area remained constant for all alternatives.

Table 22. Economic Values for Present Net Value Analysis

Activity	2008 Dollars	2012 Dollars
Timber (M \$)		
Sawtimber Value		from Spectrum Model – by Alternative
Range (\$ / AUM)		
All Livestock (Cattle, Sheep, Horses)	\$12.60	\$13.38
Minerals		
Dimension Stone (\$/Short Ton)	\$13.83	\$14.69
Sand & Gravel (\$/Short Ton)	\$1.50	\$1.59
Recreation (\$ / Visit)		
Camping	\$29.69	\$31.53
Motorized Recreation	\$48.46	\$51.46
General Recreation	\$22.81	\$24.22
Hiking	\$91.92	\$97.62
Nature-based Recreation	\$38.00	\$40.35
OHV Use	\$62.26	\$66.12
Primitive Camping	\$30.61	\$32.51
Picnicking	\$48.01	\$50.98
Skiing	\$188.14	\$199.80
Snowmobiling	\$171.91	\$182.56
Non-motorized Recreation	\$155.67	\$165.32
Fish & Wildlife (\$ / Visit)		
Hunting	\$44.44	\$47.19
Fishing	\$66.08	\$70.17
Viewing Wildlife and Nature	\$37.74	\$40.08

Appendix C – Wilderness Evaluation

Introduction

The 1982 Planning Procedures state that “roadless areas within the NFS shall be evaluated and considered for recommendation as potential wilderness areas during the forest planning process.” This appendix describes the analysis used in evaluating individual roadless areas on the IPNF. It includes a summary of each area’s evaluation of suitability for recommended wilderness.

Background

In the 1970s, the Forest Service studied all roadless and undeveloped areas in the NFS for the purpose of prioritizing areas with strong wilderness characteristics for further study. These studies were known as Roadless Area Review and Evaluation I and II (RARE I and RARE II).

In the 1980s the IPNF began development of a land and resource management plan, which included an evaluation of roadless areas. The 1987 IPNF Plan EIS, appendix C and its addendum, included 48 inventoried roadless areas (IRAs) on 853,800 acres.

Few updates were provided for the 2000 Roadless Area Conservation EIS from information that was in the 1987 Forest Plan. When the revision process was started in 2001 the IPNF updated its inventory of roadless areas and acres on the Forest. There had been changes in some of the roadless areas from management activities that had occurred where 1987 Forest Plan MA allocations had allowed development. Roadless acreages changed due to these refinements in the boundaries and use of new technology (GIS) to determine acreages of these areas.

These acres were updated in 2007 to reflect a change to one roadless area (Skitwish) and changes to others based on land exchanges and minor boundary adjustments in GIS. This current inventory totals 850,999 acres on 48 areas (figure 5 and table 23). Inventoried roadless areas in Idaho have been identified as Idaho Roadless Areas under the 2008 Idaho Roadless Rule (36 CFR 294 Subpart C).

Maps

Figure 5 and the accompanying table of figures and page numbers (table 23) show the IRAs forestwide. Figures 6 through 35 are detailed maps of the individual IRAs.

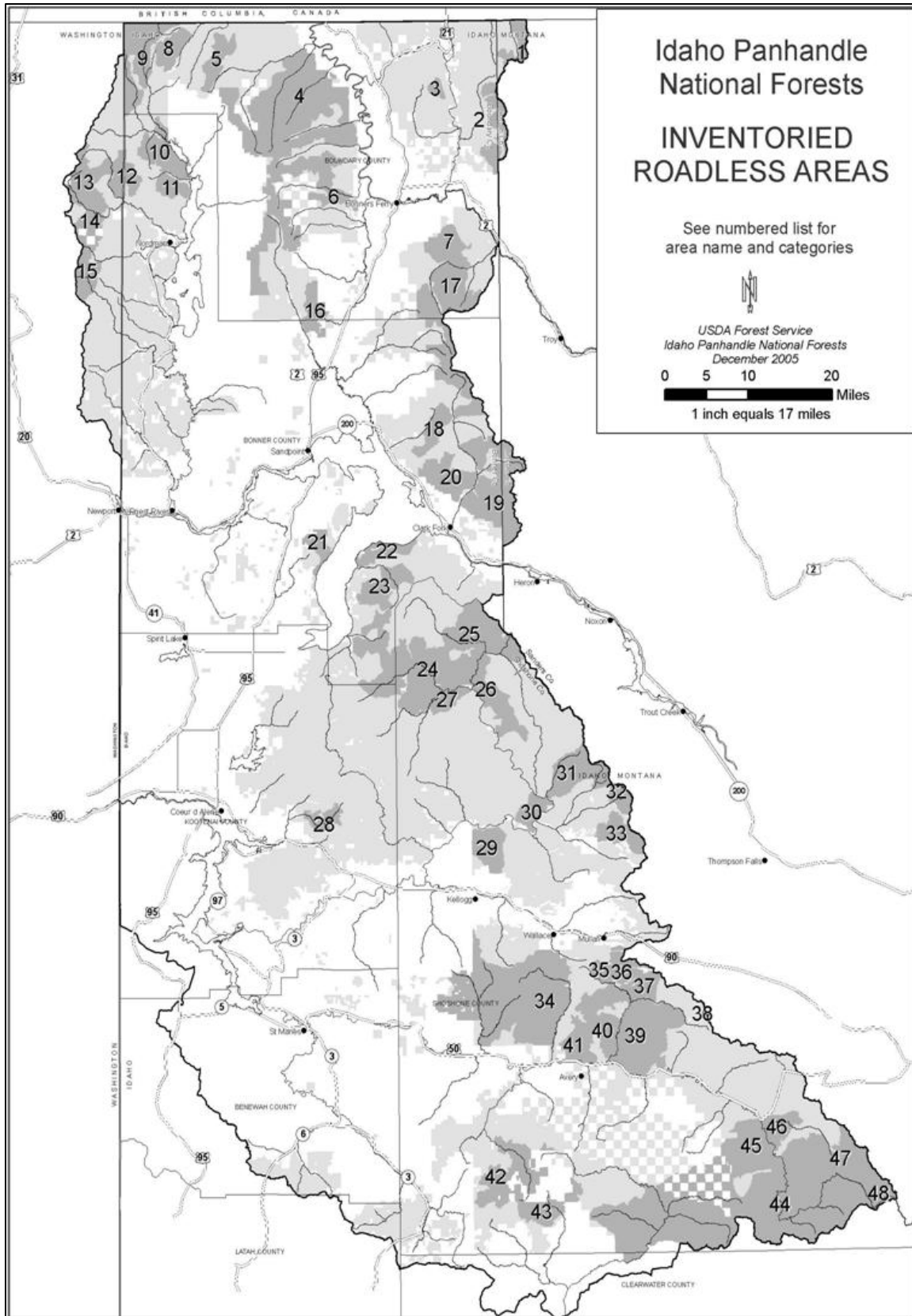


Figure 5. Idaho Panhandle National Forests IRAs Index Map

Table 23. Idaho Panhandle National Forests Inventoried Roadless Area Map Reference List

Mapcode	Area Name	Figure #	Page #
1	Northwest Peak #663	6	55
2	Buckhorn Ridge #661	7	51
3	Hellroaring #128	7	51
4	Selkirk #125 (North/South Portion)	8/10	57/58
5	Saddle Mountain #154	8	57
6	Kootenai Peak #126 Selkirk #125 (Center Portion)	9	58
7	Katka Peak #157	11	60
8	Continental Mountain #153	14	63
9	Salmo-Priest #981	14	63
10	Upper Priest #123	15	64
11	Blacktail Mountain #122	15	64
12	Little Grass Mountain #121	16	65
13	Grassy Top #982	16	65
14	South Fork Mountain #124	17	66
15	Hungry Mountain #156	17	66
16	White Mountain #127	13	62
17	Willard-Lake Estelle #173 (North/South Portion)	11/12	60/61
18	Trestle Peak #129	16	65
19	Scotchman Peaks #662	20	69
20	Beetop #130	18	67
21	Blacktail Mountain #161	19	68
22	Schafer Peak #160	19	68
23	Packsaddle #155 (North/South Portion)	19/21	68/70
24	Magee #132	21	70
25	East Cathedral #131	22	71
26	Spion Kop #136	23	72
27	Tepee Creek #133	23	72
28	Skitwish Ridge #135	26	75
29	Graham Coal #139	25	74
30	Trouble Creek #138	25	74
31	Lost Creek #137	24	73
32	Trout Creek #664	24	73
33	Maple Peak #141	24	73
34	Big Creek #143 (West/East Portion)	27/28	76/77
35	Stevens Peak #142	29	78
36	Wonderful Peak #152	29	78
37	Roland Point #146	29	78
38	Gilt Edge-Silver Creek #792	30	79
39	North Fork #147	30	79
40	Hammond Creek #145	29	78
41	Storm Creek #144	29	78

Mapcode	Area Name	Figure #	Page #
42	Grandmother Mountain #148	31	80
43	Pinchot Butte #149	31	80
44	Mallard-Larkins #300 (West/East Portion)	32/23	81/82
45	Mosquito-Fly #150	34	83
46	Midget Peak #151	34	83
47	Sheep Mountain-State Line #799	35	84
48	Meadow Cr-Upper N. Fork #302	35	84

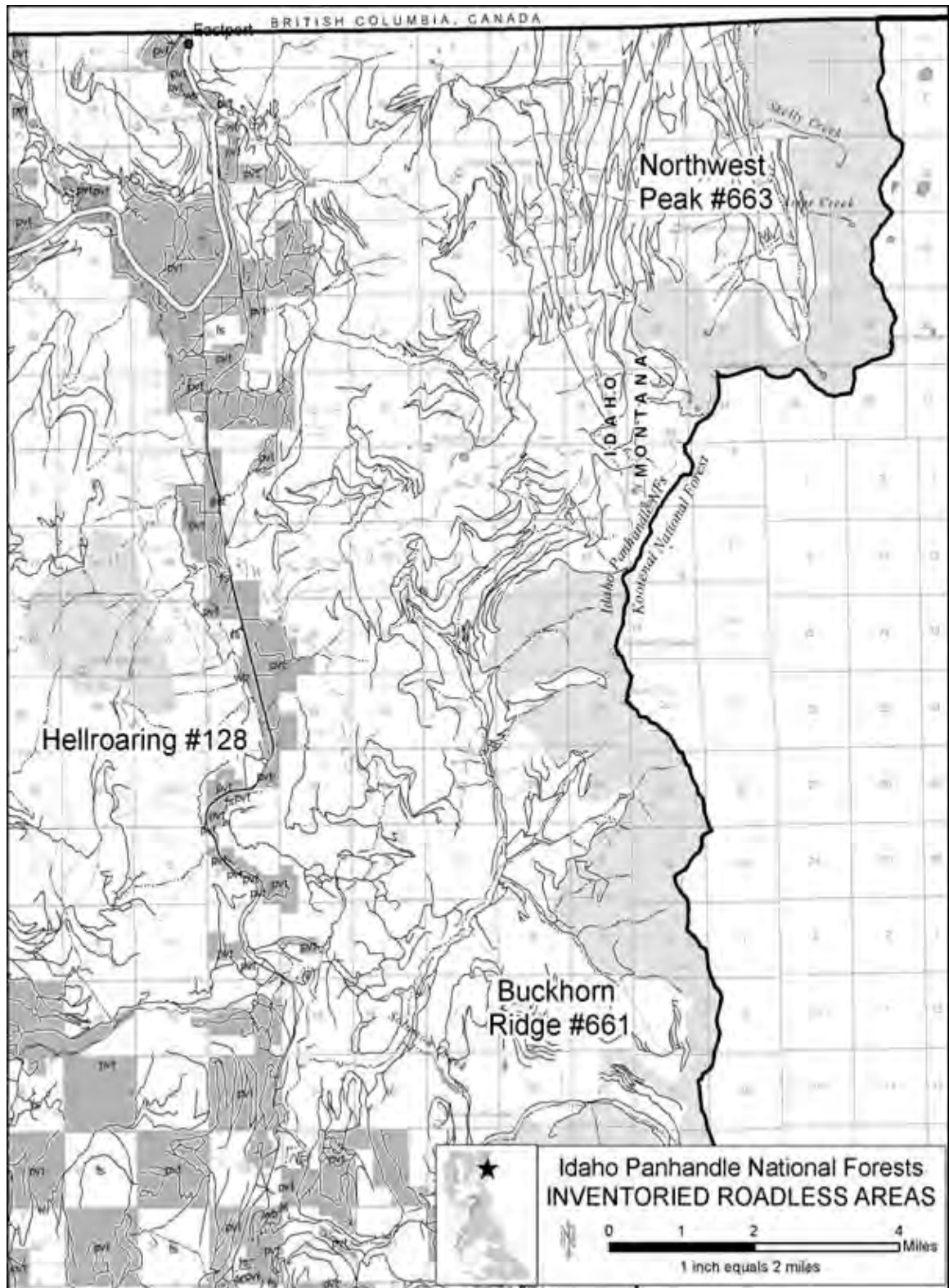


Figure 6. Northwest Peak #663 IRA

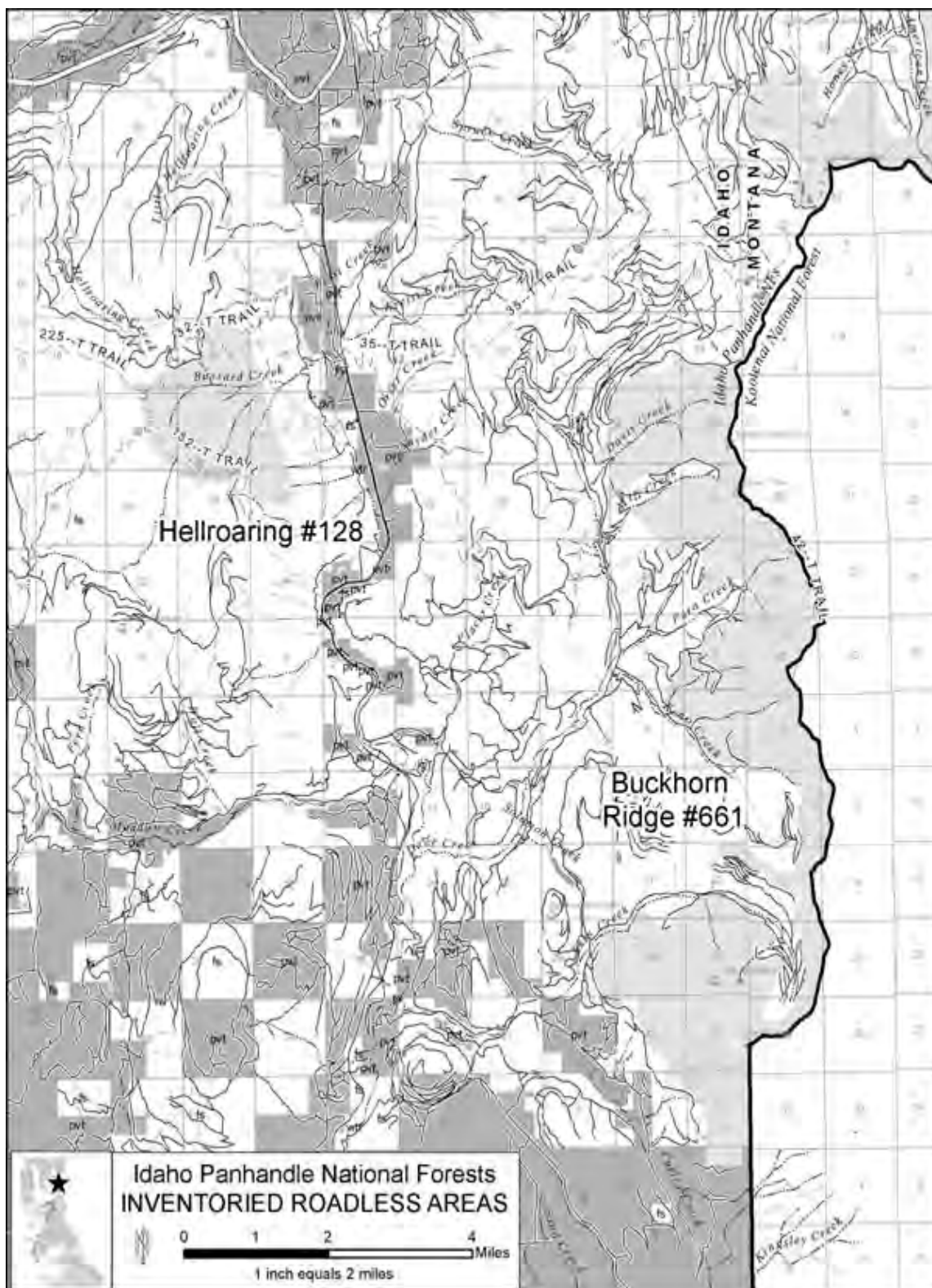


Figure 7. Hellroaring #128 and Buckhorn Ridge #661 IRAs

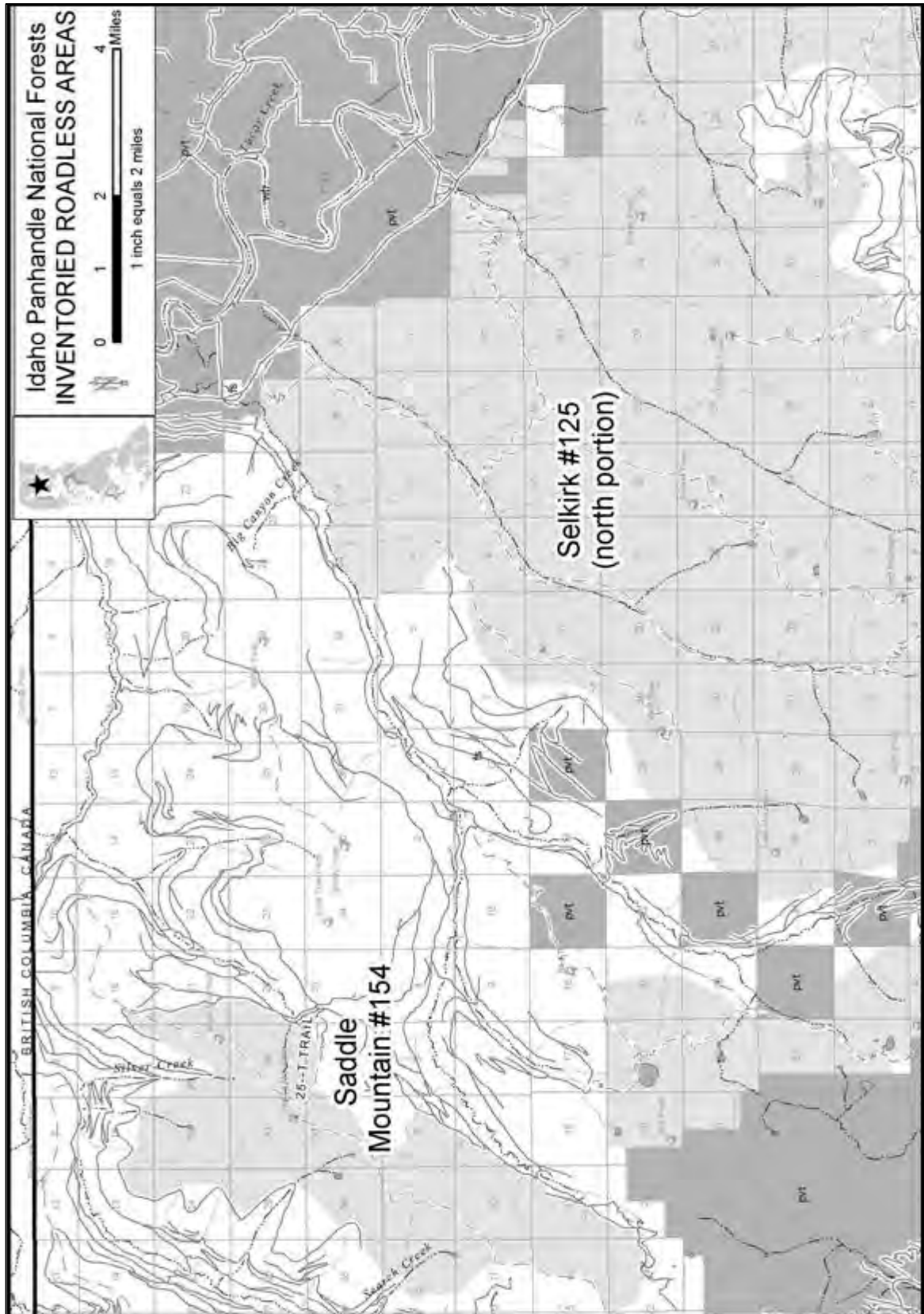


Figure 8. Saddle Mountain #154 and Selkirk #125 (north portion) IRAs

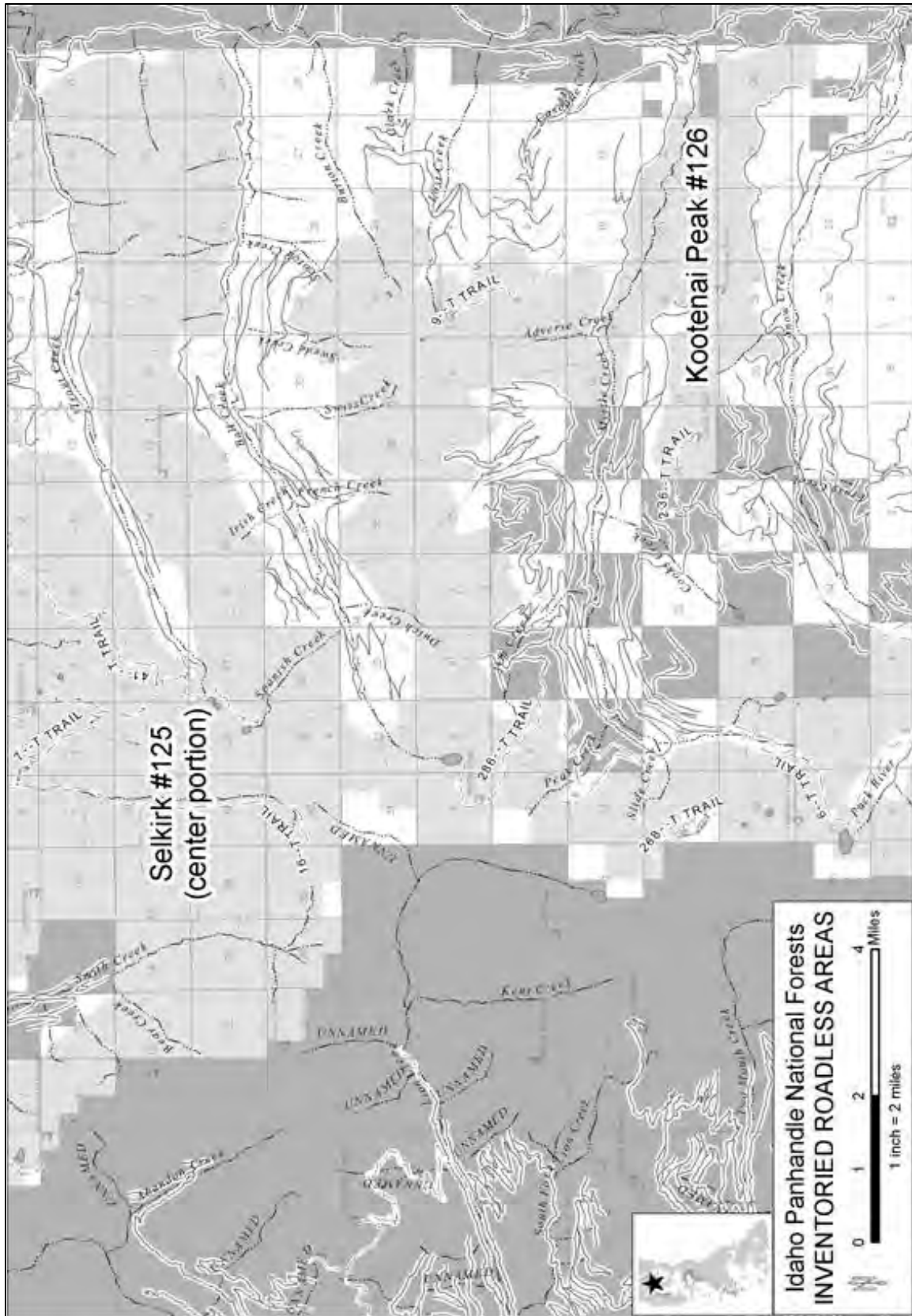


Figure 9. Selkirk #125 (center portion) and Kootenai Peak #126 IRAs

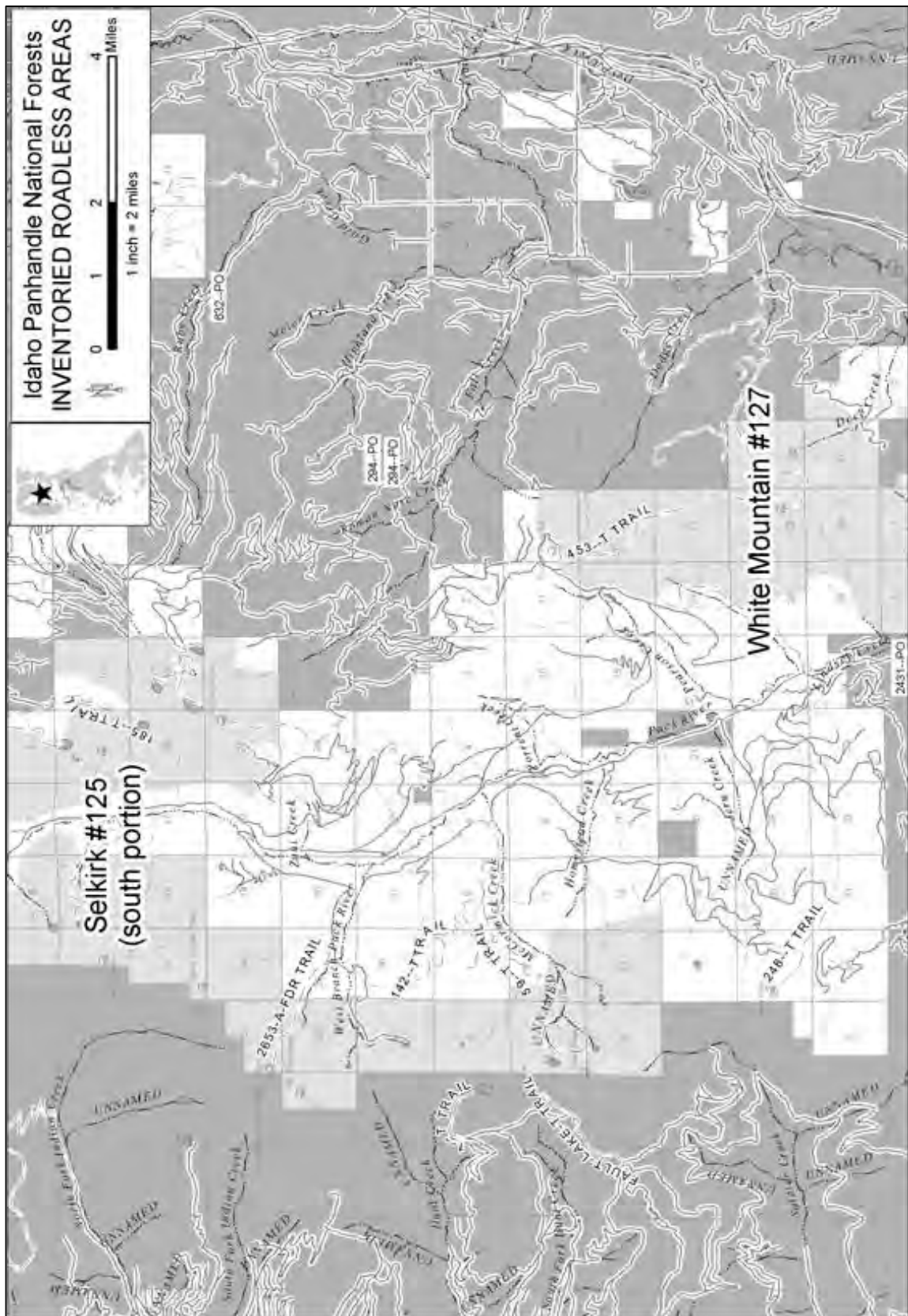


Figure 10. Selkirk #125 (south portion) IRA

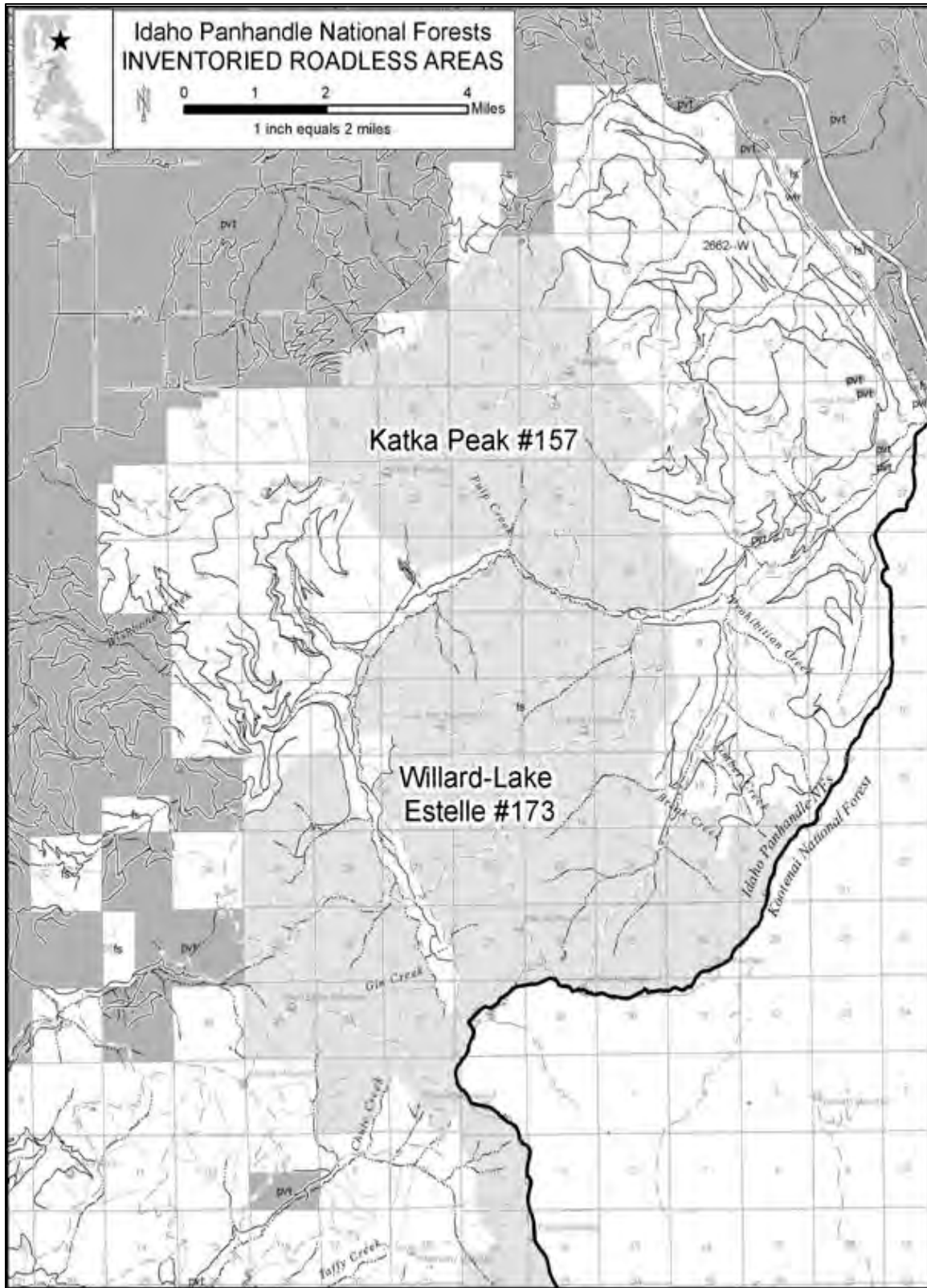


Figure 11. Katka Peak #157 and Willard-Lake Estelle #173 (north portion) IRAs

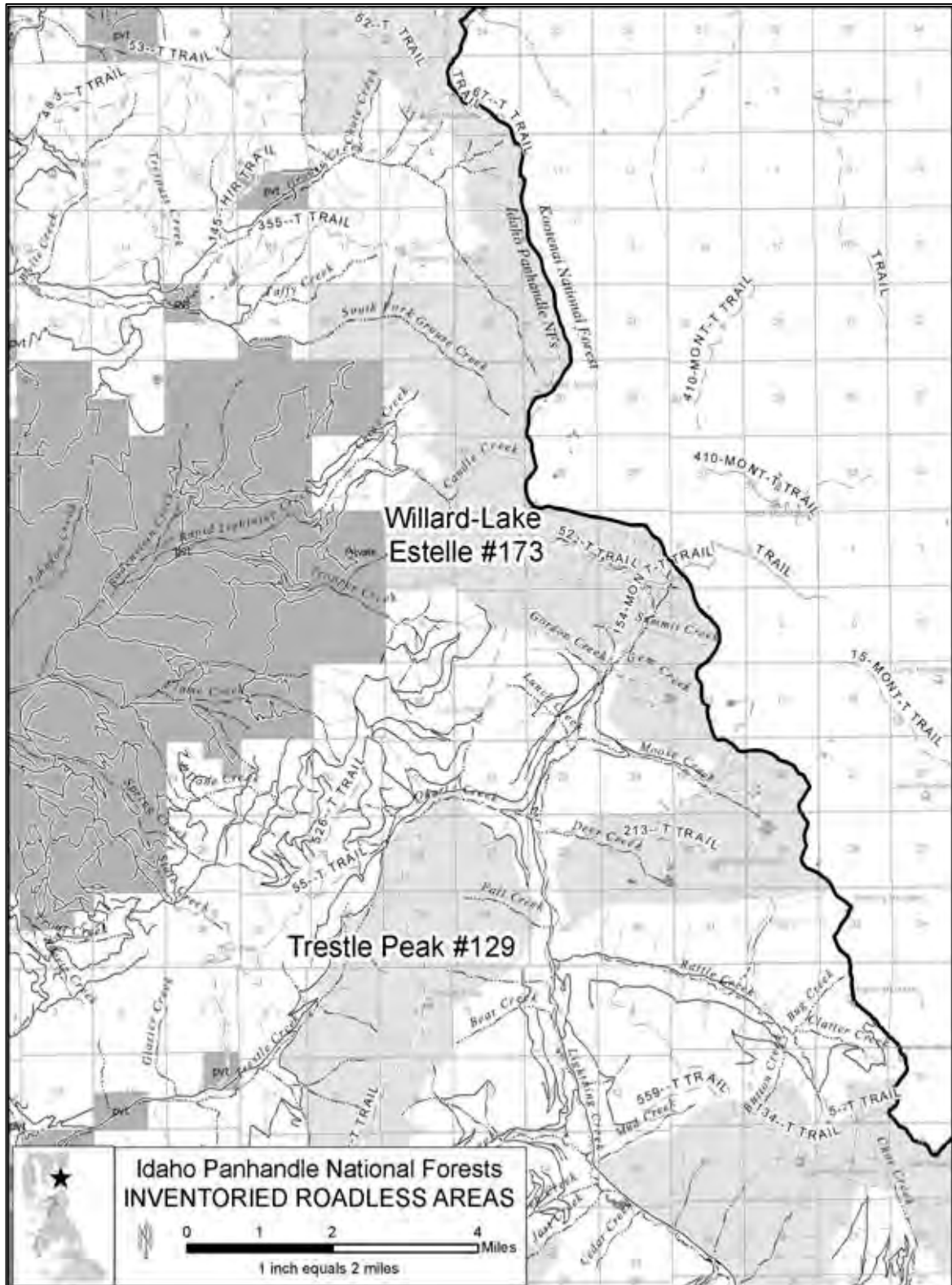


Figure 12. Willard-Lake Estelle #173, (south portion) IRA

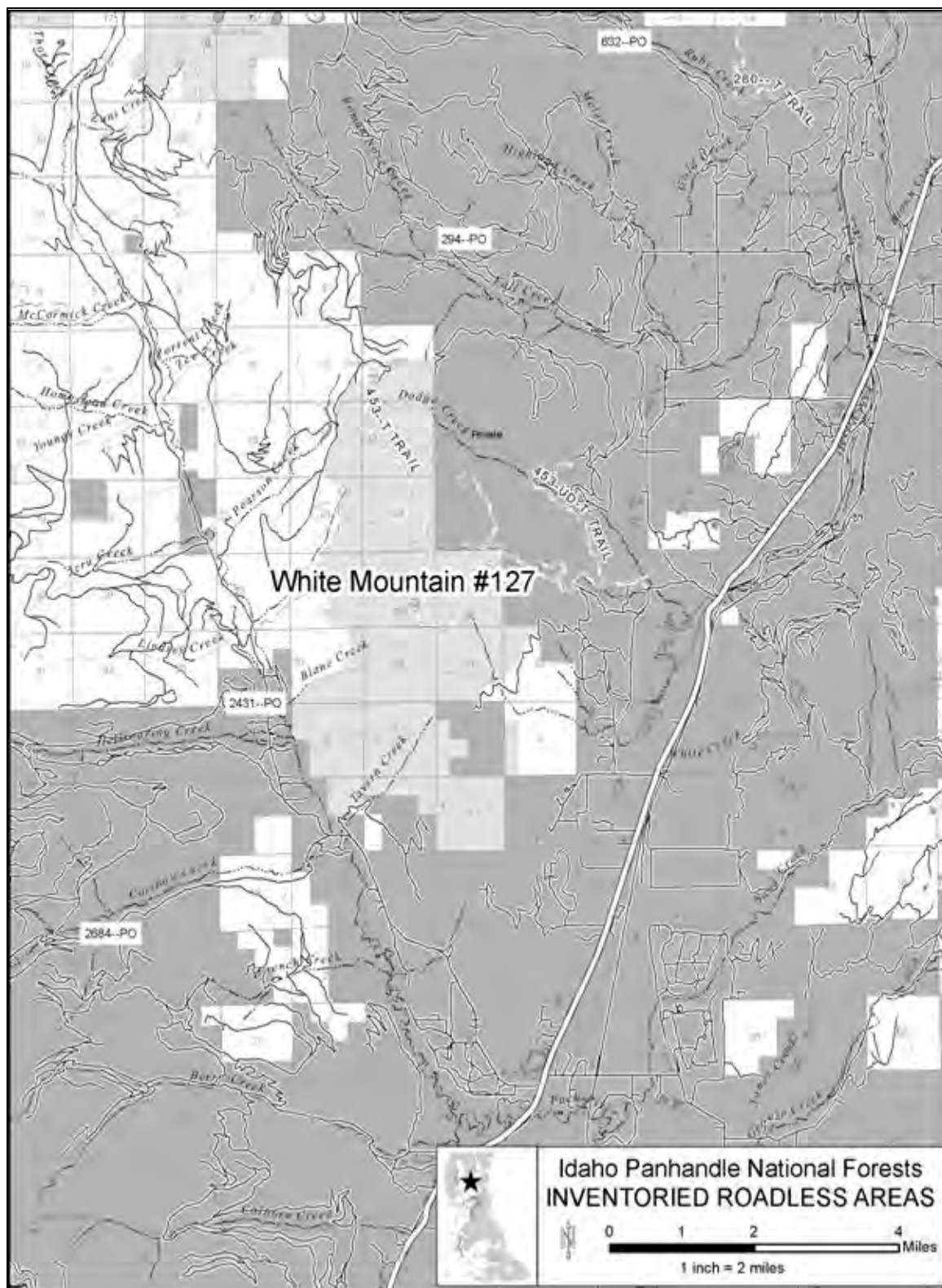


Figure 13. White Mountain #127 IRA

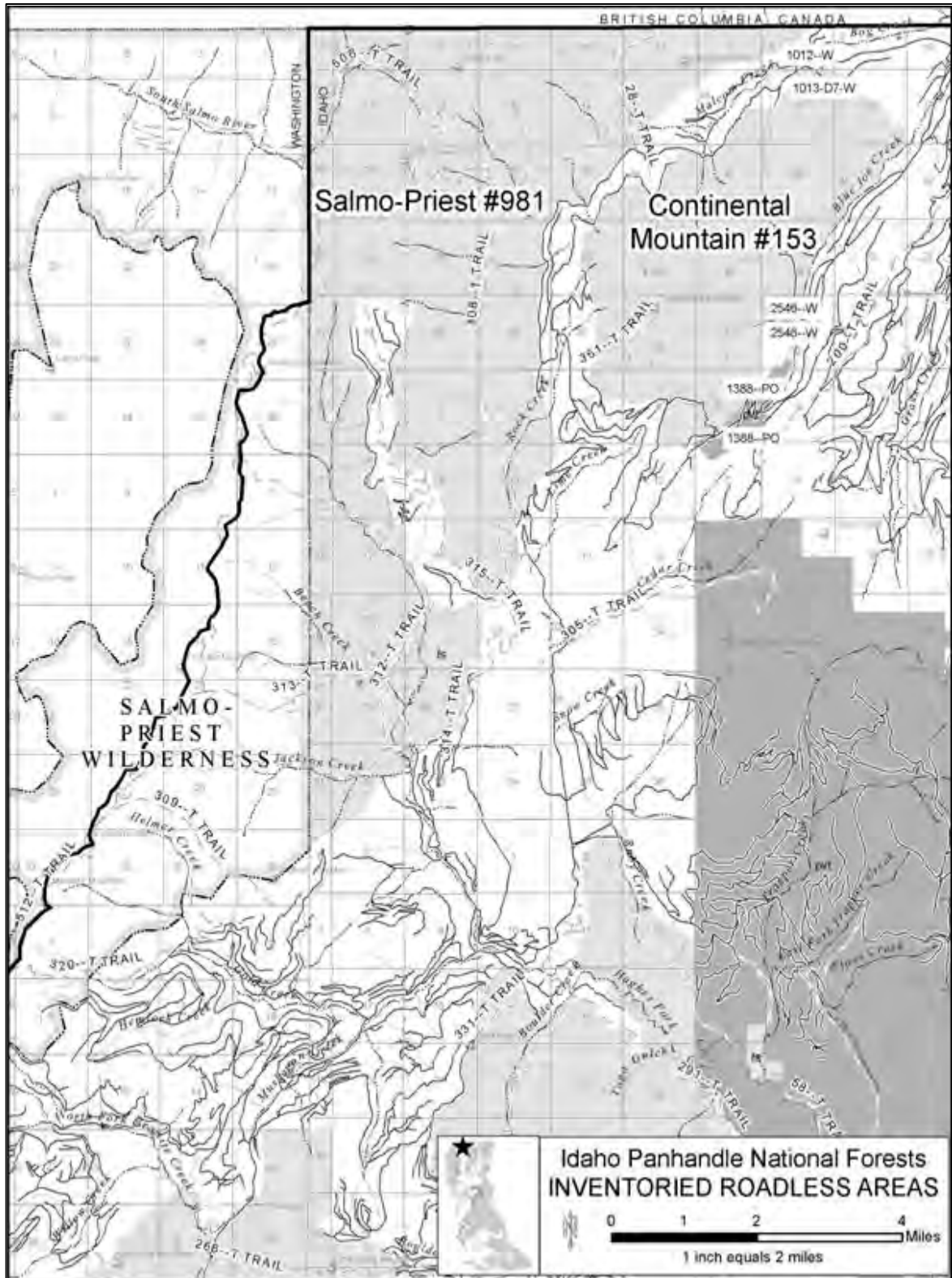


Figure 14. Salmo-Priest #981 and Continental Mountain #153 IRAs

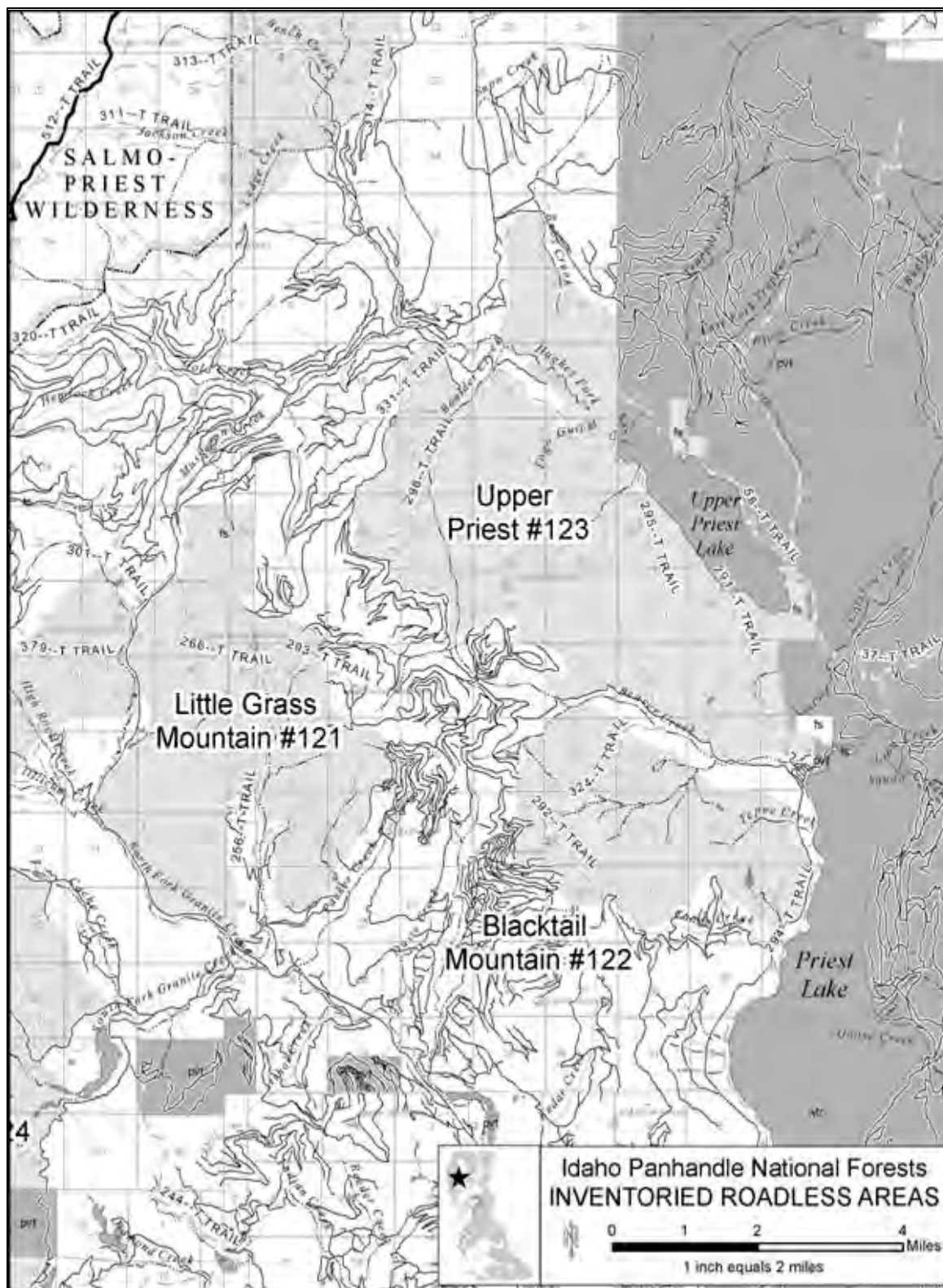


Figure 15. Upper Priest #123 and Blacktail Mountain #122 IRAs

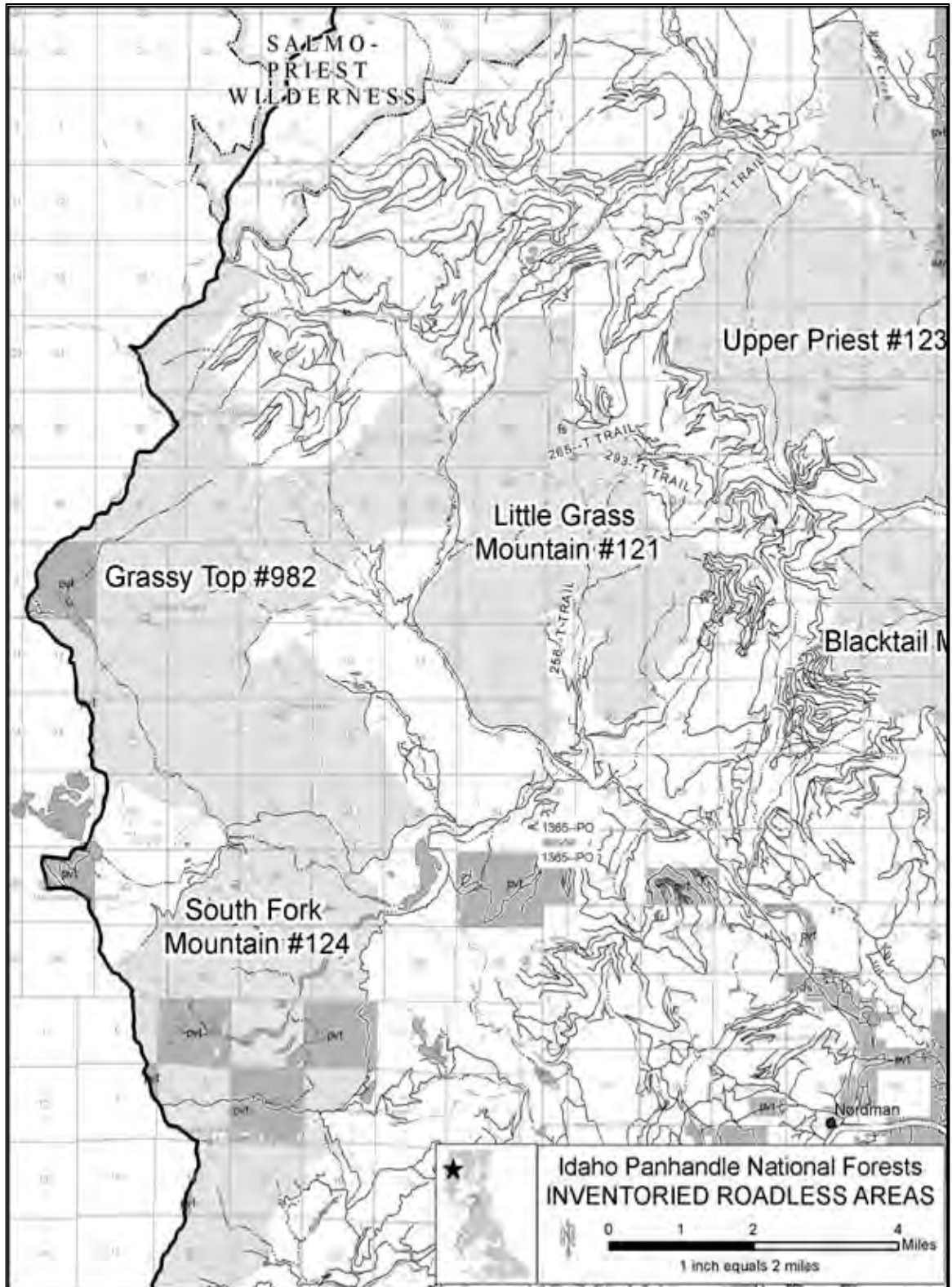


Figure 16. Little Grass Mountain #121 and Grassy Top #982 IRAs

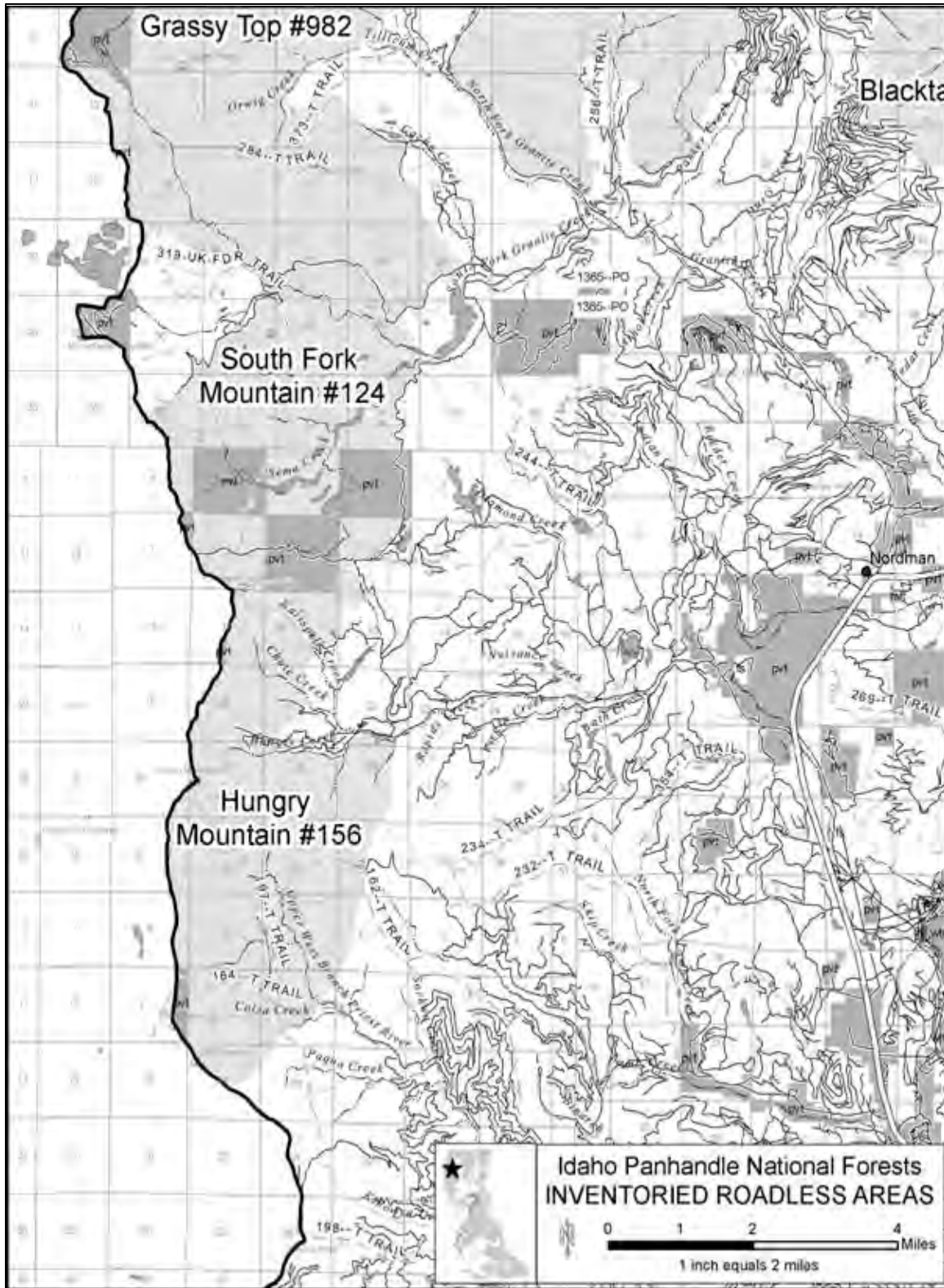


Figure 17. South Fork Mountain #124 and Hungry Mountain #156 IRAs

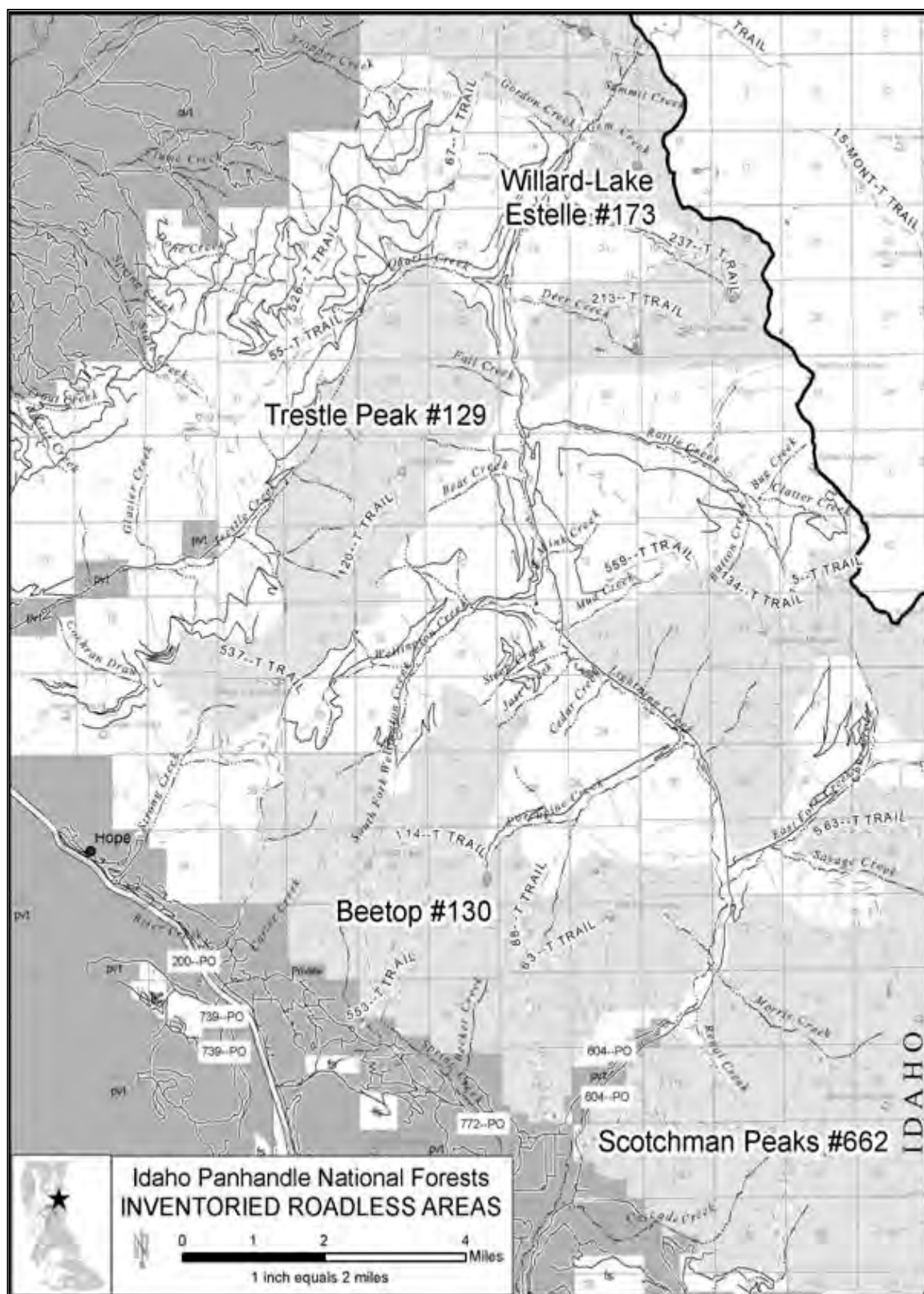


Figure 18. Trestle Peak #129 and Beetop #130 IRAs

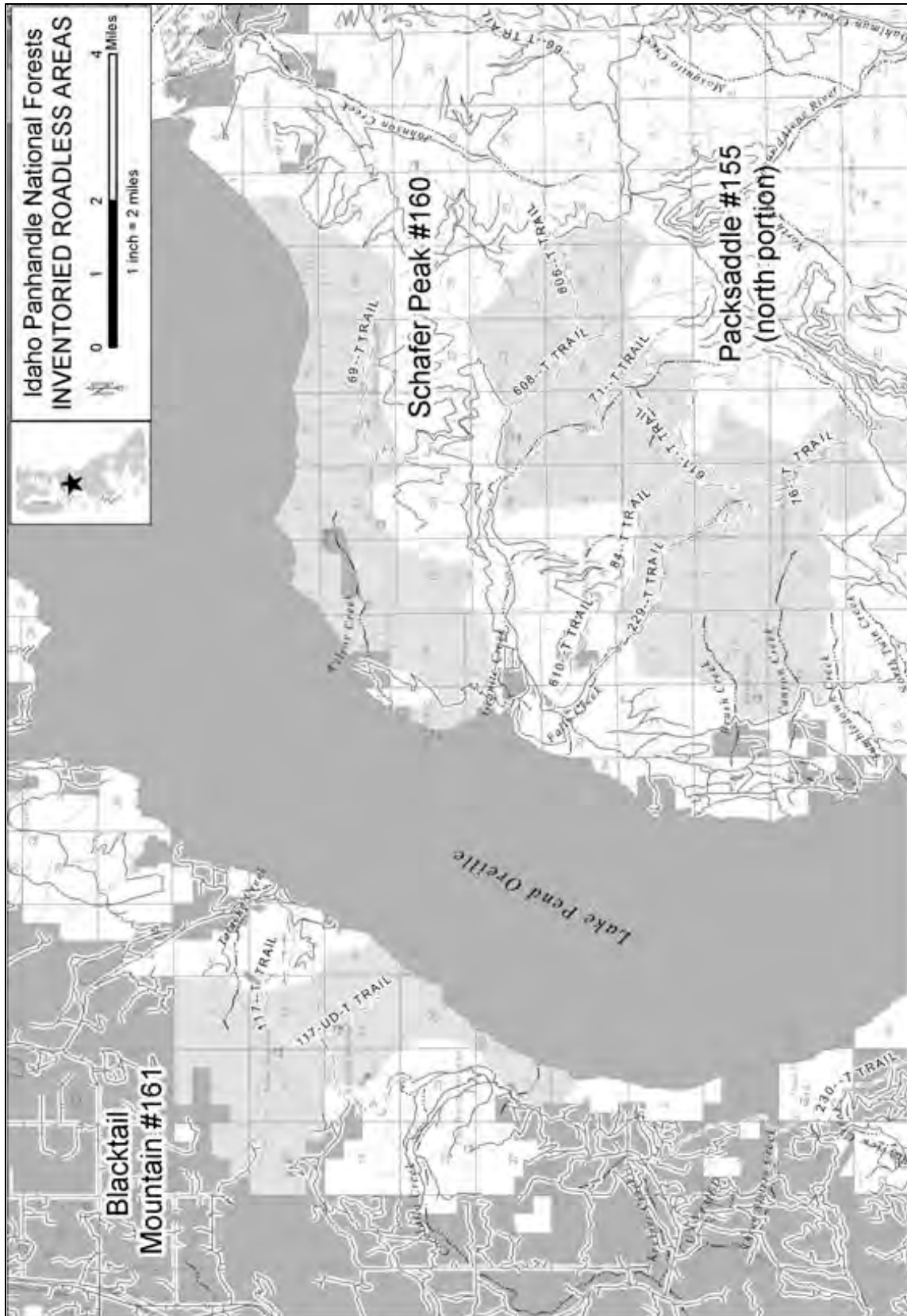
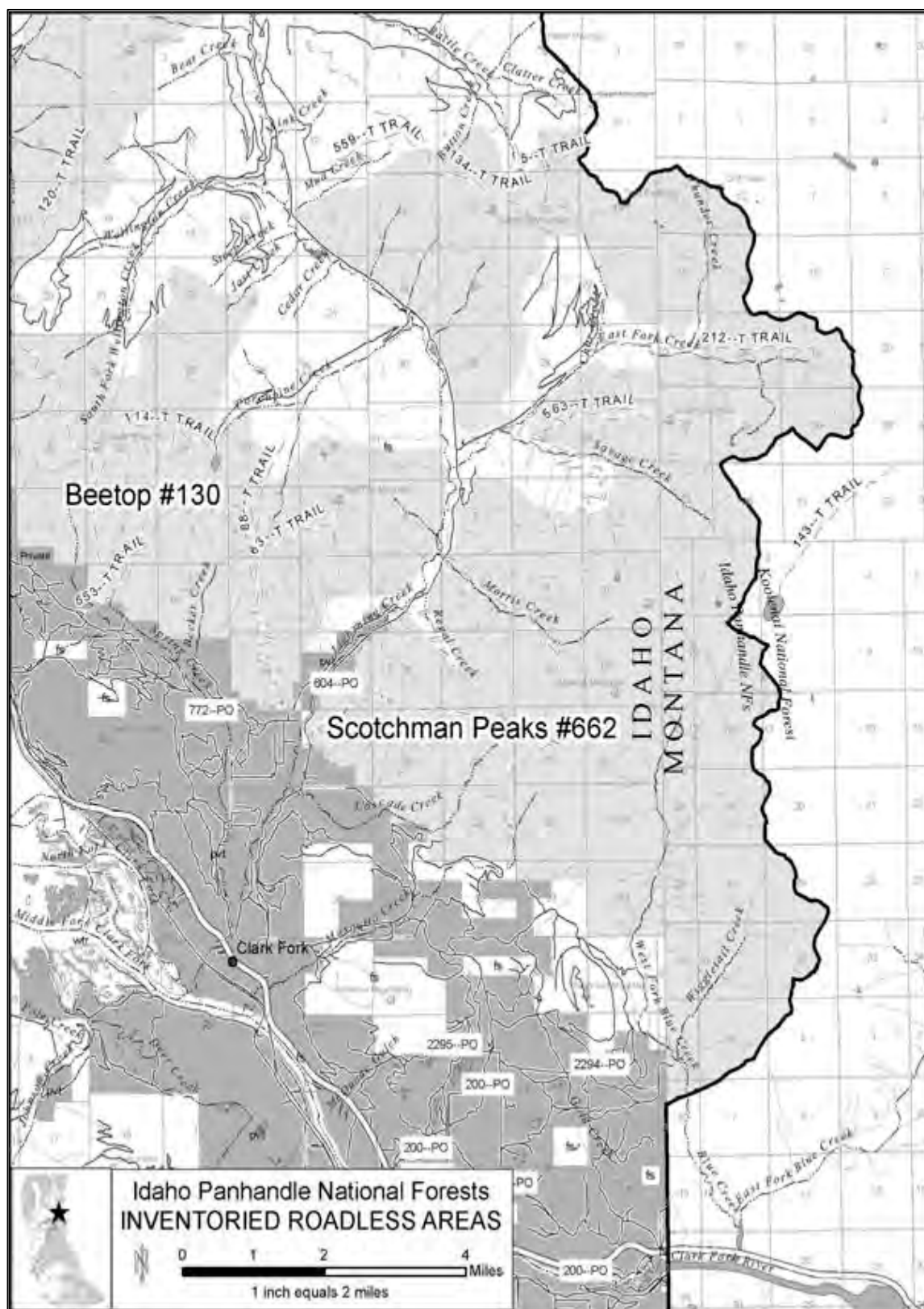


Figure 19. Blacktail Mtn #161, Schafer Peak #160 and Packsaddle #155 (north) IRAs



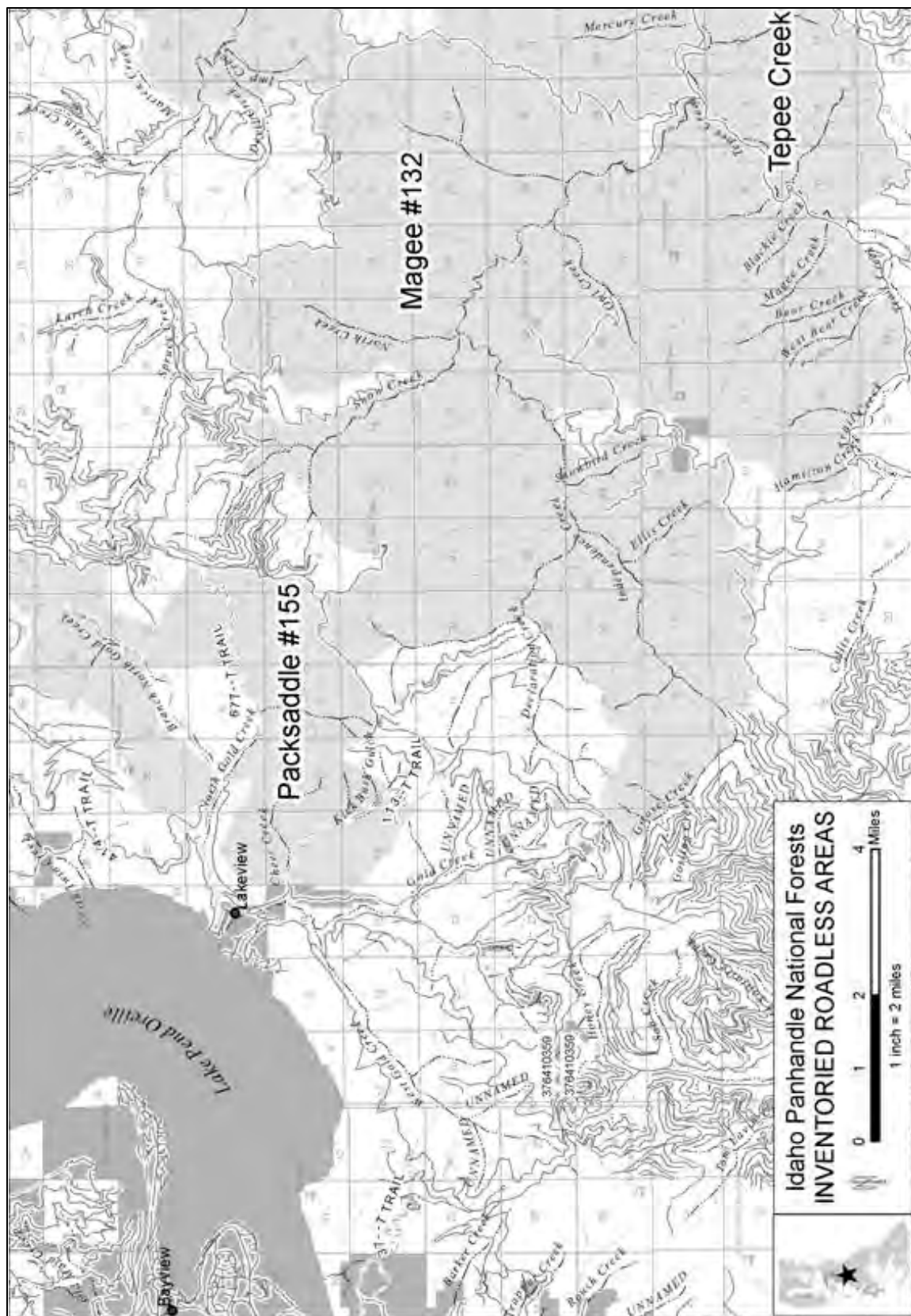


Figure 21. Packsaddle #155 (south portion) and Magee #132 IRAs

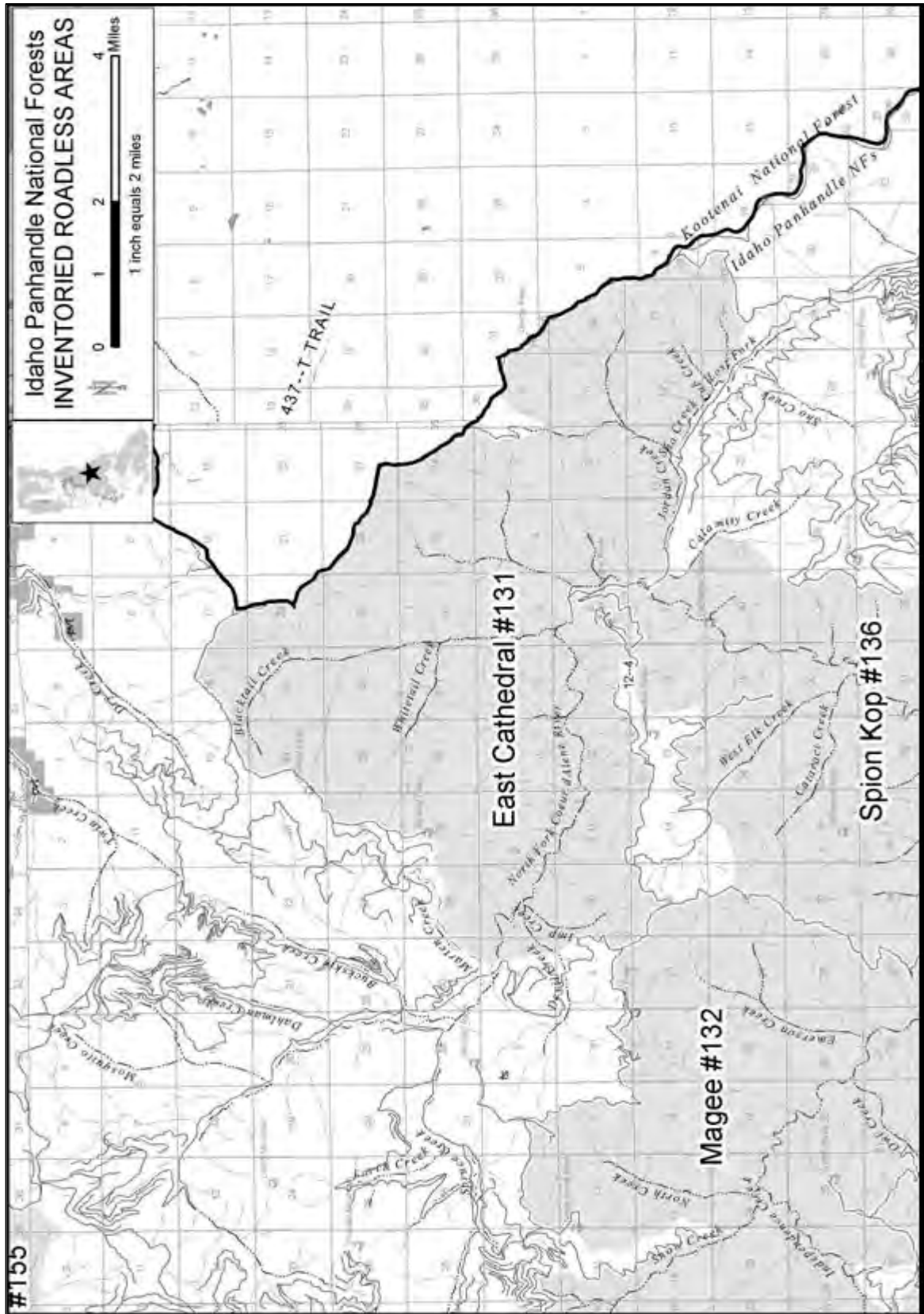


Figure 22. East Cathedral #131 IRA

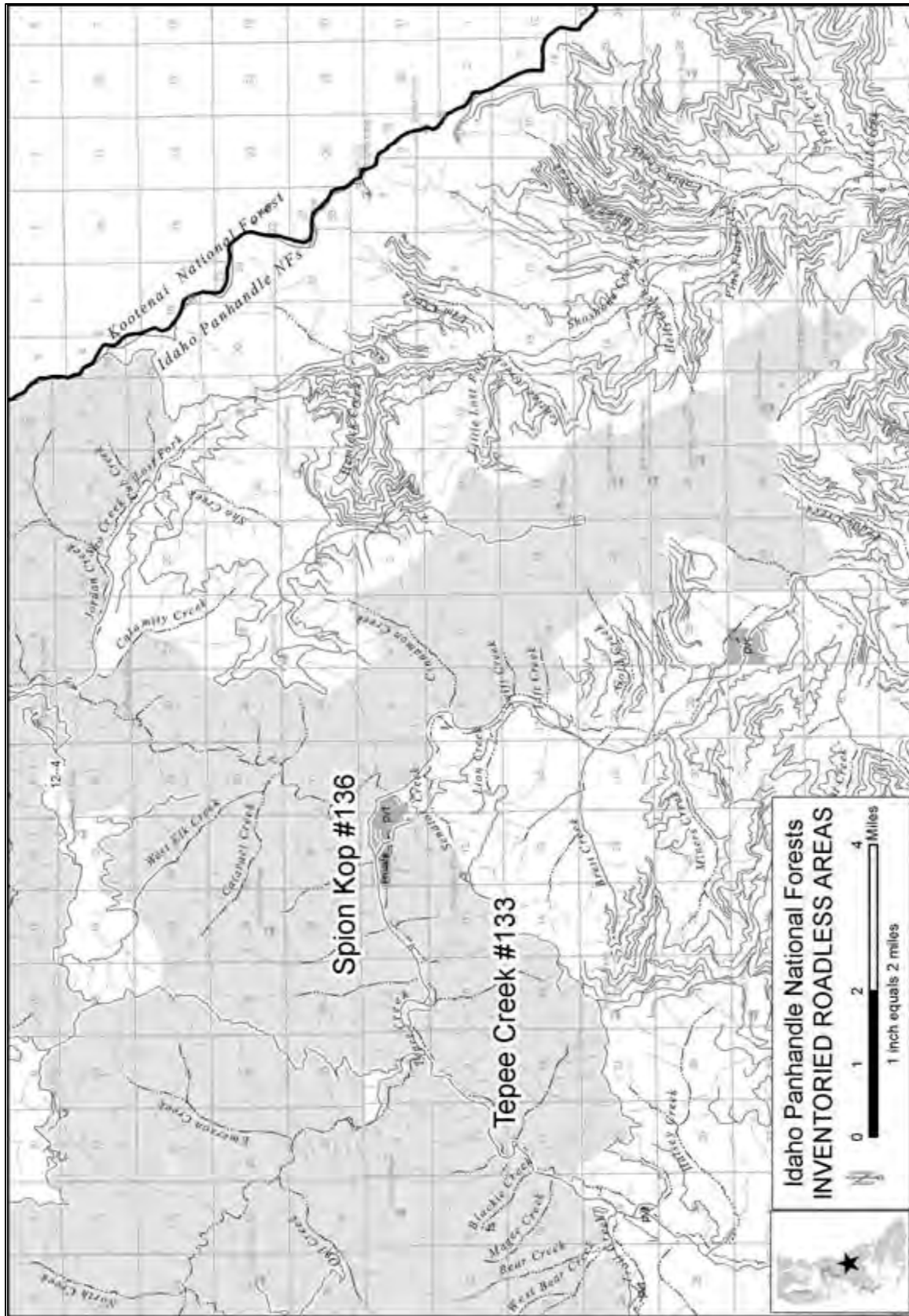


Figure 23. Spion Kop #136 and Tepee Creek #133 IRAs

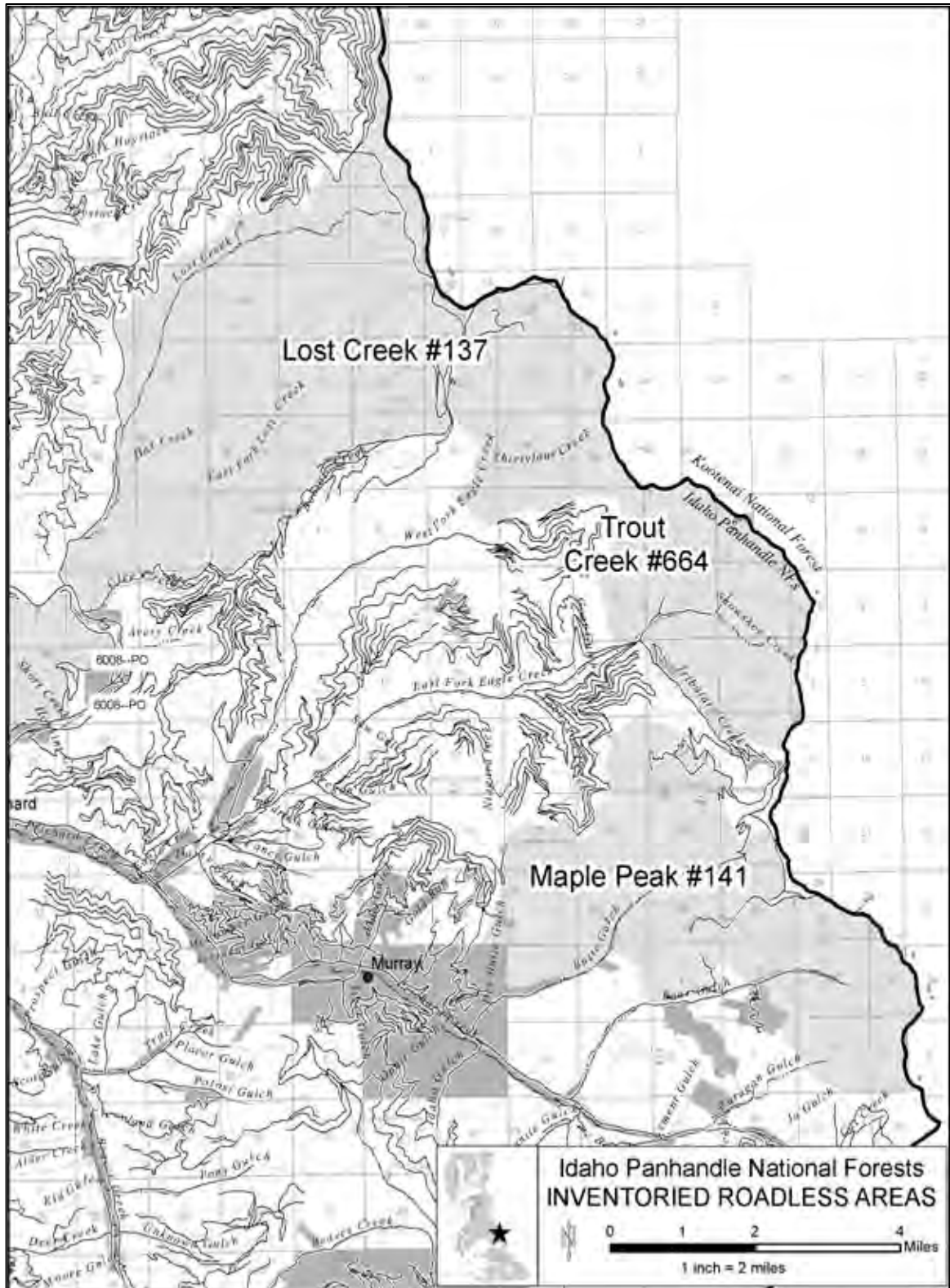


Figure 24. Lost Creek #137, Trout Creek #664 and Maple Peak #141 IRAs

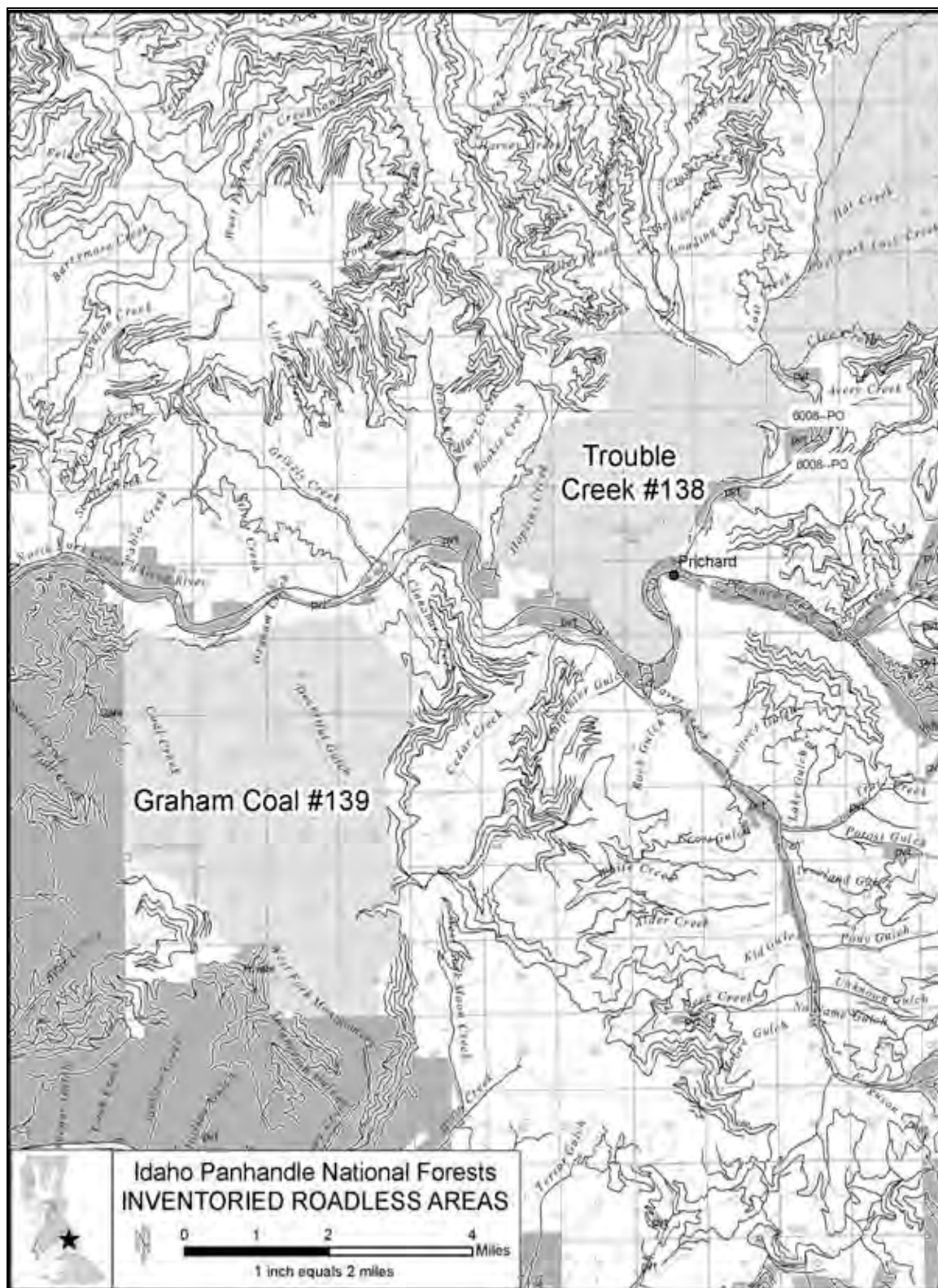


Figure 25. Trouble Creek #138 and Graham Coal #139 IRAs

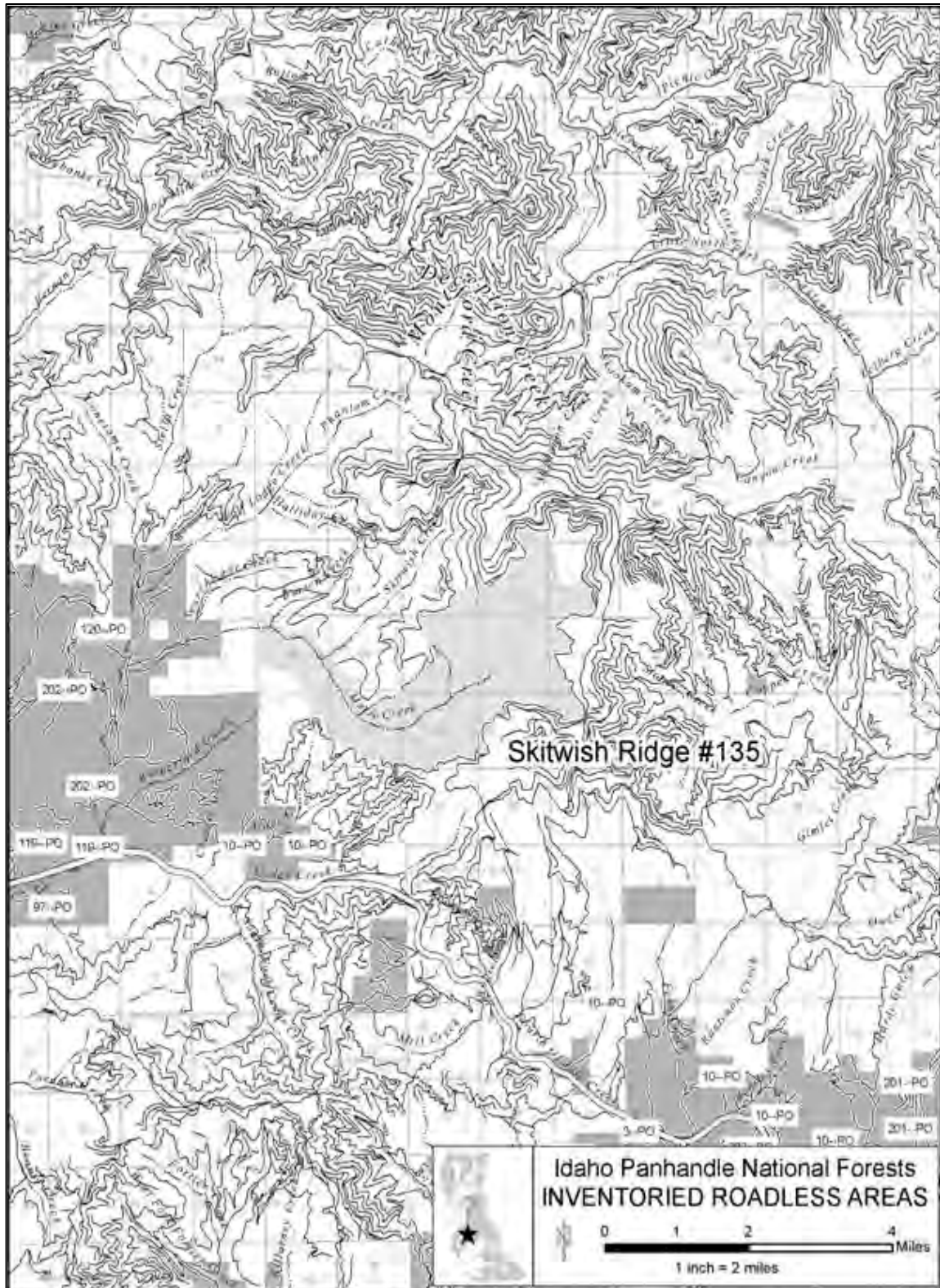


Figure 26. Skitwish Ridge #135 IRA

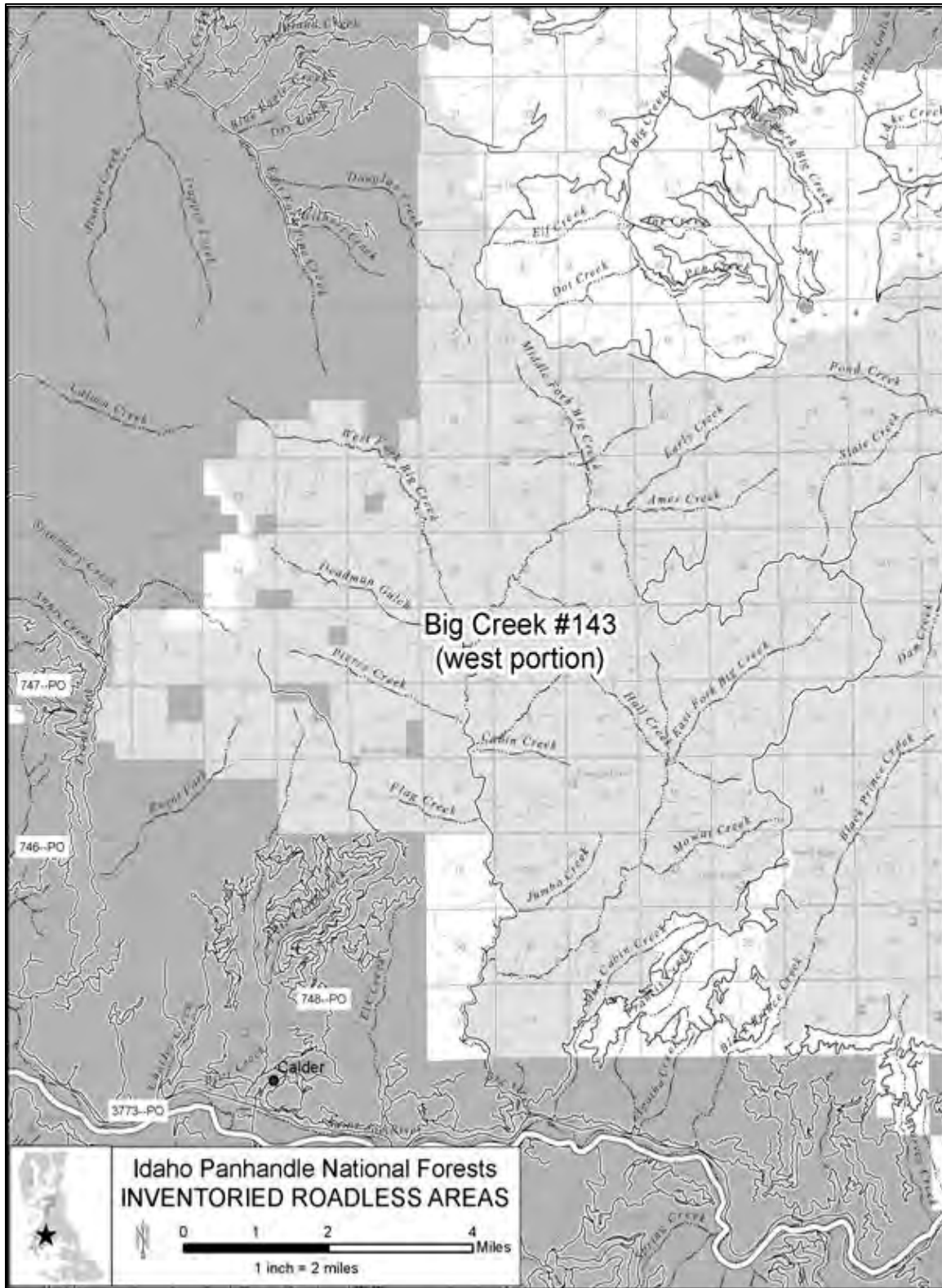


Figure 27. Big Creek #143 (west portion) IRA

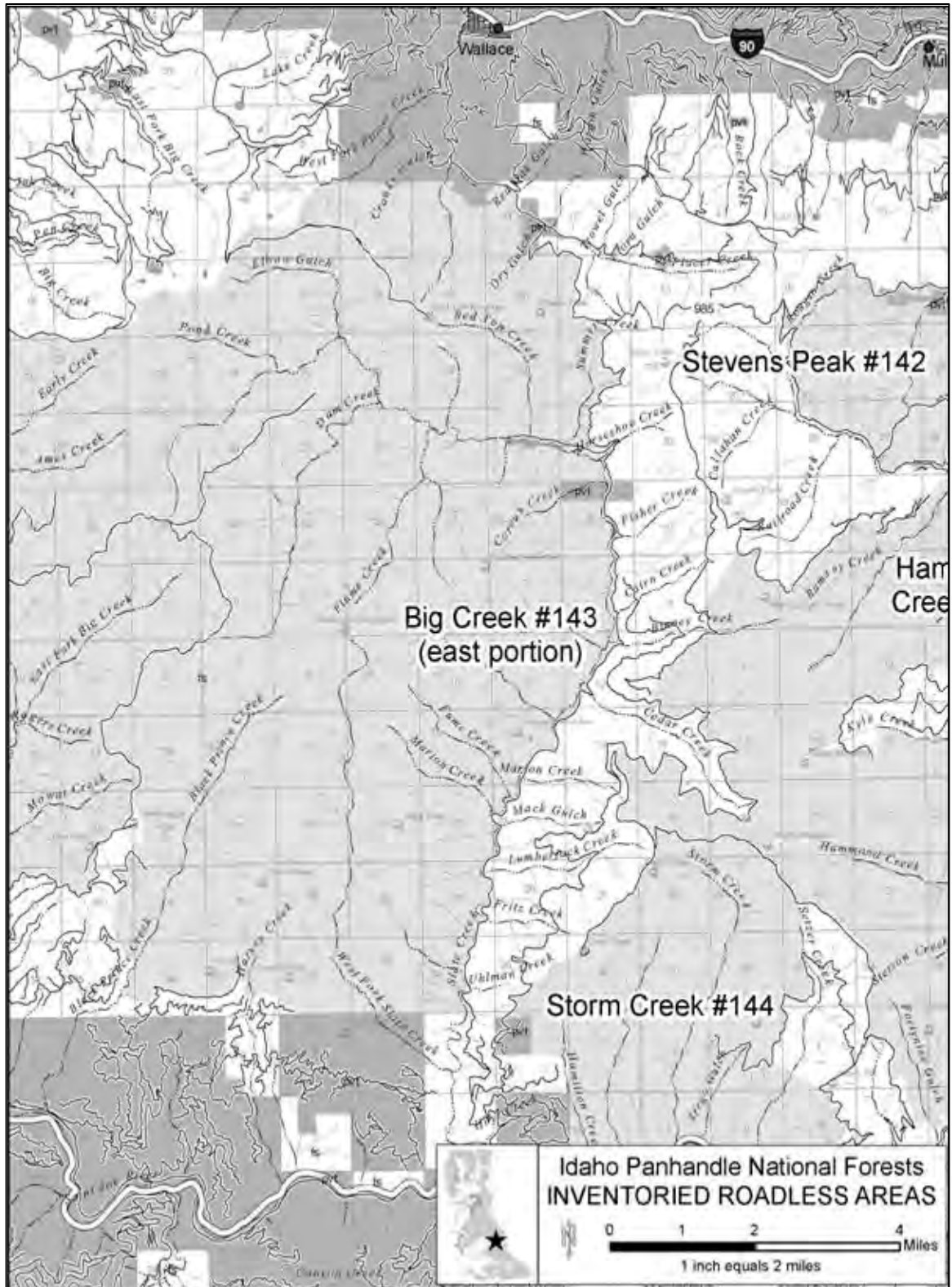


Figure 28. Big Creek #143 (east portion) IRA

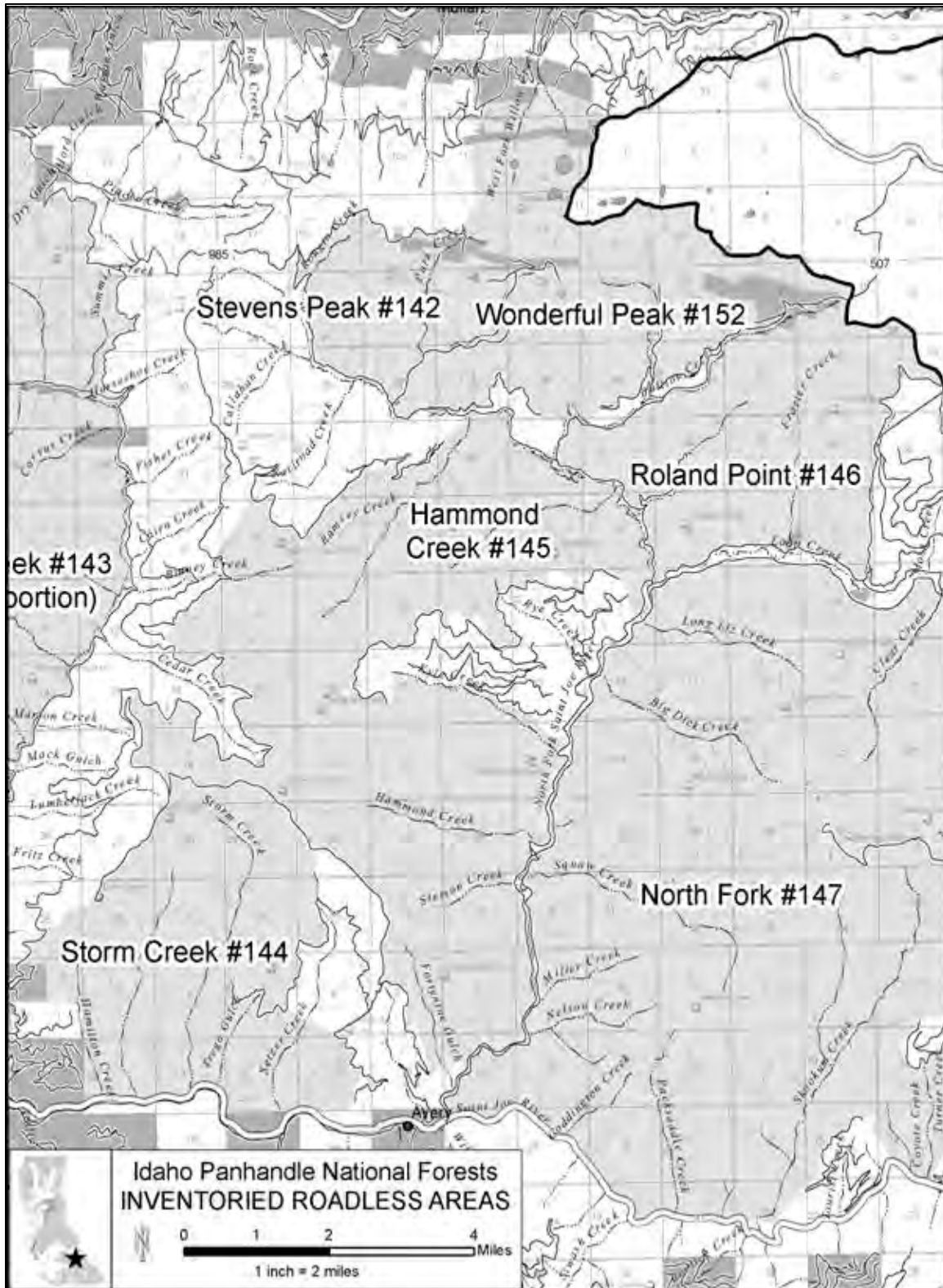


Figure 29. Stevens Peak #142, Wonderful Peak #152, Roland Point #146, Hammond Creek #145 and Storm Creek #144 IRAs

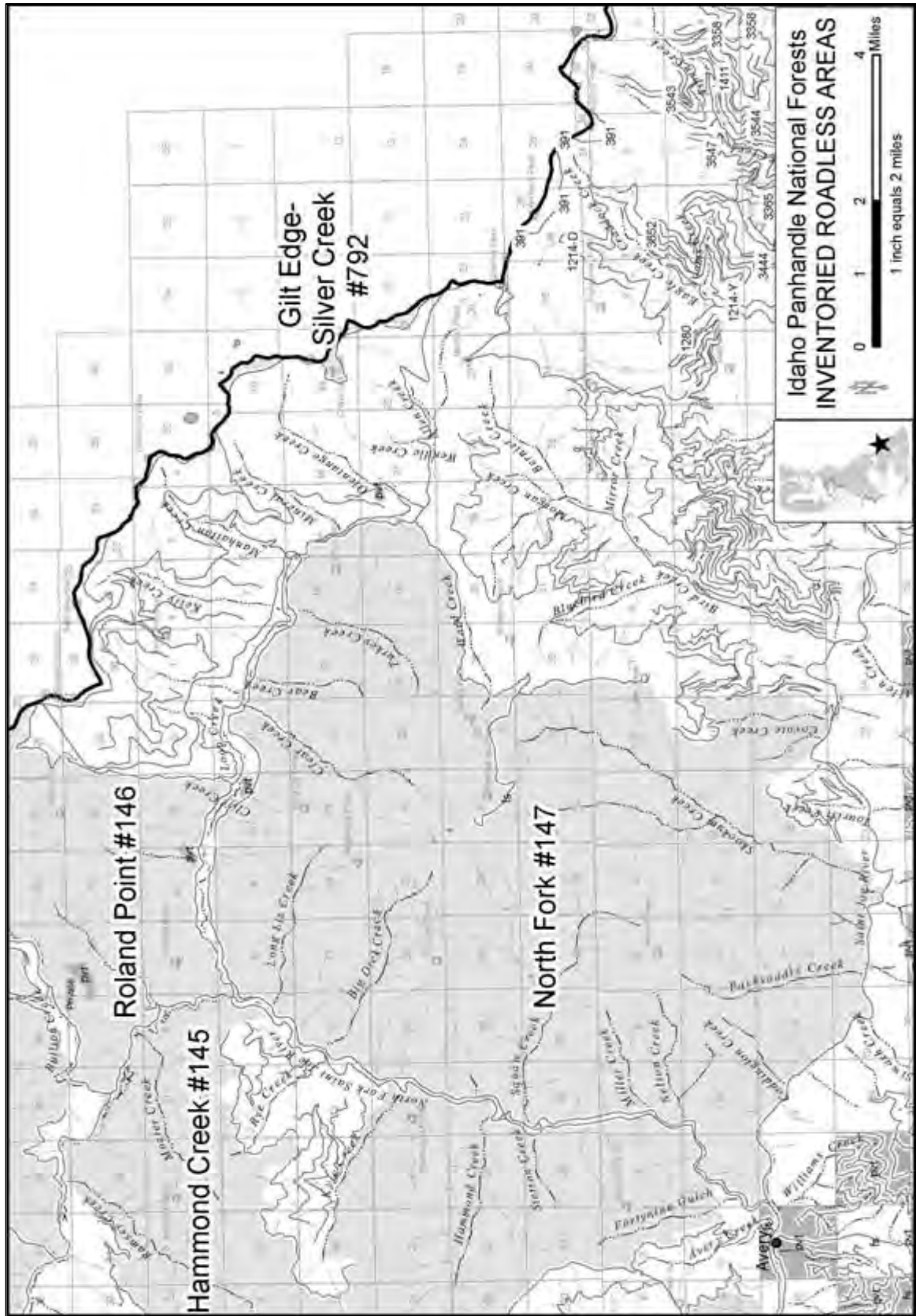


Figure 30. North Fork #147 and Gilt Edge-Silver Creek #792 IRAs

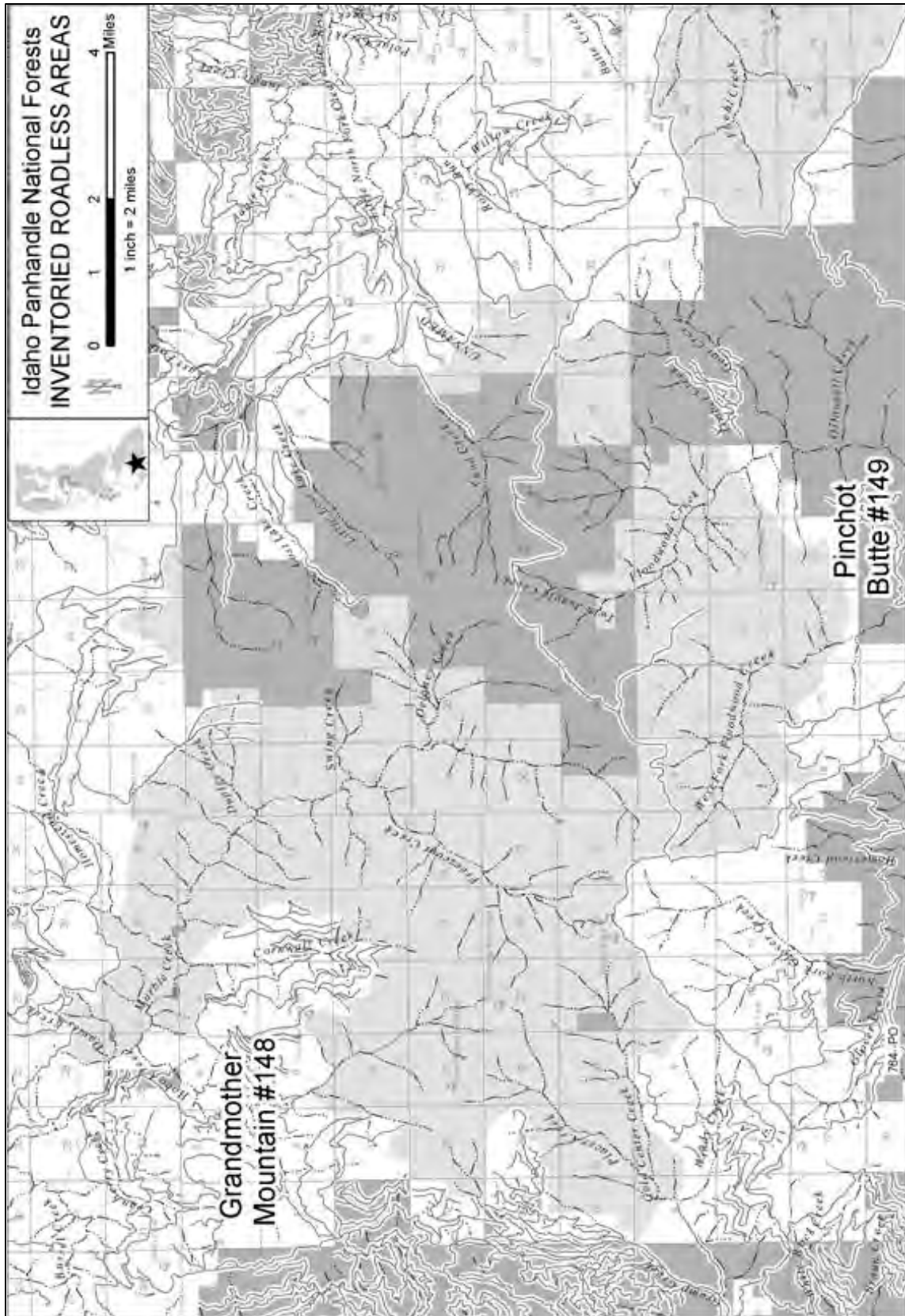


Figure 31. Grandmother Mountain #148 and Pinchot Butte #149 IRAs

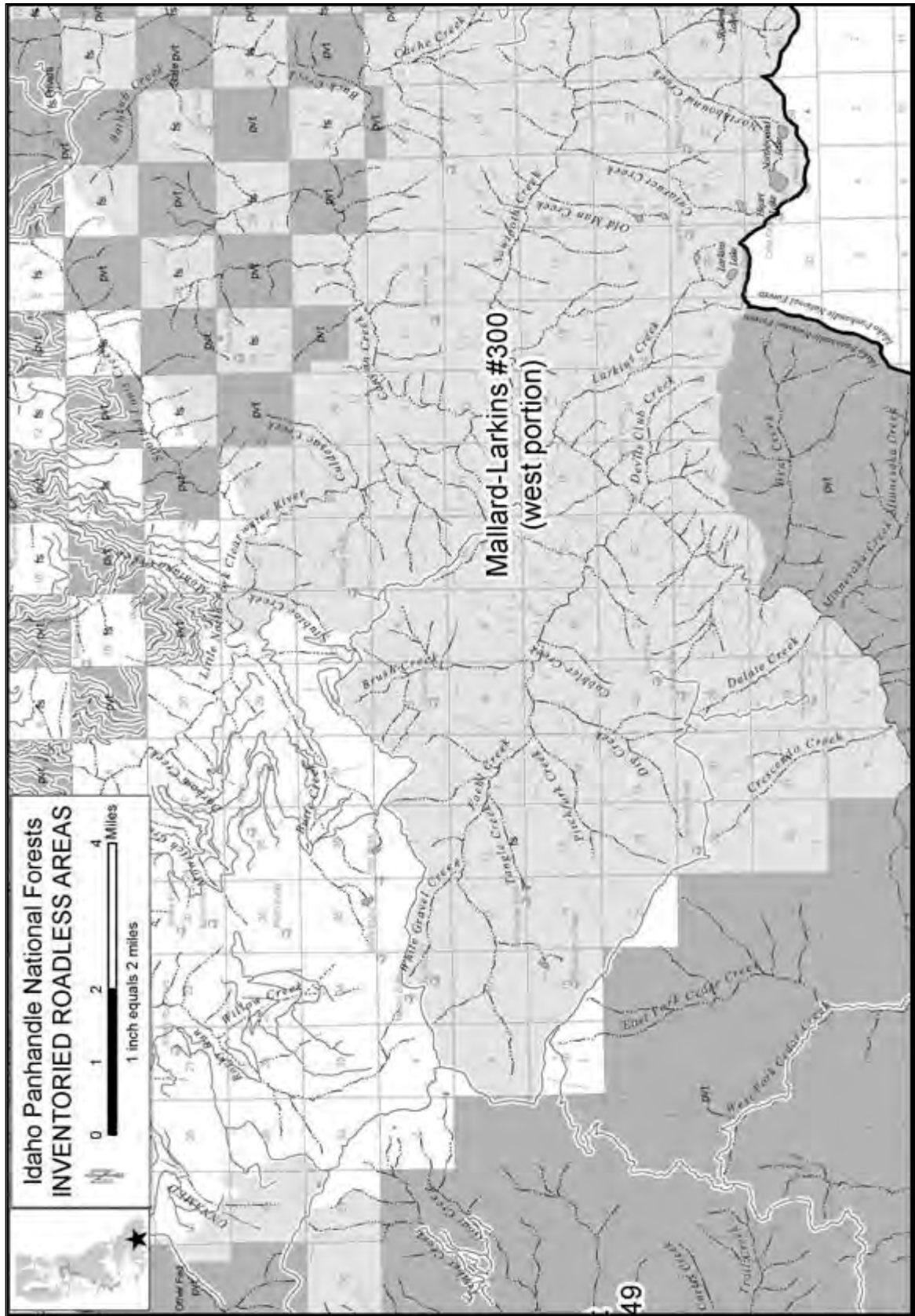


Figure 32. Mallard-Larkins #300 (west portion) IRA

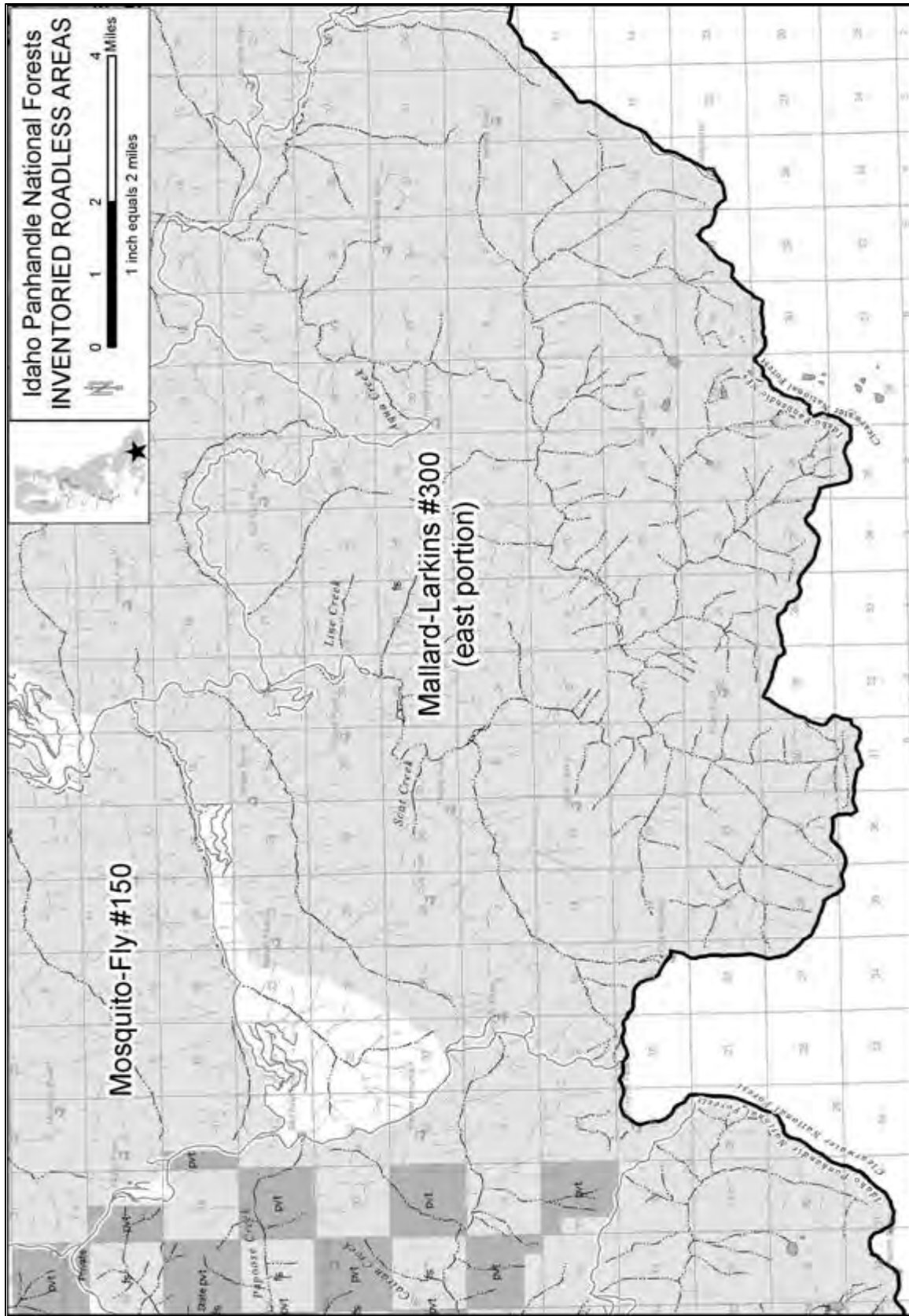


Figure 33. Mallard-Larkins #300 (east portion) IRA

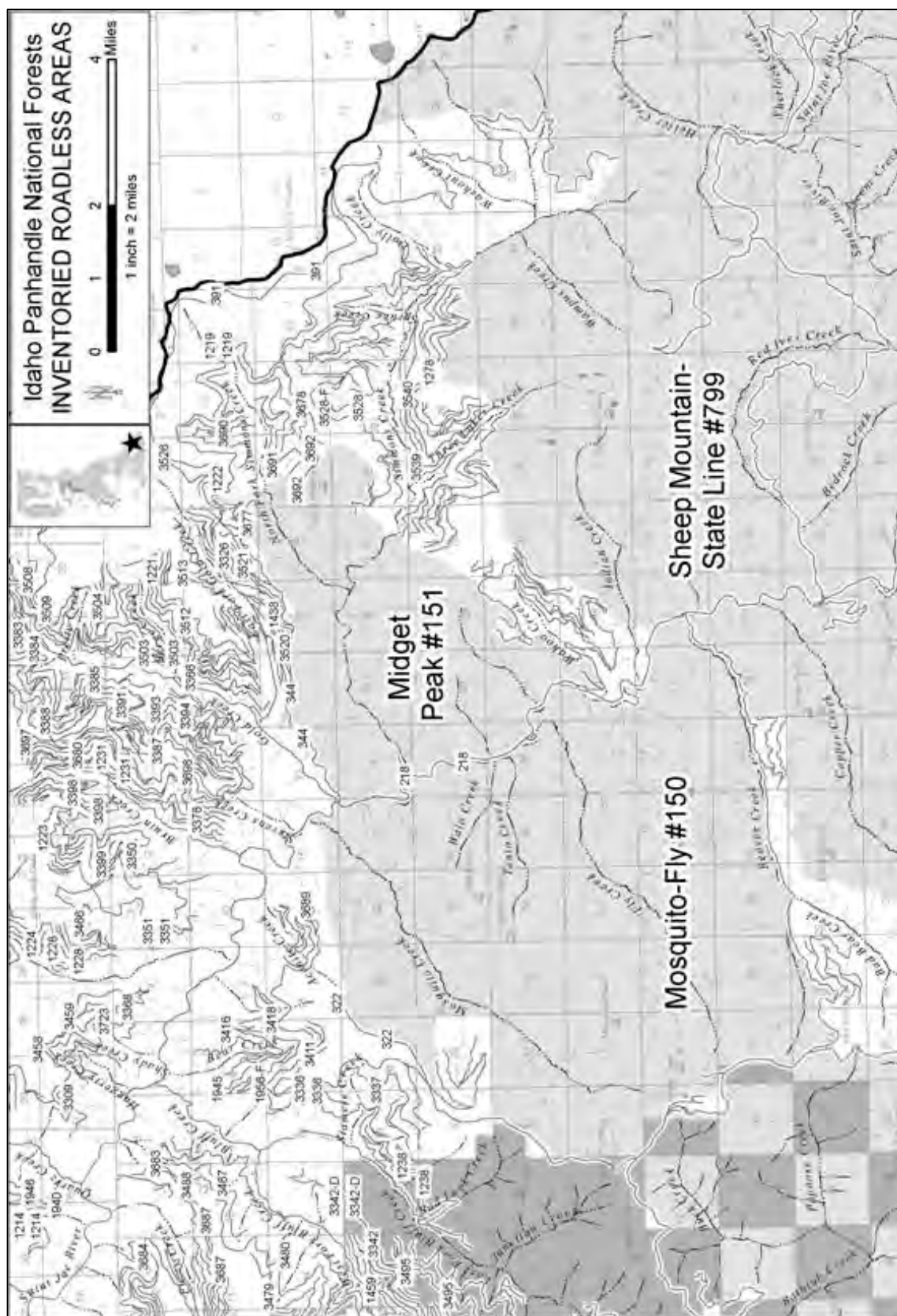


Figure 34. Midget Peak #151 and Mosquito-Fly #150 IRAs

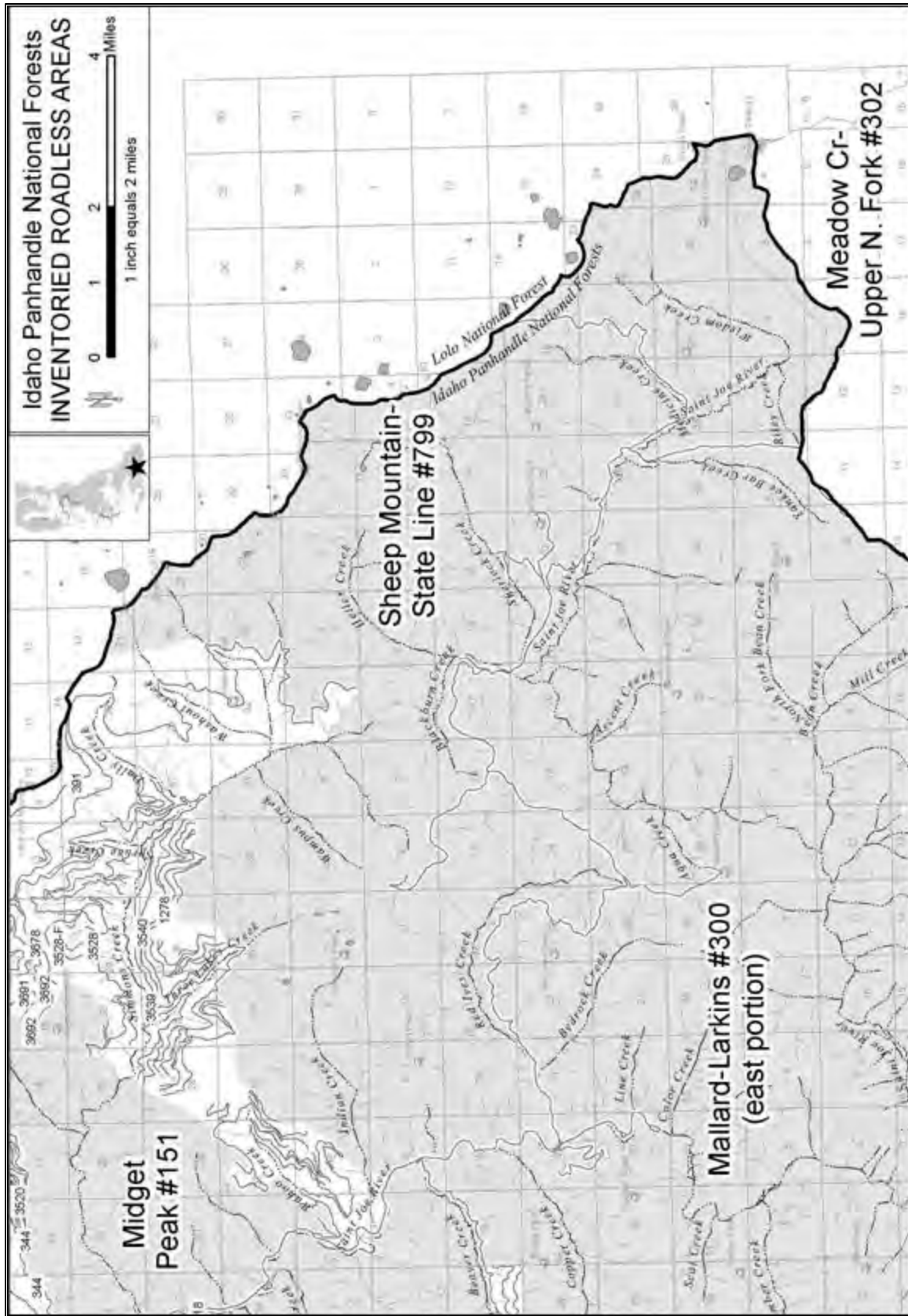


Figure 35. Sheep Mtn-State Line #799 and Meadow Creek-Upper North Fork #302 IRAs

Evaluation

The following pages describe the process followed in evaluating IRAs for capability, availability, and need, and the results of these analyses. The process for the final determination of wilderness recommendations is included.

When revising forest plans, national forests are required to evaluate roadless areas, consider their wilderness characteristics, and to make recommendations to Congress regarding areas suitable for inclusion into the National Wilderness Preservation System. The Forest Service can only recommend potential wilderness allocations to Congress via forest plans, and only Congress can designate wilderness through the legislative process.

Criteria for determining whether an area of NFS land qualifies as an IRA are provided in Forest Service handbook 1909.12, Chapter 70, which states: “Areas qualify for placement on the potential wilderness inventory if they meet the statutory definition of wilderness. Include areas that meet either criteria 1 and 3, or criteria 2 and 3 below.”

1. Areas contain 5,000 acres or more;
2. Areas contain less than 5,000 acres, but can meet one or more of the following criteria:
 - Areas can be preserved due to physical terrain and natural conditions;
 - Areas are self-contained ecosystems, such as an island, that can be effectively managed as a separate unit of the National Wilderness Preservation System; and
 - Areas are contiguous to existing wilderness, primitive areas, administration-endorsed wilderness, or potential wilderness in other federal ownership, regardless of their size.
3. Areas do not contain forest roads (36 CFR 212.1) or other permanently authorized roads, except as permitted in areas east of the 100th meridian (sec. 71.12).

The IPNF coverage submitted for the Roadless Area Conservation Rule, because of the short response time, did not show where all NEPA projects since 1987 had reduced IRA acreages. Some portions of that coverage accurately depicted the current situation while other portions did not. The inventory of IPNF roadless areas was updated as mentioned above prior to the evaluation process for potential recommended wilderness. Roadless Areas in Idaho have been designated into management classifications as identified in the 2008 Idaho Roadless Rule (36 CFR 294 Subpart C).

This evaluation of potential wilderness identified and inventoried all areas within NFS lands that satisfy the definition of wilderness found in section 2(c) of the 1964 Wilderness Act (FSH 1909.12, Chapter 70). The areas identified through this evaluation process are called potential wilderness areas. The 2003 updated inventory resulted in 48 IRAs totaling 849,305 acres, a decrease of 4,495 acres from the 1987 Idaho Panhandle National Forests Plan. As part of the Forest Plan revision process, these inventories were again reviewed in 2005. The current inventory of potential wilderness includes 48 areas for a total of 847,974 acres.

Roadless areas on the IPNF in Montana or Washington are identified in a set of inventoried roadless area maps, contained in the Forest Service Roadless Area Conservation, FEIS, Volume 2, dated November, 2000, which are held at the National Headquarters of the Forest Service.

Roadless areas on the IPNF in Idaho have been designated into management classifications as identified in the 2008 Idaho Roadless Rule.

Inventoried roadless areas may contain improvements such as motorized trails, unauthorized and user-created roads, fences, outfitter camps, and evidence of historic logging activities. Roadless areas are valued for many resource benefits including their undeveloped fisheries and wildlife habitat, biodiversity, and various undeveloped recreation settings. The same areas are also valued for their development potential, particularly for wood products.

Roadless Acres Analyzed for Capability, Availability, and Need

The next step is an evaluation of potential wilderness areas as potential additions to the National Wilderness Preservation system is to determine the mix of land and resources uses that best meet public needs. An area recommended as suitable for wilderness must meet the test of capability, availability, and need. In addition to the inherent wilderness quality it possesses, an area must provide opportunities and experiences that are dependent upon and enhanced by a wilderness environment, and the ability of the area to be managed as wilderness.

The IPNF evaluation process (capability, availability, and need) and the suitability evaluation of the roadless areas for potential wilderness are outlined; these evaluations indicate the inherent wilderness quality of each roadless area.

The IRAs were evaluated for suitability for potential wilderness with the test of capability, availability, and need as follows:

- **Capability** – The capability of a potential wilderness is the degree to which that area contains the basic characteristics that make it suitable for wilderness recommendation without regard to its availability for or need as wilderness. This includes environmental as well as manageability considerations.
- **Availability** – The determination of availability is conditioned by the value of and need for the wilderness resource compared to the value of and need for other resources. Other resource demands and uses were evaluated. Constraints and encumbrances were also reviewed to determine the degree of Forest Service control over the surface and subsurface area.
- **Need** – This is an analysis of the degree to which the potential wilderness area would contribute to the overall national Wilderness Preservation System. This evaluation was conducted at the regional level.

In 2003 a Wilderness Needs Assessment was completed for the USDA Forest Service Northern Region. Need is described as an analysis of the degree to which an area contributes to the local and national distribution of wilderness (FSH 1909.12, Chapter 70). Social and ecological factors are considered in the Northern Region assessment.

Methodology Used for Evaluating Capability, Availability, and Need

Undeveloped areas on the IPNF were evaluated for wilderness recommendation. The three tests of capability, availability, and need are used as set forth in (FSH) 1909.12, Chapter 72. In addition to the inherent wilderness quality an undeveloped area might possess, the area should provide opportunities and experiences one would expect to find in a wilderness environment.

Capability

The five basic characteristics identified in FSH 1909.12, Chapter 70 to evaluate the capability of an area are: natural, undeveloped, outstanding opportunities for solitude or primitive and unconfined recreation, special features and values, and manageability.

The environment provides the person the opportunity to feel or experience solitude and serenity, a spirit of adventure and awareness, and a sense of self-reliance. The area should appear natural and free from disturbance and where the normal activities and life cycles of biotic species take place. A range of geological, biological, and ecological variability exists and is identified. Any scientific, educational, or historical values are identified and considered. Social and economic factors must blend with the environment and natural features to make the area desirable and manageable as wilderness.

Outdoor recreation opportunities that are primitive and unconfined include hiking, backpacking, stock riding, hunting, fishing, skiing, snowshoeing, and rafting. These may or may not currently exist within an individual area. Other outdoor recreational activities may currently exist but are not compatible with a wilderness setting or other wilderness characteristics.

Special features recognize scientific, educational, historical, and scenic values found in the area. The abundance and variety of wildlife and fish, including threaten and endangered species, will be considered. Other special features that are unique or are outstanding will be identified.

Manageability considers the ability to manage the area as wilderness as required by the 1964 Wilderness Act. Such factors as size, shape, and juxtaposition to external situations are considered. Boundary location and the ability to easily identify the boundary on the ground are critical in meeting this characteristic.

The combinations of basic natural characteristics are of infinite variety. No two areas possess any of these characteristics in the same measure. The process, then, is to analyze the quality and quantity of these characteristics and determine if they can be provided by establishing management, protective, mitigation, or enhancement measures.

In order to evaluate the five basic characteristics, they were broken down into elements, activities, or features that describe the basic characteristics and provide a basis for rating. At least two criteria will be established for each element, activity, or feature with three criteria considered optimal. While there is no limit on the number of criteria that can be established, the number of criteria must be kept to a number that can reasonably provide for evaluation of the characteristics. Since criteria will probably not be of equal importance, criterion was listed in order of priority for each element, activity, or feature. Criteria were established to consider existing as well as future conditions both inside and adjacent to the area.

Forest and district resource specialists and managers rated the criterion as high, medium, or low depending on how well the criterion is or can be met in the area. For areas that crossed forest boundaries, the criteria were evaluated only for the portion that lies within the IPNF boundaries. Final evaluation of these areas will not be completed until coordination with the adjoining forest can be made.

Three specialists from the forests will then evaluate the elements, activities, or features based on the criteria rating given in the first evaluation. The area was given a summary rating of high, moderate, or low in capability. Methodology used three Forest Service specialists familiar with

the area along with three that generally do not know the area and was limited to the criteria ratings and comments provided by the districts during the first evaluation.

Availability

Availability of an area for wilderness management must be evaluated against other resource needs, demands, and uses of the area. To be available for wilderness, the wilderness value, both tangible and intangible, should offset the value of the other resources. The predominant value does not necessarily reflect the use or combination of uses that would yield the greatest dollar return or the greatest unit output. In evaluating other resources, current uses, trends, and potential future uses and outputs need to be considered.

Constraints and encumbrances on lands may also govern the availability of lands for wilderness. Forest Service control over the surface and subsurface of the area is a consideration regarding availability. The Forest Service should have sufficient control to prevent development of irresolvable, incompatible uses that would negatively affect wilderness character and potential.

Other resources evaluated are determined from resource specialists' knowledge of the areas and public comments. Once the resources were identified, criteria were established for evaluation. Forest and district resource specialists' rated the criteria as high, medium, or low. Two to six forest program managers then evaluated each area's availability for wilderness designation.

Need

Evaluation of need determines the degree to which an area can contribute to the overall National Wilderness Preservation System. There should be evidence of current or future public need for additional designated wilderness in the general vicinity of the area being considered. Need analysis uses such factors as the geographic distribution of areas, representations of landforms and ecosystems, and the presence of wildlife expected to be present in a wilderness environment.

To best analyze the need for additional wilderness in the Northern Region, the regional forester decided a needs assessment would be completed at the regional level. Two to six program managers then incorporate the assessment to rate the areas for need and assign a rating of high, moderate, or low to each area.

Evaluation Findings

Potential wilderness is based on the inherent wilderness quality determined in the capability, availability, and needs assessment. In addition to the inherent wilderness quality an area might possess, the area should provide opportunities and experiences one would expect to find in a wilderness environment. Potential wilderness management considers establishing boundaries that are easy to define and locate on the ground. Forest land managers reviewed the evaluation and determined which areas to recommend for wilderness designation.

Potential wilderness boundaries and mapping was completed following the guidelines in FSH 1909.12, Chapter 70 for each area recommended for wilderness designation. Boundaries should be easy to define, locatable on the ground, and be manageable. Determination of a recommended wilderness boundary uses the following guidelines (in descending order of desirability).

- (1) Use natural features locatable on both a map and on the ground, such as a ridge top, mountain peak, or lake shore;

- (2) Use semi-permanent human-made features such as roads and power lines. The boundary may be set back a given distance from these features;
- (3) Use previously surveyed lines or legally determined lines such as section and township lines, property lines, or state boundaries;
- (4) Use a straight line from one locatable, visible point to another, such as between two mountain peaks; and
- (5) Use a series of bearings and distances between locatable points that are not visible.

Evaluation of the 48 areas for potential wilderness and recommendation was based on the methodology established above. Areas that crossed the IPNF boundaries on to the KNF, Clearwater, and Colville National Forests are evaluated for those portions that are within the IPNF boundaries.

Capability Process

Methodology required identifying elements, activities, or features that described the basic characteristics and provided a base for rating. This was completed by the Forest recreation program manager and assisted by a NEPA specialist and the Forest planners. Work began in September 2002 and was completed in early 2006.

The five basic characteristics were broken down into 19 elements, activities, or features. A total of 47 criteria were established and used in rating each of the 48 areas. Generally, the criteria are listed in order of priority for each element, activity, or feature. Criteria were established to consider existing as well as future conditions both inside and adjacent to an area.

Evaluation of the criteria was performed by district recreation managers, Forest Fishery and Wildlife Biologists, and Forest Hydrologists. Each criterion was rated as high, medium, or low. For areas that crossed forest boundaries, the evaluation was conducted on each individual forest.

The Forest wilderness program manager and two district resource managers from the Forest rated the 19 elements, activities, or features as the first step. The area was then rated as high, medium/high, medium, medium/low, or low in capability. The medium/high and medium/low ratings were used only when an area did not clearly fit in one of the ratings established in methodology and was consider in a transition area between two established ratings.

A final capability rating for areas that crossed most other national forest boundaries was completed. This was accomplished by comparing the capability evaluation done by the adjacent forest with the evaluation on the IPNF.

Table 24 shows the 19 elements, activities and features and the 47 criteria used to rate the areas. Figure 5 shows the inventoried roadless areas for the IPNF.

Table 24. Area Capability Assessment Element and Criteria

High	Medium	Low
Environmental Elements		
Opportunity for Solitude		
Feeling of being alone or remote from civilization.	Feeling of being alone is possible but signs of civilization are likely.	Little opportunity of feeling alone.

High	Medium	Low
The possibility of meeting another party is remote.	The possibility of meeting or not meeting another party is about equal.	It would be rare to not meet another party.
Recreation use is light.	Recreation use is moderate.	Recreation use is high.
Natural and Free from Disturbance		
IRA appears free of human disturbance. Any disturbance appears to be natural, such as a small wildfire.	IRA appears mostly free of human disturbance. Natural disturbance evident, but does not dominate the landscape.	IRA shows signs of human disturbance. Natural disturbance dominates the landscape, such as a stand replacing wildfire.
Area visible in surrounding foreground (outside the IRA) may show some human disturbance but does not dominate the view.	Area visible in surrounding foreground has signs of human activity such as a road or farmhouse.	Area visible in surrounding foreground shows obvious human activity such as clearcuts or a town.
Has only a minor improvement, such as a trail.	Have several minor improvements.	Has a major improvement such as a power line, dam, or road.
Noxious weeds not evident.	Noxious weeds evident in isolated spots.	Noxious weeds common or scattered throughout the area.
High water quality. Fully supports beneficial uses.	Good water quality. Partially supports beneficial uses.	Poor water quality. Does not support beneficial uses.
Provides Challenge and Adventure		
Terrain generally rugged.	Terrain typical for general forest area.	Terrain more gentle and rolling.
Requires above average physical ability, knowledge, or skill to safely recreate in the area.	Requires similar physical ability, knowledge, or skill as the general forested area.	Area easily accessible; requires average physical ability, limited knowledge and skill as compared to the abilities required in the general forest area.
Non-hunting outfitting permitted within area.	Non-hunting outfitting permitted but rarely used.	Non-hunting outfitting not permitted within area.
Manageable		
Size and shape of area allows for effective management.	Size or shape will affect manageability but can be mitigated by boundary changes.	Size is small or has irregular shape that makes management difficult.
Minimum activity in surrounding area that affects manageability.	Activity is evident and ongoing in surrounding area but will not keep the area from being managed.	Activity in surrounding area will affect the manageability of the IRA.
Located adjacent to existing Wilderness or other IRAs.	Located near existing Wilderness or other IRAs. May be difficult to access.	Isolated, small parcel of land.
Special Features		
Scientific, Educational, or Historical Values		
Several significant scientific, educational, or historical values have been identified in the IRA.	At least one significant or several minor scientific, educational, or historical values have been identified in the IRA.	No scientific, educational, or historical value has been identified in the IRA.
Identified values are unique to the northern Rockies.	Identified values are common in northwestern US but is uncommon on IPNF.	Any identified values are common throughout the IPNF and northwest US.

High	Medium	Low
Scenic Features		
Area has peaks or rocky formations considered spectacular from the rest of the Forest and/or special vegetative features that are considered very scenic.	Area has a peak or formation that stands out from surrounding terrain and/or vegetative features considered scenic.	Terrain is typical of the Forest or surrounding area and the vegetation is common to the surrounding area.
Area has alpine lakes, creeks in alpine meadows, or waterfalls.	Area may have bodies of water but are typical for the Forest.	Area has no permanent lakes but may have perennial creeks or ponds.
Variety and Abundance of Wildlife		
There is a diverse community of native mammals, birds, and fish.	There is a moderate variety of native mammals, birds, and fish.	The community of native mammals, birds, and fish is not diverse.
There is a known high variety of Threatened Endangered Species within the IRA.	There is a known moderate variety of Threatened Endangered Species within the IRA.	There is a known low variety of Threatened Endangered Species within the IRA.
Overall wildlife habitat integrity rating of high.	Overall wildlife habitat integrity rating of moderate.	Overall wildlife habitat integrity rating of low.
Provides critical linkage between wildlife areas or habitats.	Provides linkage between wildlife areas or habitats.	Does not provide linkage between wildlife areas or habitats.
Other Special Features		
Area has at least one major other special feature, such as a grove of western red cedars, high mountain meadow, bog, etc.	Area has several minor other special features, such as old growth stand, flat creek bottom, or small waterfalls.	Area has no major or very few minor other special features.
Contains a designated special area such as a Wild & Scenic River or SIA, etc.	Contains a candidate or eligible special area such as a Wild & Scenic River or SIA, etc.	Does not contain an established, candidate, or eligible special area such as a Wild & Scenic River or SIA, etc.
Primitive And Unconfined Recreation		
Hiking Opportunities		
Two or more trails, class 3 or higher, that are routinely maintained.	At least one trail, class 2 or higher, which is routinely maintained.	No system trails that are maintained.
Terrain is gentle and vegetation open to allow easy cross-country travel.	Terrain is moderate or vegetation brushy that impedes cross-country travel.	Terrain is steep or vegetation too dense (including down material) that cross-country travel is difficult.
Backpacking Opportunities		
Two or more trails, class 3 or higher, that are routinely maintained.	At least one trail, class 2 or higher, which is routinely maintained.	No system trails that are maintained.
Area has several dispersed camping sites that are routinely used.	Area has at least one dispersed camping site that is occasionally used.	Area does not have dispersed camping sites that are used, but progressive camping may occur.

High	Medium	Low
Saddle Stock Opportunities		
At least one trail, class 3 or higher, designed for saddle stock and routinely maintained.	At least one trail, class 2 or higher, which is suitable for saddle stock and routinely maintained.	No system trails that are maintained.
Trailhead has stock facilities, such as unloading ramp.	Trailhead has room to turn around stock truck or stock trailer.	Trailhead does not support use of stock.
Hunting Opportunities		
Good populations of the big game animals or fair population of permitted animals, such as sheep or goats.	Have fair populations of game animals.	Has scattered small herds of big game animals.
Terrain is gentle and vegetation open to allow easy hunting access off trails and ridges.	Terrain is moderately steep or vegetation brushy that limits hunting on much of the area.	Terrain is steep or vegetation too dense that hunting is limited to trails or ridges.
Fishing Opportunities		
Good populations of native game fish.	Have fair populations of native game fish.	Have low populations of native game fish.
Stream bottoms are generally gentle with minor brush allowing access to water.	Stream channel has enough brush to limit access; channel bottom or side slopes not overly steep.	Stream channel steep, or steep rocky side slopes, or brush along channel makes access difficult.
Skiing and Snowshoeing Opportunities		
Terrain is gentle and vegetation open to allow easy cross-country travel.	Terrain is moderate or vegetation brushy that impedes cross-country travel.	Terrain is steep or vegetation too dense that cross-country travel is difficult.
Area is easily accessible in winter by motorized wheel vehicles.	Snow keeps wheeled vehicles several miles from area but access is possible by snowmobile.	Area is difficult or rarely accessed by snowmobile.
Snowmobiling Opportunities		
Terrain is steep or vegetation too dense that cross-country travel is difficult.	Terrain is moderate or vegetation brushy that impedes cross-country travel.	Terrain is gentle and vegetation open to allow easy cross-country travel.
Snowmobile use prohibited, or if allowed, rarely used.	Snowmobile use restricted to two months or less, or on half or less of the area.	Snowmobile use permitted.
Manageability – The Extent That Area Boundaries Are Recognizable		
Area Boundaries are Recognizable		
The vast majority of the boundary follows features that can be easily found and identified on the ground, such as a dominate ridge, creek, road, or trail.	More than half of the boundary follows a feature that can be easily found and identified on the ground.	Boundary generally lies across the hill side and can rarely be located without equipment, such as a GPS unit.
Boundary can be easily adjusted to follow locatable and identifiable features without significantly modifying the area boundaries.	Boundary can be adjusted to follow locatable and identifiable features but will modify the general size and shape of the IRA. Boundary may be identified with minimal signing.	Boundary cannot be adjusted to follow locatable and identifiable features, or requires extensive signing.

High	Medium	Low
Area Boundaries Promote Remoteness		
Area accessed by trail or closed and re vegetated road; adjacent area has natural setting.	May be accessed by narrow or two track open road that is lightly traveled; minimal human presence evident.	Boundary adjacent to heavily used road or along area showing high human presence, such as a number of farm houses with outbuildings, pasture land, etc.
No active disturbance near boundary.	May have disturbance near boundary but is short term such as a logging operation.	Boundary adjacent to long term disturbance like farmland or mining operations.
Natural processes take place undisturbed and un-manipulated.	Minimal disturbance of natural processes.	Natural processes cannot occur without human intervention.
Area Boundaries are Manageable		
Boundary total on national forest and not adjacent to private property.	Boundary follows property line forming irregular shape.	Boundary crosses private property so there are in-holdings along the boundary.
No inholdings.	Few small inholdings may be present.	Several small or a large inholding.
Area Boundaries Constitute Barrier to Prohibited Use		
Topographic feature provides a natural barrier, such as major stream or steep hill side.	Topography generally makes it difficult to participate in prohibited use.	Topography not a deterrent to prohibited use.
Human improvement is significant to physically provide a barrier, such as a road cut slope.	Human improvement places user on notice of prohibited use, such as a sign.	Human improvement not a deterrent; may provide point of access of prohibited use.

Capability Results for the IPNF

The results of the capability assessment for the IPNF are displayed in table 25 through table 36.

Table 25. Area Capability Assessment for the IPNF (Beetop, Big Creek, Blacktail Mt (122 and 161))

	Beetop #130	Big Creek #143	Blacktail Mt #122	Blacktail Mt #161
Environmental Elements				
Opportunity for Solitude				
1 Feeling alone	High	High	High	Med
2 Other parties	High	High	High	Med
3 Recreation use	High	High	High	Med
Natural and Free from Disturbance				
4 Free of Disturbance	High	High	High	Med
5 Visible foreground	High	High	High	Med
6 Improvements	Med	High	High	Med
7 Noxious weeds	Med	High	High	Med
8 Water quality	High	High	High	High
Provides Challenge and Adventure				
9 Terrain	Med	High	High	Med
10 Ability/knowledge/skill	Med	High	High	Med

	Beetop #130		Big Creek #143		Blacktail Mt #122		Blacktail Mt #161	
11 Non-hunting outfitting	Low		Low		Med		Low	
Manageable								
12 Size and shape	Med	Med	Med	Med	Med	High	Med	Med
13 Surrounding area	Med		Med		High		Med	
14 Location	Med		Med		High		Low	
Special Features								
Scientific, Educational, or Historical Values								
15 Value presence	Low	Low	Med	Med	Low	Low	Low	Low
16 Value uniqueness	Low		Low		Low		Low	
Scenic Features								
17 Terrain features	Med	High	High	Med	Low	Low	Low	Low
18 Water features	High		Low		Med		Low	
Variety and Abundance of Wildlife								
19 Native animals	High	Med	High	Med	High	Med	Med	Med
20 TE&S species	Med		Med		Med		Med	
21 Wildlife habitat	High		Med		Med		Med	
22 Habitat linkage	Low		Low		Low		Low	
Other Special Features								
23 Other special features	Med	Med	Med	Med	Low	Low	Low	Med
24 Designated special area	High		High		Low		High	
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	Med	Med	High	Med	Low	Low	Med	Med
26 Terrain	Low		Low		Low		Med	
Backpacking								
27 Trails	Med	High	High	High	Low	Low	Med	Med
28 Dispersed camping	High		High		Low		Med	
Saddle Stock								
29 Trails	Med	Low	High	High	Low	Low	Med	Low
30 Trailhead facilities	Low		High		Low		Low	
Hunting Opportunities								
31 Big game populations	High	Med	High	Med	High	Med	Med	Med
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game fish populations	Low	Low	Med	Med	Low	Low	Low	Low
34 Stream variables	Med		Med		Low		Med	
Skiing and Snowshoeing								
35 Terrain	Low	Low	Low	Low	Low	Low	Low	Low
36 Area access	Med		Low		Low		Low	
Snowmobiling								
37 Terrain	Med	Med	High	High	High	High	High	High

	Beetop #130		Big Creek #143		Blacktail Mt #122		Blacktail Mt #161	
38 Use restrictions	Low		High		High		High	
Manageability – the Extent that Area Boundaries Are Recognized								
39 Identifiable on ground	Med	Med	Med	Med	Low	Low	High	High
40 Boundary adjustment	Low		Med		Low		Med	
Area Boundaries Promote Remoteness								
41 Area access	Med	Med	Med	Med	Low	Low	Med	Med
42 Adjacent disturbance	Med		Med		Low		Med	
43 Natural process	Med		High		Med		Med	
Area Boundaries are Manageable								
44 Adjacent property	Low	Med	Low	Low	High	High	Med	High
45 Inholdings	High		Low		High		High	
Area Boundaries Constitute Barrier to Prohibited Use								
46 Topographic feature	Med	Med	Low	Low	High	High	Med	Med
47 Human improvement	Med		Low		High		Med	
Capability Rating	Mod		Mod		Low+		Mod	

Table 26. Area Capability Assessment for the IPNF (Buckhorn Ridge, Continental Mtn, East Cathedral, Gilt Edge-Silver Cr)

	Buckhorn Ridge # 661	Continental Mtn. #153	East Cathedral #131	Gilt Edge-Silver Cr. #792				
Environmental Elements								
Opportunity for Solitude								
1 Feeling alone	High	High	High	High	High	High	NR	NR
2 Other parties	High		High		Med		NR	
3 Recreation use	High		High		High		NR	
Natural and Free from Disturbance								
4 Free of Disturbance	High	High	Med	High	High	High	NR	NR
5 Visible foreground	High		High		High		NR	
6 Improvements	High		High		High		NR	
7 Noxious weeds	High		Med		High		NR	
8 Water quality	High		High		High		High	
Provides Challenge and Adventure								
9 Terrain	High	High	High	High	High	High	NR	NR
10 Ability/knowledge/skill	High		High		High		NR	
11 Non-hunting outfitting	Med		Med		High		NR	
Manageable								
12 Size and shape	Med	Med	High	High	High	High	NR	NR
13 Surrounding area	High		High		High		NR	
14 Location	Med		High		High		NR	
Special Features								
Scientific, Educational, or Historical Values								

	Buckhorn Ridge # 661		Continental Mtn. #153		East Cathedral #131		Gilt Edge-Silver Cr. #792	
15 Value presence	Low	Low	Med	Med	Med	Low	NR	NR
16 Value uniqueness	Low		Low		Low			
Scenic Features								
17 Terrain features	Med	Med	Med	Med	Med	Med	NR	NR
18 Water features	Med		Med		Med			
Variety and Abundance of Wildlife								
19 Native animals	Med	High	Med	High	High	Med	Low	NR
20 TE&S species	High		High		Med		Low	
21 Wildlife habitat	High		High		Med		Med	
22 Habitat linkage	High		Low		Low		Low	
Other Special Features								
23 Other special features	Med	Med	Low	Low	High	High	NR	NR
24 Designated special area	Low		Low		Med		NR	
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	High	Med	Low	Low	High	Med	NR	NR
26 Terrain	Low		Low		Low		NR	
Backpacking								
27 Trails	High	High	Low	Med	High	High	NR	NR
28 Dispersed camping	High		Med		High		NR	
Saddle Stock								
29 Trails	High	High	Low	Low	High	High	NR	NR
30 Trailhead facilities	Med		Low		Med		NR	
Hunting Opportunities								
31 Big game populations	Med	Med	High	Med	High	Med	Low	NR
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game fish populations	Low	Low	Low	Low	High	Med	Low	NR
34 Stream variables	Low		Low		Med		NR	
Skiing and Snowshoeing								
35 Terrain	Low	Low	Low	Low	Low	Low	NR	NR
36 Area access	Low		Low		Low		NR	
Snowmobiling								
37 Terrain	High	High	High	High	High	High	NR	NR
38 Use restrictions	Med		High		High		NR	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable on ground	Med	Med	Med	Med	Med	Med	NR	NR
40 Boundary adjustment	Med		Med		Med		NR	
Area Boundaries Promote Remoteness								
41 Area access	High	High	Med	Med	High	Med	NR	NR
42 Adjacent disturbance	High		Med		Med		NR	

	Buckhorn Ridge # 661		Continental Mtn. #153		East Cathedral #131		Gilt Edge-Silver Cr. #792	
43 Natural process	High		Med		Med		NR	
Area Boundaries are Manageable								
44 Adjacent property	High	High	Med	Med	High	High	NR	NR
45 Inholdings	High		Med		High		NR	
Area Boundaries Constitute Barrier to Prohibited Use								
46 Topographic feature	Low	Low	Med	Med	High	High	NR	NR
47 Human improvement	Med		Med		Med		NR	
Capability Rating	High **		Mod		High		**	

Table 27. Area Capability Assessment for the IPNF (Graham Coal, Grandmother Mtn, Grassy Top, Hammond Cr)

	Graham Coal #139	Grandmother Mtn. #148	Grassy Top #982	Hammond Cr. #145				
Environmental Elements								
Opportunity for Solitude								
1 Feeling alone	Med	Med	High	High	High	High	High	High
2 Other parties	Low		Med		High		Med	
3 Recreation use	Med		High		High		High	
Natural and Free from Disturbance								
4 Free of Disturbance	Med	Med	Med	High	High	High	Med	Med
5 Visible foreground	Low		High		Low		High	
6 Improvements	Med		High		High		High	
7 Noxious weeds	Med		Low		High		Med	
8 Water quality	Med		High		High		High	
Provides Challenge and Adventure								
9 Terrain	Med	Med	High	High	High	High	High	High
10 Ability/knowledge/skill	Med		High		High		High	
11 Non-hunting outfitting	Low		Med		Med		Med	
Manageable								
12 Size and shape	Low	Low	Med	Med	Med	Med	Med	Med
13 Surrounding area	Med		Med		Med		Med	
14 Location	Low		High		High		High	
Special Features								
Scientific, Educational, or Historical Values								
15 Value presence	Low	Low	High	Med	Low	Low	Med	Med
16 Value uniqueness	Low		Low		Low		Med	
Scenic Features								
17 Terrain features	Low	Low	High	High	Low	Low	Med	Med
18 Water features	Low		High		Low		Med	
Variety and Abundance of Wildlife								
19 Native animals	Med	Low	High	M/H	High	High	High	Med
20 TE&S species	Low		High		High		Med	

	Graham Coal #139		Grandmother Mtn. #148		Grassy Top #982		Hammond Cr. #145	
21 Wildlife habitat	Med		Med		High		Med	
22 Habitat linkage	Low		Low		Low		Low	
Other Special Features								
23 Other special features	Low	Low	High	High	Low	Low	Med	Med
24 Designated special area	Low		Med		Low		Med	
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	Med	Med	High	High	High	High	High	Med
26 Terrain	Low		Med		Med		Low	
Backpacking								
27 Trails	Med	Low	High	High	High	Med	High	High
28 Dispersed camping	Low		High		Med		High	
Saddle Stock								
29 Trails	Med	Low	High	High	High	Med	High	High
30 Trailhead facilities	Low		Med		Med		Med	
Hunting Opportunities								
31 Big game populations	High	Med	High	Med	High	High	High	Med
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game fish populations	Med	Low	Med	Med	Med	Low	Med	Low
34 Stream variables	Low		Med		Low		Low	
Skiing and Snowshoeing								
35 Terrain	Med	Med	Low	Low	Low	Low	Low	Low
36 Area access	Med		Low		Low		Low	
Snowmobiling								
37 Terrain	Med	Low	High	High	High	High	High	High
38 Use restrictions	Low		High		High		High	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable on ground	Low	Low	Low	Med	Low	Low	High	High
40 Boundary adjustment	Low		Med		Low		High	
Area Boundaries Promote Remoteness								
41 Area access	Low	Low	High	Med	Med	Med	High	Med
42 Adjacent disturbance	Low		Med		Med		Med	
43 Natural process	Low		Med		Low		Med	
Area Boundaries are Manageable								
44 Adjacent property	Low	Low	Low	Low	Low	Low	High	High
45 Inholdings	Med		Low		Low		High	
Area Boundaries Constitute Barrier to Prohibited Use								
46 Topographic feature	Med	Med	Low	Low	High	High	High	Med
47 Human improvement	Low		Low		High		Low	
Capability Rating	Low		High		Mod		Mod	

Table 28. Area Capability Assessment for the IPNF (Hellroaring, Hungry Mtn, Katka Peak, Kootenai Peak)

	Hellroaring #128		Hungry Mtn. #156		Katka Peak #157		Kootenai Peak #128	
Environmental Elements								
Opportunity for Solitude								
1 Feeling alone	Low	Med	Med	Med	Med	Med	Low	Med
2 Other parties	Med		High		High		High	
3 Recreation use	Med		High		High		High	
Natural and Free from Disturbance								
4 Free of Disturbance	Med	Med	Low	Low	Med	Med	High	Med
5 Visible foreground	Low		Low		Med		Med	
6 Improvements	High		Med		High		High	
7 Noxious weeds	Med		Med		Med		Med	
8 Water quality	High		High		High		Med	
Provides Challenge and Adventure								
9 Terrain	Med	Med	High	High	High	High	High	High
10 Ability/knowledge/skill	Med		High		High		High	
11 Non-hunting outfitting	High		Med		High		Med	
Manageable								
12 Size and shape	Low	Low	Med	Med	Med	Med	Med	Med
13 Surrounding area	Low		Med		Med		Med	
14 Location	Low		High		High		High	
Special Features								
Scientific, Educational, or Historical Values								
15 Value presence	Low	Low	Low	Low	Low	Low	Low	Low
16 Value uniqueness	Low		Low		Low		Low	
Scenic Features								
17 Terrain features	Low	Low	Low	Low	Med	Med	Low	Low
18 Water features	Med		Low		Med		Med	
Variety and Abundance of Wildlife								
19 Native animals	Low	Low	Med	Med	Med	Med	Med	Med
20 TE&S species	Low		Med		Med		Med	
21 Wildlife habitat	Med		Med		Med		Med	
22 Habitat linkage	Low		Low		Low		Med	
Other Special Features								
23 Other special features	Low	Low	Low	Low	Low	Low	Low	Low
24 Designated special area	Low		Low		Low		Low	
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	Med	Med	High	Med	High	High	Med	Med
26 Terrain	Med		Med		Low		Med	

	Hellroaring #128		Hungry Mtn. #156		Katka Peak #157		Kootenai Peak #128	
Backpacking								
27 Trails	Med	High	High	High	High	High	Med	Med
28 Dispersed camping	High		High		High		Med	
Saddle Stock								
29 Trails	High	Med	High	High	High	High	Med	Low
30 Trailhead facilities	Low		Med		Med		Med	
Hunting Opportunities								
31 Big game populations	Low	Med	High	Med	High	Med	High	Med
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game fish populations	Low	Med	Low	Low	Low	Low	Low	Low
34 Stream variables	Med		Low		Low		Low	
Skiing and Snowshoeing								
35 Terrain	Med	Med	Low	Low	Low	Low	Med	Low
36 Area access	Med		Low		Low		Low	
Snowmobiling								
37 Terrain	Med	Low	High	High	Med	Med	High	Med
38 Use restrictions	Low		High		Med		Med	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable on ground	Low	Low	Med	Med	Low	Low	Med	Med
40 Boundary adjustment	Low		Med		Med		Med	
Area Boundaries Promote Remoteness								
41 Area access	High	Med	Low	Low	Med	Med	Med	Med
42 Adjacent disturbance	Med		Med		Med		Med	
43 Natural process	Med		Low		Med		Low	
Area Boundaries are Manageable								
44 Adjacent property	High	High	Low	Low	Med	Med	Med	Med
45 Inholdings	High		Med		High		High	
Area Boundaries Constitute Barrier to Prohibited Use								
46 Topographic feature	Low	Low	High	High	Low	Low	Low	Med
47 Human improvement	Low		High		Med		Med	
Capability Rating	Low		Low		Mod		Mod	

Table 29. Area Capability Assessment for the IPNF (Little Grass Mtn, Lost Creek, Magee, Mallard Larkins)

	Little Grass Mtn. #121	Lost Creek #137	Magee #132	Mallard Larkins #300				
Environmental Elements								
Opportunity for Solitude								
1 Feeling alone	High	High	High	Med	High	High	High	High
2 Other parties	High		Med		Med		High	

	Little Grass Mtn. #121		Lost Creek #137		Magee #132		Mallard Larkins #300	
3 Recreation use	High		Med		High		High	
Natural and Free from Disturbance								
4 Free of Disturbance	High	High	High	High	High	High	High	High
5 Visible foreground	Med		High		High			
6 Improvements	High		High		High			
7 Noxious weeds	Med		Med		Med			
8 Water quality	High		High		High			
Provides Challenge and Adventure								
9 Terrain	High	High	High	Med	High	High	High	High
10 Ability/knowledge/skill	High		Med		High			
11 Non-hunting outfitting	Med		Low		Med			
Manageable								
12 Size and shape	Med	High	High	Med	High	High	Med	Med
13 Surrounding area	High		Med		High			
14 Location	High		Med		High			
Special Features								
Scientific, Educational, or Historical Values								
15 Value presence	Low	Low	Med	Low	Med	Low	High	High
16 Value uniqueness	Low		Low		Low			
Scenic Features								
17 Terrain features	Low	Low	Low	Low	Med	Med	High	High
18 Water features	Low		Low		Med			
Variety and Abundance of Wildlife								
19 Native animals	Med	Med	Med	Med	High	Med	High	High
20 TE&S species	Med		Med		Med			
21 Wildlife habitat	High		Med		Med			
22 Habitat linkage	Low		Low		Low			
Other Special Features								
23 Other special features	Low	Low	Low	Low	Med	Med	High	High
24 Designated special area	Low		Low		Med			
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	High	M/H	Med	Med	High	Med	High	Med
26 Terrain	Low		Low		Low			
Backpacking								
27 Trails	High	Med	Med	High	High	High	High	High
28 Dispersed Camping	Med		High		High			
Saddle Stock								
29 Trails	High	Med	Med	Med	High	High	High	High
30 Trailhead Facilities	Med		Med		High			
Hunting Opportunities								

	Little Grass Mtn. #121		Lost Creek #137		Magee #132		Mallard Larkins #300	
31 Big Game Populations	High	High	High	Med	High	Med	High	Med
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game Fish Populations	Low	Low	High	Med	High	Med	High	Med
34 Stream Variables	Med		Low		Med		Med	
Skiing And Snowshoeing								
35 Terrain	Low	Low	Low	Low	Low	Low	Low	Low
36 Area Access	Low		Med		Low		Low	
Snowmobiling								
37 Terrain	High	High	High	Med	High	High	High	High
38 Use Restrictions	High		Low		High		High	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable On Ground	Med	Med	Med	Med	High	High	High	High
40 Boundary Adjustment	Low		Med		High		Med	
Area Boundaries Promote Remoteness								
41 Area Access	Low	Low	High	High	High	High	Med	Med
42 Adjacent Disturbance	Low		Med		Med		Med	
43 Natural Process	Med		High		High		Med	
Area Boundaries Are Manageable								
44 Adjacent Property	High	High	High	High	High	High	Low	Med
45 Inholdings	High		High		High		Med	
Area Boundaries Constitute Barrier To Prohibited Use								
46 Topographic Feature	High	High	Med	Low	Med	Low	Med	Med
47 Human Improvement	High		Low		Low		Low	
Capability Rating	Mod		Mod		High		High	

Table 30. Area Capability Assessment for the IPNF (Maple Peak, Meadow Cr - Upper NF, Midget Peak, Mosquito-Fly)

	Maple Peak #141	Meadow Cr.- Upper NF #302	Midget Peak #151	Mosquito-Fly #150				
Environmental Elements								
Opportunity For Solitude								
1 Feeling Alone	High	High	High	High	High	High		
2 Other Parties	High		Low		High		High	
3 Recreation Use	High		High		High		High	
Natural And Free From Disturbance								
4 Free Of Disturbance	Med	Med	High	High	High	High	High	
5 Visible Foreground	Low		High		High			High
6 Improvements	Med		High		High			High
7 Noxious Weeds	Med		Med		Med			Med
8 Water Quality	Med		High		High			High

	Maple Peak #141		Meadow Cr.- Upper NF #302		Midget Peak #151		Mosquito-Fly #150	
Provides Challenge And Adventure								
9 Terrain	Med	Med	High	High	High	High	High	High
10 Ability/Knowledge/Skill	Med		High		High			
11 Non-hunting Outfitting	Low		High		Med			
Manageable								
12 Size And Shape	Low	L/M	High	High	Low	Med	Med	Med
13 Surrounding Area	Low		High		Med			
14 Location	Med		High		High			
Special Features								
Scientific, Educational, Or Historical Values								
15 Value Presence	Med	Low	Med	Med	Low	Low	Med	Med
16 Value Uniqueness	Low		Low		Low			
Scenic Features								
17 Terrain Features	Low	Low	High	High	Med	Med	High	High
18 Water Features	Low		High		Low		Med	
Variety And Abundance Of Wildlife								
19 Native Animals	Med	Low	Med	Med	Med	Med	Med	Med
20 Te &S Species	Low		Med		Low		Med	
21 Wildlife Habitat	Med		Med		Med		Med	
22 Habitat Linkage	Low		Low		Low		Low	
Other Special Features								
23 Other Special Features	Low	Low	High	High	Med	Med	High	Med
24 Designated Special Area	Low		High		Low		Low	
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	Med	Med	High	Med	High	Med	High	Med
26 Terrain	Low		Low		Low			
Backpacking								
27 Trails	Med	Med	High	High	High	High	High	High
28 Dispersed Camping	Med		High		High		High	
Saddle Stock								
29 Trails	Med	Low	High	High	High	High	High	High
30 Trailhead Facilities	Low		Med		Med		Med	
Hunting Opportunities								
31 Big Game Populations	High	Med	High	Med	High	Med	High	Med
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game Fish Populations	Low	Low	High	Med	High	Med	Med	Med
34 Stream Variables	Low		Med		Med		High	
Skiing And Snowshoeing								
35 Terrain	Low	Low	Low	Low	Low	Low	Low	Low

	Maple Peak #141		Meadow Cr.- Upper NF #302		Midget Peak #151		Mosquito-Fly #150	
36 Area Access	Med		Low		Low		Low	
Snowmobiling								
37 Terrain	High	Med	High	High	High	High	High	High
38 Use Restrictions	Low		High		High		High	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable On Ground	Low	Low	High	High	Med	Med	High	High
40 Boundary Adjustment	Low		High		Med		Med	
Area Boundaries Promote Remoteness								
41 Area Access	Med	Med	High	High	High	High	High	Med
42 Adjacent Disturbance	Med		High		High		Med	
43 Natural Process	Low		High		High		Med	
Area Boundaries Are Manageable								
44 Adjacent Property	Med	Med	High	High	High	High	Low	Med
45 Inholdings	Med		High		High		Med	
Area Boundaries Constitute Barrier To Prohibited Use								
46 Topographic Feature	High	Med	High	High	Med	Med	High	High
47 Human Improvement	Low		Med		Med		Med	
Capability Rating	Low **		High		Mod		High	

Table 31. Area Capability Assessment for the IPNF (North Fork, NW Peaks, Packsaddle, Pinchot Butte)

	North Fork #147	NW Peaks #663	Packsaddle #155	Pinchot Butte #149				
Environmental Elements								
Opportunity For Solitude								
1 Feeling Alone	High	Med	High	High	Med	Med	Med	High
2 Other Parties	Med		High		Med		High	
3 Recreation Use	High		High		Med		High	
Natural And Free From Disturbance								
4 Free Of Disturbance	High	High	High	High	High	Med	High	Med
5 Visible Foreground	High		Low		Med		Low	
6 Improvements	High		High		Med		High	
7 Noxious Weeds	Med		High		Med		High	
8 Water Quality	High		High		Med		Med	
Provides Challenge And Adventure								
9 Terrain	High	High	High	High	Med	Med	High	High
10 Ability/Knowledge/Skill	High		High		Med		High	
11 Non-hunting Outfitting	Med		Med		High		Med	
Manageable								
12 Size And Shape	Med	Med	Med	Med	Med	Med	Low	Med
13 Surrounding Area	Med		Med		Med		Med	
14 Location	High		Med		Med		High	

	North Fork #147		NW Peaks #663		Packsaddle #155		Pinchot Butte #149	
Special Features								
Scientific, Educational, Or Historical Values								
15 Value Presence	Med	Med	Med	Med	Low	Low	Low	Low
16 Value Uniqueness	Med		Low		Low		Low	
Scenic Features								
17 Terrain Features	High	Med	High	High	Med	Med	Low	Low
18 Water Features	Low		High		Med		Low	
Variety And Abundance Of Wildlife								
19 Native Animals	High	Med	Med	H/M	High	Med	Med	Med
20 Te &S Species	Med		High		Med		Low	
21 Wildlife Habitat	Med		High		Med		Med	
22 Habitat Linkage	Low		Low		Low		Low	
Other Special Features								
23 Other Special Features	Med	Med	Med	Med	High	Med	Low	Low
24 Designated Special Area	Med		High		Low		Low	
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	High	Med	High	Med	High	High	Low	Low
26 Terrain	Low		Low		Med		Low	
Backpacking								
27 Trails	High	High	High	High	High	High	Low	Low
28 Dispersed Camping	High		High		High		Low	
Saddle Stock								
29 Trails	High	High	High	Med	Med	Med	Low	Low
30 Trailhead Facilities	Med		Low		Med		Low	
Hunting Opportunities								
31 Big Game Populations	High	Med	High	High	High	Med	High	Med
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game Fish Populations	Med	Low	Low	Low	Med	Med	Low	Low
34 Stream Variables	Low		Low		Med		Low	
Skiing And Snowshoeing								
35 Terrain	Low	Low	Low	Low	Low	Low	Low	Low
36 Area Access	Low		Med		Med		Low	
Snowmobiling								
37 Terrain	High	High	High	H/M	High	Med	High	High
38 Use Restrictions	High		Med		Low		High	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable On Ground	High	High	Med	Med	Med	Med	Med	Low
40 Boundary Adjustment	Med		Med		Med		Low	
Area Boundaries Promote Remoteness								

	North Fork #147		NW Peaks #663		Packsaddle #155		Pinchot Butte #149	
41 Area Access	Med	Med	Med	Med	Med	Med	Med	Med
42 Adjacent Disturbance	Med		Med		Med		Med	
43 Natural Process	Med		Med		Med		Med	
Area Boundaries Are Manageable								
44 Adjacent Property	High	High	High	High	Med	Med	Low	Low
45 Inholdings	High		High		High		Low	
Area Boundaries Constitute Barrier To Prohibited Use								
46 Topographic Feature	High	Med	Med	Med	Med	Med	Med	Low
47 Human Improvement	Low		Med		Med		Low	
Capability Rating	Mod/High		High **		Mod		Low	

Table 32. Area Capability Assessment for the IPNF (Roland Point, Saddle Mtn, Salmo-Priest, Schafer Peak)

	Roland Point #146		Saddle Mtn #154		Salmo-Priest #981		Schafer Peak #160	
Environmental Elements								
Opportunity For Solitude								
1 Feeling Alone	Med	Med	High	High	High	High	Med	Med
2 Other Parties	High		High		High		High	
3 Recreation Use	High		High		Med		High	
Natural And Free From Disturbance								
4 Free Of Disturbance	Med	Med	Med	High	High	High	High	High
5 Visible Foreground	Med		High		High		High	
6 Improvements	High		High		High		High	
7 Noxious Weeds	Med		Med		Med		Med	
8 Water Quality	Med		High		High		High	
Provides Challenge And Adventure								
9 Terrain	High	High	High	High	High	High	High	High
10 Ability/Knowledge/Skill	High		High		High		High	
11 Non-hunting Outfitting	Med		Med		Med		High	
Manageable								
12 Size And Shape	Med	Med	High	High	Med	High	High	High
13 Surrounding Area	Med		High		High		High	
14 Location	High		Med		High		Med	
Special Features								
Scientific, Educational, Or Historical Values								
15 Value Presence	Low	Low	Low	Low	Med	Med	Low	Med
16 Value Uniqueness	Low		Low		Low		Med	
Scenic Features								
17 Terrain Features	Low	Low	Low	Med	Med	High	Med	Med
18 Water Features	Low		Med		High		Med	
Variety And Abundance Of Wildlife								

	Roland Point #146		Saddle Mtn #154		Salmo-Priest #981		Schafer Peak #160	
19 Native Animals	Med	Med	Med	High	High	High	High	High
20 Te & S Species	Low		High		High		High	
21 Wildlife Habitat	Med		High		High		Med	
22 Habitat Linkage	Low		Low		Low		Low	
Other Special Features								
23 Other Special Features	Med	Low	Low	Low	High	High	Med	Med
24 Designated Special Area	Low		Low		High		Low	
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	Med	Med	Med	Med	High	High	Med	Med
26 Terrain	Low		Med		Med		Low	
Backpacking								
27 Trails	Med	Med	Med	High	High	High	Med	High
28 Dispersed Camping	High		High		High		High	
Saddle Stock								
29 Trails	Med	Med	Med	Med	High	High	Med	Med
30 Trailhead Facilities	Med		Med		Med		Med	
Hunting Opportunities								
31 Big Game Populations	High	High	High	Med	High	Med	High	Med
32 Terrain	Med		Med		Med		Low	
Fishing Opportunities								
33 Game Fish Populations	Low	Low	Low	Low	Med	Med	Low	Low
34 Stream Variables	Low		Low		Med		Low	
Skiing And Snowshoeing								
35 Terrain	Low	Low	Low	Low	High	Med	Low	Low
36 Area Access	Med		Low		Med		Low	
Snowmobiling								
37 Terrain	High	High	High	High	High	High	High	High
38 Use Restrictions	High		Med		High		Low	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable On Ground	High	High	Med	Med	Low	Low	Med	High
40 Boundary Adjustment	High		Med		Low		High	
Area Boundaries Promote Remoteness								
41 Area Access	High	Med	Med	Med	High	High	High	Med
42 Adjacent Disturbance	Med		Med		High		Med	
43 Natural Process	High		High		Med		Med	
Area Boundaries Are Manageable								
44 Adjacent Property	High	Med	High	High	Med	High	Med	Low
45 Inholdings	Med		High		High		Low	
Area Boundaries Constitute Barrier To Prohibited Use								
46 Topographic Feature	Med	Med	Med	Med	High	High	Med	High

	Roland Point #146		Saddle Mtn #154		Salmo-Priest #981		Schafer Peak #160	
47 Human Improvement	Med		Med		High		High	
Capability Rating	Mod		Mod		High		Mod	

Table 33. Area Capability Assessment for the IPNF (Scotchman Peaks, Selkirk, Sheep Mtn-State Line, Skitwish Ridge)

		Scotchman Peaks #662		Selkirk #125		Sheep Mtn- State Line #799		Skitwish Ridge #135
Environmental Elements								
Opportunity For Solitude								
1 Feeling Alone	High	High	High	Med	High	High	Med	Med
2 Other Parties	High		Med		High		Med	
3 Recreation Use	High		Med		High		Med	
Natural And Free From Disturbance								
4 Free Of Disturbance	Med	High	Med	High	High	High	Med	Med
5 Visible Foreground	Med		High		High		Low	
6 Improvements	Med		High		High		Low	
7 Noxious Weeds	Med		Med		Med		Med	
8 Water Quality	High		High		High		Med	
Provides Challenge And Adventure								
9 Terrain	High	High	High	High	High	High	Med	Med
10 Ability/Knowledge/Skill	High		High		High		Med	
11 Non-hunting Outfitting	Low		High		Med		Med	
Manageable								
12 Size And Shape	High	High	Med	Med	Med	High	Low	Low
13 Surrounding Area	Med		Med		High		Low	
14 Location	High		High		High		Low	
Special Features								
Scientific, Educational, Or Historical Values								
15 Value Presence	Low	Med	High	High	Med	Med	Low	Low
16 Value Uniqueness	Low		Med		High		Low	
Scenic Features								
17 Terrain Features	High	High	High	High	High	High	Low	Low
18 Water Features	Med		High		High		Low	
Variety And Abundance Of Wildlife								
19 Native Animals	High	High	High	High	High	High	High	Med
20 TE&S Species	High		High		High		Low	
21 Wildlife Habitat	High		High		Med		Med	
22 Habitat Linkage	High		High		Low		Low	
Other Special Features								
23 Other Special Features	High	High	Med	High	High	Med	Low	Low
24 Designated Special Area	High		High		Low		Low	
Primitive And Unconfined Recreation								

	Scotchman Peaks #662		Selkirk #125		Sheep Mtn- State Line #799		Skitwish Ridge #135	
Hiking Opportunities								
25 Trails	Med	Med	High	Med	High	Med	Med	Med
26 Terrain	Low		Low		Low		Low	
Backpacking								
27 Trails	Med	High	High	High	High	High	Med	Med
28 Dispersed Camping	High		High		High		High	
Saddle Stock								
29 Trails	Med	Med	High	High	High	High	Med	High
30 Trailhead Facilities	Low		High		Med		High	
Hunting Opportunities								
31 Big Game Populations	High	Med	High	Med	High	Med	High	Med
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game Fish Populations	Med	Med	Med	Med	Med	Low	Low	Med
34 Stream Variables	Med		Med		Low		High	
Skiing And Snowshoeing								
35 Terrain	Med	Med	Med	Med	Low	Low	Med	Med
36 Area Access	Med		Low		Low		Med	
Snowmobiling								
37 Terrain	High	High	Med	Med	High	High	High	Med
38 Use Restrictions	High		Med		High		Low	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable On Ground	Med	Med	Low	Low	Med	Med	Med	Med
40 Boundary Adjustment	Med		Low		Med		Med	
Area Boundaries Promote Remoteness								
41 Area Access	High	Med	Med	Med	Med	High	Low	Low
42 Adjacent Disturbance	Med		Med		High		Med	
43 Natural Process	Med		Med		High		Low	
Area Boundaries Are Manageable								
44 Adjacent Property	Med	Med	Med	Med	High	High	Med	Med
45 Inholdings	High		High		High		High	
Area Boundaries Constitute Barrier To Prohibited Use								
46 Topographic Feature	High	Med	Med	Med	Med	Med	Med	Med
47 Human Improvement	Med		Med		Med		Low	
Capability Rating	High **		High		High		Low	

Table 34. Area Capability Assessment for the IPNF (South Fk Mtn, Spion Kop, Stevens Peak, Storm Creek)

	South Fk Mtn #124	Spion Kop #136	Stevens Peak #142	Storm Creek #144
Environmental Elements				
Opportunity For Solitude				

	South Fk Mtn #124		Spion Kop #136		Stevens Peak #142		Storm Creek #144	
1 Feeling Alone	Med	Med	High	High	High	High	Med	High
2 Other Parties	High		High		High			
3 Recreation Use	High		High		High			
Natural And Free From Disturbance								
4 Free Of Disturbance	Low	Med	Med	Med	Med	High	High	High
5 Visible Foreground	Med		Low		High			
6 Improvements	Med		Med		High			
7 Noxious Weeds	Med		High		Med			
8 Water Quality	Med		High		Med			
Provides Challenge And Adventure								
9 Terrain	High	High	High	Med	High	High	High	High
10 Ability/Knowledge/Skill	High		Med		High			
11 Non-hunting Outfitting	Med		Low		Low			
Manageable								
12 Size And Shape	Low	Low	Med	Med	Low	Med	Low	Med
13 Surrounding Area	Low		Med		Low			
14 Location	Med		High		High			
Special Features								
Scientific, Educational, Or Historical Values								
15 Value Presence	Low	Low	Med	Low	Med	Med	Med	Med
16 Value Uniqueness	Low		Low		Med			
Scenic Features								
17 Terrain Features	Low	Low	Med	Med	Med	High	Low	Low
18 Water Features	Low		Low		High			
Variety And Abundance Of Wildlife								
19 Native Animals	Med	Med	High	Med	Med	Med	High	Med
20 Te &S Species	Med		Med		Low			
21 Wildlife Habitat	High		Med		Med			
22 Habitat Linkage	Low		Low		High			
Other Special Features								
23 Other Special Features	Med	Med	Med	Med	High	Med	Med	Low
24 Designated Special Area	Low		Med		Low			
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	Med	Med	High	Med	High	Med	Med	Med
26 Terrain	Med		Low		Low			
Backpacking								
27 Trails	Med	Med	High	High	High	High	Med	Med
28 Dispersed Camping	Med		High		High			
Saddle Stock								
29 Trails	Low	Low	High	High	High	High	Low	Low

	South Fk Mtn #124		Spion Kop #136		Stevens Peak #142		Storm Creek #144	
30 Trailhead Facilities	Low		Med		Med		Low	
Hunting Opportunities								
31 Big Game Populations	High	High	High	Med	Med	Med	High	Med
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game Fish Populations	Med	Med	High	Med	Low	Low	Low	Low
34 Stream Variables	Med		Med		Low		Low	
Skiing And Snowshoeing								
35 Terrain	Med	Low	Low	Low	Low	Med	Med	Med
36 Area Access	Low		Low		Med		Med	
Snowmobiling								
37 Terrain	High	High	Med	Low	High	High	High	High
38 Use Restrictions	High		Low		High		High	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable On Ground	Low	Low	Low	Med	Med	Low	Med	Med
40 Boundary Adjustment	Low		Med		Low		Med	
Area Boundaries Promote Remoteness								
41 Area Access	Low	Low	High	Med	High	Med	Med	Med
42 Adjacent Disturbance	Med		Med		Med		Med	
43 Natural Process	Low		Med		Med		Low	
Area Boundaries Are Manageable								
44 Adjacent Property	Low	Low	High	High	Low	Low	Low	Low
45 Inholdings	Low		High		Med		Med	
Area Boundaries Constitute Barrier To Prohibited Use								
46 Topographic Feature	High	High	High	High	Med	Med	Med	Low
47 Human Improvement	Med		Med		Low		Low	
Capability Rating	Low		Mod		Mod/High		Low	

Table 35. Area Capability Assessment for the IPNF (Tepee Creek, Trestle Peak, Trouble Creek, Trout Creek)

	Tepee Creek #133		Trestle Peak #129		Trouble Creek #138		Trout Creek #664	
Environmental Elements								
Opportunity For Solitude								
1 Feeling Alone	High	High	High	High	Med	High	High	High
2 Other Parties	High		High		High			
3 Recreation Use	High		High		High			
Natural And Free From Disturbance								
4 Free Of Disturbance	Med	Med	High	High	Med	Med	Med	Med
5 Visible Foreground	Med		High		Low			
6 Improvements	High		High		Med			
7 Noxious Weeds	Med		Med		Med			

	Tepee Creek #133		Trestle Peak #129		Trouble Creek #138		Trout Creek #664	
8 Water Quality	High		High		High		Med	
Provides Challenge And Adventure								
9 Terrain	High	Med	Med	Med	Med	Med	High	Med
10 Ability/Knowledge/Skill	Med		Med		Med			
11 Non-hunting Outfitting	Low		High		Low			
Manageable								
12 Size And Shape	Low	Low	High	High	Low	Low	High	High
13 Surrounding Area	Low		High		Low		High	
14 Location	Med		Med		Low		High	
Special Features								
Scientific, Educational, Or Historical Values								
15 Value Presence	Med	Low	Low	Low	Low	Low	Med	Med
16 Value Uniqueness	Low		Low		Low		Low	
Scenic Features								
17 Terrain Features	Low	Low	Med	Med	Low	Low	Low	Low
18 Water Features	Low		Low		Low		Med	
Variety And Abundance Of Wildlife								
19 Native Animals	Med	Med	Med	Med	High	Med	Med	M/L
20 Te &S Species	Low		Med		Low		Low	
21 Wildlife Habitat	Med		Med		Med		Med	
22 Habitat Linkage	Low		Low		Low		Low	
Other Special Features								
23 Other Special Features	Low	Low	Med	Med	Low	Low	High	Med
24 Designated Special Area	Low		High		Low		Low	
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	Med	Med	Med	Med	Low	Low	Med	Med
26 Terrain	Low		Med		Low		Low	
Backpacking								
	Med	Med	Med	Med	Low	Low	Med	Med
28 Dispersed Camping	Med		Med		Low		Med	
Saddle Stock								
29 Trails	Med	Med	Med	Med	Low	Low	Med	Med
30 Trailhead Facilities	Low		Med		Low		Med	
Hunting Opportunities								
31 Big Game Populations	High	Med	Med	Med	High	Med	High	High
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game Fish Populations	High	Med	Med	Med	Med	Low	Med	Low
34 Stream Variables	Med		Med		Low		Low	
Skiing And Snowshoeing								

	Tepee Creek #133		Trestle Peak #129		Trouble Creek #138		Trout Creek #664	
35 Terrain	Low	Low	Med	Med	Low	Low	Low	Low
36 Area Access	Med		Med		Low		Low	
Snowmobiling								
37 Terrain	High	Med	Low	Low	High	Med	High	High
38 Use Restrictions	Low		Low		Low		High	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable On Ground	High	High	High	High	Med	Med	Med	Med
40 Boundary Adjustment	High		Med		Low		Med	
Area Boundaries Promote Remoteness								
41 Area Access	High	Med	Med	Med	Med	Low	High	Med
42 Adjacent Disturbance	Med		Med		Low		Med	
43 Natural Process	Low		Med		Low		Med	
Area Boundaries Are Manageable								
44 Adjacent Property	Med	Med	High	High	Med	Med	Med	Med
45 Inholdings	High		High		Med		Med	
Area Boundaries Constitute Barrier To Prohibited Use								
46 Topographic Feature	High	High	High	High	Med	Med	Med	Med
47 Human Improvement	Med		Med		Low		Low	
Capability Rating	Mod/Low		Mod/High		Low		Mod **	

Table 36. Area Capability Assessment for the IPNF (Upper Priest, White Mtn, Willard-Estelle, Wonderful Peak)

	Upper Priest #123	White Mtn #127	Willard-Estelle #173	Wonderful Peak #152				
Environmental Elements								
Opportunity For Solitude								
1 Feeling Alone	High	High	Med	Med	H/M	NS	High	High
2 Other Parties	Med		Med		Med		High	
3 Recreation Use	Low		Med		Med		High	
Natural And Free From Disturbance								
4 Free Of Disturbance	High	High	Med	Med	Med	NS	Med	Med
5 Visible Foreground	High		Med		High		Med	
6 Improvements	Med		High		H/M		High	
7 Noxious Weeds	Med		Med		Med		Med	
8 Water Quality	High		High		High		Med	
Provides Challenge And Adventure								
9 Terrain	High	Med	Med	Med	H/M	NS	High	High
10 Ability/Knowledge/Skill	Med		Med		H/M		High	
11 Non-hunting Outfitting	Med		Med		High		Low	
Manageable								
12 Size And Shape	Med	Med	Med	Med	High	NS	Low	Low
13 Surrounding Area	Med		Med		H/M		Low	

	Upper Priest #123		White Mtn #127		Willard-Estelle #173		Wonderful Peak #152	
14 Location	High		Low		H/M		High	
Special Features								
Scientific, Educational, Or Historical Values								
15 Value Presence	Low	Low	Low	Low	M/L	NS	Med	Med
16 Value Uniqueness	Low		Low		Low		Med	
Scenic Features								
17 Terrain Features	Low	High	Med	Med	Med	NS	Med	Med
18 Water Features	High		Low		M/H		Low	
Variety And Abundance Of Wildlife								
19 Native Animals	High	High	Med	Med	High	NS	Med	Med
20 Te &S Species	High		Med		High		Low	
21 Wildlife Habitat	High		Med		High		Med	
22 Habitat Linkage	Low		Low		Low		Med	
Other Special Features								
23 Other Special Features	High	High	Low	Low	L/M	NS	Med	Med
24 Designated Special Area	High		Low		Low		Low	
Primitive And Unconfined Recreation								
Hiking Opportunities								
25 Trails	High	High	Med	Med	High	NS	High	Med
26 Terrain	Med		Low		L/M		Low	
Backpacking								
27 Trails	High	Med	Med	Med	High	NS	Med	Med
28 Dispersed Camping	Med		Med		High		High	
Saddle Stock								
29 Trails	High	High	Med	Low	H/M	NS	Med	Med
30 Trailhead Facilities	Med		Low		H/M		Med	
Hunting Opportunities								
31 Big Game Populations	High	Med	High	Med	High	NS	Med	Med
32 Terrain	Med		Med		Med		Med	
Fishing Opportunities								
33 Game Fish Populations	Med	Med	Low	Low	Med	NS	Low	Low
34 Stream Variables	Med		Med		L/M		Low	
Skiing And Snowshoeing								
35 Terrain	Med	Med	Low	Med	H/M	NS	Low	Low
36 Area Access	Med		Med		L/M		Low	
Snowmobiling								
37 Terrain	High	High	Med	High	Med	NS	High	High
38 Use Restrictions	High		High		H/L		High	
Manageability – The Extent That Area Boundaries are Recognized								
39 Identifiable On Ground	Low	Low	Med	Med	H/M	NS	High	High
40 Boundary Adjustment	Low		Med		H/M		High	

	Upper Priest #123	White Mtn #127	Willard-Estelle #173	Wonderful Peak #152				
Area Boundaries Promote Remoteness								
41 Area Access	Low	Low	Med	Med	H/M	NS	High	Med
42 Adjacent Disturbance	Low		Med		Med		Med	
43 Natural Process	Med		Med		H/M		Med	
Area Boundaries Are Manageable								
44 Adjacent Property	Med	Med	Med	Med	M/L	NS	Low	Low
45 Inholdings	High		High		High		Low	
Area Boundaries Constitute Barrier To Prohibited Use								
46 Topographic Feature	High	High	Med	Med	M/L	NS	Med	Med
47 Human Improvement	High		Med		Med		Low	
Capability Rating	High		Mod/Low		High **		Mod	

** Capability Rating Notes for the IPNF:

- Buckhorn Ridge 661: The Capability Rating for this area reflects the evaluation completed by the KNF.
- Gilt Edge-Silver Creek 792: This area lies mostly on the Lolo National Forest and was not rated for capability for the IPNF. Of the more than 11,000 acres in this area, only about 200 acres lie within the IPNF boundary. The area will be managed in concert with the Lolo National Forest management direction.
- Maple Peak 141: The Capability Rating for this area reflects the evaluation completed by the Lolo and KNF.
- Northwest Peaks 663: The Capability Rating for this area reflects the evaluation completed by the KNF.
- Scotchman Peaks 662: The Capability Rating for this area reflects the evaluation completed by the KNF.
- Trout Creek 664: The Capability Rating for this area reflects the evaluation completed by the KNF.
- Willard-Estelle 173: The Capability criteria for the Willard-Estelle area were rated separately by the Bonners Ferry and Sandpoint Ranger Districts. A composite rating between the two districts was not made. When there are more than two ratings provided the first rating is for Bonners Ferry and the second rating is for Sandpoint. The overall Capability Rating for this area reflects the evaluation completed by both the IPNF and KNF.

Availability Process

While capability evaluated the wilderness characteristics of an area, availability considers other resources. Direction from FSH 1909.12, Chapter 70 and internal and external comments were used to identify other resources for evaluation and establish the rating process. Eight resource categories were identified by the Forest wilderness program manager. The manager selected resource specialists from the Forest to rate the resource categories using a high, moderate, or low rating system. Specialists included recreation managers, wildlife and fishery biologists, hydrologists, ecologists, geologists, fuels and wildfire specialists, land specialists (special use permits), and silviculturists.

Individual district and forest specialists' ratings are determined for each area. An overall availability rating was then determined by the Forest wilderness program manager.

Table 37 lists the eight resource categories evaluated and the rating scale used. The availability of an area for potential wilderness designation is the opposite of the rating for other resource requirements. For example, a rating of high mineral value will mean a low rating for availability.

Table 37. Area Availability Resource Assessment

RESOURCES	
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	
2. Areas needing management for wildlife or aquatic animals that MIGHT conflict with wilderness management.	
3. Area needing active aquatic restoration activities.	
4. Area needing active vegetative restoration activity due to specific species survival, or identifiable fuel reduction activity to reduce the risk of catastrophic wildfire, or known areas of severe insect infestation that will lead to heavy tree mortality.	
5. Areas of high value mineral deposits of economic or strategic importance.	
6. Areas having such unique characteristics or natural phenomena that general public access should be developed to facilitate public use and enjoyment including winter sports sites.	
7. Lands committed through contracts, permits, or agreements that would be in conflict with wilderness management (some minor permitted uses may still be allowed.)	
8. Forest Service does not have sufficient control to prevent development or irresolvable, incompatible uses that would lessen wilderness character and potential.	
RATING	
HIGH = Areas having evidence and a high priority need for treatment in the resource category. Availability would equate to Low.	
MODERATE = Areas having a need for treatment in the resource category. Availability would equate to Moderate.	
LOW = Areas have no to little need of treatments in the resource category. Availability would equate to High.	

Availability Results for the IPNF

The results of the availability assessment for the IPNF are displayed in table 38 through table 49.

Table 38. Area Availability Resource Assessment for the IPNF (Beetop, Big Creek, Blacktail Mtn, Blacktail Mtn)

Wilderness Evaluation - Availability	Beetop #130	Big Creek #143	Blacktail Mtn #122	Blacktail Mtn #161
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Low	Mod/ Low
3. Area needing active aquatic restoration activities.	Low	Low	Low	Low

Wilderness Evaluation - Availability	Beetop #130	Big Creek #143	Blacktail Mtn #122	Blacktail Mtn #161
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Mod	Low	Low	High
5. Area of high value mineral deposits of economic or strategic importance.	High	High	Mod	High
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Mod	Low	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	Mod	High	Low	Mod
Availability Rating	Mod	Low	High	Low

Table 39. Area Availability Resource Assessment for the IPNF (Buckhorn Ridge, Continental Mtn, East Cathedral, Gilt Edge-Silver Creek)

Wilderness Evaluation – Availability	Buckhorn Ridge #661	Continental Mtn #153	East Cathedral #131	Gilt Edge-Silver Creek #792
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Low/Mod	Low
3. Area needing active aquatic restoration activities.	Low	Low	Mod	Low
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Low	Low	Low	Low
5. Area of high value mineral deposits of economic or strategic importance.	High	Mod	Low	Mod
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Low	Low	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	Low	Low	Low	Low

Wilderness Evaluation – Availability	Buckhorn Ridge #661	Continental Mtn #153	East Cathedral #131	Gilt Edge-Silver Creek #792
Availability Rating	Mod	High	High	High

Table 40. Area Availability Resource Assessment for the IPNF (Graham Coal, Grandmother Mtn, Grassy Top, Hammond Creek)

Wilderness Evaluation - Availability	Graham Coal #139	Grandmother Mtn #148	Grassy Top #982	Hammond Creek #145
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Low/Mod	Low
3. Area needing active aquatic restoration activities.	Low	Low	Low/Mod	Low
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Low	Low	Low	Low
5. Area of high value mineral deposits of economic or strategic importance.	Low	Low	Mod	Mod
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Low	Mod	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	Mod	High	Mod	Low
Availability Rating	High	Mod	Mod	High

Table 41. Area Availability Resource Assessment for the IPNF (Hellroaring, Hungry Mtn, Katka Peak, Kootenai Peak)

Wilderness Evaluation – Availability	Hellroaring #128	Hungry Mtn #156	Katka Peak #157	Kootenai Peak #128
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Low	Low
3. Area needing active aquatic restoration activities.	Low	Low	Low	Low
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Mod	Mod	Mod	Mod/High
5. Area of high value mineral deposits of economic or strategic importance.	Mod	Low	High	Low
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Mod	Low	Low	Mod
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	Low	Mod	Low	Mod
Availability Rating	Mod	High	Mod	Mod

Table 42. Area Availability Resource Assessment for the IPNF (Little Grass Mtn, Lost Creek, Magee, Mallard Larkins)

Wilderness Evaluation - Availability	Little Grass Mtn #121	Lost Creek #137	Magee #132	Mallard Larkins #300
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low/Mod	Low	Low
3. Area needing active aquatic restoration activities.	Low	Mod	Low	Low
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Low	Low	Low	Low

Wilderness Evaluation - Availability	Little Grass Mtn #121	Lost Creek #137	Magee #132	Mallard Larkins #300
5. Area of high value mineral deposits of economic or strategic importance.	Mod	Mod	Low	Low
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Mod
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Low	Low	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	Low	Low	Low	Mod
Availability Rating	High	Mod	High	High

Table 43. Area Availability Resource Assessment for the IPNF (Maple Peak, Meadow Cr-Upper N Fk, Midget Peak, Mosquito-Fly)

Wilderness Evaluation – Availability	Maple Peak #141	Meadow Cr-Upper N Fk #302	Midget Peak #151	Mosquito-Fly #150
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Low	Low
3. Area needing active aquatic restoration activities.	High/ Low	Low	Low/Mod	Low
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Mod/Low	Low	Mod	Low
5. Area of high value mineral deposits of economic or strategic importance.	High	Low	Low	Low
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Low	Low	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	High	Low	Low	Low
Availability Rating	Low	High	High Low	High

Table 44. Area Availability Resource Assessment for the IPNF (North Fork, Northwest Peaks, Packsaddle, Pinchot Butte)

Wilderness Evaluation - Availability	North Fork #147	Northwest Peaks #663	Packsaddle #155	Pinchot Butte #149
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Mod	Low
3. Area needing active aquatic restoration activities.	Low	Low	Mod	Low
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Low	Low	Mod/High	Low
5. Area of high value mineral deposits of economic or strategic importance.	Mod	Mod	Mod	Low
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Mod	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Low	Low	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	Low	Low	Low	High
Availability Rating	High	High	Mod	Mod

Table 45. Area Availability Resource Assessment for the IPNF (Roland Point, Saddle Mtn, Salmo-Priest, Schafer Peak)

Wilderness Evaluation – Availability	Roland Point #146	Saddle Mtn #154	Salmo-Priest #981	Schafer Peak #160
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Low	Low/Mod
3. Area needing active aquatic restoration activities.	Low	Low	Low	Low
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Low	Low	Low	Mod/High
5. Area of high value mineral deposits of economic or strategic importance.	High	Mod	Mod	High

Wilderness Evaluation – Availability	Roland Point #146	Saddle Mtn #154	Salmo-Priest #981	Schafer Peak #160
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Low	Mod	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	High	Low	Low	High
Availability Rating	Low	High	High	Low

Table 46. Area Availability Resource Assessment for the IPNF (Scotchman Peaks, Selkirk, Sheep Mtn-State Line, Skitwish Ridge)

Wilderness Evaluation - Availability	Scotchman Peaks #662	Selkirk #125	Sheep Mtn-State Line #799	Skitwish Ridge #135
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Low	Low/Mod
3. Area needing active aquatic restoration activities.	Low	Low	Low	Mod
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Low	Low	Low	Mod
5. Area of high value mineral deposits of economic or strategic importance.	High	Low	Low	Low
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Mod	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Low	Low	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	Low	Mod	Low	Low
Availability Rating	Mod	High	High	Mod

Table 47. Area Availability Resource Assessment for the IPNF (South Fk Mtn, Spion Kop, Stevens Peak, Storm Creek)

Wilderness Evaluation – Availability	South Fk Mtn #124	Spion Kop #136	Stevens Peak #142	Storm Creek #144
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low/Mod	Low/Mod	Low	Low/Mod
3. Area needing active aquatic restoration activities.	Mod	Mod	Low /Mod	Low
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Low	Low	Low	Low
5. Area of high value mineral deposits of economic or strategic importance.	Low	Low	High	Low
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Low	Low	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	High	Low	High	Mod
Availability Rating	Mod	High	Low	High

Table 48. Area Availability Resource Assessment for the IPNF (Tepee Creek, Trestle Peak, Trouble Creek, Trout Creek)

Wilderness Evaluation - Availability	Tepee Creek #133	Trestle Peak #129	Trouble Creek #138	Trout Creek #664
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Low/Mod	Low/Mod
3. Area needing active aquatic restoration activities.	Low	Low	Low	High/Mod
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Low	Mod/ Low	Mod	Low
5. Area of high value mineral deposits of economic or strategic importance.	Low	Mod	Mod	High

Wilderness Evaluation - Availability	Tepee Creek #133	Trestle Peak #129	Trouble Creek #138	Trout Creek #664
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Low	Low	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	Low	Low	Low	High
Availability Rating	High	High	Mod	Low

Table 49. Area Availability Resource Assessment for the IPNF (Upper Priest, White Mtn, Willard-Lake Estelle, Wonderful Peak)

Wilderness Evaluation – Availability	Upper Priest #123	White Mtn #127	Willard-Lake Estelle #173	Wonderful Peak #152
1. Areas that are of high value for water yield or on-site storage where the installation and maintenance of improvements may be required.	Low	Low	Low	Low
2. Areas needing management for wildlife or aquatic animals that might conflict with wilderness management.	Low	Low	Low	Low
3. Area needing active aquatic restoration activities.	Low	Low	Low	Mod
4. Area needing active vegetative restoration activity due to specific species survival, or fuel reduction activity to reduce risk of catastrophic wildfire, or severe insect infestation that will lead to heavy mortality.	Low	Mod	Low	Low
5. Area of high value mineral deposits of economic or strategic importance.	Mod	Low	Mod	High
6. Area having unique characteristics or natural phenomena that public access should be developed to facilitate public use and enjoyment.	Low	Low	Low	Low
7. Land committed through contracts, permits, or agreements that would be in conflict with wilderness management.	Mod	Low	Low	Low
8. Forest Service does not have sufficient control to prevent irresolvable, incompatible uses that would lessen wilderness character and potential.	Low	Mod	Low	High
Availability Rating	High	High	High	Low

Need Process

The next step of the evaluation process is the determination of need as part of the overall National Wilderness Preservation System. A Wilderness Needs Assessment was completed in 2003 by an interdisciplinary team at the Region 1 office. This allowed the assessment to cover

Montana, northern Idaho, and parts of the Dakotas (a much larger area than the IPNF). The assessment focused on social and ecological factors.

The social factors included current levels of use in designated wilderness in the Northern Region, national and local trends in outdoor activities, and population statistics. Ecological factors included representation of vegetative cover types and ecological sections, fisheries, and wildlife. See the document *Wilderness Needs Assessment, 2003*, by the Northern Region of the USDA Forest Service.

Since the regional needs assessment covers a large and diverse area, it could not address individual areas. The Forest wilderness program manager applied the regional needs assessment to the 48 areas in the IPNF. The assessment was broken down into six questions and each area rated high, moderate, or low. Maps created for the regional assessment were used to evaluate the resource criteria of individual areas. Table 50 shows the six resource criteria evaluated and the rating system.

Diversity within the IPNF and application of the broad regional needs assessment resulted in ratings for individual areas. Ratings for questions 1 and 2 were determined for each area based on the presence or absence of the species being addressed. Question 3 was split based on whether the area was located adjacent to an existing wilderness or located near another area. A rating was determined for either 3a or 3b, but not both. A rating for question 4 was determined for the entire forest or portion of a forest. It was split on the IPNF between the north and south halves. A single population center was selected from the list in the regional needs assessment for question 5. Coeur d'Alene, Idaho was selected for the population center for the IPNF. For question 6, the Forest produced a map that showed the four selected under-represented plant communities that occur in the IPNF. The four plant communities selected were VRU 2 (ponderosa pine), 5 (western red cedar and western hemlock), and 8 (western red cedar and western hemlock – wet) and aquatic response unit (ARU) types representing forest-dominated riparian areas.

An overall rating was then applied for each area based on the following parameters:

- The overall rating would be high if:
 - Three or more questions were rated high; or
 - Two questions were rated high and at least two of the remaining four questions were rated moderate.
- The overall rating would be moderate if:
 - Two questions were rated high and not more than one of the remaining four questions was rated moderate; or
 - One question was rated high and at least one of the remaining five was rated moderate; or
 - No question was rated high but two or more were rated moderate.
- The overall rating would be low if:
 - Five of the questions rated low; or
 - No question was rated high and no more than two were rated moderate.

Table 50. Area Needs Assessment

Resource Criteria	High	Moderate	Low
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Presence of 2 fish	Presence of 1 fish	None of the species present
2. Presence of sensitive plant species.	Sensitive plant(s) identified in IRA are globally rare	Sensitive plants identified in IRA would benefit from wilderness designation = moderate/high Sensitive plants present in IRA = moderate/low	No sensitive plants identified in IRA.
3a. Areas adjacent to existing Wilderness (larger reserved size beneficial for wildlife conservation.)	IRA is adjacent to existing Wilderness boundary	IRA adjacent but separated by corridor	Not applicable
3b. IRAs could be combined to form large habitat patches.	Two or more IRAs adjacent and separated only by a narrow corridor, such as a road.	Two or more IRAs could be connected by a wildlife travel corridor.	IRA not adjacent or close to another IRA
4. Ecological Sections represented in Wilderness.	Ecological Section represented by not more than 10,000 acres.	Ecological Section represented by 10,001 to 100,000 acres.	Ecological Section represented by more than 100,000 acres.
5. Number of Wilderness acres within 100 miles of Kalispell or Couer d'Alene.	Wilderness acres of approximately 100,000 acres.	Wilderness acres of approximately 500,000 acres.	Wilderness acres of approximately 1,000,000 acres.
6. Under-represented plant communities.	VRU 2, 5, or 8 and ARU forest-dominated riparian covers more than 2/3 of the IRA.	VRU 2, 5, or 8 and ARU forest-dominated riparian covers 1/3 to 2/3 of the IRA.	VRU 2, 5, or 8 and ARU forest-dominated riparian covers less than 1/3 of the IRA.

Need Results for the IPNF

The results of the needs assessment for the IPNF are summarized in table 51 through table 62.

Table 51. Area Needs Assessment for the IPNF (Beetop, Big Creek, Blacktail Mtn (122 and 161))

Wilderness Evaluation - Need	Beetop #130	Big Creek 143	Blacktail Mtn #122	Blacktail Mtn #161
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Low	Low	Low
2. Presence of sensitive plant species.	Mod/ Low	High	High	Mod/ High
3a. Areas adjacent to existing wilderness.				
3b. IRAs could be combined to form large habitat patches.	Low	Low	Mod Upper priest	Low
4. Ecological Sections represented in Wilderness.	High	Low	High	High

Wilderness Evaluation - Need	Beetop #130	Big Creek 143	Blacktail Mtn #122	Blacktail Mtn #161
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	Mod	High	High	High
Need Rating	Mod/ High	High	High	High
# of Highs	2	3	4	4
# of Moderates	2	3	1	1
# of Lows	3	0	1	2

Table 52. Area Needs Assessment for the IPNF (Buckhorn Ridge, Continental Mtn, East Cathedral, Gilt Edge – Silver Creek)

Wilderness Evaluation – Need	Buckhorn Ridge #661	Continental Mtn #153	East Cathedral #131	Gilt Edge – Silver Creek #792
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Mod	Mod	Low
2. Presence of sensitive plant species.	Low	Mod/ Low	Low	Low
3a. Areas adjacent to existing wilderness.				
3b. IRAs could be combined to form large habitat patches.	Low	High – Salmo Priest	High – Spion Kop, McGee	Low
4. Ecological Sections represented in Wilderness.	High	High	Low	Low
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	Mod	Mod	High	Low
Need Rating	Mod	High	High	Low
# of Highs	2	3	3	1
# of Moderates	1	3	1	0
# of Lows	3	1	2	5

Table 53. Area Needs Assessment for the IPNF (Graham Coal, Grandmother Mtn, Grassy Top, Hammond Creek)

Wilderness Evaluation - Need	Graham Coal #139	Grandmother Mtn #148	Grassy Top #982	Hammond Creek #145
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Low	Low	Low
2. Presence of sensitive plant species.	Low	Low	Low	Low
3a. Areas adjacent to existing wilderness.				

Wilderness Evaluation - Need	Graham Coal #139	Grandmother Mtn #148	Grassy Top #982	Hammond Creek #145
3b. IRAs could be combined to form large habitat patches.	Low	High – Pinchot	High – Hungry	High – Roland N. Fork Storm
4. Ecological Sections represented in Wilderness.	Low	Low	High	Low
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	High	High	Mod	High
Need Rating	Mod	High	High	High
# of Highs	2	3	3	3
# of Moderates	0	0	1	0
# of Lows	4	3	2	3

Table 54. Area Needs Assessment for the IPNF (Hellroaring, Hungry Mtn, Katka Peak, Kootenai Peak)

Wilderness Evaluation - Need	Hellroaring #128	Hungry Mtn #156	Katka Peak #157	Kootenai Peak #128
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Low	Low	Low
2. Presence of sensitive plant species.	Low	Low	High	Low
3a. Areas adjacent to existing wilderness.	-	-	-	-
3b. IRAs could be combined to form large habitat patches.	Low	High – Grassy	High – Willard	Low
4. Ecological Sections represented in Wilderness.	High	High	High	High
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	High	High	Mod	High
Need Rating	High	High	High	High
# of Highs	3	4	4	3
# of Moderates	0	0	1	0
# of Lows	3	2	1	3

Table 55. Area Needs Assessment for the IPNF (Little Grass Mtn, Lost Creek, Magee, Mallard Larkins)

Wilderness Evaluation - Need	Little Grass Mtn #121	Lost Creek #137	Magee #132	Mallard Larkins #300
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Low	Low	Mod

Wilderness Evaluation - Need	Little Grass Mtn #121	Lost Creek #137	Magee #132	Mallard Larkins #300
2. Presence of sensitive plant species.	Mod/ High	Low	Low	High
3a. Areas adjacent to existing wilderness.	-	-	-	-
3b. IRAs could be combined to form large habitat patches.	High – Grassy Top	High – Trout Creek	High – Spion Kop	High – Mosquito Fly Sheep
4. Ecological Sections represented in Wilderness.	High	Low	Low	Low
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	High	High	High	Mod
Need Rating	High	High	High	High
# of Highs	5	3	3	3
# of Moderates	1	0	0	2
# of Lows	1	3	3	1

Table 56. Area Needs Assessment for the IPNF (Maple Peak, Meadow Cr-Upper N Fk, Midget Peak, Mosquito-Fly)

Wilderness Evaluation - Need	Maple Peak #141	Meadow Cr – Upper N Fk #302	Midget Peak #151	Mosquito-Fly #150
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Low	Low	Mod
2. Presence of sensitive plant species.	Low	Low	Low	Low
3a. Areas adjacent to existing wilderness.				
3b. IRAs could be combined to form large habitat patches.	Low	High – Mallard Sheep Mtn	High – Mosquito	High – Mallard Larkins
4. Ecological Sections represented in Wilderness.	Low	Low	Low	Low
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	Mod	Mod	High	Mod
Need Rating	Mod	Mod	High	High
# of Highs	1	2	3	2
# of Moderates	1	1	0	2
# of Lows	4	3	3	2

Table 57. Area Needs Assessment for the IPNF (North Fork, Northwest Peaks, South Fk Mtn, Spion Kop)

Wilderness Evaluation – Need	North Fork #147	Northwest Peaks #663	South Fk Mtn #124	Spion Kop #136
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Low	Low	Mod
2. Presence of sensitive plant species.	Low	Low	Low	High
3a. Areas adjacent to existing wilderness.				
3b. IRAs could be combined to form large habitat patches.	High – Hammond – Roland	Low	High – Grassy, Hungary	High – E Cathedral
4. Ecological Sections represented in Wilderness.	Low	High	High	Low
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	High	Low	High	High
Need Rating	High	Mod	High	High
# of Highs	3	2	4	4
# of Moderates	0	0	0	1
# of Lows	3	4	2	1

Table 58. Area Needs Assessment for the IPNF (Sheep Mtn – State Line, Skitwish Ridge, Scotchman Peaks, Selkirk)

Wilderness Evaluation – Need	Sheep Mtn – State Line #799	Skitwish Ridge #135	Scotchman Peaks #662	Selkirk #125
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Low	Mod	Low
2. Presence of sensitive plant species.	High	Low	High	Mod/ High
3a. Areas adjacent to existing wilderness.				
3b. IRAs could be combined to form large habitat patches.	High – Mallard/ Meadow Cr	Low	Low	Low
4. Ecological Sections represented in Wilderness.	Low	Low	High	High
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	Mod	High	Low	Mod
Need Rating	High	Mod	High	High
# of Highs	3	2	3	3
# of Moderates	1	0	1	2
# of Lows	2	4	2	2

Table 59. Area Needs Assessment for the IPNF (Salmo-Priest, Schafer Peak, Roland Point, Saddle Mtn)

Wilderness Evaluation - Need	Salmo-Priest #981	Schafer Peak #160	Roland Point #146	Saddle Mtn #154
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Mod	Low	Low	Low
2. Presence of sensitive plant species.	Mod/ High	Mod/Low	High	Mod/ High
3a. Areas adjacent to existing wilderness.	High			
3b. IRAs could be combined to form large habitat patches.		Low	High – Stevens - Wonderful	Low
4. Ecological Sections represented in Wilderness.	High	Low	Low	High
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	Mod	High	Mod	Mod
Need Rating	High	Mod	High	High
# of Highs	4	2	3	3
# of Moderates	3	1	1	2
# of Lows	0	4	2	2

Table 60. Area Needs Assessment for the IPNF (Packsaddle, Pinchot Butte, Stevens Peak, Storm Creek)

Wilderness Evaluation - Need	Packsaddle #155	Pinchot Butte #149	Stevens Peak #142	Storm Creek #144
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Mod	Low	Low
2. Presence of sensitive plant species.	Low	Low	Low	Low
3a. Areas adjacent to existing wilderness.				
3b. IRAs could be combined to form large habitat patches.	Mod - McGee	High - Grandmother	High – Roland Wonderful	High - Hammond
4. Ecological Sections represented in Wilderness.	Low	Low	Low	Low
5. Number of wilderness acres within 100 miles of Couer d'Alene.	High	High	High	High
6. Under-represented plant communities.	High	High	Mod	High
Need Rating	Mod	High	Mod	High
# of Highs	2	3	2	3
# of Moderates	1	1	1	0
# of Lows	3	2	3	3

Table 61. Area Needs Assessment for the IPNF (Tepee Creek, Trestle Peak, Trouble Creek, Trout Creek)

Wilderness Evaluation – Need	Tepee Creek #133	Trestle Peak #129	Trouble Creek #138	Trout Creek #664
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Low	Low	Low	Low
2. Presence of sensitive plant species.	High	Mod/ Low	Low	Low
3a. Areas adjacent to existing wilderness.				
3b. IRAs could be combined to form large habitat patches.	High – Spion Kop	Mod – Willard	Low	High – Lost Creek
4. Ecological Sections represented in Wilderness.	Low	High	Low	Low
5. Number of wilderness acres within 100 miles of Couer d’Alene.	High	High	High	High
6. Under-represented plant communities.	High	Mod	High	Mod
Need Rating	High	High	Mod	Mod
# of Highs	4	2	2	2
# of Moderates	0	3	0	1
# of Lows	2	2	4	3

Table 62. Area Needs Assessment for the IPNF (Upper Priest, White Mtn, Willard-Lake Estelle, Wonderful Peak)

Wilderness Evaluation - Need	Upper Priest #123	White Mtn #127	Willard-Lake Estelle #173	Wonderful Peak #152
1. Areas having the presence of Westslope cutthroat, Yellowstone cutthroat, or bull trout.	Mod	Low	Low	Low
2. Presence of sensitive plant species.	High	Low	Mod/ High	Low
3a. Areas adjacent to existing wilderness.	-	-	-	-
3b. IRAs could be combined to form large habitat patches.	Mod - Blacktail	Low	High - Katka	High – Stevens + Roland
4. Ecological Sections represented in Wilderness.	High	High	High	Low
5. Number of wilderness acres within 100 miles of Couer d’Alene.	High	High	High	High
6. Under-represented plant communities.	High	Mod	Mod	Mod
Need Rating	High	Mod	High	Mod
# of Highs	4	2	4	2
# of Moderates	2	1	2	1
# of Lows	0	3	1	3

Determination of Suitability as Recommended Wilderness

FSH 1909.12, Chapter 70 outlines the process for determining which areas are recommended as wilderness.

Each individual area received a summary rating for capability, availability, and need. Generally, to be considered for recommended wilderness, capability, availability and need should all rate relatively high. The size and shape of the area and boundaries should contribute to the manageability of the area as wilderness. Recommendations also consider adjacent lands. Areas not recommended for wilderness are considered for other management area allocations.

The three ratings of capability, availability, and need provide detailed information for determining whether to recommend an area as wilderness. Factors such as size and shape, wilderness opportunities, and the ability to manage the area as wilderness were then considered by the forest supervisor, district rangers, forest staff officers, and forest wilderness program manager. For areas determined to be recommended as wilderness, boundaries were then identified and mapped.

An areas' inherent wilderness quality could be demonstrated if the capability rating was high or moderate/high. Availability and need for potential wilderness could be demonstrated if at least one of these ratings was high and the other moderate or high. A rating of low for capability, availability or need indicated the area did not have inherent wilderness quality. Applying the other considerations completed the process for identifying which areas to recommend as wilderness.

Parameters for mapping recommended wilderness are (in order of priority):

- 1. Boundaries must be identifiable on the ground. Major ridges and roads provide the best topography or human development features that can identify a boundary. Minor or broad ridges are often hard to identify on the ground and should not be used. Major creeks or rivers are suitable for boundaries but small creeks should not be used. Contour lines are difficult to locate even with the proper equipment and generally will not be used except for short distances. Meandering lines are not used.
Points and connecting straight lines using GPS may provide adequate boundary identification in the near future. Small handheld GPS units can locate boundaries to within a few feet. This method is used when other boundary location methods are not adequate.
- 2. Some boundaries are adjusted for wildfire protection by providing a buffer near private property, along state and federal highways and county roads and along major utility corridors. The buffer used is generally ½ mile from these features. Narrower buffers are used where use of private property was not conducive for human occupancy, such as high elevation corporate timber lands, or where remoteness of the area allows for a narrower buffer. In some cases, recommended wilderness boundaries are inside a WUI boundary.
- 3. Boundaries generally accommodate maintenance of existing roads. Boundaries are set 300 feet (horizontal distance) on either side of the road centerline to provide adequate width to maintain clearing limits, provide fuel breaks, handle slumps and slides, maintain water drainage structures, and allow for improvements necessary for safe travel. Along major arterial roads where traffic is normally heavy and the road provides the main access to the national forest, the distance was increased to ¼ mile.

- 4. When two or more adjacent areas are recommended as wilderness and separated by an open road, the areas could be proposed as a single wilderness but a 600 foot (300 foot either side of the road) motorized travel corridor would be retained.
- 5. Old harvest units and access roads could be included within a recommended wilderness, provided the evaluation process indicated wilderness management was the highest resource value for the area. In these cases access would be controlled and adequate mitigation measures taken to reduce erosion.

Public comment was considered when determining which areas should be recommended as wilderness for each alternative. Areas recommended for wilderness are described in the “Roadless” section of chapter 3 and are mapped as MA1b on the alternative maps.

Inventoried Roadless Area Description

This section summarizes each inventoried roadless area (IRA) on the IPNF, and was added between draft and final EIS. The discussion includes a brief description of the area, summary of environmental consequences by alternative, allocation of roadless area by alternative and brief history of the IRA.

- 1987 Forest Plan Roadless Area (RA) and 1987 Recommended Wilderness acres shown in this appendix are from the 1987 Forest Plan, and 1987 Forest Plan FEIS appendix C.
- 2001 Roadless Area Conservation Rule (RACR) Inventoried Roadless Area (IRA) acres shown are based on the environmental analysis that went with this rule.
- The 2003 Update was a review of the 2001 RACR boundaries. This update was completed using GIS and a review of areas that had been managed.
- Differences in acres over time can be due to mapping, boundary adjustments, or more accurate acreage calculations. The IRA history included in this appendix is intended as a brief overview of the IRA, not a complete record of the IRA.
- Some IRAs are managed by more than one forest or state. Acres shown for IRAs that cross multiple jurisdictions are for information only; those acres not on the IPNF are not analyzed in the IPNF FEIS.

Beetop - (No. 01-130)

Description – This roadless area is located 12 miles east of Sandpoint, Idaho, and 5 miles north of where the Clark Fork River enters into Lake Pend Oreille. It is within the Cabinet Mountain Range between Hope and Clark Fork, Idaho, in Bonner County on the Sandpoint Ranger District. The area is accessible by several trails originating from forest roads.

The most prominent mountain peak is Beetop Mountain at 6,060 feet in elevation. The southernmost portion of the roadless area is the lowest at 2,400 feet. This area includes one primary ridge which has been shaped by continental and alpine glaciation. The headwaters of numerous small streams are included within the area. Porcupine and Still Lakes are within this area.

The vegetation is primarily is high alpine forest type with interspersed rocky and grassy openings near the ridgetops. Forest types range from mixed conifer stands common in northern Idaho in the lower elevations to alpine fir, lodgepole pine, and an occasional whitebark pine and mountain hemlock in the higher elevations. Occasional beargrass meadows are also present.

Table 63. Beetop Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Beetop (01-130)	Moderate	Moderate	Moderate/High	None	Ratings of moderate for both capability and availability limit this area's suitability for recommended wilderness. In addition, the entire southwestern boundary is adjacent to private property.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 64. Beetop IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Beetop (01-130)	11,180	11,200	0	12,900	12,446	12,436	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Beetop (or any partial acres) for wilderness designation.

Table 65. Beetop Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Beetop (01-130)	Backcountry/Restoration & MA 5	12,436	12,436	12,436

Big Creek - (No. 01-143)

Description – The Big Creek Roadless Area is located 26 miles east of St. Maries and 4 miles south of Wallace, Idaho. The area is in Shoshone County on the Avery and St. Maries Districts of the Idaho Panhandle National Forests. Approximately 1,480 acres of small private ownerships, 320 acres of State of Idaho ownership, and 2,160 acres administered by the Bureau of Land Management are included. These lands are concentrated on the western end of the roadless area. Several of the low standard roads constructed by the Civilian Conservation Corps or mining interests and a series of maintained trails provide access within the unit.

Prominent peaks include Bad Tom Mountain, Lemonade Peak, Spooky Butte, Mastodon Mountain, Foolhen Mountain, and Elsie Peak. Topography is steep and dissected by numerous small drainages with elevations ranging from 2,400 feet on Big and Slate Creeks to over 6,000 feet on the St. Joe-Coeur d'Alene Divide, with the exception of two small areas which drain northward into the Coeur d'Alene River system. The majority of the unit flows in a southerly

direction via Big Creek, Slate Creek, and their tributaries into the St. Joe River. Numerous bedrock outcrops are typical, especially in the lower reaches of the major streams.

In 1910, fire consumed nearly the entire unit, with much of the area reburning between 1919 and 1929. The present vegetative pattern reflects this past fire history as exhibited by extensive brushfields on the southern aspects and seedling/sapling stands on the more cool northerly aspects. Remnants of plantations of ponderosa pine, eastern and western white pine, and spruce which followed the 1910 fire and escaped subsequent reburns also exist throughout the unit. Small patches of old-growth timber remain, with the largest concentration in the southeastern corner. Habitat-types vary with the Douglas-fir and grand fir occupying the drier and western hemlock and cedar the more moist lower sites, grading at higher elevations into the mountain hemlock or alpine fir series.

Table 66. Big Creek Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Big Creek (01-143)	Moderate	Low	High	None	Ratings of moderate for capability and low for availability limit this area's suitability for recommended wilderness. In addition, much of the western boundary is adjacent to private property.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 67. Big Creek IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Big Creek (01-143)	74,940	75,000	0	74,500	76,347	76,462	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Big Creek (or any partial acres) for wilderness designation.

Table 68. Big Creek Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Big Creek (01-143)	Backcountry/Restoration & MA 5	76,462	76,462	76,462

Blacktail Mountain - (No. 01-122)

Description – The Blacktail Mountain Roadless Area is located in Bonner County, Idaho, on the northwest side of Priest Lake. It is located entirely on the Priest Lake Ranger District of the Idaho Panhandle National Forests. The area is accessed on the east by Forest Road 237, a paved road which forms the boundary of the area. The north is accessed by Forest Road 1341, the south by Forest Road 638. Both are native-surfaced roads.

This oval-shaped area faces, and is visible from, Priest Lake; the eastern boundary lies within ¼ mile of the lake's shoreline. The area is steep mountainous timberland, with one portion in the northwest characterized by a very steep slope highly dissected with drainages in unstable soils. Elevations range from 2,600 feet near the lakeshore to 5,495 feet at the top of Blacktail Mountain. Drainages within the area include Bottle Creek, Tepee Creek, and tributaries of Beaver Creek and Tango Creek.

Vegetative cover is composed of mixed cedar, hemlock, Douglas-fir, grand fir, larch, and white pine. Habitat types are those most typically found elsewhere on the Priest Lake District- cedar or hemlock/pachistima. In addition, there is a virgin white pine plant community in the Tepee Creek area and a sphagnum bog in the Bottle Lake area.

There are two Research natural Areas (RNAs) within the boundary. The Tepee Creek RNA encompasses the virgin white pine community, while the Bottle Lake RNA includes Bottle Lake and its unique wetland plant community.

Table 69. Blacktail Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Blacktail Mountain (01-122)	Low	High	High	None	A low rating for capability limits this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 70. Blacktail Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Blacktail Mountain (01-122)	5,140	5,100	0	5,300	4,965	4,965	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. In addition, the Research Natural Areas (MA 4a & Forest Plan Special Area under the Idaho Roadless Rule classification system) within this area would not change in any action alternative as they are and will remain established in the Revised Forest Plan. None of these alternatives recommend Blacktail Mountain (or any partial acres) for wilderness designation.

Table 71. Blacktail Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Blacktail Mountain (01-122)	Backcountry/Restoration & MA 5	4,132	4,132	4,132
	Forest Plan Special Areas & MA 4a	833	833	833

Blacktail Mountain - (No. 01-161)

Description – This roadless area is located 8 miles south of Sandpoint, Idaho, and 2 miles east of Cocolalla Lake. The area is adjacent to Lake Pend Oreille, within Bonner County, and is in the Sandpoint Ranger District of the Idaho Panhandle National Forests. The area is easily accessible from all sides away from the lake and is within reasonable walking distance of maintained County roads.

The area is approximately 3 miles long and 2 miles wide; 2 ½ miles of the boundary follow along the Pend Oreille Lake shoreline. A small mountainous range is encompassed within this area, of which the two focal points are Butte Mountain and Blacktail Mountain. Steep cliffs face into the western shore of Lake Pend Oreille. A small wetland, Maiden Rock Lake, and Maiden Creek are the only aquatic habitats in this roadless area. Over 50 percent of the boundary of this area is bordered by private lands.

Almost the entire area is timbered, with stands averaging 70-80 years old. Forest types include mixed conifer stands common to the lower elevations in northern Idaho. Timber productivity is considered good to excellent. Natural openings occur on scattered areas with shallow soils, and an occasional old-growth tree can be seen protruding above the primary forest canopy. Red Alder, a remnant of ancient times, can be found along the lakeshore.

Table 72. Blacktail Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Blacktail Mountain (01-161)	Moderate	Low	High	None	Ratings of moderate for capability and low for availability limit this area's suitability for recommended wilderness. In addition, much of the northern and western boundary is adjacent to private property.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 73. Blacktail Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Blacktail Mountain (01-161)	0	4,700	0	4,900	4,830	4,831	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Blacktail Mountain (or any partial acres) for wilderness designation.

Table 74. Blacktail Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Blacktail Mountain (01-161)	Backcountry/Restoration & MA 5	4,831	4,831	4,831

Buckhorn Ridge - (No. 01-661)

Description – The Buckhorn Ridge Roadless Area is located along the Idaho-Montana border along the divide between the Moyie and Yaak Rivers, in the northwest corner of the Forest. The southern section is formed by Newton Ridge while the northern section is formed by the Spread Creek Road, which divides the area from the Northwest peaks roadless area to the north. Access is available from several roads ending in trails off of Yaak Road 508, particularly Pine Creek, Fourth of July Creek, Meadow Creek, Hellroaring Creek, and Spread Creek.

The geography and topography are characterized by a high elevation ridgeline (6,500 feet) with broad, open, grassy side slopes and timbered basins divided by spur ridges. The area includes headwater areas for Pine, Meadow, Hellroaring, Red Top, and Spread Creeks of the Kootenai, and Deer Creek of the Idaho Panhandle.

The area is surrounded by some developments, especially roads and clearcuts. Buckhorn Ridge contains representatives of the Cedar Hemlock Pine forest and Western Spruce Fir forest ecosystems.

Table 75. Buckhorn Ridge Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Buckhorn Ridge (01-661)	High	Moderate	Moderate	None	Ratings of moderate for availability and need limit this area's suitability for recommended wilderness. In addition, this roadless area has a boundary that would be difficult to manage as wilderness..

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 76. Buckhorn Ridge IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Buckhorn Ridge (01-661)	3,500	9,600	0	9,400	9,558	9,558	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – Alternatives B Modified, and C would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. Alternative D would protect all lands within Idaho and under the Idaho Roadless Rule as Backcountry/Restoration and MA 5 (6,700 ac,) but allow management on 2,152 acres of this roadless areas managed by the IPNF and located in Montana. None of these alternatives recommend Buckhorn Ridge (or any partial acres) for wilderness designation.

Table 77. Buckhorn Ridge Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Buckhorn Ridge (01-661)	Backcountry/Restoration & MA 5	BCR = 6,700 (IRR Portion) MA5 = 9,558	BCR = 6,700 (IRR Portion) MA5 = 9,558	BCR = 6,700 (IRR Portion) MA5 = 7,406
	General Forest & MA 6	0	0	MA 6 = 2,152 (located in MT)

Continental Mountain - (No. 01-153)

Description – The Continental Mountain Roadless Area is located approximately 20 miles north of Nordman, Idaho, just south of the Canadian border. It lies within Boundary County and the Priest Lake and Bonners Ferry Ranger Districts of the Idaho Panhandle National Forests. The northwest and south boundaries are accessed by Roads 637 and 638, while the eastern boundary parallels Road 2546. Road 2546 and the portion of Road 637 east of Continental Creek are gated to prevent motorized vehicle access due to grizzly bear habitat.

This somewhat oval-shaped roadless area is largely mountainous timberland dominated by the most prominent feature-Continental Mountain (6,677 feet). Elevation ranges from the high on Continental Peak to the low of about 4,200 feet at the north end of the area. Drainage is provided by Spread, Continental, Rock Bog, Lime, and Blue Joe Creeks.

The area contains subalpine vegetative components in the vicinity of the summit of Continental Mountain. Old-growth spruce, fir, and pine are common to the higher elevations, with hemlock, cedar, Douglas-fir, and pine at the lower elevations.

Table 78. Continental Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Continental Mountain (01-153)	Moderate	High	High	None	A rating of moderate for capability limits this area's suitability for recommended wilderness. The high need is addressed by the proposed addition of the Salmo= Priest roadless areas as recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 79. Continental Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Continental Mountain (01-153)	0	6,900	0	7,700	7,525	7,525	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternatives would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Continental Mountain (or any partial acres) for wilderness designation.

Table 80. Continental Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Continental Mountain (01-153)	Backcountry/Restoration & MA 5	7,525	7,525	7,525

East Cathedral - (No. 01-131)

Description – This roadless area is located about 38 miles northeast of Coeur d’Alene, Idaho, along the Idaho-Montana border. It is within Shoshone County on the Wallace Ranger District of the Idaho Panhandle National Forests. The area is accessible by dirt roads which form most of the boundary of the area.

A variety of vegetation and terrain elements characterize the area. The Coeur d’Alene River is the primary drainage; others include Deer and Alden Creeks. Attractive features include the river bottom and rock outcroppings along its course. Elevation ranges from 3,400 feet on the river to 5,400 feet on Whitetail Peak. This area is underlain by the Libby and Striped Peak formations of the Belt Supergroup. These argillites and quartzites compose the two upper members of the Belt rocks.

Large forest fires in 1910 and 1919 were major factors in vegetation development. Several tree species, including Douglas-fir, western white pine, and western larch, dominate the landscape. Where fires did not burn, small pockets of old-growth hemlock, Douglas-fir, and grand fir are present. Mountain hemlock, subalpine fir, and lodgepole pine forests are found on north slopes and high elevation ridges. Where fires were more severe, brushfields are found, especially on south facing slopes. Plantations started in the mid-1930s by the Civilian Conservation Corps (CCC) are found in the East Fork of Alden Creek and Sheep Run Creek. Species include Douglas-fir and western white pine. Plantation success is varied due to brush competition and blister rust mortality in the white pine.

Table 81. East Cathedral Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
East Cathedral (01-131)	High	High	High	22,346 acres recommended in Alternative C	This area is recommended for wilderness in one action alternative because of the high ratings. The other action alternatives do not recommend wilderness designation and would retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and two of the alternatives match this classification with the Forest Plan management area designation of MA 5.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 82. East Cathedral IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
East Cathedral (01-131)	20,890	22,300	0	22,900	22,320	22,347	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – Alternatives B Modified and D would protect roadless characteristics on almost all of this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. In addition another 2,326 acres falls within a Forest Plan Special Area under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 2b (Eligible Wild & Scenic River). Alternative C protects roadless characteristics as well because of the proposed classification of Wild Land Recreation and companion management area designation of MA 1b. However, Alternative C is not compliant with the Idaho Roadless Rule and could not be implemented until this proposed change went through the rule making process to modify the management classification defined in 36 CFR 294.29.

Table 83. East Cathedral Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
East Cathedral (01-131)	Wild Land Recreation & MA 1b	0	22,346	0
	Backcountry/Restoration & MA 5	19,969	0	19,969

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
	General Forest & MA 6	52	0	52
	Forest Plan Special Areas & MA 2b	2,326	0	2,326

Gilt Edge Silver Creek - (No. 01-792)

Description – This roadless area lies 6 miles west of DeBorgia, Montana, and 20 miles west of St. Regis, Montana. It is an elongated unit extending between Interstate 90 and the Idaho border, a distance of 6 miles. It is about 4 miles wide. The Stateline Road (Road 391) provides southern and western access points. Forest System roads along the West and Middle Forks of Big Creek extend into and form part of the eastern boundary. Access to the north comes from Interstate 90 and the Saltese Beacon Road. Portions of two system trails totaling 6 miles cross the area..

The lower slopes support a mixed stand of western larch, Douglas-fir, spruce, and lodgepole pine. Some areas in the vicinity of the Stateline are sparsely timbered. These are primarily rockland and/or talus slopes or high elevation meadows dominated by beargrass, bunchgrass, and forbs. Nearly all of the Gilt Edge-Silver Creek Roadless Area is classified as commercial timberland.

A series of streams tributary to Big Creek head along the state divide and flow to the northeast. Consequently, several ridgelines extend off of the Divide and parallel the streams. On the western edge, tributaries of Silver Creek drain off to the north. Glacial cirques occur along the Stateline Divide and several contain small lakes.

Rocks of the Precambrian Age Wallace Formation and Ravalli Group are exposed in this roadless unit. They are broken and sheared by the complex Silver Creek fault system which is oriented generally east to west. The Wishard Sill, a gabbroic intrusive, cuts through the Wallace and Ravalli strata and is in turn offset by the faults.

Table 84. Gilt Edge Silver Creek Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Gilt Edge Silver Creek (01-792)	NR	High	Low	None	This area is primarily located on the Lolo NF and just a small sliver is located on the IPNF therefore is not recommend for wilderness. It was not rated for <i>Capability</i> .

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 85. Gilt Edge Silver Creek IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Gilt Edge Silver Creek (01-792)	300	300	0	200	202	200	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Gilt Edge-Silver Creek (or any partial acres) for wilderness designation.

Table 86. Gilt Edge Silver Creek Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Gilt Edge Silver Creek (01-792)	Backcountry/Restoration & MA 5	200	200	200

Graham Coal - (No. 01-139)

Description – The Graham Coal Roadless Area is located about 4 miles north of Kellogg, Idaho, along the Coeur d’Alene River. It is within Shoshone County on the Wallace Ranger District of the Idaho Panhandle National Forests. Access to the area is provided by the Graham Creek and Coal Creek Trails. Both of these trails originate at Forest Highway 9 on the Coeur d’Alene River.

Graham Peak, at 5,730 feet, is the most prominent feature. The southern aspect of this peak is visible from Interstate 90. The lowest elevation is about 2,400 feet at the mouth of Coal Creek. Major drainages include Graham Creek, Coal Creek, and Deceitful Gulch. Aspect is generally north. The Coal Creek drainages offer a pristine riparian area with many scenic waterfalls. Exposed in the study area are metasediments of the Precambrian Belt Supergroups. Although it is close to the Oxburn Fault, few faults have been mapped in this area. The southern portion of this area is part of the Coeur d’Alene Mining District.

Vegetative cover consists primarily of white pine, western hemlock, western red cedar, Douglas-fir, and lodgepole pine. Most trees occurring below 4,000 feet are immature. However, 325 acres of old-growth timber have been identified in Graham Creek.

Table 87. Graham Coal Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Graham Coal (01-139)	Low	High	Moderate	None	Ratings of low for Capability and moderate for Need limit this area’s suitability for recommended wilderness. In addition, most of the western and southern boundary is adjacent to private property.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 88. Graham Coal IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Graham Coal (01-139)	11,580	10,800	0	10,700	10,290	10,290	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. All three alternatives include a small acreage in a Forest Plan Special Area that is within management area 2b (Eligible Wild and Scenic River). Management Area 2b will protect most roadless characteristics under this management prescription. None of these alternatives recommend Graham Coal (or any partial acres) for wilderness designation.

Table 89. Graham Coal Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Graham Coal (01-139)	Backcountry/Restoration & MA 5	10,219	10,219	10,219
	Forest Plan Special Areas & MA 2b	71	71	71

Grandmother Mountain - (No. 01-148)

Description – The Grandmother Mountain Roadless Area is located in Shoshone County, Idaho, approximately 30 miles southeast of St. Maries, Idaho. The area lies on the St. Maries and Avery Ranger Districts of the Idaho Panhandle National Forests. Several well maintained roads surround the area, allowing access at several points. The most popular entry points begin from Fishhook-Gold Center Road 301, Marble Creek Road 321, and the Little North Fork Road 760. A series of maintained trails access the interior.

The amoeba-shaped unit includes a U-shaped ridge as its center, consisting of Grandfather Mountain, Grandmother Mountain, Marks Butte, Crater Peak, Widow Mountain, and Lookout Mountain. Several cirques, cirque lakes, and moraines along the ridgeline remain as evidence of past glacial activity, especially in the area of Lookout Mountain. The headwaters of Marble Creek, a major tributary of the St. Joe River, flow northward from the ridgeline. Flowing to the east are the headwaters of the Little North Fork of the Clearwater Rivers. The southwest corner is drained by Placer Creek into the St. Maries River system. Elevations range from 6,800 feet at Widow Mountain to 3,400 feet at Marble Creek.

Vegetation patterns reflect the high elevation, glacial activity, and past fire history of the area. Nearly half of the unit consists of immature pole or sawtimber stands of mixed composition resulting from wildfires in 1910 and 1923. The remaining forested area consists of mature or overmature stands largely composed of mountain hemlock, Engelmann spruce, and subalpine fir. Much of the high elevation areas support relatively sparse subalpine vegetation and contain

numerous rockland or talus slopes. Habitat-types graduate from cedar/clintonia to either a mountain hemlock or subalpine fir series as elevation rises.

Table 90. Grandmother Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Grandmother Mountain (01-148)	High	Moderate	High	None	Because this area has a moderate Availability rating combined with its complex boundary and intermixed ownership pattern this area's suitability for recommended wilderness is limited.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 91. Grandmother Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Grandmother Mountain (01-148)	16,460	16,400	0	24,100	22,347	25,545	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics within almost all of this area because of its Idaho Roadless Area classification of Backcountry/Restoration and Wild Land Recreation and companion management area designations of MA 5 and MA 1c. In addition, all three alternatives include Idaho Roadless Rule Forest Plan Special Areas (Forest Plan management areas 2b and 3) that will protect all roadless characteristics. In all three action alternatives 123 acres are proposed to be managed under the Idaho Roadless Rule classification of General Forest, Rangelands, and Grasslands and companion management area designation of MA6 which does allow management on these few acres. None of these alternatives recommend Grandmother Mountain (or any partial acres) for wilderness designation.

Table 92. Grandmother Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Grandmother Mountain (01-148)	Wild Land Recreation & MA 1c	6,788	6,788	6,788
	Backcountry/Restoration & MA 5	18,241	18,241	18,241
	General Forest & MA 6	123	123	123
	Forest Plan Special Areas & MAs 2b and 3	394	394	394

Grassy Top - (No. 01-982)

Description – The Grassy Top Roadless Area is located about 35 miles north of Newport, Washington, entirely within Pend Oreille County in the State of Washington. The area may be accessed via the Priest Lake Highway (State 57). A maintained National Forest road which will take a visitor to several trailheads starts at the end of the highway. The interior may be accessed by several trails. The area may be accessed from Washington State Highway 20 and a maintained County road.

The area contains a portion of the divide between Priest and Pend Oreille Rivers, two side ridges, and the upper portion of the South Fork of Granite Creek. Most of the area is mid-to-upper-slope mountainous terrain, and slopes are moderate to steep.

Most of the area is forested with mixed conifer forest which originated as a result of a large fire in the 1920s. Common tree species include larch, Douglas-fir, grand fir, lodgepole pine, and subalpine fir.

The area is underlain by metasediments of the Precambrian Belt Supergroup which have been intruded by Cretaceous age igneous rocks. The rocks are cut by northwest and northeast striking faults.

Table 93. Grassy Top Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Grassy Top (01-982)	Moderate	Moderate	High	13,579 acres recommended in Alternative C	Ratings of moderate for both Capability and Availability limit this area's suitability for recommended wilderness, however this area is recommended for wilderness in one action alternative (Alt C) primarily due to its high Need rating. The other action alternatives do not recommend wilderness designation and retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and three of the alternatives match this classification with the Forest Plan management area designation of MA 5.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 94. Grassy Top IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Grassy Top (01-982)	0	12,900	0	13,300	13,617	13,629	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – Alternatives B modified and D would protect roadless characteristics within this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. In addition, another 103 acres falls within a Forest Plan Special Area under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 3 (Special Areas). Alternative C protects roadless characteristics as well because of the proposed classification of Wild Land Recreation and companion management area designation of MA 1b. However, Alternative C is not compliant with the Idaho Roadless Rule and could not be implemented until this proposed change went through the rule making process to modify the management classification defined in 36 CFR 294.29.

Table 95. Grassy Top Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Name	IRR & MA	Action Alternatives		
		B Modified	C	D
Grassy Top (01-982)	Wild Land Recreation & MA 1b	0	13,579	0
	Backcountry/Restoration & MA 5	13,527	46	13,527
	Forest Plan Special Areas & MA 3	103	5	103

Hammond Creek - (No. 01-145)

Description – The Hammond Creek Roadless Area is located on the west side of the North Fork of the St. Joe River drainage beginning approximately 1 mile north of Avery, Idaho. The area lies entirely within Shoshone County on the Avery Ranger District of the Idaho Panhandle National Forests. Primary access exists from the North Fork Road 456 on the east and Bonneville Power Administration roads on the northwest. The Cedar Mountain, Kyle Creek, and Hammond Creek trail systems provide access into the interior.

The Hammond Creek Roadless Area roughly resembles an inverted triangle with a long finger of excluded land penetrating from the east. Elevation changes from 2,600 feet in the North Fork drainage to 6,100 feet on Cedar Mountain and Marcus Cook Point along the Slate Creek-North Fork Divide, the dominant geographic feature. Glacial activity typifies the higher elevations, with Cedar Lake occupying a glacial cirque at the head of Kyle Creek. Slopes are generally steep with numerous rock outcroppings, especially characterizing the stretch along the North Fork of the St. Joe River. The unit contains several major tributaries of the North fork of the St. Joe and Slate Creek.

The 1910 Fire burned the majority of the area, leaving only small, isolated, parcels of old-growth trees at scattered locations through the unit. The 1934 fire burned the southern half of the unit, generating large areas of non-stocked brushfields or seedling/sapling stands. Extensive stands of pure lodgepole pine or mixed species composition cover the remaining area. Mountain hemlock habitat types cover the high elevation areas, with western hemlock and cedar series occupying primarily the lower altitudes.

Table 96. Hammond Creek Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Hammond Creek (01-145)	Moderate	High	High	None	A rating of moderate for Capability limits this area's suitability for recommended wilderness. The Need rating of high is addressed with the recommendation of the Mallard-Larkins area to the south.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 97. Hammond Creek IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Hammond Creek (01-145)	21,100	16,100	0	18,700	17,404	17,404	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternatives would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Hammond Creek (or any partial acres) for wilderness designation.

Table 98. Hammond Creek Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Hammond Creek (01-145)	Backcountry/Restoration & MA 5	17,404	17,404	17,404

Hellroaring - (No. 01-128)

Description – This roadless area is located 12 miles northeast of Bonners Ferry, Idaho, within Boundary County. The area is within the Bonners Ferry Ranger District of the Idaho Panhandle National Forests. The area is accessed by driving north from Bonners Ferry on US 2 to Forest Road 2503 and then on Forest Road 211 to one of several trailheads along Forest Road 211. Several trails access the interior of the area.

The area consists of a moderately high north-south ridge sloping rather sharply into the surrounding Moyie and Kootenai River Valleys. The slopes are rather rocky.

Vegetation ranges from larch/Douglas-fir/white pine at lower elevations to higher elevation spruce/fir. The trees are about 100 years old.

Table 99. Hellroaring Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Hellroaring (01-128)	Moderate	High	High	None	Capability was rated as moderate and the area has been determined to be too small to recommend designation in any alternative.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 100. Hellroaring IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Hellroaring (01-128)	13,870	11,800	0	1,700	1,978	1,978	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative propose to manage this area consistent with the Idaho Roadless Rule classification of General Forest, Rangelands, and Grasslands because of its limited acreage. None of these action alternatives protect roadless characteristics however, all three are consistent with the Idaho Roadless Rule. None of these alternatives recommend Hellroaring (or any partial acres) for wilderness designation.

Table 101. Hellroaring Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Hellroaring (01-128)	General Forest & MA 6	1,978	1,978	1,978

Hungry Mountain - (No. 01-156)

Description – The Hungry Mountain Roadless Area is approximately 7 miles to the west and south of Nordman, Idaho. It is entirely within Pend Oreille County, Washington, on the Priest Lake Ranger District of the Idaho Panhandle National Forests. Access is provided by Forest Roads 70, 306, 308, 310, 312, and 658. Roads 70, 306, and 308 provide access from the Newport Ranger District to the west and immediately adjacent to the roadless area.

The long and narrow roadless area is primarily mountainous timberland, much of which burned in the 1920s. Elevations range from 3,200 feet to 6,173 feet at North Baldy Summit, 5,552 feet at Hungry Mountain, and 5,416 feet at Gleason Mountain. Several smaller creeks provide drainage to Kalispell Creek and the Upper West Branch of Priest River. The divide between the Pend Oreille River drainage and the Priest River drainage forms the western boundary of the roadless area. The area lies nearly equidistant between two major state highways, about 8 miles to either side.

Vegetation consists of Douglas-fir, larch, lodgepole pine, and grand fir timber and brushfields. The timber is primarily of young age due to extensive burns in the 1920s. Approximately 3,800 acres of the northern part of the area were hand-planted by the Civilian Conservation Corps during the 1930s and 1940s.

Table 102. Hungry Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Hungry Mountain (01-156)	Low	High	High	None	This area was not recommended due to its low capability rating.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 103. Hungry Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Hungry Mountain (01-156)	0	9,600	0	8,900	8,615	8,640	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Hungry Mountain (or any partial acres) for wilderness designation.

Table 104. Hungry Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Hungry Mountain (01-156)	Backcountry Restoration & MA 5	8,640	8,640	8,640

Katka Peak - (No. 01-157)

Description – Katka Peak Roadless Area is located 5 miles southeast of Bonners Ferry. It is within Boundary County on the Bonners Ferry Ranger District of the Idaho Panhandle National Forests. Access can be gained from U.S. 95 via the Trail Creek Road- a maintained, unsurfaced road.

This roadless area is part of a northeast-southwest ridge and associated side drainages. Slopes to the northwest are very steep; southeast slopes are more moderate. Several southeast-bearing side ridges are also found. Most drainages are only partially within the roadless area.

Lower elevations support cedar/hemlock/white pine, with subalpine fir common at high elevations.

Table 105. Katka Peak Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Katka Peak (01-157)	Moderate	Moderate	High	None	Ratings of moderate for both Capability and Availability limit this area's suitability for recommended wilderness. In addition, portions of the northern boundary is adjacent to private property.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 106. Katka Peak IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Katka Peak (01-157)	0	12,400	0	10,500	10,343	10,343	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics on the majority of acreage within this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. All three alternatives propose to manage this roadless area consistent with the Idaho Roadless Rule including 1,330 acres managed under the Idaho Roadless Area classification of General Forest, Rangelands, and Grasslands and the companion Forest Plan Management Area 6 (General Forest) which will allow management actions to be proposed, analyzed, and implemented if approved. None of these alternatives recommend Katka Peak (or any partial acres) for wilderness designation.

Table 107. Katka Peak Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Katka Peak (01-157)	Backcountry/Restoration & MA 5	9,013	9,013	9,013
	General Forests & MA 6	1,330	1,330	1,330

Kootenai Peak - (No. 01-126)

Description – This roadless area is located five miles west of Bonners Ferry in Boundary County on the Bonners Ferry Ranger District of the Idaho Panhandle National Forests. The area is accessible from the Myrtle Creek/Snow Creek Road, which is maintained for automobile traffic.

The Kootenai Peak Roadless Area encompasses both sides of a long ridge extending from Cooks Pass to the Kootenai River Valley. There are no lakes or outstanding topographic features in this area.

This ridge is generally covered by heavy timber on the Snow Creek side, and the timber is young; on the Myrtle Creek side, much of the timber is very old and ranges from cedar/hemlock at lower elevations to spruce/fir at higher elevations.

A portion of the area facing east into the Kootenai River Valley is visible from the city of Bonners Ferry and at numerous points along U.S. Highway 95, as well as from secondary roads in the valley. The Myrtle Creek drainage is the domestic water source for the city of Bonners Ferry.

Table 108. Kootenai Peak Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Kootenai Peak (01-126)	Moderate	Moderate	High	None	This area was not recommended in any alternative due its Capability and Availability ratings, the limited acreage, and its isolated location.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 109. Kootenai Peak IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Kootenai Peak (01-126)	7,250	6,000	0	4,500	4,974	4,974	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative propose to manage this area consistent with the Idaho Roadless Rule classification of General Forest, Rangelands, and Grasslands because of its limited acreage and isolated location. None of these action alternatives protect roadless characteristics however; all three are consistent with the Idaho Roadless Rule. None of these alternatives recommend Kootenai Peak (or any partial acres) for wilderness designation.

Table 110. Kootenai Peak Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Kootenai Peak (01-126)	General Forest & MA 6	4,974	4,974	4,974

Little Grass Mountain - (No. 01-121)

Description – This roadless area is located seven miles northwest of Nordman on the Priest Lake Ranger District of the Idaho Panhandle National Forests. The area is somewhat oval-shaped, with a two mile long intrusion of road at the southern end. One-half of the area is in Pend Oreille County, Washington; the remainder lies within Bonner County, Idaho. The area is accessed by the Nordman-Metaline Falls Road 302. This road forms the western boundary of the roadless area and is a well maintained gravel road suitable for automobile travel.

Although the area itself is natural appearing, signs of timber harvest activities and roads are visible from within the area. Elevations range from 3,200 feet at the south end of the area to a high of 5,696 feet on Little Grass Mountain, the most prominent feature in the steep, mountainous timberland. The roadless area drains into the North Fork of Granite Creek and is comprised of Zero Creek, the West Fork of Packer Creek, associated tributaries to these streams, and other minor unnamed drainages.

Much of the area was burned in the 1920s and includes considerable amounts of immature timber. Habitat types are generally those common to the Priest Lake Ranger District, primarily cedar or hemlock/boxwood and subalpine fir/beargrass or menziesia. In addition, Douglas-fir, larch, grand fir, and white pine are found throughout the canopy.

Table 111. Little Grass Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Little Grass Mountain (01-121)	Moderate	High	High	None	A rating of moderate for Capability limits this area's suitability for recommended wilderness. The Need rating of high is addressed with the recommendation of the Salmo-Priest area to the north as an addition to the Salmo-Priest Wilderness Area.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 112. Little Grass Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Little Grass Mountain (01-121)	4,540	7,900	0	7,900	7,966	7,967	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternatives would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. A significant portion of this roadless area is located in Washington, therefore not under the purview of the Idaho Roadless Rule. The portion located in Washington State would have a Forest Plan designation of MA5 for all three action alternatives and would protect roadless characteristics. In addition, all three action alternatives propose a Forest Plan Special Area that would also protect roadless characteristics (MA3 – Huff Lake Special Area). None of these alternatives recommend Little Grass Mountain (or any partial acres) for wilderness designation.

Table 113. Little Grass Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Little Grass Mountain (01-121)	Backcountry/Restoration & MA 5	BCR = 2,900 (IRR Portion MA5 = 7,933	BCR = 2,900 (IRR Portion MA5 = 7,933	BCR = 2,900 (IRR Portion MA5 = 7,967
	MA 3	34	34	0

Lost Creek - (No. 01-137)

Description – The Lost Creek Roadless Area is located near the Idaho-Montana Divide approximately 17 miles north of Wallace, Idaho. The entire area is located in Shoshone County on the Wallace Ranger District of the Idaho Panhandle National Forests.

Elevations range from 5,860 feet at Bloom Peak to about 2,400 feet near the Coeur d’Alene River. Major drainages include Lost Creek and the East Fork of Lost Creek. The general aspect is southwest. Quartzites and argillites of the Precambrian Belt rocks are exposed in this study area. Two persistent faults are the only structures mapped in the area and they are parallel, striking north-northwest.

Vegetative cover is predominately Douglas-fir, western larch, western white pine, and grand fir. Most of Lost Creek was burned in 1910. The vegetation is mostly pole-size trees or brushfields. Burning to improve big game winter range has occurred on about 3,000 acres since 1970.

Table 114. Lost Creek Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Lost Creek (01-137)	Moderate	High	High	None	A rating of moderate for Capability limits this area's suitability for recommended wilderness. None of the action alternatives recommend wilderness designation so all alternatives retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and includes a small acreage in a Forest Plan Special Area (MA 2b).

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 115. Lost Creek IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Lost Creek (01-137)	11,600	11,300	0	11,600	11,606	11,606	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternatives would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. In addition, a small acreage in all three alternatives fall within a Forest Plan Special Area under the Idaho Roadless Rule and is designated as MA 2b (Eligible Wild & Scenic River) which protects most roadless characteristics. None of these alternatives recommend Lost Creek (or any partial acres) for wilderness designation.

Table 116. Lost Creek Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Lost Creek (01-137)	Backcountry/Restoration & MA 5	11,517	11,517	11,517
	Forest Plan Special Areas & MA 2b	89	89	89

Magee - (No. 01-132)

Description – This roadless area is located 32 miles northeast of Coeur d’Alene, Idaho. It is within Shoshone County and on the Fernan Ranger District of the Idaho Panhandle National Forests. It is paralleled by Trail 22, a National Recreational Trail.

The area consists of mountainous terrain with elevations ranging from 2,900 feet at the mouth of Independence Creek to 5,200 feet at Faset peak. The study area is underlain by quartzites and argillites of the Precambrian Belt Supergroup. The lower members of the Belt- Prichard, Burke, Revett, and St. Regis- are present in limited amounts. The area is very highly faulted, with an apparent general north-south trend.

Large wildfires burned over most of the area in 1910 and 1926. Currently, second-growth coniferous vegetation dominates the north and east aspects, with grass and brush occupying most south and west slopes. Independence Creek flows through the entire area and is characterized by a broad, flat valley bottom with many open grass parks along its lower reaches.

Table 117. Magee Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Magee (01-132)	High	High	High	34,812 acres recommended in Alternative C	This area is recommended for wilderness in one action alternative because of the high ratings. The other action alternatives do not recommend wilderness designation and would retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and three of the alternatives match this classification with the Forest Plan management area designation of MA 5.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 118. Magee IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Magee (01-132)	36,760	34,800	0	34,100	34,811	34,812	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – Alternatives B modified and D would protect roadless characteristics across all of this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area

designation of MA 5. Alternative C protects roadless characteristics as well because of the proposed classification of Wild Land Recreation and companion management area designation of MA 1b. However, Alternative C is not compliant with the Idaho Roadless Rule and could not be implemented, if selected, until this proposed change went through the rule making process to modify the management classification defined in 36 CFR 294.29.

Table 119. Magee Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Magee (01-132)	Wild Land Recreation & MA 1b	0	34,812	0
	Backcountry Restoration & MA 5	34,812	0	34,812

Mallard Larkins - (No. 01-300)

Description – The Mallard-Larkins Roadless Area extends west from the Bitterroot Mountain Range generally along the divide between the St. Joe River and the Clearwater River drainages. It is situated approximately 36 miles southeast of Avery, Idaho, 60 miles northeast of Orofino, Idaho, and 20 miles southwest of Superior, Montana. Mallard-Larkins is in Clearwater and Shoshone Counties on the Clearwater and Idaho Panhandle National Forests.

The area is generally accessible by moderate to low standard gravel and dirt roads. Access along the north side is provided from several dead-end roads extending south to and into the interior from the main St. Joe River Road and Road 320 from Red Ives work center east. Access to the east side is possible from the Pierce-Superior road 250, the Fly Hill Road 720, and the Pot Mountain Ridge Road 715. Access to the south side is from numerous logging roads in the Cold Springs, Quartz, and Skull Creek drainages, and the North Fork Clearwater River Road 249. The southwest corner is accessed by the Dog Ridge Road 700.

Interior access, with some exceptions, is provided over a network of approximately 280 miles of low standard, fire control and administrative trails. Several trails into the more popular areas, such as the original Mallard-Larkins Pioneer Area and along the upper St. Joe River, have been improved to some extent in recent years.

The unit is large and complex, composed of generally steep, rocky ridges, and deep canyons. The taller major peaks include Mallard Peak (6,870 feet), Larkins Peak (6,661 feet), Crag Peak (6,879 feet), Heart Peak (6,870 feet), Black Mountain (7,077 feet), East Sister (7,043 feet), The Nub (6,924 feet), Cold Springs Peak (6,731 feet), and Five Lakes Butte (6,713 feet).

Flowing through the area are parts of three river systems and numerous large and small fast moving but mostly crystal-clear streams. The three river systems include most of the headwaters of the St. Joe River, a large section of the Little North Fork of the Clearwater River, and the main North Fork of the Clearwater River. The North Fork passes through a small section above Dworshak Reservoir and borders several stretches of the area along the east and south sides. A major divide separates the Little North Fork and St. Joe Rivers from the land draining into the main North Fork of the Clearwater. Major streams draining into the Little North Fork include Sawtooth Creek, Canyon Creek, and Foehl Creek. Major streams draining into the main North Fork of the Clearwater include Isabella Creek, Collins Creek, Skull Creek, and Quartz Creek.

There are 38 mountain lakes large enough to be named. Heart Lake, containing 35 acres, is the largest one.

Geologically, most of the area is underlain by metamorphosed rocks of the Precambrian Belt Supergroup consisting of rocks from the Wallace formation, Ravalli Group, and Prichard Formation. These units contain interbedded layers of quartzite, schists, and gneiss. The extreme southeastern portion contains some rocks of the Idaho batholith consisting mainly of granite. Much of the granite is rapidly decomposing (in geologic terms), resulting in very unstable landscapes with sensitive soil mantles. Exposed in the northwest one-third of the area are anthracites, gneisses, and schists which are older than the Belt Supergroups.

Although there are numerous rock outcroppings, talus slopes, and barren areas, a large portion is heavily vegetated, ranging from mountain grasslands and meadows to dense mixtures of large varieties of trees and shrubs. Two vegetative ecosystems are present: a cedar-hemlock-pine forest at elevations generally below 6,000 feet and a western spruce-fir forest above 6,000 feet.

Approximately 80 percent of the land was burned over in 1910 and much of it again in 1919, 1920, and 1924. Where conditions are favorable, vast stands of lodgepole pine, Douglas-fir, grand fir, Engelman spruce, larch, western redcedar, western white pine, and mountain hemlock exist, some escaping the fires but most regenerating afterwards. Where the soils are thin and conditions severe, such as on the higher ridges and steep south facing slopes, shrubs still dominate the sites. The lands above 6,000 feet are subalpine in character, supporting mountain hemlock, subalpine fir, and lodgepole pine.

There are three major attractions: (1) The original Mallard-Larkins Pioneer Area, which is a highly scenic area along the major divide between the Little North Fork and the main North Fork River systems. It contains many high peaks and mountain lakes and is relatively accessible by a good trail system. (2) The Five Lakes Butte area along the upper northeast side of the roadless area bounded by the Fly Hill-Gospel Hill Road. Its main attraction is the open mountain grasslands, barren ground, and a cluster of lakes within easy walking distance of each other. (3) Elizabeth Lakes area in the southeast corner above the main North Fork of the Clearwater River. It also is composed of several mountain peaks and a cluster of eight small lakes, all within two miles of each other.

Table 120. Mallard Larkins Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Mallard Larkins (01-300)	High	High	High	B Mod=73,103 C= 75,528 D= 50,087	All three action alternatives recommend all or a portion of this roadless area as recommended wilderness (MA 1b). Alternative C would include acreage that would be inconsistent with the Idaho Roadless Rule.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 121. Mallard Larkins IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Mallard Larkins (01-300)	131,120	127,100	76,300	119,800	129,376	129,439	73,103

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternatives would protect roadless characteristics because of its Idaho Roadless Area classifications of Wild Land Recreation and Backcountry/Restoration and companion management area designations of 1b and 5. In addition the majority of the remaining acres are classified as Forest Plan Special Areas under the Idaho Roadless Rule and a variety of protected areas in the Revised Forest Plan (MAs 2a, 2b, 3, & 4a). All four alternatives recommend significant portions of Mallard Larkins Roadless Area for wilderness designation.

Table 122. Mallard Larkins Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Mallard Larkins (01-300)	Wild Land Recreation & MA 1b	73,103	75,528	50,087
	Backcountry/Restoration & MA 5	45,752	43,250	45,736
	General Forest & MA 6	0	12	14
	Forest Plan Special Areas & MAs 2a, 2b, 3 and 4a	10,585	10,648	33,601

Maple Peak - (No. 01-141)

Description – This roadless area is located about 10 miles north of Mullan, Idaho, in Shoshone County, Idaho, and Sanders County, Montana. This roadless area is shared by three National forests: the Idaho Panhandle, Kootenai, and Lolo National Forests. Access to the Idaho side is gained by exiting I-90 at Kingston, Idaho, traveling the paved Coeur d'Alene River Road to Prichard, and then following Forest Highway 9 to the periphery of the area where access to the area is gained by trails. Access to the Montana side is gained by exiting State Highway 200 at the Thompson Pass road (maintained gravel road) which leads to trailhead access to the area.

Topographically, the area consists of an east-west ridge which crosses the drainages. Slopes are moderate, except near the State divide. Smaller drainages are wholly included. The boundary irregularly traverses ridges, streams, and cross slopes. Two small lakes are found within this area; neither is considered a significant fishery.

About 90 percent of the vegetation is a result of the 1910 fire which left large areas of brushfields and timber stands which are now pole-size lodgepole, Douglas-fir, larch, and white pine. Subalpine vegetation is found at the highest elevations.

Table 123. Maple Peak Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Maple Peak (01-141)	Low	Low	Moderate	None	Ratings of low for both Capability and Availability limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 124. Maple Peak IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Maple Peak (01-141)	8,740	8,700	0	8,500	8,674	8,674	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Maple Peak (or any partial acres) for wilderness designation.

Table 125. Maple Peak Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Maple Peak (01-141)	Backcountry/Restoration & MA 5	8,674	8,674	8,674

Meadow Creek/Upper North Fork - (No. 01-302)

Description – The Meadow Creek-Upper North Fork Roadless Area is situated on the Idaho-Montana border, approximately 40 miles west of Missoula, Montana. The Idaho portion is located in parts of Clearwater and Shoshone Counties within the Clearwater and Idaho Panhandle National Forests. The Montana portion is in Mineral County within the Lolo National Forest.

Accessibility is provided from several directions. From the east, it is 16 miles from Superior, Montana, via Cedar Creek Road 320 or 24 miles via Pierce-Superior Road 250. From the northwest, it is 35 miles from Avery, Idaho, via St. Joe River Road 320. From the northwest, it is 35 miles from Avery, Idaho, via St. Joe River Road 320. From the south, it is 100 miles from Orofino, Idaho via Fly Hill Road 715 and Pot Mountain Ridge Road 720.

Interior access is provided through over 54 miles of relatively low standard fire control and administrative trails. Because of funding and need, many trails are maintained intermittently. Cross-country travel is very difficult over most of the area because of rugged terrain and dense

low vegetation. Access along the state line divide is easier over barren and sparse vegetation areas.

Topography changes from narrow, flat valley bottoms to very narrow, flat and U-shaped valleys at higher elevations. Sharp, rugged relief above 7,000 feet occurs along the Bitterroot Divide, which separates Idaho from Montana. Several cirque basins containing four small lakes are also found near the divide. Two other small lakes are found at lower elevations. Topography becomes less steep in the North Fork of the Clearwater River drainage, dropping down to 3,800 feet in elevation where the river exits the area.

Geologically, the area is composed of Belt Series bedrock which is made up of schists and gneiss. These rocks are generally more stable and less erosive than those within the batholith.

Two major river systems, the St. Joe and the North Fork of the Clearwater, start within the area. The streams in the Montana side drain into the Clark Fork River. Six lakes are found and all but one are within relatively short distance of the Bitterroot Divide.

The area contains three major vegetative ecosystems: (a) cedar-hemlock-pine forest encompassing the lower elevations in the North Fork of the Clearwater River and Meadow and Chamberlain Creeks, (b) western spruce-fir forest at the higher elevations up to 6,000 feet, and (c) alpine meadows and barren land in a band along the Bitterroot Divide above 6,000 feet.

Vegetation varies from carex and beargrass on high elevation south slopes to grand fir and western redcedar types at lower elevations. Large forest fires in the late 1800s and early 1900s had a major influence on the present vegetation, with much of the area being covered with even-aged stands of lodgepole pine averaging six to ten inches in diameter. Most of the area is reforested, with the exception of south slopes having thin soils. Other species present include subalpine fir, western larch, mountain hemlock, grand fir, and some white bark pine.

Table 126. Meadow Creek/Upper North Fork Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Meadow Creek/Upper North Fork (01-302)	High	High	Moderate	4,355 acres recommended in Alternative C	This area is recommended for wilderness in one action alternative (C) because of the high ratings for Capability and Availability. The other action alternatives do not recommend wilderness designation and would retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and three of the alternatives match this classification with the Forest Plan management area designation of MA 5.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 127. Meadow Creek/Upper North Fork IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Meadow Creek/Upper North Fork (01-302)	6,100	6,100	0	4,300	6,056	6,024	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – Alternatives B modified and D would protect roadless characteristics across this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. In addition another 1,510 acres falls within a Forest Plan Special Area under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 2a (Wild & Scenic River). Alternative C protects roadless characteristics as well because of the proposed classification of Wild Land Recreation and companion management area designation of MA 1b. However, Alternative C is not compliant with the Idaho Roadless Rule and could not be implemented until this proposed change went through the rule making process to modify the management classification defined in 36 CFR 294.29.

Table 128. Meadow Creek/Upper North Fork Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Meadow Creek/Upper North Fork (01-302)	Wild Land Recreation & MA 1b	0	4,355	0
	Backcountry/Restoration & MA 5	4,514	159	4,514
	Forest Plan Special Areas & MA 2a	1,510	1,510	1,510

Midget Peak - (No. 01-151)

Description – Situated on the Avery Ranger District of the Idaho Panhandle National Forests, the Midget Peak Roadless Area lies in Shoshone County approximately 22 miles southeast of Avery, Idaho. A paved road, the St. Joe River Road, forms the eastern boundary and provides primary road access to the area. Several trails, including the Simmons Creek and Simmons Ridge systems, traverse the interior. A short quarter-mile road to the trailhead for the Simmons Creek Trail extends into the unit from the west.

Steep, rugged terrain with numerous rock outcrops, especially in the drainage bottoms, characterizes the topography of this triangular-shaped unit. Elevations range from 3,500 feet along the St. Joe River to over 6,000 feet along Simmons Ridge. Portions of several watersheds feed westward into the St. Joe River, with the most important being Simmons Creek.

The vegetation reflects past fire history. Fires in 1910, 1924, and 1931 burned most of the area leaving only scattered patches of older timber, with the largest component present in the Gold Creek drainage. In the burned portion, lodgepole pine predominates, with significant amounts of

larch, Douglas-fir, grand fir, and subalpine fir intermixed in the canopy. Remnants of off-site ponderosa pine planted in 1939 occur at several locations along the St. Joe River corridor and Simmons Creek. Large acreages on the more exposed sites in the Simmons, Midget, and Slide Creek drainages still remain in a brushfield condition.

Habitats through the area range from cedar series in the lower elevations to mountain hemlock or subalpine fir on the ridgelines.

Table 129. Midget Peak Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Midget Peak (01-151)	Moderate	High/Low	High	None	Ratings of moderate for Capability and High/Low for Availability limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 130. Midget Peak IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Midget Peak (01-151)	7,300	7,000	0	6,400	7,239	7,239	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. In addition, another 764 acres falls within a Forest Plan Special Area under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 2a (Wild & Scenic River). None of these alternatives recommend Maple Peak (or any partial acres) for wilderness designation.

Table 131. Midget Peak Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Midget Peak (01-151)	Backcountry/Restoration & MA 5	6,476	6,476	6,476
	Forest Plan Special Areas & MA 2a	764	764	764

Mosquito Fly - (No. 01-150)

Description – The Mosquito Fly Roadless Area lies in Shoshone County approximately 20 miles southeast of Avery, Idaho, on the Avery Ranger District of the Idaho Panhandle National Forests.

The area lies within the checkerboard landownership pattern, with Burlington Northern, Inc. owning the odd-numbered sections in the eastern two-thirds of the unit.

Access to the roadless area is provided by the St. Joe River Road, a paved road which forms the eastern boundary, and the Beaver, Avery Timber Creek, and Junction Ridge Roads which form the remaining perimeter. A network of trails follows the major ridgelines and drainage bottoms. A historical resource, the Old Montana Trail, follows the northwestern perimeter but lies abandoned along most of its route.

Steep, rugged terrain with sharp ridges dissected by several drainages marks the topography, with elevations rising sharply from 3,300 feet along the St. Joe River to over 6,500 feet along the ridgelines. Rock outcrops and shallow soils typify a large proportion of this squarish-shaped roadless area. Three major tributaries—Mosquito, Fly, and Beaver Creeks—flow northeastward into the St. Joe River. Several major peaks, including Conrad Peak, Junction Peak, and Peggy Peak, are located within the area. Two small pond-like lakes—Twin Lakes—are situated along the western boundary at a major trailhead near Peggy Peak.

The 1910 fire burned a majority of the area, with a portion reburning in 1924. Scattered stands of old-growth timber are intermixed with partially stocked or non-stocked brushfields or immature stands of dominantly lodgepole pine, larch, or Douglas-fir. In 1940, portions of Beaver Creek were planted with ponderosa pine and cedar. Remnants of these plantations still exist. Habitats range greatly, with grand fir or Douglas-fir types on the more exposed slopes and cedar dominating the moister sites. Mountain hemlock and subalpine fir series dominate the higher elevations.

Table 132. Mosquito Fly Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Mosquito Fly (01-150)	High	High	High	17,898 acres recommended in Alternative C	This area is recommended for wilderness in one action alternative (C) because of the high ratings. The other action alternatives do not recommend wilderness designation and would retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and three of the alternatives match this classification with the Forest Plan management area designation of MA 5.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 133. Mosquito Fly IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Mosquito Fly (01-150)	15,500	15,400	0	13,200	19,408	19,404	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – Alternatives B modified and D would protect roadless characteristics across this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. In addition another 1,507 acres falls within a Forest Plan Special Area under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 2a (Wild & Scenic River). Alternative C protects roadless characteristics as well because of the proposed classification of Wild Land Recreation and companion management area designation of MA 1b. However, Alternative C is not compliant with the Idaho Roadless Rule and could not be implemented, if selected, until this proposed change went through the rule making process to modify the management classification defined in 36 CFR 294.29.

Table 134. Mosquito Fly Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Mosquito Fly (01-150)	Wild Land Recreation & MA 1b	0	17,898	0
	Backcountry/Restoration & MA 5	17,897	0	17,897
	Forest Plan Special Areas & MA 2a	1,507	1,507	1,507

North Fork - (No. 01-147)

Description – The North Fork Roadless Area is located immediately northeast of Avery, Idaho, and 20 miles southeast of Wallace, Idaho. It lies entirely within Shoshone County on the Avery Ranger District of the Idaho Panhandle National Forests. Primary access includes the St. Joe River Road 218 and the North Fork Road 456. A poorly maintained secondary road constructed by the Civilian Conservation Corps (CCC) extends approximately 3 miles into the center of the unit at Shefoot Mountain. A network of trails, including the Nelson Ridge National Recreation Trail system, provides interior access.

The rectangular-shaped unit is an area of rugged, mountainous timberland. Elevations sharply rise from 2,800 feet on the North Fork and main St. Joe Rivers to 6,300 feet at Shefoot Mountain, the highest peak within the unit.

Several major tributaries of the St. Joe, the North Fork, and Loop Creek drain the area, with the largest being Skookum Creek. Steep, incised draws typified by breakland topography and numerous bedrock outcrops cover roughly half of the North Fork Roadless Area. Glacial topography is evidenced in the Shefoot Mountain area.

The 1910 fire and subsequent reburns created a patchwork of vegetative cover. A few islands of old growth which escaped the 1910 fire remain scattered throughout the unit, with the largest contained in the Skookum Creek drainage. A large portion of the southern one-third of the unit reburned in 1934 leaving large areas of non-stocked brushfields. Extensive stands of lodgepole pine occupy much of the remaining area as well as mixed stands of larch, Douglas-fir, and grand fir. Habitat types are Douglas-fir/ninebark, western hemlock/clintonia, and cedar/clintonia at the lower elevations, graduating to mountain hemlock/menziesia or beargrass at the higher elevations.

Table 135. North Fork Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
North Fork (01-147)	Moderate/High	High	High	None	Ratings of moderate/high for Capability limit this area's suitability for recommended wilderness. In addition, this roadless area has a boundary that would be difficult to manage as wilderness. The Idaho Roadless Rule (which went through extensive public comment and review) has classification this roadless area as Backcountry/Restoration and all four alternatives match this classification with the Forest Plan management area designation of MA 5.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 136. North Fork IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
North Fork (01-147)	32,100	32,100	0	30,300	31,357	31,400	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. In addition, another 847 acres fall within a Forest Plan Special Area under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 2a (Wild & Scenic River). None of these alternatives recommend North Fork (or any partial acres) for wilderness designation.

Table 137. North Fork Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
North Fork (01-147)	Backcountry/Restoration & MA 5	30,510	30,510	30,510
	Forest Plan Special Areas & MA 2a	847	847	847

Northwest Peaks - (No. 01-663)

Description – This roadless area is located in the extreme northwest corner of the Kootenai National Forest, bordered by Canada to the north and Idaho to the west. Part of the area extends into the Idaho Panhandle.

Access to the area is provided via the Yaak River Road leading in from U.S. Highway 2. Destination points via trails from the Pete Creek Road include Hawkins Lake and Northwest Peak, and the ridgeline running along Rock Candy Mountain and Black Top Mountain.

The area is characterized as a high ridgeline setting with a generally rough topography. The highest points are Northwest Peak (7,700 feet), Davis Mountain (7,500 feet), and Ewing Mountain (7,500 feet), all of which are in the existing Northwest Peaks Scenic Area. The lowest elevation is around 6,000 feet. Subalpine and alpine in character, timber is generally stunted and scattered. There is some suitable timber land on the southern edge. Species include Engelmann spruce, alpine fir, whitebark pine, and alpine larch. Headwater sections for Spread and Hawkins Creek are found in this area, as are Seven Lakes. Named lakes include Hawkins and Burke.

Timber harvest and road building are most noticeable on the Idaho side, but can be seen from all high points of the area. The ecosystems represented in this area are Western Spruce Fir forest and Cedar Hemlock Pine forest.

Table 138. Northwest Peaks Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Northwest Peaks (01-663)	High	High	Moderate	None	None of the action alternatives recommend any acres for wilderness designation. This area is primarily made up of the Northwest Peaks Scenic Area (MA 3 - Special Area) and that designation is retained in all three action alternatives.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 139. Northwest Peaks IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Northwest Peaks (01-663)	0	5,700	0	5,400	5,479	5,481	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Forest Plan Special Area under the Idaho Roadless Rule and the associated Forest Plan Management Area allocation of 3 (Special Area). In addition, another 739 acres (894 in Alt D) are within the Idaho Roadless classification of Backcountry Restoration and companion Forest Plan Management Area 5 which would protect roadless characteristics. A few acres in alternative B Modified and C (155) would be managed under the Roadless Rule classification of General Forest, Rangelands, and Grasslands and our companion MA 6. These acres would not have protections to retain roadless characteristics. None of these alternatives recommend Northwest Peaks (or any partial acres) for wilderness designation.

Table 140. Northwest Peaks Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Northwest Peaks (01-663)	Backcountry/Restoration & MA 5	739	739	894
	General Forest & MA 6	155	155	0
	Forest Plan Special Areas & MA 2a	4,587	4,587	4,587

Packsaddle - (No. 01-155)

Description – This roadless area is located approximately 14 miles southeast of Sandpoint, Idaho, and 7 miles southwest of Clark Fork, Idaho. It lies from 2 to 4 miles east of the southern end of Lake Pend Oreille. This area is within Bonner County and is on the Sandpoint Ranger District of the Idaho Panhandle National Forests.

This area is approximately 11 miles long and averages no more than 2 miles wide. The boundaries are irregular, with fingers of roaded and logged areas protruding towards the interior of it. This area includes Packsaddle Mountain (6,402 feet), a prominent peak within the area. Alpine glaciation occurred on Packsaddle Mountain, but the remaining roadless area's landform was shaped by continental glaciation. Topography changes from 2,600 feet to 6,400 feet. Major drainages include Branch North Gold Creek, Falls Creek, and Granite Creek. Numerous other smaller drainages originate within this area and eventually drain into Lake Pend Oreille. No mountain lakes are found within this roadless area.

Forest types within this area include mixed conifer stands which are common in the lower elevations of northern Idaho. Only the highest elevations support alpine fir, lodgepole pine, and Engelmann spruce. Dry southwest exposures on the lower elevations are winter range for deer

and elk. Most of the timber stands average 70-90 years old. Boulder fields interspersed with subalpine fir forest, beargrass meadows, and huckleberry and menziesia openings form the landscape in the upper reaches of Packsaddle Mountain.

Table 141. Packsaddle Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Packsaddle (01-155)	Moderate	Moderate	Moderate	None	Ratings of moderate for Capability, Availability, and Need limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 142. Packsaddle IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Packsaddle (01-155)	0	18,700	0	17,900	19,309	19,310	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Packsaddle (or any partial acres) for wilderness designation.

Table 143. Packsaddle Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Packsaddle (01-155)	Backcountry/Restoration & MA 5	19,310	19,310	19,310

Pinchot Butte - (No. 01-149)

Description – The Pinchot Butte Roadless Area is located approximately 36 miles southeast of St. Maries, Idaho. The area is in Shoshone County, Idaho, on the Idaho Panhandle National Forests. The area includes approximately 1,080 acres of State of Idaho lands and 80 acres of private ownership. The remainder is administered by the Forest Service and the Bureau of Land Management (BLM). The BLM administers approximately 2,480 acres in the northern part of the area.

The area lies along the south side of the divide between the North Fork of the Clearwater River and the St. Joe River. Pinchot Butte is the highest point in the area, with an elevation of 5,995 feet. The lowest point in the area is approximately 3,400 feet in Floodwood Creek on the southern boundary. The entire area drains into the Little North Fork of the Clearwater River.

Topography is characterized by narrow ridges which drop off into steep, narrow draws. Several areas of rock outcrops appear along the slopes of Pinchot Butte and the tops of ridges. This unit has very complex geology and structure. The area is highly folded and faulted with numerous intrusions of granitic igneous rock. Contact metamorphism from the igneous rocks has altered the surrounding sediments to schists, quartzites, and garnetiferous amphibolites.

Vegetation in the area is composed of overmature, scattered hemlock and alpine fir interspersed with brushfields. Northerly and easterly facing slopes include denser patches of timber. Vegetation in the area has been influenced by fires which burned over the area in 1910 and again in 1923. Pinchot Marsh, a high elevation wetland, is a unique area characterized by wetlands vegetation.

Table 144. Pinchot Butte Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Pinchot Butte (01-149)	Low	Moderate	High	None	Ratings of low for Capability, and moderate for Availability limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 145. Pinchot Butte IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Pinchot Butte (01-149)	7,980	7,000	0	7,800	8,509	8,588	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Pinchot Butte (or any partial acres) for wilderness designation.

Table 146. Pinchot Butte Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Pinchot Butte (01-149)	Backcountry/Restoration & MA 5	8,588	8,588	8,588

Roland Point - (No. 01-146)

Description – The Roland Point Roadless Area is located on the south side of the Idaho Montana border about six miles southeast of Mullan, Idaho, and 10 miles north of Avery, Idaho. The area lies within Shoshone County on the Avery Ranger District of the Idaho Panhandle National Forests.

About 265 acres of patented mining claims are contained within the unit. Bonneville Power Administration (BPA) tower access roads, Bullion Creek, Loop Creek, and Cliff Creek Roads provide motorized access to the western, eastern, and southern boundaries. Low standard mining roads, the State Line Trail, and Triangle Peak Trail offer interior access.

The roughly triangle-shaped unit rises in elevation from 3,400 feet on the North Fork of the St. Joe River to over 6,500 feet on the Bitterroot Divide. Terrain is precipitous, with generally steep, rocky slopes. Streams flow southward into the St. Joe River system.

Existing vegetation resulted from the 1910 and successive fires which consumed the entire unit. Extensive nonstocked brushfields remain on the more exposed southern aspects, with immature sapling or small sawtimber stands of mixed composition on the cooler north aspects. Additionally, portions of the area were planted with off-site ponderosa pine or western white pine. Little old-growth timber remains anywhere within the unit.

The Bitterroot Divide is characterized by open subalpine vegetation. Habitat varies from cedar/clintonia at the lower elevations to mountain hemlock or subalpine fir types on the higher slopes.

Table 147. Roland Point Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Roland Point (01-146)	Moderate	Low	High	None	Ratings of moderate for Capability and low for Availability limit this area's suitability for recommended wilderness..

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 148. Roland Point IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Roland Point (01-146)	6,300	6,300	0	6,400	6,524	6,592	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Roland Point (or any partial acres) for wilderness designation.

Table 149. Roland Point Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Roland Point (01-146)	Backcountry/Restoration & MA 5	6,592	6,592	6,592

Saddle Mountain - (No. 01-154)

Description – The Saddle Mountain Roadless Area is located in the northwest corner of the Bonners Ferry Ranger District on the Idaho Panhandle Nation Forests in Boundary County. The area is accessed by Forest roads originating in the Smith creek and Boundary Creek drainages. The interior may be accessed by travelling one of several trails which traverse this area.

The area is narrow and somewhat rectangular in shape, occupying the ridge between Grass and Cow Creeks. Prominent features are Saddle Mountain (6,983 feet) and Silver Mountain (6,555 feet). Three small lakes are found in this area. Slopes from the ridge to stream bottoms are moderate to steep.

Approximately 3,000 acres were burned in 1967. The area is densely forested with cedar, spruce, hemlock, larch, white pine, and subalpine fir. Some old-growth timber is present. One grazing allotment uses part of the transitory range created by the Trapper Peak Fire.

Table 150. Saddle Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Saddle Mountain (01-154)	Low	Moderate	High	None	Ratings of low for Capability, and moderate for Availability limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 151. Saddle Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Saddle Mountain (01-154)	0	8,600	0	7,500	7,765	7,766	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Saddle Mountain (or any partial acres) for wilderness designation.

Table 152. Saddle Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Saddle Mountain (01-154)	Backcountry/Restoration & MA 5	7,766	7,766	7,766

Salmo-Priest - (No. 01-981)

Description – The Salmo-Priest Roadless Area is located entirely within Boundary County, Idaho, in the immediate far northwest corner of the County and State. The area is approximately 45 miles north of Priest River, Idaho. Primary access is gained by traveling State Highway 57 north from Priest River until the pavement ends at Nordman. Travel continues on Forest Road 1013 which leads to a number of trailheads. The interior is accessed via a number of well-maintained trails.

The Salmo-Priest Roadless Area consists of significant portions of the west slope of the Upper Priest River drainage. Terrain, for the most part, is very steep and faces east-southeast. Continental glaciation has shaped most of this area. The Upper Priest River and the upper portions of several tributaries are within the area. A small portion of the Salmo River is also included.

The area contains a wide variety of vegetation, ranging from near alpine on Snowy Top to lush old-growth cedar/hemlock along the river. Portions near Kaniksu Mountain were burned in 1967. A large mid-elevation meadow, Hughes Meadow, is also part of this variety. Avalanche activity maintains significant brushfields as well.

Table 153. Salmo-Priest Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Salmo-Priest (01-981)	High	High	High	Alt B Mod = 16,027; Alts C & D = 18,605	All three action alternatives recommend most of this roadless area as recommended wilderness (MA 1b) because it is rated high for Capability, Availability, and Need and its proximity to the existing Salmo-Priest Wilderness Area.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 154. Salmo-Priest IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Salmo-Priest (01-981)	19,600	20,500	17,300	20,300	20,020	20,021	16,027

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternatives would protect roadless characteristics because of its Idaho Roadless Area classifications of Wild Land Recreation and companion management area designations of 1b (Recommended Wilderness). In addition, the remaining acres are classified as Forest Plan Special Areas under the Idaho Roadless Rule including two protected areas in the Revised Forest Plan (MAs 2b and 4a). All three alternatives recommend most of the Salmo-Priest Roadless Area for wilderness designation.

Table 155. Salmo-Priest Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Salmo-Priest (01-981)	Wild Land Recreation & MA 1b	16,027	18,605	18,605
	Forest Plan Special Areas & MAs 2b and 4a	3,995	1,416	1,416

Schafer Peak - (No. 01-160)

Description – This roadless area is located 10 miles southeast of Sandpoint, Idaho, along the southern edge of Lake Pend Oreille. It is within Bonner County on the Sandpoint Ranger District of the Idaho Panhandle National Forests. The area is accessible on the north and east boundaries by boat and by the Johnson Creek Road along the southern ridge boundary.

This long and narrow-shaped roadless area has about 10 miles of lakeshore. From the waterfront, slopes rise sharply above the lake. Schafer Peak and Green Monarch Mountain are the dominant geographic features. Topography changes from 2,100 feet at the lake surface to 5,000 feet at the top of Schafer Peak. The roadless boundary follows just south of the main ridge overlooking Pend Oreille Lake.

A dense timber canopy common to the lower elevations of northern Idaho covers almost all of the area. A few alpine fir and lodgepole pine can be found near the top of the highest mountains.

The area is known locally as the Green Monarchs and can be viewed from Highway 200 near Hope, Idaho. Activities within the area primarily revolve around the use of Schafer Peak Trail 69 which follows along the top of the main ridge. Approximately 2 miles of the Lake Pend Oreille shoreline in the Kilroy Bay area is privately owned.

Table 156. Schafer Peak Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Schafer Peak (01-160)	Moderate	Low	Moderate	None	Ratings of moderate for Capability, and low for Availability limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 157. Schafer Peak IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Schafer Peak (01-160)	0	6,600	0	6,100	5,894	5,894	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternatives would protect roadless characteristics on most of this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. A small portion of this roadless area would be managed under the Idaho Roadless Rule classification of General Forest, Rangelands, and Grasslands and companion management area designation of 6. This small acreage (403 acres) managed under this classification would not protect roadless characteristics. None of these alternatives recommend Schafer Peak (or any partial acres) for wilderness designation.

Table 158. Schafer Peak Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Schafer Peak (01-160)	Backcountry/Restoration & MA 5	5,491	5,491	5,491
	General Forest & MA 6	403	403	403

Scotchman Peaks - (No. 01-662)

Description – The Scotchman Peaks Roadless Area is located in the southwest corner of the Kootenai National Forest in western Lincoln and Sanders Counties, Montana, and northeast Bonner County, Idaho, situated on the Idaho-Montana border between the Kootenai and Clark Fork Rivers. The area extends into the Idaho Panhandle National Forests (33,849 acres). Access to the area is provided by State Highways 200 and 56 leading to several trails, particularly the Ross Creek Trail in the mid-portion and to Pellick Ridge in the southeast corner. Trails are also present in Star and Napoleon Gulches, leading to Squaw Peak on Pellick Ridge and in Spar and Cub Creeks on the northern tip. On the Idaho side, a few trails provide access into the area.

The area is surrounded by Forest developments such as roads and clearcuts, particularly in the northern portion and by private lands along State Highways 56 and 200.

Discussions of geography, topography, and vegetation invariably include descriptions of the area's rugged alpine scenery left by glaciers. Perhaps some of the most classic examples of glacial cirques found in the region dominate the upper reaches of Ross creek. Other displays of the deep glaciation are particularly striking in the Savage Creek area. Major streams draining the Scotchman area are Ross, Spar, and Blue Creeks. Spar Creek forms a deep canyon from Little Spar Lake to Spar Lake. Little Spar Lake is the only named water body in the area although several alpine potholes or ponds are scattered throughout the rocks along the main divide. (Lightning Creek drains much of the west side, in the Idaho Panhandle National Forests, including the north face of Scotchman Peak. Steep, timbered breaks characterize this stretch of

Lightning Creek, where the elevation changes a dramatic 4,500 feet in less than two miles on the slopes of Scotchman Peak.) Just over the headwalls of the deep cirques in Ross Creek, hillsides of alpine vegetation slope into the West Fork Blue Creek while the backsides of distinctive Sawtooth and Billiard Table Mountains drain through side hill parks and waterfalls to the East Fork of Blue Creek. The U-shaped valley of South Fork Ross Creek curves through green meadows and rock slides to meet the main Ross Creek. The scoured headlands of Ross Creek are soon lost in stands of large cedar, hemlock, and white pine, as the creek tumbles through what is often a tangle of moss-covered boulders and devil's club on its way to the scenic Ross Creek Cedar grove below. Pellick Ridge, with its summit of Squaw Peak, tips rocky south slopes nearly 4,000 feet into the Clark Fork and lower Bull River valleys. In contrast, an almost continuous canopy of trees cover the Upper Star Gulch, like neighboring Hamilton Gulch, shows much of its bedrock at the surface.

Table 159. Scotchman Peaks Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Scotchman Peaks (01-662)	High	Moderate	High	22,719 in all action alternatives	All three action alternatives recommend most of this roadless area as recommended wilderness (MA 1b) because of its ratings and the matching proposal on the Kootenai NF.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 160. Scotchman Peaks IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Scotchman Peaks (01-662)	19,410	31,800	22,000	30,200	32,070	32,068	22,719

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternatives would protect roadless characteristics because of its Idaho Roadless Area classifications of Wild Land Recreation and Backcountry/Restoration and companion management area designations of 1b and 5. In addition, the majority of the remaining acres are classified as a Forest Plan Special Area under the Idaho Roadless Rule and a protected area in the Revised Forest Plan (MA 4a – Research Natural Area). A small portion of this roadless area would be managed under the Idaho Roadless Rule classification of General Forest, Rangelands, and Grasslands and companion management area designation of 6. This small acreage (376 acres) managed under this classification would not protect roadless characteristics. All three alternatives recommend significant portions of Scotchman Peaks Roadless Area for wilderness designation.

Table 161. Scotchman Peaks Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Scotchman Peaks (01-662)	Wild Land Recreation & MA 1b	22,719	22,719	22,719
	Backcountry/Restoration & MA 5	7,661	7,661	7,661
	General Forest & MA 6	376	376	376
	Forest Plan Special Areas & MA 4a	1,312	1,312	1,312

Selkirk - (No. 01-125)

Description – This is the largest roadless area on the Kaniksu National Forest. It is located in the north-central portion of the Idaho Panhandle. The area begins roughly 4 miles south of the Canadian border and continues in a southerly direction for approximately 30 miles. The area includes roadless areas previously delineated in the RARE process as Selkirk Creek (RARE 159) and Long Canyon (RARE 156). Selkirk Crest RARE 159 is presently a special management area administered jointly under a cooperative agreement between the State of Idaho and the Forest Service.

The primary drainages in the area are Smith Creek, Long Canyon Creek, Trout Creek, Ball Creek, Myrtle Creek, and Snow Creek, all of which empty into the Kootenai River. The southernmost portion of the area drains into Pack River, which empties into Lake Pend Oreille. Terrain is very rugged and contains steep slopes, many of which exceed 70 percent. The highest mountains in northern Idaho are found in this roadless area. There are numerous peaks in the 7,000 foot elevation range, the highest being Parker Peak at 7,670 feet. The lowest point is around 2,000 feet along the east side close to Kootenai River.

The area is heavily forested with various species on bottomlands and mid-slopes in Long Canyon, Smith Creek, Trout Creek, and Ball Creek and has barren rocky ridges at higher elevations. There is an abundance of subalpine vegetation over the entire area and water quality is high.

The study area is underlain primarily by intrusive igneous rocks, including those of the Selkirk Crest complex. These intrude metamorphosed sediment of the Belt Supergroup and an older gneiss. The igneous units of the Selkirk Crest complex appear to be bounded by large faults on the east and west sides.

Table 162. Selkirk Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Selkirk (01-125)	High	High	High	B Mod = 35,636 C = 46,686 D = 35,636	All three action alternatives recommend significant portions of this roadless area as recommended wilderness (MA 1b) because of its ratings of high for all three rating criteria.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 163. Selkirk IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Selkirk (01-125)	102,400	102,000	26,600	95,800	97,959	97,964	35,636

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternatives would protect roadless characteristics because of its Idaho Roadless Area classifications of Wild Land Recreation and Backcountry/Restoration and companion management area designations of 1b, 1e, and 5. In addition, 1,423 acres are classified as a Forest Plan Special Areas under the Idaho Roadless Rule and protected areas in the Revised Forest Plan (MA 4a – Research Natural Area and MA 2b – Eligible Wild and Scenic River). A portion of this roadless area would be managed under the Idaho Roadless Rule classification of General Forest, Rangelands, and Grasslands and companion management area designation of 6. This acreage (8,635 acres) managed under this classification would not protect roadless characteristics but does match the Idaho Roadless Rule classifications. All three alternatives recommend significant portions of the Selkirk Roadless Area for wilderness designation.

Table 164. Selkirk Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Selkirk (01-125)	Wild Land Recreation & MA 1b and 1e	46,685	46,685	46,685
	Backcountry/Restoration & MA 5	41,222	41,222	41,222
	General Forest & MA 6	8,635	8,635	8,635
	Forest Plan Special Areas & MAs 2b and 4a	1,423	1,423	1,423

Sheep Mountain - (No. 01-799)

Description – The Sheep Mountain-State Line Roadless Area lies along the Montana-Idaho State Line south and east of the Dry Creek road. It is located 12 miles southwest of St. Regis, Montana, 5 miles west of Superior, Montana, and 30 miles east of Avery, Idaho.

The access to the area is by either the Dry Creek Road or the Cedar Creek Road system. There are 10 trails in the area totaling about 40 miles. Included within the unit are 4 miles of improved road and 3 short, unimproved roads. The Stateline area is accessed by the Stateline National Recreation Trail.

The geography of the area is characterized by high alpine terrain with vegetation of the grassy-bald or subalpine habitat groups. Elevations range from approximately 3,500 feet near Dry Creek to 7,543 feet at the top of Eagle Cliff.

Prominent peaks or landmarks include Binocular Peak at 7,266 feet, Sheep Mountain at 6,723 feet, Mount Baldy at 7,543 feet, Black Tail Mountain at 6,167 feet, and Eagle Cliff. Some of these landmarks are seen from the Clark Fork Valley, which contains Interstate 90.

Geology of the area is characterized by northwest to southeast trending faults extending the length of the area and bringing the various formations into contact with one another. These formations include limestones, calcareous argillites, and quartzites of the Precambrian Age Wallace Formation which crop out in the western two-thirds of the area. Missoula Group rocks cover the balance of the area.

Vegetation varies from the lower elevation habitat types (Douglas-fir climax) to the subalpine types intermixed with high elevation grassy balds. Between the extremes, the forested types are present containing lodgepole pine, Douglas-fir, and western larch. The understory vegetation is typified by the ninebark type in the northwest corner to the clintonia group on the north and east aspects of higher elevations. The upper ridges and peaks contain scree mixed with subalpine vegetation. Also included is menziesia and dry beargrass. The area has been burned over several times creating a mosaic of successional stages.

Table 165. Sheep Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Sheep Mountain (01-799)	High	High	High	26,588 acres recommended in Alternative C	This area is recommended for wilderness in one action alternative because of the high ratings. The other action alternatives do not recommend wilderness designation and would retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and two of the alternatives match this classification with the Forest Plan management area designation of MA 5.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 166. Sheep Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Sheep Mountain (01-799)	30,500	28,000	0	26,900	27,733	27,743	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – Alternatives B modified and D would protect roadless characteristics on almost all of this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. In addition, another 788 acres falls within a Forest Plan Special Area under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 2a (Wild & Scenic River). Alternative C protects roadless characteristics as well because of the proposed classification of Wild Land Recreation and companion management area designation of 1b. However, Alternative C is not compliant with the Idaho Roadless Rule and could not be implemented until this proposed change went through the rule making process to modify the management classification defined in 36 CFR 294.29.

Table 167. Sheep Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Sheep Mountain (01-799)	Wild Land Recreation & MA 1b	0	26,588	0

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
	Backcountry/Restoration & MA 5	26,955	367	26,927
	General Forest & MA 6	0	0	28
	Forest Plan Special Areas & MA 2a	788	788	788

Skitwish Ridge - (No. 01-135)

Description – The Skitwish Ridge Area is located 12 miles east of Coeur d’Alene, Idaho. It is within Kootenai County and on the Fernan Ranger District of the Idaho Panhandle National Forests. The area consists of mountainous terrain with elevations ranging from 2,400 feet at the mouth of Marie Creek to 4,800 feet on Skitwish Ridge. This area’s bedrock exposures consist mostly of Prichard and Burke formations, with minor outcrops of the Revett. These argillites and quartzites are metasediments of the Precambrian Belt rocks. The area has numerous northwest-trending faults which are the loci for mineralizations in the Coeur d’Alene Mining District.

Large wildfires burned over most of the area in approximately 1880. Currently, second-growth coniferous vegetation dominates the area.

A non-system Forest Service trail enters the area at the mouth of Marie Creek, follows the creek upstream past Skitwish Creek and Skitwish Ridge, where it then exits the area. A second non-system trail used and maintained by a grazing permittee enters the area from Rutherford Gulch and drops into Marie Creek in Section 23.

Table 168. Skitwish Ridge Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Skitwish Ridge (01-135)	Low	Moderate	Moderate	None	Ratings of low for Capability, and moderate for Availability and Need limit this area’s suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 169. Skitwish Ridge IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Skitwish Ridge (01-135)	6,330	6,300	0	6,900	4,746	4,010	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. None of these alternatives recommend Skitwish Ridge (or any partial acres) for wilderness designation.

Table 170. Skitwish Ridge Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Skitwish Ridge (01-135)	Backcountry/Restoration & MA 5	4,010	4,010	4,010

South Fork Mountain - (No. 01-124)

Description – The South Fork Mountain Roadless Area is located approximately 8 miles west and north of Nordman, Idaho. It lies within Pend Oreille County, Washington, on the Priest Lake Ranger District, Idaho panhandle National Forests. Access is provided by Forest Roads 308, 311, 319, and 321. Road 311 forms the southern and eastern boundaries of the area.

The somewhat circular-shaped area is largely mountainous timberland, with elevations ranging from 3,200 feet at Sema Meadows to 4,600 feet on the divide between Pend Oreille River drainage and the Priest River drainage. South Fork Mountain lies in the northern part of the roadless area; its elevation is 4,203 feet. Slopes are generally shallow to moderate. Drainage is provided by Tobasco Creek, Sema Creek, and the South Fork of Granite Creek. There are several wetlands associated with the first two creeks.

Habitat types are primarily either cedar/pachistima or hemlock/pachistima. There is a large component of immature timber as a result of burns in the 1920s which resulted in a fairly dense, uniform vegetation pattern.

Table 171. South Fork Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
South Fork Mountain (01-124)	Low	Moderate	High	None	Ratings of low for Capability, and moderate for Availability limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 172. South Fork Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
South Fork Mountain (01-124)	0	5,400	0	5,200	5,292	5,294	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. None of these alternatives recommend South Fork Mountain (or any partial acres) for wilderness designation.

Table 173. South Fork Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
South Fork Mountain (01-124)	Backcountry/Restoration & MA 5	5,294	5,294	5,294

Spion Kop - (No. 01-136)

Description – The Spion Kop Roadless Area is located about 22 miles north of Kellogg, Idaho, encompassing the Shoshone Range from Little Guard to Spion Kop. It is within Shoshone County on the Wallace Ranger District of the Idaho Panhandle National Forests. The area is accessible by road from every side.

The highest elevation in the area is 6,210 feet at Bennett Peak and the lowest is 2,700 feet near the mouth of Little Canyon Creek. Other major peaks include Guard, Pond, Sentinel, and Amethyst. Major drainages include the Coeur d’Alene River, Cinnamon Creek, Calamity Creek, and Cataract Creek. The area is underlain by metasediments of the Belt Supergroup. The Wallace and Striped Peak Formations are the prevalent units, with only minor amounts of the Libby Formation. Two major northwest-trending faults have been mapped in the area.

About 85 percent of the area burned in 1935. As a result, the vegetation on the area includes about 15 percent mature western white pine and grand fir, 40 percent brushfields, and several thousand acres of western white pine plantations created by the Civilian Conservation Corps (CCC) between 1936 and 1940. There are some old-growth mountain hemlock stands on the east side of the Shoshone Range in the south end of the roadless area. The remaining area consists of natural, pole-size stands.

Table 174. Spion Kop Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Spion Kop (01-136)	Moderate	High	High	8,915 acres recommended in Alternative C	A portion of this area is recommended for wilderness in one action alternative. The other action alternatives do not recommend wilderness designation and would retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and two of the alternatives match this classification with the Forest Plan management area designation of 5.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 175. Spion Kop IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Spion Kop (01-136)	31,300	23,700	0	22,500	22,391	22,391	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – Alternatives B modified and D would protect roadless characteristics of this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. In addition, another 2,744 acres falls within Forest Plan Special Areas under the Idaho Roadless Rule and associated Forest Plan Management Area allocations of 2b (Eligible Wild & Scenic River) and 4a (Research Natural Area). Alternative C protects roadless characteristics as well because of the proposed classifications of Wild Land Recreation and Backcountry/Restoration and companion management area designations of 1b and 5. In addition, another 1,748 acres falls within Forest Plan Special Areas under the Idaho Roadless Rule and associated Forest Plan Management Area allocations of 2b (Eligible Wild & Scenic River) and 4a (Research Natural Area). However, Alternative C is not compliant with the Idaho Roadless Rule and could not be implemented until this proposed change went through the rule making process to modify the management classification defined in 36 CFR 294.29.

Table 176. Spion Kop Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Spion Kop (01-136)	Wild Land Recreation & MA 1b	0	8,915	0
	Backcountry/Restoration & MA 5	19,647	11,727	19,645
	Forest Plan Special Areas & MAs 2b and 4a	2,744	1,748	2,746

Stevens Peak - (No. 01-142)

Description – The Stevens Peak Roadless Area is situated on both sides of the Idaho-Montana state line about four miles south of Mullan, Idaho, and nine miles north of Avery, Idaho. The Idaho portion lies within Shoshone County on the Avery and Wallace Ranger Districts of the Idaho Panhandle National Forests; the Montana portion lies in Mineral County on the Superior Ranger District of the Lolo National Forest. Approximately 600 acres of private land are included within the area-all patented mining claims. The most popular access is on trails which originate at the Lookout Pass overpass on Interstate 90. Other access is provided by low standard mining roads entering at several locations into the unit.

Stevens Peak, with an elevation of 6,838 feet, dominates the topography of this irregularly-shaped unit. Several features of alpine glaciation, including cirques, alpine lakes, and moraines, typify the area lying north of Stevens Peak. Steep slopes dissected by tributaries of the North

Fork of the St. Joe characterize the southern half. The lowest elevation of the unit is 3,600 feet along the North Fork of the St. Joe River.

A majority of the area burned in 1910 and reburned in 1928. One area of old-growth mountain hemlock remains in the upper reaches of Rougin and Park Creek drainages, with isolated residual trees scattered elsewhere in the unit. The lower elevations on both the St. Joe and Lolo portions were planted following the 1928 fire with off-site ponderosa pine or eastern white pine. Several areas, however, remain in a nonstocked brushfield condition. The higher elevations now support relatively sparse vegetation, generally subalpine, with some rockland and talus slopes present. The more productive slopes generally are covered by pole-sized stands of mixed species composition. Habitat-types range from cedar/clitonia at the lower elevations to mountain hemlock/menziesia or mountain hemlock/beargrass at the higher elevations.

Table 177. Stevens Peak Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Stevens Peak (01-142)	Moderate/High	Low	Moderate	None	Ratings of moderate/high for Capability, low for Availability, and moderate for Need limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 178. Stevens Peak IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Stevens Peak (01-142)	4,370	4,400	0	4,600	4,729	4,731	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. None of these alternatives recommend Stevens Peak (or any partial acres) for wilderness designation.

Table 179. Stevens Peak Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Stevens Peak (01-142)	Backcountry/Restoration & MA 5	4,731	4,731	4,731

Storm Creek - (No. 01-144)

Description – The Storm Creek Roadless Area borders the north side of the St. Joe River approximately one mile west of Avery, Idaho. The area is situated entirely within Shoshone County on the Avery Ranger District of the Idaho Panhandle National Forests. Maintained roads encircle the area, with the Trego Point Road intruding 3 miles into the unit from the east.

Steep, rugged slopes transected by several small drainages characterize the topography of this rectangular-shaped unit. Elevation ranges between 2,400 and 5,700 feet, with Dunn Peak, Storm Mountain, and Flash Peak being the most prominent landscape features.

The entire unit burned in 1910 and reburned in 1934, creating a mosaic of pole-sized timber and brushfields. Reforestation efforts followed the fires, with ponderosa pine being the primary planted species. Natural stands of lodgepole and Douglas-fir also occur throughout the area. A major portion of the unit, however, remains non-stocked. Primary habitat types are western hemlock/clintonia and cedar/clintonia.

Table 180. Storm Creek Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Storm Creek (01-144)	Low	High	High	None	A rating of low for Capability limits this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 181. Storm Creek IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Storm Creek (01-144)	8,560	8,200	0	8,200	8,228	8,227	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. None of these alternatives recommend Storm Creek (or any partial acres) for wilderness designation.

Table 182. Storm Creek Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Storm Creek (01-144)	Backcountry/Restoration & MA 5	8,227	8,227	8,227

Tepee Creek - (No. 01-133)

Description – This roadless area is located 35 miles northeast of Coeur d’Alene, Idaho. It is within Shoshone County and on the Wallace Ranger District of the Idaho Panhandle National Forests. The area is accessible from a maintained gravel road; Trail 407 provides access to the center of the area. It is within a two hour drive from Coeur d’Alene.

The Tepee Creek area is of mountainous terrain; elevations range from 2,850 feet on the North Fork of the Coeur d’Alene River to 4,970 feet under Spyglass Lookout. Exposed in this area are metasediments of the Striped Peak and Libby formations (Belt Supergroup). Faults in the area are generally north-south trending and are more abundant in the western part of the area. The area consists of four smaller entire drainages which form the northeast half of a ridge. The topography is moderately steep, which is typical of the surrounding area.

Table 183. Tepee Creek Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Tepee Creek (01-133)	Moderate/Low	High	High	5,186 acres recommended in Alternative C	This area is recommended for wilderness in one action alternative (C). The other action alternatives do not recommend wilderness designation and would retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and two of the alternatives match this classification with the Forest Plan management area designation of 5.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 184. Tepee Creek IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Tepee Creek (01-133)	5,100	5,100	0	5,400	5,187	5,187	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – Alternatives B modified and D would protect roadless characteristics of this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. Alternative C protects roadless characteristics as well because of the proposed classifications of Wild Land Recreation and companion management area designations of 1b. However,

Alternative C is not compliant with the Idaho Roadless Rule and could not be implemented until this proposed change went through the rule making process to modify the management classification defined in 36 CFR 294.29.

Table 185. Tepee Creek Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Tepee Creek (01-133)	Wild Land Recreation & MA 1b	0	5,186	0
	Backcountry/Restoration & MA 5	5,187	0	5,187

Trestle Peak - (No. 01-129)

Description – This roadless area is located 10 miles east of Sandpoint, Idaho, and 3 miles northeast of Lake Pend Oreille within the Cabinet Mountains. It is within Bonner County and is on the Sandpoint Ranger District of the Idaho panhandle National Forests. The area is accessible from several trailheads originating from State Highway 200 to the south, the Trestle Creek Road to the west and north, and the Lightning Creek Road from the east.

This long narrow roadless area includes the mountain range from Roundtop Mountain at 6,149 feet to Trestle Peak at 6,032 feet. It is approximately 7 miles long and averages 1-1/2 miles wide. The ridge is mostly shaped by continental glaciation. Elevation varies from 3,800 to 6,348 feet. The headwaters of three small streams are also included. Alpine glaciation has created several cirque basins within this area, but no mountain lakes exist.

Most of this area is high alpine forest type with interspersed rocky and grassy openings near the ridgetops. Diversity of vegetative type is most pronounced near the high elevation ridgetops. Forest types include mixed conifer stands common to northern Idaho in the lower elevations to alpine fir, lodgepole pine, and an occasional whitebark pine in the higher elevations.

The ridgetop is the location for Roundtop Trail 120, which bisects numerous alpine openings. Scenic views of Lake Pend Oreille can be experienced from Roundtop Mountain, and the Cabinet Mountain Range to the east can also be seen.

Table 186. Trestle Peak Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Trestle Peak (01-129)	Moderate/ High	High	High	None	A rating of moderate/high for Capability combined with a poor boundary limits this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 187. Trestle Peak IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Trestle Peak (01-129)	7,940	7,100	0	7,400	7,274	7,274	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of MA 5. None of these alternatives recommend Trestle Peak (or any partial acres) for wilderness designation.

Table 188. Trestle Peak Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Trestle Peak (01-129)	Backcountry/Restoration & MA 5	7,274	7,274	7,274

Trouble Creek - (No. 01-138)

Description – The Trouble Creek Roadless Area is located about 10 miles north of Osburn, Idaho, along the Coeur d’Alene River. It is within Shoshone County and on the Wallace Ranger District of the Idaho Panhandle National forests. The area is characterized by steep rock bluffs facing the Coeur d’Alene River, which dominate the view along Forest Highway 9 and Forest System Road 208. Major drainages include Trouble, Creaky, and Hopkins Creeks. Topography changes from 4,320 feet at the east end of Uranus Ridge to about 2,400 feet along the Coeur d’Alene River. Medisedimentary rocks of the Precambrian Belt Supergroup are exposed in the Trouble Creek Roadless Area. Several north-to-northwest-trending faults have been mapped.

About 60 percent of the area burned in 1890 and the rest in 1910. About 90 percent of the trees are pole size. The Civilian Conservation Corps (CCC) planted trees extensively in the unit in the late 1930s. Oak, chestnut, and maple plantations are still identifiable.

Table 189. Trouble Creek Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Trouble Creek (01-138)	Low	Moderate	Moderate	None	Ratings of low for Capability and moderate for both Availability and Need limit this area’s suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 190. Trouble Creek IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Trouble Creek (01-138)	6,100	6,100	0	5,900	5,950	5,983	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. In addition, another 995 acres falls within a Forest Plan Special Area under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 2b (Eligible Wild & Scenic River). None of these alternatives recommend Trouble Creek (or any partial acres) for wilderness designation.

Table 191. Trouble Creek Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Trouble Creek (01-138)	Backcountry/Restoration & MA 5	4,989	4,989	4,989
	Forest Plan Special Areas & MA 2b	995	995	995

Trout Creek - (No. 01-664)

Description – The area is located on the southern border of the Forest, in western Sanders County and is bordered on the west by Idaho, into which part of the area extends. It is readily accessible from the Clark Fork Valley. Roads up Trout Creek, White Pine Creek, Minton Peak, and to the Lost Peak-Bloom Peak Ridgeline provide easy access via several trailheads.

From the Idaho Panhandle side of the area, access is available from the Casper Creek Trail and Idaho-Montana Divide Trail.

The area is rugged, steep, and mountainous with some very productive timberlands. The high ridgeline setting and timbered drainages make it unique among roadless areas on the Kootenai. Black Peak at 6,500 feet is the highest point. The area was mostly burned over during the 1910 fire, but some old growth remains in a few areas untouched by the fires. Most of the productive timberland contains 70-80 year old stands. The fire also left many of the southern slopes bare or brush covered. This area includes numerous named tributaries of Trout Creek plus some headwater areas of both Whitepine and Beaver Creeks on the Kootenai portion. On the Idaho Panhandle portion, major drainages include Casper, West Fork Eagle, and Tributary Creeks.

Clearcut blocks and roads are most noticeable on the Idaho side of the roadless area. However, because of the concaveness of the roadless area, once off of the ridgetop, surrounding developments are not an intrusion.

Three ecosystem types are represented: Douglas-fir forest, cedar hemlock pine forest, and western spruce fir forest.

Table 192. Trout Creek Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Trout Creek (01-664)	Moderate	Low	Moderate	None	Ratings of moderate for Capability and low for Availability limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 193. Trout Creek IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Trout Creek (01-664)	8,440	8,300	0	8,400	8,538	8,507	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion forest plan management area designation of 5. In addition, another 110 acres falls within a Forest Plan Special Area under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 3 (Special Area). None of these alternatives recommend Trout Creek (or any partial acres) for wilderness designation.

Table 194. Trout Creek Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Trout Creek (01-664)	Backcountry/Restoration & MA 5	8,397	8,397	8,397
	Forest Plan Special Areas & MA 3	110	110	110

Upper Priest - (No. 01-123)

Description – The Upper Priest Roadless Area is located about 50 miles north of Priest River, Idaho, within Bonner County and the Priest Lake Ranger District in the Idaho Panhandle National Forests. Primary access is provided by paved Forest Road 237 and native-surfaced Roads 401, 1013, and 1341. The area may also be accessed by boat from Priest Lake.

The somewhat triangular-shaped area includes a portion of Priest River, all of Upper Priest Lake, and the surrounding mountainous forestland. Slopes to the lake are mostly moderate to gentle. Elevations range from 2,440 feet at lake level to the 5,000 foot ridge of Plowboy Mountain. Gold Peak and Armstrong Meadows are other topographical features of the area. About 25 percent of the area is rockland or flat stream bottoms. Drainage is provided by Beaver Creek, Boulder Creek, Hughes Fork, Ruby Creek, Deadman Creek, and Upper Priest River. About 300 acres of private land are included within the boundary of the roadless area.

Mixed conifer forest of fairly recent fire origin (since 1880) covers most of the land area. Old-growth stands are found in the southern part of the area, while cedar, cottonwood, and brush are common along Priest River. Habitat types are generally hemlock or cedar/pachistima.

Table 195. Upper Priest Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Upper Priest (01-123)	High	High	High	None	Half the acreage within this roadless area is allocated to Forest Plan Special Areas in the Idaho Roadless Rule as well as the associated Forest Plan Management Areas. All three action alternatives would retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and Forest Plan Special Areas. In addition, this area is adjacent to State lands managed intensively for timber as well as a lake with motorized use.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 196. Upper Priest IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Upper Priest (01-123)	14,140	14,300	0	13,700	14,008	12,627	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics because of its Idaho Roadless Area classification of Backcountry/Restoration and companion forest plan management area designation of 5. In addition, another 6,313 acres fall within Forest Plan Special Areas under the Idaho Roadless Rule and associated Forest Plan Management Area allocations of 2b (Eligible Wild and Scenic Rivers), 3 (Special Area)s, 4a (Research Natural Areas), and 7 (Primary Recreation Areas). None of these alternatives recommend Upper Priest (or any partial acres) for wilderness designation.

Table 197. Upper Priest Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Upper Priest (01-123)	Backcountry/Restoration & MA 5	6,313	6,313	6,314
	Forest Plan Special Areas & MAs 2b, 3, 4a, and 7	6,313	6,313	6,314

White Mountain - (No. 01-127)

Description – This roadless area is located approximately 15 miles north of Sandpoint, Idaho, and lies southeast of the Selkirk Crest Area. The roadless area is divided in two by Boundary County to the north and Bonner County to the south. It is within the Sandpoint Ranger District of the Idaho Panhandle National Forests and is accessible by the Pack River Road along the west boundary.

The area is irregular in shape, averaging 6 miles long and 2 miles wide. The roadless area rises from the Pack River Valley on the west side and the Purcell Trench on the east side. Three prominent landmarks exist within the area: Dodge Peak, White Mountain, and Mutiny Point. Topography changes from 2,200 feet in Pack River Valley to 5,027 feet at the top of Dodge Peak. No unique features or mountain lakes exist within the area.

Vegetation is diverse within the area, ranging from lodgepole pine, alpine fir, and Engelmann spruce in the higher elevations to grand fir, Douglas-fir, and some cedar in the lower elevations. Scattered ponderosa pine and Douglas-fir are also present. Very little old growth exists within the area due to logging activity and fires which occurred near the turn of the century. The area is generally forested, with a few occasional brushfields.

In this area's center lies White Mountain Trail 453, which bisects the roadless area. The trail runs down the ridgeline from Dodge Peak south to White Mountain. Views from along this trail include the Selkirk Crest to the north, the Cabinet Mountain range to the far east, and immediate viewing of the Purcell Trench and Pack River Valley, U.S. Highway 95, rural farms, and small communities such as Elmira and Naples.

Table 198. White Mountain Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
White Mountain (01-127)	Moderate/ Low	High	Moderate	None	Ratings of moderate/low for Capability, and moderate for Need limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 199. White Mountain IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
White Mountain (01-127)	8,980	7,800	0	8,700	7,499	7,649	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics on almost the entire acreage within this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. Only 18 acres fall within Forest Plan Special Areas under the Idaho Roadless Rule and associated Forest Plan Management Area allocation of 2b (Eligible Wild and Scenic Rivers). All three alternatives propose to manage this roadless area consistent with the Idaho Roadless Rule including 89 acres managed under the Idaho Roadless Area classification of General Forest, Rangelands, and Grasslands and the companion Forest Plan Management Area 6 (General Forest) which will allow management actions to be proposed, analyzed, and implemented if approved. None of these alternatives recommend White Mountain (or any partial acres) for wilderness designation.

Table 200. White Mountain Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
White Mountain (01-127)	Backcountry/Restoration & MA 5	7,543	7,543	7,543
	General Forest & MA 6	89	89	89
	Forest Plan Special Areas & MA 2b	18	18	18

Willard Lake Estelle - (No. 01-173)

Description – This area is located 13 miles northeast of Sandpoint, Idaho, and 9 miles southeast of Bonners Ferry, Idaho. The area is along the divide that separates the Kootenai and Idaho Panhandle National Forests. The majority of this roadless area lies in the Bonners Ferry and Sandpoint Ranger Districts of the Idaho Panhandle National Forests. The area runs north-south extending from North Creek in Boundary County to Benning Mountain in Bonner County. Only 300 acres in the Survey Mountain Area are in Lincoln County, Montana. Access is provided by gravel roads in several drainages, particularly Raymond Creek, North Callahan Creek, Keeler Creek, Grouse Creek, and Boulder Creek, and high elevation access near Lunch Peak.

The roadless area is long and narrow. It follows a ridge which is a watershed divide between the Pend Oreille and Kootenai River watersheds. Average width is 4 miles and length is approximately 14 miles. The highest peak is Mt. Pend Oreille, with an elevation of 6,755 feet. The lowest elevation within this roadless area is approximately 3,500 feet. The land type was shaped by both continental and alpine glaciation. Six mountain lakes are included within this area. The disintegrating granitic rock and soil types found in this area make it particularly prone

to erosion and stream channel damage. Development along the boundaries has created irregular boundaries.

Most of this area is high alpine forest type with interspersed rocky and grassy openings near the ridgetops. Diversity of vegetative types is most pronounced near the high elevation ridgetops. Forest types include mixed conifer stands common to northern Idaho in the lower elevations and alpine fir, lodgepole pine, and an occasional whitebark pine in the highest elevations.

Trail 67 follows along much of the main ridgetop within this roadless area. Views along the trail include Lake Pend Oreille, the Cabinet Mountains, the Selkirk Mountains, and the Purcell Trench. Numerous trails also allow easy access into the mountain lakes. Lake Darling, Gem Lake, Moose Lake, Lake Estelle, and Blacktail Lake provide recreational opportunities for camping, fishing, and hiking.

Table 201. Willard Lake Estelle Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Willard Lake Estelle (01-173)	High	High	High	None	This roadless area has a boundary that would be difficult to manage as wilderness. In addition, this roadless area is shared with the Kootenai NF and is not recommended for wilderness in their plan. All three action alternatives would retain consistency with the Idaho Roadless Rule (which went through extensive public comment and review). The IRR classification of this roadless area is Backcountry/Restoration and Forest Plan Special Areas.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 202. Willard Lake Estelle IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Willard Lake Estelle (01-173)	0	35,300	0	32,700	35,000	35,003	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics within this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. Only 1,426 acres fall within Forest Plan Special Areas under the Idaho Roadless Rule and

associated Forest Plan Management Area allocation of 4a (Research Natural Areas). All three alternatives propose to manage this roadless area consistent with the Idaho Roadless Rule. None of these alternatives recommend Willard-Lake Estelle (or any partial acres) for wilderness designation.

Table 203. Willard Lake Estelle Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Willard Lake Estelle (01-173)	Backcountry/Restoration & MA 5	33,577	33,577	33,577
	Forest Plan Special Areas & MA 4a	1,426	1,426	1,426

Wonderful Peak - (No. 01-152)

Description – The Wonderful Peak Roadless Area is located on both sides of the Idaho-Montana border about four miles southeast of Mullan, Idaho, and nine miles north of Avery, Idaho. The Idaho portion lies within Shoshone County on the Avery Ranger District of the Idaho Panhandle National Forests, with the Montana portion contained in Mineral County of the Superior Ranger District of the Lolo National Forest.

About 500 acres of patented mining claims are contained within the unit. Bonneville Power Administration (BPA) tower-access roads, the Bullion Creek Road, and Hanakar Creek Road provide motorized access to the eastern and southern boundaries. Low standard mining roads, the Stateline Trail, Wonderful Peak Trail, and Copper Gulch Trail offer interior access.

The roughly diamond-shaped unit rises in elevation from 3,400 feet on the North Fork of the St. Joe River to over 6,500 feet on the Bitterroot Divide. Terrain is precipitous with generally steep, rocky slopes. Alpine glaciation occurred along the stateline, being most evident on the Montana portion. The Montana portion contains one alpine lake, Copper Lake, and drains northward via Copper Gulch and Hanakar Creek into the St. Regis River. The Idaho segment flows southward into the St. Joe River system.

Existing vegetation resulted from the 1910 and successive fires which consumed the entire unit. Extensive nonstocked brushfields remain on the more exposed southern aspects, with immature sapling or small saw timber stands of mixed composition on the cooler north aspects. Additionally, portions of the area were planted with off-site ponderosa pine or western white pine. Little old-growth timber remains anywhere within the unit.

The Bitterroot Divide is characterized by open subalpine vegetation. Habitat varies from cedar/clintonia at the lower elevations to mountain hemlock or subalpine fir types on the higher slopes.

Table 204. Wonderful Peak Rating Summary for Recommended Wilderness

Roadless Area	Summary Rating ¹			Recommend in Action Alts	Rationale
	Capability	Availability	Need		
Wonderful Peak (01-152)	Moderate	Low	Moderate	None	Ratings of moderate for Capability and low for Availability limit this area's suitability for recommended wilderness.

¹Please refer to detailed ratings and summaries in this appendix for each roadless area

Table 205. Wonderful Peak IRA History

Roadless Area	RARE II	1987 Forest Plan	1987 Forest Plan Recommend Wilderness	2001 RACR	2003 Update	2011 DEIS	2013 RFP Recommended Wilderness
Wonderful Peak (01-152)	5,070	5,100	0	5,100	4,938	5,041	0

¹ Minor acreage changes are due to better mapping, or minor boundary adjustment over time

Summary of Environmental Consequences by Alternative – All three action alternative would protect roadless characteristics of this roadless area because of its Idaho Roadless Area classification of Backcountry/Restoration and companion management area designation of 5. Minimal acreage in Alternative D would be managed under the Idaho Roadless Rule classification of General Forest, Rangelands, and Grasslands and companion management area designation of 6. This acreage (45 acres) managed under this classification would not protect roadless characteristics and is not consistent with the Idaho Roadless Rule. None of these alternatives recommend Wonderful Peak (or any partial acres) for wilderness designation.

Table 206. Wonderful Peak Allocation by Idaho Roadless Rule Classification and Management Area for each Action Alternative

Roadless Area	IRR & MA	Action Alternatives		
		B Modified	C	D
Wonderful Peak (01-152)	Backcountry/Restoration & MA 5	5,041	5,041	4,996
	General Forest & MA 6	0	0	45

Appendix D –Aquatics: Analyses and Methodology

Use of a multi-scale hierarchical approach helps to integrate spatial scale into the evaluation of ecosystem processes and the patterns they create (Jensen et al. 1996). There is no single scale of ecological organization that is correct for all purposes (Jensen et al. 1996). Most land management activities are analyzed at the subbasin scale or smaller, and projects are often implemented at the subwatershed scale or smaller. Spatial and temporal scales of ecological processes and disturbance regimes necessitate a larger than planning view of ecosystems. Management to maintain or restore ecological integrity must consider how different processes operate at different scales, particularly with reference to how physical and biological processes are functionally organized (Urban et al. 1987 in Rieman et al. 2006). There is a degree of uncertainty with multi-scale approaches that is not recognized by many current management regulations or applications (Rieman et al. 2006). Even with perfect information, we cannot precisely predict how aquatic ecosystems will respond to alternative management actions (Rieman et al. 2006). Scale is particularly important when trying to manage for fish species conservation and recovery. Recent work on inland salmonids at larger scales suggests spatial pattern, including habitat size and isolation, may drive processes affecting species persistence (Rieman and McIntyre 1995, Dunham et al. 1997, Rieman and Dunham 2000). Aquatic specialists considered the value of meta-populations (interacting groups of two or more local or sub-populations (Hanski 1999)) for both development of the desired condition Plan component and identification and prioritization of conservation and restoration watersheds related to native fish conservation.

The watershed rating assessment, used for the analysis of existing condition, provides a multi-scale context between subbasins (4th level hydrologic units), watersheds (5th level hydrologic units), and subwatersheds (6th level hydrologic units). These different scales can be aggregated to identify population status, habitat conditions, restoration needs, and management risks and opportunities, in order to meet the objectives outlined in the revised Forest Plan through site-specific management actions. This assessment accounts for the current condition of the aquatic resources based on the integration of hydrologic function, dynamic stream equilibrium, native fish populations, subwatershed sensitivity, and land management disturbances. The assessment provides a step-down implementation process that forms the basis for a much bigger picture of effects (direct, indirect, and cumulative effects at a programmatic scale) on the sustainability and recovery of aquatic species and de-listing of water quality impaired water bodies. The assessment shows how an individual subwatershed contributes to recovery of a species within a subbasin. The multi-scale assessment served as the groundwork in the development of the comprehensive strategy that was used in the development of management direction to support the goals, objectives, and requirements of existing laws, regulations, and other fish and water quality statutes. Updates to the data provided in the watershed rating and salmonid assessments ensure a mechanism to track and evaluate progress towards attainment of goals and objectives outlined in the revised Forest Plan.

Watershed Condition Rating (V2.5, February 2011)

Watershed condition was evaluated for every 6th level hydrologic unit boundary, also known as a subwatershed, which may be influenced by Forest Service land management activities. The analysis included a variety of physical measures reflecting the sensitivity and resiliency of

watersheds, combined with attributes of human caused disturbances. Measures of disturbance and inherent sensitivity were combined to determine a final watershed condition rating.

Subwatersheds with < 25 percent land area under Forest Service jurisdiction were not considered in this analysis, due to anticipated data deficiencies, perceived difficulties in affecting changes to watershed conditions through agency land management activities, and reluctance to describe watershed condition beyond Forest Service jurisdiction.

Watershed Sensitivity Rating

Watershed sensitivity provides an indication of a drainages inherent sensitivity with regards to both human and natural disturbances, as well as potential for recovery, following disturbance. Watershed sensitivity rating is based on the following factors and the individual breaks between low, medium, and high categories are determined from a quartile analysis of the distribution of values across the Forest:

- **1. Sensitive snow zone (%)** – Percentage of subwatershed in areas susceptible to rain on snow events. Calculated as a proportion of the drainage between 3,000 and 4,500 foot elevation, which represents snowpack that is typically near ripe (no cold content) through most of the winter season (January-February). Sensitive snow exhibits rapid conversion from ice to liquid or water vapor as a result of warm moist air masses typical to north Idaho during winter months. This conversion results in exceptional heat transfer. Snowpack with no cold content to satisfy the heat transfer rapidly melts. When large amounts of snowpack undergo this process in a drainage, high intensity and widespread flooding is also likely.
- **2. Sensitive land types (%)** – Percentage of subwatershed made up of sensitive land types. Sensitive land types are those identified as having a combination of slope stability and surface erosion hazards that exhibit high erosion rates under disturbed conditions, and with high delivery efficiencies that can route the eroded products (e.g., sediment) to the waterways within the drainage.

Watershed sensitivity score is determined from the following distribution of watershed sensitivity values (table 207).

Table 207. Watershed Sensitivity Values

Watershed Sensitivity Factors	Watershed Sensitivity Values			Multiplier
	Low (1X)	Moderate (2X)	High (3X)	
Sensitive Snow Zone (%)	≤ 36	36 - 51	≥ 51	1
Sensitive Land Type (%)	≤ 8	8 - 19	≥ 19	2

A final watershed sensitivity score is then calculated as:

$$\Sigma \text{ Sensitive Snow Zone} * 1, \text{ Sensitive Land Type} * 2) / 0.09$$

A final watershed sensitivity rating is determined from the following distribution of watershed sensitivity scores (table 208).

Table 208. Watershed Sensitivity Scores

Low	Moderate	High	Extreme
< 50	≤ 50 – 75	≤ 75 - 90	≥ 90

Watershed Disturbance Rating

Watershed disturbance rating is based on the following factors and the individual breaks between low, medium, and high categories are determined from a quartile analysis of the distribution of values across the Forest:

- 1. Road density
- 2. Road density on sensitive land types, as a function of watershed area
- 3. Stream crossing frequency
- 4. Detrimental disturbance
- 5. Equivalent clearcut acres

1. Road density (mi/mi²) – Miles of all roads, relative to the watershed area.

2. Road density on sensitive land types (mi/mi²) – Miles of all roads on sensitive land types relative to the watershed area.

3. Stream crossing frequency – Number of road and stream intersections relative to the miles of stream within a subwatershed.

4. Detrimental disturbance (%) – Percentage of a subwatershed considered to have detrimental soil disturbance, based on ground based harvest activities. The Forest Service Activity Tracking System (FACTS) database was queried to determine past ground based harvest activities and assign a coefficient for detrimental disturbance and associated recovery factor (see table 209). Activities include timber harvests, along with date of the harvest and the type of equipment used to accomplish the harvest, site preparation and the type of equipment used to accomplish the site prep, and fires along with the type of fire, the time of year the fire occurred, and the aspect of the stand in which it occurred.

Soil disturbance coefficients were assigned on the basis of a presumed sequence of activities (i.e., a harvest followed by some type of site prep and/or fire). Because multiple sequences of harvest/site prep/fire can be difficult to track spatially in an automated fashion in TSMRS, this query looks for the sequence of activities following last harvest in a stand and applies a coefficient based on this sequence to the entire stand.

Table 209. Detrimental Disturbance

Detrimental Disturbance	Recovery Periods
0.13	2000-2011
0.13	1990-2000
0.10	1980-1990
0.10	1970-1980
0.08	1960-1970
0.06	1950-1960

5. Equivalent clearcut acres (%) – Equivalent clearcut acres (ECA) for a subwatershed are the total ECA divided by the subwatershed acres.

The amount of ECA within each subwatershed was determined by querying timber harvest activities from the timber harvest activities database, FACTS. A given harvest type is assigned an ECA value (see table 210) related to the amount of crown cover that has been removed (ECA percentage) and the portion of a given stand that may have been harvested (harvest percentage). Records in the FACTS database were selected for stands with the most land disturbing activity and most current year. For these records, the harvest value is calculated as percentage of activity acres to stand acres and any resulting value greater than 1.0 is reset to 1.0. An ECA factor is then assigned to each of the records, based on the activity_code/local_qualifier field in the database. ECA values were originally determined from WATSED analyses (see discussion at the end of this section) and USFS Regional input. TSMRS codes have been adapted from FACTS activity codes for this exercise.

Table 210. ECA Factor Values

Code	Activity	ECA Factor
4110	Clearcutting	1.0
4111	Patch Clearcut	1.0
4112	Strip clearcutting	1.0
4113	Stand Clearcut	1.0
4114	Stand clearcutting - Salvage Mortality	1.0
4115	Patch Clearcut (w/ leave trees)	1.0
4117	Stand Clearcut (w/ leave trees)	1.0
4121	Shelterwood Preparatory Cut	0
4122	Seed-tree Preparatory Cut	0
4123	Shelterwood seed cut (w/res)	1.0
4131	Shelterwood Establish. Cut (with or without leave trees)	.92
4132	Seed-tree Seed Cut (with and without leave trees)	.96
4133	Shelterwood cut (w/res)	.92
4134	Seed-tree cut (w/res)	.98
4141	Shelterwood Removal Cut	1.0
4142	Seed-tree Final Cut	1.0
4145	Shelterwood Removal Cut (w/ leave trees)	1.0
4146	Seed-tree Removal Cut (w/ leave trees)	1.0
4148	Shelterwood Staged Removal Cut	.92
4151	Single-tree Selection Cut	0
4152	Group Selection Cut	.98
4183	Two-aged Seed-tree Seed and Removal Cut (w/res)	1.0
4192	Two-aged Preparatory Cut (w/res)	0
4194	Two-aged Shelterwood Establishment Cut (w/res)	.92
4196	Two-aged Shelterwood Final Removal Cut (w/res)	1.0
4210	Improvement Cut	.03
4210	Improvement Cut (post/pole harvest)	.03
4211	Liberation Cut	.16

Code	Activity	ECA Factor
4220	Commercial Thin	.16
4230	Sanitation (salvage)	.16
4231	Salvage Cut (intermediate treatment, not regeneration)	.16
4232	Sanitation Cut	.16
4240	Special Cut	.16
4241	Special Products Removal	.16
4250	High Severity Wildfire	.88
4250	Insect/Disease	0
4250	Low Severity Wildfire	.15
4250	Mixed Severity Wildfire	0.5
4250	Wildfire	1.0
4250	Wind	0
4260	Human Caused Fire – High Severity	1.0
4260	Human Caused Fire – Low Severity	.15
4260	Human Caused Fire – Mixed Severity	0.5
4270	Permanent Land Clearing	1.0
NA	Non-Forest Service lands, where data unavailable	0
NA	Roads (use 4 acres/mile and no recovery)	1.0

EXAMPLES:

100 Acres of Code 4111 = $100 * 1.00 = 100$ Equivalent clearcut acres (ECAs) with no recovery

100 Acres of Code 4211 = $100 * 0.16 = 16$ ECAs, with no recovery

100 Acres of Code 4151 = $100 * 0 = 0$ ECAs and no effect on water yield

Equivalent clearcut acres in the previous table assume no recovery. Recovery occurs over time since initial perturbation, for most activities, and adjustments to ECAs need to account for this recovery. These recovery factors (see table 211) are based on a moderate speed recovery curve, which was developed from the WATSED model.

Table 211. ECA Recovery Factors

Years Since Ground Disturbing Activity	Activity Year Between these Years	Recovery Factor*	% Recovery
0	2002-2011	1.00	0
10	1992-2001	0.73	27
20	1982-1991	0.53	47
30	1972-1981	0.39	61
40	1962-1971	0.30	70
50	1952-1961	0.23	77
60	1942-1951	0.18	82
70	1932-1941	0.13	87

Years Since Ground Disturbing Activity	Activity Year Between these Years	Recovery Factor*	% Recovery
80	1922-1931	0.09	91
90	1912-1921	0.06	94
100	--1911	0.03	97

*The value "% Recovery" is for informational purposes only and not used in the ECA calculations.

To develop an ECA recovery factor by year, rather than by decade, a logarithmic equation was developed to simulate recovery using years since activity and ECA recovery factors. Based on analysis of WATSED data, the ECA recovery factor was determined as follows:

$$\text{ECA factor} = -0.308(\text{LN (years since disturbance)}) + 1.440$$

Non-Forest Service Lands – For subwatersheds with mixed ownership, activities on non-Forest Service lands were accounted for where reliable data is readily available. If data was available, the same analysis for ECAs on Forest Service lands applied. In the absence of reliable data, an ECA value of 0 (zero) was used, due to the inherent difficulty in determining or making interpretations of activities on lands outside of Forest Service jurisdiction. However, roads on non-Forest Service lands were accounted for, because data is readily available and fairly reliable. Roads on non-Forest Service lands are assumed to have an ECA of 1, with no recovery, as with Forest Service lands.

WATSED Analysis – Predicted runoff is derived from the methods documented in the WATBAL Technical User Guide (Patten 1989). The model calibrated for the IPNF, known as WATSED, is a tool that organizes typical watershed response relationships resulting from land management activities. Use of the model is designed to provide information to the resource specialist, who, along with knowledge of the model and its limitations, other data and analyses, experience, and professional judgment, integrates all available information to draw conclusions about the probable effects of land management activities on sediment and water yield.

WATSED estimates the most probable mean annual sediment loads, expected sediment load modifications over time, and water yield. WATSED is not intended to determine event-based processes or specific in-channel responses. It does, however, incorporate the results of those processes in the calibration of its driving coefficients. Furthermore, WATSED does not evaluate increases in sediment and peak flows specifically resulting from “rain-on-snow” events or other stochastic events, nor does it attempt to estimate in-channel and stream-bank erosion. WATSED includes assumptions and cannot determine the exact response of a given subwatershed.

Table 212. Watershed Disturbance Score Determination

Watershed Disturbance Factors	Watershed Disturbance Ratings			Multiplier
	Low (1X)	Moderate (2X)	High (3X)	
Road Density (mi/mi ²)	≤ 2.25	2.25 - 4.05	≥ 4.05	1
Road Density on Sensitive Land Types (mi/mi ²)	≤ 0.3	0.3 - 0.71	≥ 0.71	3
Stream Crossing Frequency (#/stream mi)	≤ 0.75	0.75 - 1.35	≥ 1.35	5
Detrimental Disturbance (%)	≤ 2	2 - 4	≥ 4	2
ECA (%)	≤ 15	15 - 45	≥ 45	1

As an example, a subwatershed with 46 percent of its area in an ECA condition would have a relatively high level of disturbance, thus, 3 points towards the total score. A value of 13 percent for the same factor would only generate a score of 1, or a relatively low level of disturbance.

A final watershed disturbance score is calculated as:

$$\Sigma (\text{Road Density rating} * 1, \text{Road Density on Sensitive Land Types rating} * 3, \text{Stream Crossing Frequency rating} * 5, \text{Detrimental Disturbance rating} * 2, \text{ECA} * 1) / 0.36$$

The final overall watershed disturbance rating is determined from the following distribution of watershed disturbance scores (table 213).

Table 213. Final Watershed Disturbance Scores

Low	Moderate	High	Extreme
< 50	≤ 50 – 75	≤ 75 - 90	≥ 90

Riparian Disturbance Rating

Riparian disturbance rating is based on the following factors:

- **1. Riparian Area Road Density (mi/mi²)** – Miles of all roads per total square miles of riparian area.
- **2. Intact Riparian Acres (%)** – Percentage of riparian acres without disturbance. Disturbance acres are defined as harvest activities and roads located in riparian areas (i.e., ECAs) and ECA and recovery factors are applied accordingly. Riparian areas were delineated by buffering streams and waterbodies as follows: 150 feet per side, on streams over 2 percent gradient and 300 feet per side, on streams less than or equal to 2 percent and along shores of lakes and wetlands. Intact Riparian Acres are calculated as follows:

$$\% \text{ intact riparian} = (\text{total riparian acres} - \Sigma \text{ of disturbed riparian acres}) / \text{total riparian acres}$$

Riparian disturbance rating is determined from the following distribution of riparian disturbance values and associated riparian disturbance matrix (table 214).

Table 214. Riparian Disturbance Rating

Riparian Disturbance Factors	Riparian Disturbance Values			Multiplier
	Low (3X)	Moderate (2X)	High (1X)	
% of Intact Riparian	≤ 91	97 - 91	≥ 97	2
	Low (1X)	Moderate (2X)	High (3X)	
Riparian Area Road Density (mi/mi ²)	≤ 2.4	2.4 - 4.3	≥ 4.3	1

A final riparian disturbance score is then calculated as:

$$\Sigma (\% \text{ of Intact Riparian Acres} * 2, \text{ Riparian Area Road Density} * 1) / 0.09$$

A final riparian disturbance rating is determined from the following distribution of riparian disturbance scores (table 215).

Table 215. Riparian Disturbance Scores

Low	Moderate	High
< 50	≤ 50 – 75	≥ 75

Final Watershed Condition Rating

The watershed characterization spreadsheet (V2.5 or later) incorporates results from the three processes described above (watershed sensitivity, watershed disturbance, and riparian disturbance) and provides a final watershed condition rating, using the following matrix (table 216).

Table 216. Final Watershed Condition Rating

	Watershed Sensitivity	L	M	H	L	M	H	L	M	H	Ext	Ext	Ext	L	M	H	Ext
	Watershed Disturbance	L	L	L	M	M	M	H	H	H	L	M	H	Ext	Ext	Ext	Ext
Riparian Disturbance	Low	L	L	L	L	L	M	M	M	M	L	H	H	H	H	H	H
	Mod	M	M	M	M	M	M	M	M	M	H	H	H	H	H	H	H
	High	M	M	M	M	M	H	H	H	H	H	H	H	H	H	H	H
	Extreme	H	H	H	H	H	H	H	H	H	H	H	H	H	H	H	H

Final Watershed Condition Rating

The following descriptions provide a basic summary of interpreting watershed condition ratings, although a given subwatershed may have different combinations of watershed sensitivity and watershed/riparian disturbance. For example, it is possible for a subwatershed to have a low level of sensitivity and a high level of disturbance, providing an overall rating of “moderate.”

Subwatersheds rated as “low” generally have a relative low inherent sensitivity to disturbances and low level of overall disturbance. These subwatersheds exhibit geomorphic, hydrologic, and biotic integrity relative to their natural potential condition. The drainage network is generally stable. Soil, aquatic, and riparian systems are assumed to be functional, in terms of supporting beneficial uses.

A rating of “moderate” generally indicates a subwatershed with a low to moderate inherent sensitivity and/or a low to moderate level of disturbances. Watersheds exhibit moderate geomorphic, hydrologic, and biotic integrity relative to their natural potential condition. Portions of these subwatersheds may exhibit an unstable drainage network. Soil, aquatic, and riparian systems may or may not support beneficial uses.

In general, subwatersheds rated as “high” have a relatively higher sensitivity to natural and human caused natural disturbances and relatively higher level of overall disturbances. These subwatersheds may have limited geomorphic, hydrologic, and biotic integrity relative to their natural potential condition. A majority of the drainage network may be unstable. It is assumed that beneficial uses are generally not supported.

Subwatersheds with less than 25 percent land area under Forest Service jurisdiction were not considered in the analysis. This is due, in part, to limitations in data availability and an assumption that factors outside of agency control reduce the agency’s ability to effectively change conditions at that scale.

Final watershed condition rating may also include professional judgment in some cases. Review by resource specialists, with local ground based knowledge and site-specific data, may have resulted in a change to a condition rating and those changes are noted in the fields “override” and “comments,” in the watershed characterization spreadsheet (V2.5 or later).

Salmonid Assessment (V6.5 – February 2011)

Monitoring and Adaptive Management

Monitoring and adaptive management is critical for evaluating the implementation and effectiveness of the goals and objectives outlined in the revised Forest Plan. Forest Plan level monitoring will be conducted at multiple scales, complimentary with ongoing regional, district, and project level efforts. The Forest monitoring plan accomplishes five items: (1) it bases the level of monitoring on the commensurate level of management actions; (2) it provides feedback on the effects of activities; (3) it has a mechanism for monitoring accountability and oversight; (4) it evaluates the implementation and effectiveness in the recovery/restoration of aquatic species and their habitats, and other aquatic dependent resources.

Implementation, effectiveness, and validation monitoring are designed to measure success toward achieving Plan desired conditions. In addition, project level implementation monitoring is essential for answering questions about the use of guidelines, design criteria, and best

management practices to protect soil and aquatic resources. Project level implementation monitoring is critical to successful passive restoration efforts. The goal of the effectiveness monitoring strategy is to assess the progress of forest management in attaining desired conditions. Essentially, Plan monitoring attempts to answer two basic questions: “How will we recognize achievement of desired conditions?” and “how will progress be measured?” Effectiveness monitoring is designed to collect data on aquatic and riparian condition and trend. Validation monitoring is used to validate the assumptions made during Plan revision and analysis, including modeling. Validation monitoring will be important for determining if restoration activities result in the projected fish population response and watershed conditions.

PACFISH/INFISH Biological Opinion Effectiveness Monitoring (PIBO EM) Program (Kershner et al. 2004) is currently used by national forests and BLM units west of the Continental Divide to assess the effects of management activities on aquatic ecosystems in the interior Columbia Basin. PIBO EM is designed to yield consistent, scientifically defensible, credible data with which to compare and interpret aquatic ecosystem status, condition, and trend. Through the collection of a fairly large data set that includes managed and reference watersheds across the Forest, PIBO EM can be used to measure and evaluate the effectiveness of Plan design criteria (e.g., guidelines, best management practices) in restoring and maintaining aquatic ecosystem desired conditions on NFS lands. PIBO EM will be incorporated into an evaluation of trends in aquatic habitats across the Forest and help ensure that management activities are consistent within the context of broad and local recovery and restoration goals and objectives.

The monitoring plan provides a means of evaluation for land managers to make appropriate adjustments to individual activities and forestwide programs (i.e., adaptive management). Adaptive management uses monitoring results to ensure Forest Plan direction is improving ecological conditions and reduces risks to aquatic species and aquatic dependent resources. Adaptive management provides the mechanism to modify management actions in response to the monitoring and evaluation results, changes in laws or regulations, or new information. This feedback loop allows management adjustments as needed to continue moving towards attainment of revised Forest Plan direction and goals of this strategy. For example, if monitoring concludes that a specific practice is ineffective or riparian conditions are not being maintained over a number of sites, changes in management direction will need to be considered and implemented. In some cases, low levels of negative effects from either an individual action or aggregate effects from multiple actions may persist until monitoring can alert managers of the need to change management practices or adjust Forest Plan direction. This includes the ability to make appropriate modifications to restoration direction, mitigation measures, budgets, and monitoring approaches.

Conservation/Restoration Watersheds

Salmonid Multi-Scale Assessment

The Region 1 Salmonid Multi-Scale Assessment (V6.5) was used to evaluate the status of salmonids within the planning area. Risks and threats to native fish species of interest were identified for each subwatershed and tracked in a spreadsheet (V6.0). Risks identified during Step 3 included deterministic, stochastic, and genetic extinction risk factors (Rieman et al. 1993). Extinction risks included influences at several spatial and temporal scales. An understanding of the processes of extinction and the characteristics of native fish populations that make them more or less likely to persist was fundamental to the risk assessments (Rieman et al. 1993). The list of

threats includes land use practices, invasive species, or landscape conditions that may directly or indirectly affect native fish population life stages, aquatic habitats, and subwatersheds.

The subbasin is the primary broadscale summary unit for salmonids. The subbasin acts as a terminal aquatic environment, aligning with the salmonid meta-population. A meta-population is a collection of local populations interacting to hedge against extinction through the migratory life stage. Self-sustaining populations (strongholds) act as source populations for supporting weaker populations or re-colonizing extirpated populations or new habitats. This multi-scale approach allows for broader interpretations of current conditions in terms of salmonid meta-populations and movement throughout several subwatersheds.

Aquatic data is summarized by subwatershed (6th level hydrologic units). The subwatershed is the primary fine scale for summarizing reach and habitat data. The subwatershed is often synonymous with local populations and their life stages, potential risks and threats to those populations and their life stages, and assessments of project level management actions. Each scale contains valuable information about how the ecosystem functions. Habitats are created and maintained by all the scales of a drainage system functioning together (Wissmar 1997). This multi-scale analysis incorporated professional interpretations from numerous data sources such as subbasin assessments, species recovery plans, watershed analysis, TMDL implementation plans, or other broad or mid-scale information. Subsequent project decisions would incorporate annually updated progress toward meeting desired conditions at the watershed and subbasin scale using data summarized at the subwatershed scale. Some of this information is summarized and interpreted at the subbasin (4th level hydrologic units) to determine how conditions are distributed across a larger geographic area.

At a subwatershed scale, or site-specific project scale, the potential for a management action to contribute to conditions that will positively or negatively contribute to the broader-scale goals and objectives can be completed by viewing project level effects in context to the watershed rating and salmonid assessments completed in support of Forest Plan revision and other broader-scale assessments (e.g., NWPCC Subbasin Assessments, Final Basin-wide Salmon Recovery Strategy, and Final Bull Trout Recovery Plans). These assessments provides a multi-scale context of each subbasin and its respective subwatersheds' baseline and potential status of population and habitat conditions to develop site-specific management actions to make progress towards attainment of Forest Plan goals and objectives and provides the appropriate scales to other components of this strategy, that prioritize, design, and evaluate management actions needed to move towards goals and the conservation of native fish species, their habitats, and other aquatic dependent resources.

The concept of "priority watersheds" as described in INFISH (USDA Forest Service 1995) is further refined in the revised Forest Plan as "conservation" and "restoration" watersheds. Priority watersheds in INFISH were designated based on the following criteria:

- Watersheds with excellent habitat or strong assemblages of inland native fish, with a priority on bull trout populations;
- Watersheds that provide for meta-population objectives; and
- Degraded watersheds with a high restoration potential.

INFISH states that priority watersheds are intended to provide a pattern of protection across the landscape, where habitat for inland native fish would receive special attention and treatment. Priority watersheds would have the highest priority for restoration, monitoring, and watershed analysis. Priority "areas in good condition would serve as anchors for the potential recovery of

depressed stocks, and also would provide colonists for adjacent areas where habitat had been degraded by land management or natural events (USDA Forest Service 1995)". Priority watersheds in this condition are considered "conservation" watersheds in the revised Forest Plan. Priority watersheds that are "areas of lower quality habitat, with high potential for restoration, would become future sources of good habitat with the implementation of a comprehensive restoration program (USDA Forest Service 1995)" are labeled "restoration" watersheds in the revised Forest Plan.

Conservation watersheds were evaluated by selecting subwatersheds that had strong or stable populations of bull trout, westslope cutthroat trout, interior redband trout, or a combination of the three (population status codes 111 and 113) in subwatersheds rated as "low" from the watershed characterization rating spreadsheet (V2.5).

Active restoration watersheds were determined by selecting subwatersheds that had small populations or populations of unknown size (population status codes 112 and 119) of bull trout, westslope cutthroat trout, interior redband trout, or a combination of the three, present in subwatersheds rated as "moderate."

Passive restoration watersheds were determined by selecting subwatersheds that had small populations or populations of unknown size (population status codes 112 and 119) of bull trout, westslope cutthroat trout, interior redband trout, or a combination of the three, present in subwatersheds rated as "high."

Status Coding

Each of the three digits in the salmonid status assessment numerical code represents presence or absence, habitat, species status, or unknown (e.g., 113 = species present – spawning and rearing habitat – small and stable population). This code structure is intended for use in a database that could be queried to identify occupied, unoccupied, and potential habitat. Under those separate headings you could then query further but you could not query on the second or third digits independently of the previous digits and get any meaningful results.

- **First digit – Presence, absence, or unknown**
 - **Second digit**
 - **Third digit**
- 1 present
 - 1 spawning and rearing habitat
 - 1 strong
 - 2 depressed
 - 3 small and stable
 - 9 no information
 - 2 migratory corridors
 - 0 place mark
- 2 absent
 - 1 rigorous sampling has confirmed species absence
 - 2 historically absent or currently inaccessible or unsuitable
 - 0 place mark
- 3 unknown – some data available, high uncertainty

- 1 Suitable habitat present
 - 1 connected
 - 2 un-connected
- 2 Suitable habitats not present
 - 0 place mark
- 4 assumed extirpated – may or may not have data on historical presence and current species absence
 - 0 place mark
 - 0 place mark
- 9 unknown (999)
 - 9 unknown
 - 9 unknown

Present – Strong: Spawning & Rearing Habitat (code = 111)

The subwatershed has ALL of the following conditions:

- The species is present in the subwatershed based on sample data using accepted fish sampling methods in the last 10 years;
- All major life histories (e.g., stream resident or migratory) that historically occurred in the subwatershed are still present;
- Numbers are stable or increasing, and the local population is likely to be half or more of its historic size or density; and
- The population or meta-population in the subwatershed or in the larger region of which it is part, likely is at least 5,000 individuals or 500 adults. If the population size is based on a population that extends outside of this subwatershed, the subwatershed presently constitutes an important core area for this larger population.

Note: Number of individuals and/or adults may need revision based on population characteristics or species that do not occur within the Interior Columbia River Basin.

Present – Depressed: Spawning and Rearing Habitat (code = 112)

The species is present in the subwatershed based on sample data using accepted fish sampling methods in the last 10 years; AND the subwatershed has ONE or MORE of the following conditions:

- A major life-history component (e.g. migratory or resident form of cutthroat trout) has been eliminated; or
- Numbers are declining, or species occurs in less than half of its historic habitat, or numbers are less than half of historic; or

Note: If historic habitat is unavailable, densities are less than half of comparable undamaged streams where the species is well-distributed. Hybridized cutthroat issues would be described and displayed in status of westslope cutthroat trout (*Oncorhynchus clarki lewisi*) in the United States (Shepard et al. 2005).

The population or meta-population in the subwatershed, or in the larger region of which it is part, is less than 5,000 individuals or 500 adults (fish in the watershed are isolated by distance or natural barriers from other populations that would collectively exceed these numbers).

Note: Number of individuals and/or adults may need revision based on population characteristics or species that do not occur within the Interior Columbia River Basin.

Present – Small & Stable Population: Spawning and Rearing Habitat (code = 113)

The subwatershed has the following conditions:

- The species is known to be present in this subwatershed;
- The species is using spawning and rearing habitat in this subwatershed; and
- The population in this subwatershed is small (number of individuals in population is less than 500) and the population is believed to be relatively stable and comparable to historic size.

Notes regarding this call: Small populations that are reduced in size from historic are coded as depressed. In general these are physically isolated populations or populations that occupy relatively small amounts of habitat.

Present – Unknown Pop Status: Spawning and Rearing Habitat (code = 119)

The subwatershed has the following conditions:

- The species is present in the subwatershed based on sample data using accepted fish sampling methods in the last 10 years; and
- Sampling has not been conducted at the level to characterize the status of the population.

Present – Migratory Corridor (code = 120)

The subwatershed has the following conditions:

- The species is known to be present in this subwatershed; and
- The species uses habitat in this subwatershed for migration.

Notes regarding this call: Migratory corridors are habitat that do not support spawning or rearing and function solely as routes for migrating fish. In general, these areas are main stem rivers contained within composite subwatersheds that do not contain any other spawning and rearing habitat for this species in the tributaries.

This call is not used for resident populations except for adfluvial fish (stream reaches between lakes and spawning areas) and for anadromous fish (although it is recognized that there is some juvenile rearing that occurs in these corridors).

Absent based on rigorous sampling (code = 210)

The subwatershed has the following condition:

- Sampling for this species in this subwatershed has been completed using recognized protocol for detecting small, sporadic fish presence (Must have used AFS Western Division protocol for bull trout).

Notes regarding this call: This protocol does not need to be applied for introduced fishes. For introduced fishes the species has not been detected in the subwatershed based on sample data using accepted fish sampling methods in the last 10 years.

Absent – Historically and Currently Inaccessible or Unsuitable (code = 220)

The subwatershed has the following condition:

- This subwatershed (or all suitable habitats for the species in this subwatershed) has been inaccessible or is unsuitable to this species since the last ice age, and currently remains inaccessible or is unsuitable to this species

Notes regarding this call: This call is not used to represent temporary or small barriers to the species. A determination of unsuitable habitat in this call is generally used for anadromous species.

Presence Unknown – Suitable Habitat Present and Connected (code = 311)

The subwatershed has the following conditions:

- The species has not been detected in this subwatershed;
- Rigorous sampling protocols have not been implemented to determine the presence of the species; and
- The subwatershed contains suitable habitat that is physically connected to areas outside the subwatershed that contain the species.

Presence Unknown – Suitable Habitat Present but Unconnected (code = 312)

The subwatershed has the following conditions:

- The species has not been detected in this subwatershed;
- Rigorous sampling protocols have not been implemented to determine the presence of the species; and
- The subwatershed contains suitable habitat that is not physically connected to areas outside the subwatershed that contain the species.

Presence Unknown – Suitable Habitat Not Present (code = 320)

The subwatershed has the following conditions:

- The species has not been detected in this subwatershed;
- Rigorous sampling protocols have not been implemented to determine the presence of the species; and
- The subwatershed does not contain suitable habitat.

Assumed Extirpated – Known Historical Habitat (code = 400)

The subwatershed has the following conditions:

- The species has been historically detected or assumed to be historically present based on environmental parameters in this subwatershed; and
- Assumed that the species no longer occurs in subwatershed.

Presence Unknown – Habitat Unknown (code = 999)

The subwatershed has the following conditions:

- The species has not been detected in this subwatershed;
- Rigorous sampling protocols have not been implemented to determine the presence of the species; and
- Habitat conditions in this subwatershed are unknown.

Appendix E – Wild, Scenic, and Eligible Rivers

Introduction

Congress enacted the Wild and Scenic Rivers Act (WSRA) in 1968 to preserve select river's free-flowing condition, water quality, and outstandingly remarkable values. The most important provision of the WSRA is protecting rivers from the harmful effects of water resources projects. To protect free-flowing character the Federal Energy Regulatory Commission (which licenses nonfederal hydropower projects) is not allowed to license construction of dams, water conduits, reservoirs, powerhouses, transmission lines, or other project works on or directly affecting wild and scenic rivers. Other federal agencies may not assist by loan, grant, license, or otherwise any water resources project that would have a direct and adverse effect on the values for which a river was designated.

The WSRA also directs that each river in the National Wild and Scenic Rivers System (National System) be administered in a manner to protect and enhance a river's outstanding natural and cultural values. It allows existing uses of a river to continue and future uses to be considered, so long as existing or proposed use does not conflict with protecting river values. The WSRA also directs building partnerships among landowners, river users, tribal nations, and all levels of government.

Rivers may be identified for suitability studies by an act of Congress under Section 5(a), or through federal agency-initiated study under Section 5(d) (1). By the end of 2002, Congress had authorized 138 rivers for study. Section 5(d) (1) directs federal agencies to consider the potential of wild and scenic rivers in their planning processes; and its application has resulted in numerous individual river designations, and state and area-specific legislation.

Both Sections 5(a) and 5(d) (1) require determinations to be made regarding a river's eligibility, classification, and suitability. Eligibility and classification represent an inventory of existing conditions. Eligibility is an evaluation of whether a river is free-flowing and possesses one or more outstandingly remarkable value. If found eligible, a river is analyzed as to its current level of development and a preliminary classification determination is made as to whether it should be placed into one of three classes: wild, scenic, or recreational.

The final procedural step, a suitability study, provides the basis for determining whether to recommend a river as part of the National System. A suitability study is designed to answer the following questions:

- Should the river's free-flowing character, water quality, and outstandingly remarkable values be protected, or are one or more other uses important enough to warrant doing otherwise?
- Will the river's free-flowing character, water quality, and outstandingly remarkable values be protected through designation? Is it the best method for protecting the river corridor? In answering these questions, the benefits and impacts of wild and scenic rivers designation must be evaluated and alternative protection methods considered.
- Is there a demonstrated commitment to protect the river by any nonfederal entities that may be partially responsible for implementing protective management?

Rivers authorized for suitability studies by Congress are protected under the WSRA; specifically,

- Section 7(b) – prevents the harmful effects of water resources projects;
- Section 8(b) – withdraws public lands from disposition under public land laws;
- Section 9(b) – withdraws locatable minerals from appropriation under mining laws; and
- Section 12(a) – directs actions of other federal agencies to protect river values.

These protections last through the suitability study process, including a three-year period following transmittal of the final suitability study report by the President to Congress. The integrity of the identified classification must also be maintained during the protection period.

The identification of a river as eligible through the forest planning process does not trigger any protections under the WSRA. To manage the river for its potential inclusion into the National System, other authorities are cited to protect its free-flowing character, water quality, outstandingly remarkable values, and preliminary or recommended classification.

No suitability studies are being conducted with this revised Forest Plan.

In this evaluation, only eligibility of rivers on the IPNF is completed. Suitability is deferred, pending:

- 1. Public interest or support in wild and scenic river study;
- 2. Congress expresses interest in a specific river for wild and scenic river designation, or
- 3. A proposed project would alter the free-flowing character of a stream, such as by impoundment, or adversely affect outstandingly remarkable values, or the river's inventoried classification (82.5).

Process to Identify and Classify Potentially Eligible Wild and Scenic Rivers

The following describes the process used for identifying those rivers and streams on the IPNF that are potentially eligible for inclusion in the National Wild and Scenic River System. Maps of designated and potentially eligible Wild, Scenic, and Recreational Rivers are also included.

In order to identify potentially eligible rivers the Forest used:

- Region 1 "Draft Consistency Paper – Wild and Scenic Rivers Assessment";
- Forest Service Handbook 1912.09 Ch.80 for identifying and evaluating potential additions to the National Wild and Scenic Rivers System on NFS lands pursuant to the WSRA of October 2, 1968, as amended; and
- Wild and Scenic Rivers Guidelines as published in the *Federal Register*/Vol.47, No. 173/Tuesday, September 7, 1982.

Step 1 – Evaluate the status of eligible wild and scenic rivers in the current Forest Plan.

A review of the 1987 Forest Plan for the IPNF revealed that the Forest's addressed eligibility of select rivers, but no forestwide assessments were completed. Therefore, a comprehensive forestwide evaluation of potentially eligible rivers on the Forest was needed.

Step 2 – Complete a systematic forestwide inventory of streams and rivers.

As per the Wild and Scenic River Act at 5(d) (1) and Forest Service Manual policy ([FSM 1924.03](#)) a systematic inventory of named streams and rivers was completed on the IPNF. The inventory of the named rivers and streams on the IPNF was generated from the Forest's GIS coverage of rivers and streams on the Forest.

- The inventory of named streams and rivers on the IPNF resulted in the identification of 1,337 candidates to consider for eligibility. By district there are: Bonners Ferry District (145), Priest Lake District (123), Sandpoint District (142), Coeur d'Alene District (561), and St. Joe District (366).

Step 3 – Determine which of the named rivers and streams are free-flowing.

Initial assessments were accomplished in an interdisciplinary manner by having district and/or supervisors office resource specialists review the listed named rivers and streams; and based on their knowledge, identify if the river or stream is free-flowing. This determination is made by answering the question:

- Is the river segment flowing in a natural condition without impoundment, diversion, straightening, rip rapping, or other modification of the waterway? Bridges and culverts are allowed and do not affect the segment's free-flowing nature.

If the river segment is not free-flowing, the river is not eligible.

Step 4 – Identify potential eligibility by determining which of the named rivers and streams that are free-flowing, have a potential 'outstandingly remarkable value'.

To be eligible for designation, a river must be free flowing and possess one or more outstandingly remarkable value. Thus, the eligibility analysis consists of an examination of the river's hydrology, including any man made alterations; and an assessment of its natural, cultural, and recreational resources. The determination that a river area contains outstandingly remarkable values is a professional judgment on the part of the interdisciplinary team, based on objective, site-specific assessments.

In order to be assessed as outstandingly remarkable, a river related value must be a unique, rare, or exemplary feature that is significant at a comparative regional or national scale. Dictionary definitions of the words "unique" and "rare" indicate that such a value would be one that is a conspicuous example from among a number of similar values that are themselves uncommon or extraordinary. Only one such value is needed for eligibility.

The area, region or scale of comparison is not fixed, and is defined as that which serves as a basis for meaningful comparative analysis; it may vary depending on the value being considered. Typically, a "region" is defined on the scale of an administrative unit, a portion of a state, or an appropriately scaled physiographic or hydrologic unit. The comparative scale used for this assessment is the individual Forest. That is, the rivers and streams on the IPNF were compared one to another.

While the spectrum of resources that may be considered is broad, all values should be directly river related. That is, they should:

- a) Be located in the river or on its immediate shore lands (generally within 1/4 mile on either side of the river);

- b) Contribute substantially to the functioning of the river ecosystem; and/or
- c) Owe their location or existence to the presence of the river.

The following criteria were considered in order to establish whether one or more outstandingly remarkable values are present. This is an illustrative list and is not intended to be all inclusive.

Scenery:

- Do the landforms, vegetation type or seasonal variations, watercolor or related factors result in notable or exemplary visual features or attractions?

Recreation:

- Are recreational opportunities unique or rare within the region?
- Are recreational opportunities popular enough or have the potential to be popular enough to attract visitors from throughout the region of comparison?
- Are visitors willing to travel long distances to use the river resources for recreational purposes?
- Are interpretive and/or educational opportunities exceptional and unique within the region of comparison?

Geology:

- Does the river, or area within the river corridor, contain one or more example of a geologic feature, process, or phenomenon unique or rare within the region of comparison?

Fish Populations:

- Is there threatened or endangered species represented?
- Is it an important stronghold for native fish assemblages (diversity)?
- Are there genetically pure strains of native populations?
- Is there a Native American dependence on this fishery?
- Is there a lack of exotic species or non-native species in this river?
- Are there other important wildlife species dependent upon this fishery?

Habitat:

- Is there a relationship between this river and the health and vigor of the fishery that would warrant protection of the river?
- Are there natural barriers to fish migration that restrict the distribution of the population?
- Is there high restoration or recovery potential for the habitat?
- Is this an intact system and does the habitat support native or wild stock assemblages?
- Does the habitat represent a pristine river system?

Wildlife:

- Does the river or river corridor contain nationally or regionally important populations of indigenous wildlife species?
- Does the river or river corridor provide exceptionally high quality habitat for wildlife of national or regional significance?

- Does the river or river corridor provide unique habitat or a critical link in habitat conditions for federal or state listed (or candidate) threatened, endangered, or sensitive species? [Of particular significance is the presence of wild stocks and/or federal or state listed (or candidate) threatened, endangered, or sensitive species. Diversity of species is an important consideration and could, in itself, lead to a determination of "outstandingly remarkable."]

Prehistory:

- Does the river or river corridor contain a site(s) where there is evidence of occupation or use by Native Americans?
- Do sites have unique or rare characteristics or exceptional human-interest value(s)?
- Do sites represent an area where a culture or cultural period was first identified and described?
- Were sites used concurrently by two or more cultural groups, and/or used by cultural groups for sacred purposes?

History:

- Does the river or river corridor contain a site(s) or feature(s) associated with a significant event, an important person, or a cultural activity of the past that was rare or one-of-a-kind in the region?

Botany/Rare Plants and Plant Communities:

- Are there any occurrences of federally threatened or endangered plant species?
- Are there any occurrences of plant species designated as sensitive by the Forest Service?
- Are there any occurrences of other rare plants that are tracked by the state Natural Heritage Program(s)?
- Are there any plant communities or habitats that are unique, rare, or significant, or that are tracked by the state Natural Heritage Programs?
- Are the native plant communities in good ecological conditions (i.e., relatively free of invasive plant species)?

Natural Areas:

- Are there any designated research natural areas along the river?
- Are there any special interest areas (Botanical, Geological, Scenic, Zoological, etc.) along the river?
- Are there any other specially designated areas in the corridor (such as National Natural Landmarks)?

Initial assessments were accomplished in an interdisciplinary manner by having district and/or supervisor office resource specialists review the listed named rivers and streams, and based on their knowledge, identify whether a potential 'outstandingly remarkable value' exists. In most cases, on-the-ground knowledge was used in developing the assessment of outstandingly remarkable values.

The assessment on the free flowing nature, scenery, and recreation was completed by the district recreation specialist. The assessment of geology was completed by the forest hydrologist and geologist. The assessment of fish was completed by the forest fish biologist. The assessment of

wildlife was completed by the forest wildlife biologist. The assessment of history and prehistory was completed by the forest archaeologist. The assessment of botany was completed by the forest ecologist.

The resulting assessment of the free-flowing nature and outstandingly remarkable values was summarized by named stream and input into a spreadsheet. A copy of this spreadsheet can be found in the project record.

Step 5 – Using the Forest as the comparative scale, review the identified potential ‘outstandingly remarkable values’ and determine whether they meet the criteria of being rare, unique, or exemplary.

This review was completed by the IPNF Recreation Program Manager, the KNF Recreation Program Manager and the forest plan revision team lead for Wild and Scenic Rivers.

After reviewing the initial assessments of the resource specialists, the three reviewers made a preliminary determination as to whether the potential outstandingly remarkable values was a unique, rare, or exemplary feature that is significant at the selected comparative scale and meets the other criteria for being directly river-related (as described in a, b, c, above). This resulted in the list of eligible streams that were brought forward for inclusion in the action alternatives.

Narratives were developed for each stream or river system. Some outstandingly remarkable values were found to not be rare, unique, or exemplary. Based on the narratives, the outstandingly remarkable values were identified and summarized for each eligible stream or river system. The final outstandingly remarkable value(s) were determined for the entire river system.

Step 6 – Determine preliminary Classification.

The potential classification of a river found to be eligible is based on the condition of the river and the adjacent lands as they currently exist. Section 2(b) of the WSRA of October 2, 1968 specifies and defines three classification categories for eligible rivers:

- 1. Wild rivers;
- 2. Scenic rivers; and
- 3. Recreational rivers.

The USDA and USDI Guidelines for Eligibility, Classification, and Management of River Areas dated September 7, 1982 (USDA-USDI Guidelines) provides the following classification criteria for wild, scenic, and recreational rivers.

Table 217. Classification Criteria for Wild, Scenic, and Recreational River Areas

Attribute	Wild	Scenic	Recreational
Water Resource Development	Free of impoundment.	Free of impoundment.	Some existing impoundment or diversion.
			The existence of low dams, diversions, or other modifications of the waterway is acceptable, provided the waterway remains generally natural and riverine in

Attribute	Wild	Scenic	Recreational
			appearance.
Shoreline Development	Essentially primitive. Little or no evidence of human activity.	Largely primitive and undeveloped. No substantial evidence of human activity.	Some development. Substantial evidence of human activity.
	The presence of a few inconspicuous structures, particularly those of historic or cultural value is acceptable.	The presence of small communities, dispersed dwellings, or farm structures is acceptable.	The presence of extensive residential development and a few commercial structures is acceptable.
	A limited amount of domestic livestock grazing or hay production is acceptable.	The presence of grazing, hay production, or row crops is acceptable.	Lands may have been developed for the full range of agricultural and forestry uses.
	Little or no evidence of past timber harvest. No ongoing timber harvest.	Evidence of past or ongoing timber harvest is acceptable, provided the forest appears natural from the riverbank.	May show evidence of past and ongoing timber harvest.
Accessibility	Generally inaccessible except by trail.	Accessible in places by road.	Readily accessible by road or railroad.
	No roads, railroads, or other provision for vehicular travel within the river area. A few existing roads leading to the boundary of the area are acceptable.	Roads may occasionally reach or bridge the river. The existence of short stretches of conspicuous or longer stretches of inconspicuous roads or railroads is acceptable.	The existence of parallel roads or railroads on one or both banks as well as bridge crossings and other river access points is acceptable.
Water Quality	Meets or exceeds criteria or federally approved state standards for aesthetics, for propagation of fish and wildlife normally adapted to the habitat of the river, and for primary contact recreation (swimming) except where exceeded by natural conditions.	No criteria are prescribed by the WSRA. The Federal Water Pollution Control Act Amendments of 1972 have made it a national goal that all waters of the US are made fishable and swimmable. Therefore, rivers will not be precluded from scenic or recreational classification because of poor water quality at the time of their study, provided a water quality improvement plan exists or is being developed in compliance with applicable federal and state laws.	

(1) Wild River Areas – The rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted. These represent vestiges of primitive America.

These criteria are interpreted as follows:

- a. "Free of impoundments." Wild river areas shall be free of impoundments.
- b. "Watersheds or shorelines essentially primitive." Wild river areas will show little or no evidence of human activity. Shorelines and watersheds within the river area should be essentially free of structures including such things as buildings, pipelines, power lines, dams, pumps, generators, diversion works, rip-rap, and other modifications of the waterway or adjacent land within the river corridor. The existence of a few inconspicuous structures, particularly those of historic or cultural value, at the time of study need not bar wild classification.

A limited amount of domestic livestock grazing or hay production may be considered "essentially primitive." There should be no row crops or ongoing timber harvest and the river area should show little or no evidence of past logging activities.

- c. "Generally inaccessible except by trail." Wild river areas will not contain roads, railroads, or other provisions for vehicular travel within the river area. The existence of a few inconspicuous roads leading to the boundary of the river area at the time of study will not necessarily bar wild river classification.
- d. "Waters unpolluted." The water quality of a wild river will meet or exceed federal criteria or federally approved state standards for aesthetics, for propagation of fish and wildlife normally adapted to the habitat of the stream, and for primary contact recreation except where exceeded by natural conditions.

(2) Scenic River Areas – The rivers, or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.

These criteria are interpreted as follows:

- a. "Free of impoundments." Scenic river areas will be free of impoundments.
- b. "Shorelines or watersheds still largely primitive." To qualify for scenic classification, the rivers segment's shorelines and immediate environment should not show substantial evidence of human activity. The portion of the watershed within the boundary of the scenic river may have some discernible existing development. "Largely primitive" means that the shorelines and the immediate river environment still present an overall natural character, but that in places land may be developed for agricultural purposes. Row crops would be considered as meeting the test of "largely primitive," as would timber harvest and other resource use, providing such activity is accomplished without a substantial adverse effect on the natural appearance of the river or its immediate environment.
"Shorelines largely undeveloped," means that any structures or concentration of structures must be limited to relatively short reaches of the total area under consideration for designation as a scenic river area.
- c. "Accessible in places by road." Means that roads may reach the river area and occasionally bridge the river. The presence of short stretches of conspicuous or longer stretches of inconspicuous and well-screened roads or railroads will not necessarily preclude scenic river designation. In addition to the physical and scenic relationship of the free-flowing river area to roads or railroads, consideration should be given to the type of use for which such roads or railroads were constructed and the type of use which would occur within the proposed scenic river area.

(3) Recreational River Areas – The rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

These criteria are interpreted as follows:

- a. "Some impoundment or diversion in the past." There may be some existing impoundments, diversions, and other modifications of the waterway having an impact on the river area. Existing low dams, diversion works, rip-rap, and other minor structures will not bar recreational classification, provided the waterway remains generally natural and riverine in appearance.

- b. "Some development along their shorelines." Lands may have been developed for the full range of agricultural and forestry uses, may show evidence of past and ongoing timber harvest, and may include some residential, commercial, or similar development.
- c. "Readily accessible by road or railroad." River areas classified as recreational may contain existing parallel roads or railroads in close proximity to one or both banks of the river as well as bridge crossings and roads fording or ending at the river.

There are several points to keep in mind when reading and applying the classification criteria:

- It is important to understand each criterion, but it is more important to understand their collective intent. Each river segment and its immediate environment should be considered as a unit. The basis for classification is the degree of naturalness, or stated negatively, the degree of evidence of man's activity in the river area. The most natural rivers will be classified wild; those somewhat less natural, scenic, and those least natural, recreational.
- Generally, only conditions within the river area determine classification; however, occasionally conditions outside the river area, such as developments which could impact air and water quality, noise levels, or scenic views within the river area, may influence classification.
- For the purpose of classification, a river area may be divided into segments. Each segment, considered as a whole, will conform to one of the classifications. In segmenting the river, the assessment should take into account the management strategies necessary to administer the entire river area and should avoid excessive segmentation.
- The WSRA provides no specific guidance on water quality for scenic and recreational rivers. However, the Clean Water Act has made it a national goal that all waters of the United States be made fishable and swimmable, and provides the legal means for upgrading water quality in any river which would otherwise be suitable for inclusion in the system. Therefore, rivers will not necessarily be excluded from the system because of poor water quality at the time of study, provided a water quality improvement plan exists or is being developed in compliance with applicable state and federal laws.
- Although each classification permits certain existing development, the criteria do not imply that additional inconsistent development is permitted in the future.
- The classification criteria provide uniform guidance for professional judgment, but they are not absolutes. It is not possible to formulate criteria so as to mechanically or automatically classify river areas. Therefore, there may occasionally be exceptions to some of the criteria. For example, if the assessment finds that strict application of the classification criteria would not provide the most appropriate classification for a specific river segment, the recommendation may consider an exception to the classification criteria.

Wild and Scenic Rivers

Designated

Congress designated the St. Joe wild and scenic river on November 10th, 1978 (P.L. 95-625 Section 708) as part of the Wild and Scenic Rivers System. The St. Joe River is designated as a classified wild river from Spruce Tree campground upriver to St. Joe Lake near the Montana State line, covering 29 miles and 8,229 acres of NFS ownership. The St. Joe River is designated as a

classified recreational river from Spruce Tree campground downstream to Avery, covering 41.6 miles and 13,061 acres of NFS ownership.¹

Eligible

All of the eligible rivers and streams identified in the 1987 Forest Plan and subsequent amendments were found to still be eligible, totaling 172 miles on NFS lands and 52,539 acres within the associated corridors. Three additional river and stream segments were found to be potentially eligible as wild and scenic rivers, totaling 19.5 miles on NFS lands and 5,185 acres within the associated corridors. Table 218 lists the potentially eligible wild and scenic rivers.

Table 218. Eligible Wild, Scenic, and Recreation Rivers

River	Status *	Outstandingly Remarkable Values	Preliminary Classification	NFS Miles	NFS Acres
Upper Priest River					
Seg. 1	Existing	Recreation, Scenery, Wildlife, Fisheries	Wild	19.8	5,096
Little North Fork Clearwater River					
Seg.1	Existing	Recreation, Fisheries, Wildlife	Recreational	7.9	2,443
Seg. 2	Existing		Wild	18.3	5,852
Seg. 3	Existing		Recreational	0.4	39
Coeur d'Alene (CDA) River					
Seg. 1 (all non-Forest Service)	Existing	Recreation Historic	Recreational	0.0	0.0
Seg. 2	Existing		Recreational	0.3	395
Little North Fork Coeur d'Alene River					
Seg. 1	Existing	Fisheries	Recreational	37.8	11,338
North Fork Coeur d'Alene (CDA) River					
Seg. 1	Existing	Scenery, Recreation, Fisheries	Recreational	9.2	2,904
Seg. 2	Existing		Wild	15.6	4,454
Seg. 3	Existing		Recreational	35.0	11,268
Pack River					
Seg. 1	Existing	Recreation	Recreational	13.7	4,262
Long Canyon Creek					

¹ Miles and acreages listed are from GIS data. The proclaimed (land status) acreage is actually 8,198 designated as wild and 12,665 designated recreational. The St. Joe Wild and Scenic River Development and Management Plan identify the mileage as 26.6 miles designated as wild and 39.7 designated as recreational.

River	Status *	Outstandingly Remarkable Values	Preliminary Classification	NFS Miles	NFS Acres
Seg. 1	Existing	Wildlife	Wild	14.1	4,488
Hughes Fork					
Seg. 1	New	Scenery, Recreation, Wildlife, History, Botany	Wild	4.8	1,562
Seg. 2	New		Recreational	9.9	2,410
Kootenai River					
Seg. 1	New	Scenery Fisheries	Recreational	6.5	1,213
Total				191.6	57,724

* Segments found to be eligible as wild and scenic under the 1987 Forest Plan as amended as listed as "existing." Additional segments found to be potentially eligible under the plan revision are listed as "new"

Narratives

Following are narratives for each river system listed in table 218 and the designated St. Joe River.

St. Joe River System

The St. Joe River begins its journey at St. Joe Lake, at an elevation of 6,460 feet. Known for its exceptionally clear water, visitors can stand on a bridge 30 feet above the river and see the bottom through 15 feet of water. The primary tributary is the St. Maries River, with several other smaller tributaries and lakes along the length of the river. A total of 66.3 miles of the St. Joe River is designated in the National Wild and Scenic Rivers System. The segment from St. Joe Lake to Spruce Tree Campground (26.6 miles) is designated as a wild river and the segment from Spruce Tree Campground (39.7 miles) to the town of Avery is designated as a recreational river.¹

The entire St. Joe Wild and Scenic River corridor has spectacular scenery, with crystal clear water, numerous pools, riffles and small falls, moss and fern-covered cliffs to the water's edge, a large variety of trees, views of near and distant timber covered slopes interspersed with grass, and brush field openings. Tree species are typical of northern Idaho with a scattering of 100-year old snags left standing after the 1910 fire, their tops still visible above the green canopy of the younger trees, a mosaic of fir, pine, cedar, and other species. The golden hues of the western larch scattered throughout the corridor brighten up the hill sides in the fall. Outstanding winter landscapes along the groomed snowmobile trail from Avery to Gold Creek provide opportunities to view snow-draped trees and frozen waterfalls. Visitors have an excellent opportunity to see elk, deer, and moose, and variety of birds, fish, and fur-bearing animals. More unique species such as mountain goats, mountain lions, wolves, bald eagles, osprey, and harlequin ducks can sometimes be seen throughout the river corridor.

Good access along paved roads (Highway 50 and Red Ives Road 218) takes visitors through the recreational river corridor to the doorstep of the wild river section where a non-motorized trail parallels the river for 17 miles. Facilities along the recreational river segment include a picnic

¹ Miles listed here are from the St. Joe Wild and Scenic River Development and Management Plan. See the Development and Management Plan for additional information on the management of the river.

area and several developed campgrounds. Dispersed recreation is important throughout the entire St. Joe Wild and Scenic River corridor, with over two dozen dispersed sites that are used for both camping and day use activities. Numerous trails originate from the recreation segment, providing opportunities for both non-motorized use and to a lesser extent single-track motorized opportunities. The very popular Red Ives Cabin Rental and Historic Ranger Station are located in the recreation segment two miles from the end of the road. Along the wild segment, non-motorized trail use opportunities abound. This segment of the river is favored by stock riders, backpackers, and anglers who want a more remote experience.

Recreation uses are diverse along the St. Joe Wild and Scenic River and include rafting (both whitewater and leisure floating), canoeing, kayaking, swimming, sightseeing, camping, fishing, hunting, hiking, backpacking, stock riding, berry picking, and in winter, snowmobiling. One of the few whitewater opportunities in North Idaho, segments of fast-running water, provide challenging class II, III, and IV rapids for whitewater enthusiasts in spring and early summer.

Hunting and fishing opportunities draw thousands of visitors to the area every year. The river corridor provides habitat for a variety of wildlife and is well known for its elk hunting opportunities, as well as mountain goats, deer, moose, mountain lion, and bear. The river provides outstanding habitat for a diversity of fish species, supporting populations of nationally-significant fish species such as bull trout and native westslope cutthroat trout. The river is designated as a blue-ribbon wild trout stream by Idaho Fish and Game and is considered one of the highest quality fisheries in the state. Considered by many to be the best westslope cutthroat trout river in northern Idaho, the St. Joe Wild and Scenic River is managed as catch-and-release water.

Many anglers, who visit either segment of the St. Joe, fly fish. This sport requires a great deal of concentration as you usually have to “see” a strike rather than “feel” it. With this in mind, the combination of the flowing water, steep canyons, and heightened concentration give an angler a truly wild experience.

Upper Priest River

The Upper Priest River originates at the Canadian border and flows south for approximately 20 miles to the Upper Priest Lake. The entire eligible river is under NFS ownership. This free-flowing river is characterized by cold clear water, clean substrate, and abundant deep pools that provide outstanding aquatic habitat. It meanders through a glaciated U-shaped valley vegetated with predominately continuous stands of mature old growth western redcedar and western hemlock. A large portion of the Upper Priest River is within the Salmo-Priest proposed wilderness and is also proposed as both a Research Natural Area and botanical Special Interest Area. The river is designated as critical habitat for threatened bull trout and the river corridor is within identified habitat for threatened and endangered wildlife species (woodland caribou, grizzly bear, Canada lynx), and is considered suitable habitat for harlequin duck (R1 Sensitive Species). Upper Priest River is paralleled by a non-motorized trail extending eight miles south to north terminating near the Canadian border and Upper Priest Falls. This trail and associated primitive campsites are extremely popular with locals and visitors for providing solitude not found near Priest Lake.

Little North Fork Clearwater River

The river is a free flowing stream from its source at Fish Lake to where it flows into the Dworshak Reservoir. The headwaters are on public lands administered by the Bureau of Land Management and the Forest Service. The Little North Fork of the Clearwater River is a fast-

moving but mostly crystal-clear river. Major streams draining into the Little North Fork include Sawtooth Creek, Canyon Creek, and Foehl Creek.

The upper section, from Fish Lake to Adair Creek, is classified as recreational and runs for approximately 11 miles, with 8 miles on NFS lands. This upper section gently flows through meadows and then flows through private and national forest properties that have roads and have been managed for timber production. The middle section, from Adair Creek to the border of the Idaho State lands, is classified wild and runs for approximately 26 miles, with 18 miles on NFS lands. This section flows through a deep, rugged, roadless river canyon, dominated by scenic groves of mature western redcedar and hemlock. The canyon is rimmed with scenic views of the surrounding peaks of the Mallard Larkins Pioneer Area and Snow Peak Wildlife Management Area. The third section, from the Idaho State lands to the Dworshak Reservoir, is classified as recreational and is approximately three miles long, with less than ½ mile on NFS lands. This area is roaded, with recreational access.

The Little North Fork Clearwater River contains a diverse range of unique and challenging rapids, rated from class II to Class V. In its upper reaches, the river has continuous class II-III boulder garden style rapids. Lower down, the river drops into several distinct canyons with rapids formed by exposed bedrock ledges, constricted canyon walls and large boulder fields. In its last three miles, the river offers nearly continuous class III/IV whitewater, punctuated by large and challenging class IV+ and V drops. The Little North Fork also offers paddlers the opportunity for a multi-day river trip in a remote and roadless setting. Once on the river, the user is committed for 12-15 miles until reaching the upper end of the Dworshak Reservoir. During high water runoff in May or June, there may be limited opportunities for rafting and kayaking on the Little North Fork; and access to the middle section of the river is by trail and cross-country up to several miles. Fallen trees pose floating challenges. The canyon also offers superb opportunities for recreational fishing, as well as hiking and wildlife viewing.

The Little North Fork Clearwater has superb water quality, an intact watershed, and is designated critical habitat for bull trout, and holds an exceptional fishery of westslope cutthroat. Several anadromous fishes also use the Little North Fork for spawning. In addition, the Little North Fork provides habitat for several special wildlife species including mountain goats, Canada lynx, fisher, wolverine, and harlequin ducks.

Coeur d'Alene River

The Coeur d'Alene River system begins just south of the confluence with the North Fork Coeur d'Alene River and flows approximately 38 miles to Coeur d'Alene Lake. The river is broken into two segments, both of which are classified as recreational. The first segment flows from the North Fork Coeur d'Alene River almost to the Cataldo Mission. This segment is 7.6 miles long and does not have any NFS ownership. The second segment flows from just east of the Cataldo Mission to Coeur d'Alene Lake. This segment is 30.2 miles long, with less than one mile on NFS ownership. The Coeur d'Alene River is noted for its recreational and historic values. Thousands of people recreate along this river each year. Popular activities include fishing, canoeing, camping, and inner tubing. The river is clear and shallow in this section making inner tubing a popular summertime activity. There are no developed campgrounds along this stretch of the river, but dispersed camping is very popular. This segment of river corridor is roaded with paved access along this entire stretch.

Little North Fork Coeur d'Alene River

The Little North Fork Coeur d'Alene River is currently listed as eligible in the Nationwide Rivers inventory by the Heritage Conservation and Recreation Service. The river is classified as recreational and is approximately 38 miles long, with more than 98 percent in NFS ownership. Scenery along the Little North Fork Coeur d'Alene River is spectacular, providing a large variety of trees and examples of early and mid-succession riparian vegetation. Visitors along this segment of river may see a variety of wildlife including bears, moose, elk, deer, and a variety of birds. This major tributary of the Coeur d'Alene River is noted for its crystal clear water and outstanding fisheries. The Little North Fork provides anglers with a unique opportunity to catch native westslope cutthroat trout.

North Fork Coeur d'Alene River

The North Fork Coeur d'Alene River flows out of the Bitterroot Mountains in a southwesterly direction eventually flowing into the Coeur d'Alene River. The river is 77 miles long with more than 75 percent on NFS lands. Segment 1 is classified as recreational, and flows from the headwaters at Powder Mountain to the trailhead for the Coeur d'Alene River NRT trail #20. This segment is nine miles long with 100 percent NFS ownership. Segment 2 is classified wild, and flows from trail #20 to the intersection with road 6310. This segment is almost 16 miles long with 100 percent NFS ownership. Segment 3 flows from the intersection with road 6310 to the confluence with the Coeur d'Alene River. This segment is 52 miles long with 67 percent NFS ownership.

The North Fork has beautiful scenery with clear water, multiple riffles, small pools, and varying terrain along the river's edge from forested areas to meadows and rocky cliff bands. The North Fork canyon contains unique and highly scenic geologic features including Cathedral Rocks, a formation comprised of sheer canyon walls and large rock spires. Tree species are typical of North Idaho including white pine, Douglas-fir, grand and subalpine fir, hemlock, cedar, larch, and spruce. Some snags from the 1910 fire still stand within the canopy. Wildlife is abundant including elk, deer, moose, bear, and bald eagles. Sensitive species that may occur in the area include the Coeur d'Alene salamander, western toad, black-backed woodpecker, Townsend's big-eared bat, fringed myotis, and fisher. This portion of the river contains some of the most critical bull trout habitat in the Coeur d'Alene drainage. The North Fork also provides anglers with a unique opportunity to catch native westslope cutthroat trout. There is also a rich history of human occupation along this stretch of river. This is evidenced by a large number of historic properties and archeological sites along the recreational segment of the North Fork Coeur d'Alene. The Spion Kop RNA is within the corridor of segment 3.

Recreational opportunities are abundant along the North Fork Coeur d'Alene River. The recreational segments are accessible by road or trail, with Trail 20, a National Recreation Trail paralleling the wild segment. Other opportunities along the entire river corridor include picnicking at developed picnic sites, camping at developed campgrounds or in rural, unmanaged camp sites, renting a historic cabin at Avery Creek or Magee, hiking, canoeing, kayaking, inner tubing, or swimming.

Pack River

The headwaters of the Pack River originate from a collection of high mountain lakes among the Selkirk Crest north of Sandpoint, Idaho. The river is classified as recreational and flows 15 miles, with 90 percent NFS ownership. The upper portion of the river has one access road maintained primarily for summer and winter recreation purposes. The lower portion is roaded. This stream is

the second largest tributary to Lake Pend Oreille and the upper river is a designated water body for cold water aquatic life, salmonid spawning, domestic water supply, and outdoor recreation. The Pack River drainage provides a unique setting for recreation, offering a little bit of everything; trails to high mountain lakes, summer and winter motorized trails at the lower reaches, and primitive camping experiences. The Pack River is designated as critical habitat for threatened bull trout and the portion of the river corridor above Blanc Creek is within identified habitat for threatened, endangered, and proposed wildlife species (woodland caribou, grizzly bear, Canada lynx, and wolverine) and is considered suitable habitat for harlequin duck (R1 Sensitive Species).

Long Canyon Creek

Long Canyon Creek flows north from its source in the Selkirk Crest to the Kootenai River. The river is classified wild and flows 15 miles, with 93 percent NFS ownership. The underlying material in the area is a metamorphosed granitic intrusive rock. It is one of the few remaining stream corridors of its size in northern Idaho that has seen limited disturbance by human activity. The river flows through a canyon and a hiking trail (#16) parallels most of the river. Stands of old growth western redcedar, western white pine, western hemlock, and Engelmann spruce dominate much of the canyon floor within the river corridor. Whitebark pine is found along the ridgelines of the watershed. The canyon also contains habitat for threatened, endangered, and proposed wildlife species (woodland caribou, grizzly bear, Canada lynx, and wolverine) and is suitable habitat for harlequin duck (R1 Sensitive Species). Additionally, Long Canyon Creek is designated as critical habitat for threatened bull trout.

Hughes Fork

The Hughes Fork (a tributary to the Upper Priest River) flows south from its source near Shedroof Divide for almost 15 miles to its junction with the Upper Priest River. The river is broken into two segments: segment 1 is classified as wild and flows from its source south for almost five miles to the intersection with trail 312; segment 2 flows for almost 10 miles from the intersection with trail 312 to its confluence with the Upper Priest River. The entire river is in NFS ownership. The area is popular for recreation, with trail 312 paralleling most of segment 1. The southern portion of segment 2 is roaded, with several hiking trails in the area. The river offers spectacular scenery, from meadows to mountain views.

Hughes Fork is designated as critical habitat for threatened bull trout and the stream corridor is within identified habitat for threatened wildlife species (grizzly bear, Canada lynx) and is suitable habitat for harlequin duck (R1 Sensitive Species). The meadow complex associated with the Hughes Fork is unique for the area as it supports abundant foraging grizzly bears in the late spring/early summer. The Hughes Fork basin is also home to numerous old growth cedar stands as well as a diversity of moist forest-dependent rare plants including *Botrychium* species (moonworts) and many fern species.

Sometime prior to 1925, the Forest Service established Hughes Meadow for a summer guard station. Nothing remains from this original development but another guard station and associated structures were built in 1935 and still remain today.

Kootenai River System

The Kootenai River originates in Canada then flows south and west through Montana and Idaho before turning north and flowing back into Canada. In Idaho, the river flows through a steep and confined canyon carved through the Purcell and Cabinet Mountains and then emerges into a wide,

glaciated valley composed of private agricultural lands near the community of Bonners Ferry. It is the second largest tributary to the Columbia River in volume and third largest in drainage area (18,000 square miles). The river corridor includes outstanding scenery along the entire length, abundant recreational opportunities, as well as the historic and pre-historic values that are related to the early days of northwest exploration and settlement. Approximately six miles flow across NFS lands on the IPNF.

The entire reach of the river in Idaho is designated as critical habitat for threatened bull trout and also provides spawning and rearing habitat for the endangered Kootenai River white sturgeon. Additionally, the Kootenai River and some of its tributaries are the only places burbot and redband trout (R1 Sensitive Species) can be found in northern Idaho. The river corridor also provides suitable nesting habitat for the bald eagle (R1 Sensitive Species).

Maps

Following are maps of the designated and eligible wild and scenic rivers. Figure 36 displays the wild and scenic rivers forestwide and table 219 indicates the name of the river segment, classification, and page number and figure number for detailed maps.

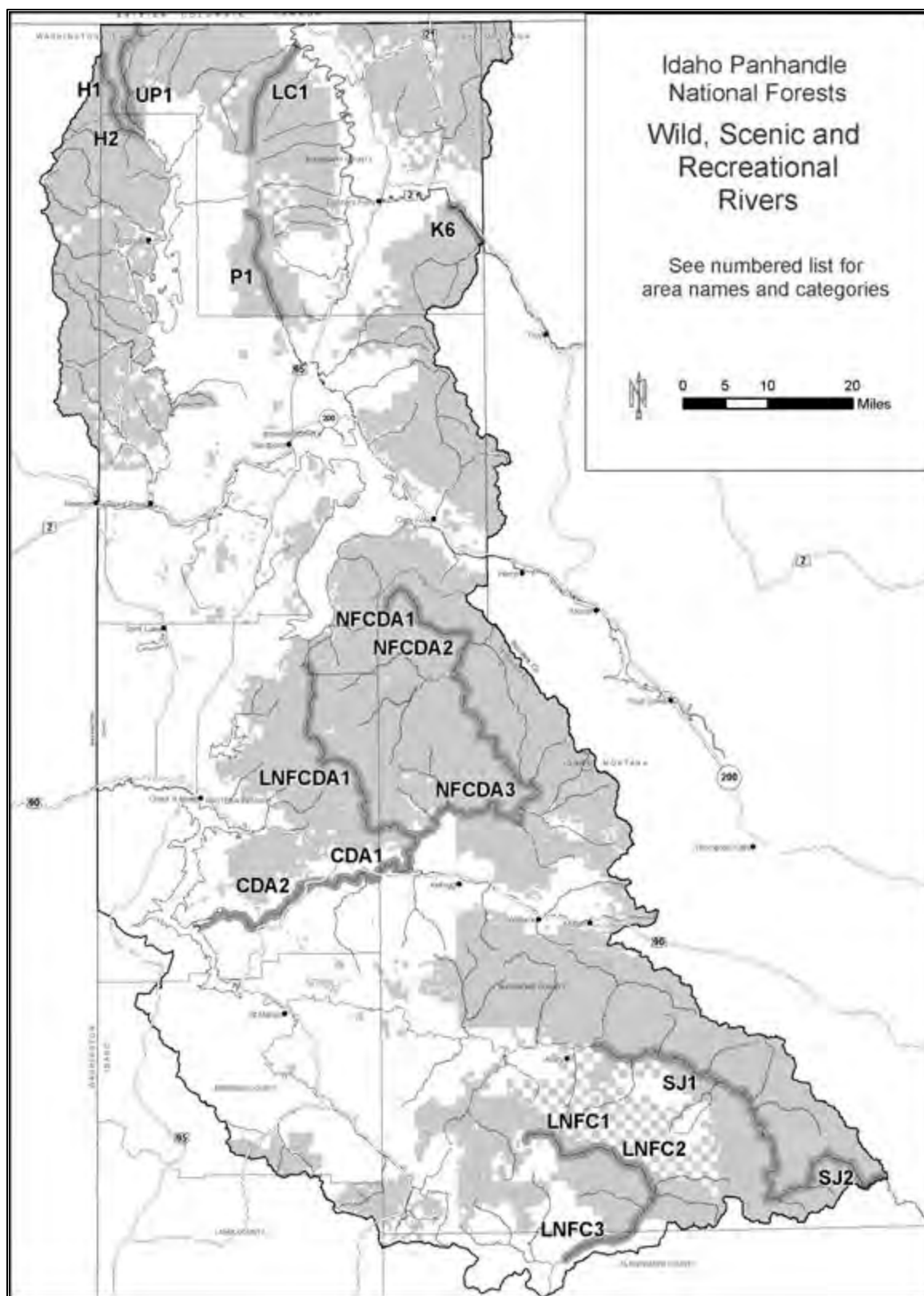


Figure 36. IPNF Wild, Scenic, and Recreational Rivers Index Map

Table 219. IPNF Wild, Scenic, and Recreation Rivers Map Reference List

Figure #	Page Number	Name	Type
37	233	Upper Priest River	Wild
38	234	Long Canyon Creek	Wild
37	233	Hughes Fork	Wild
37	233	Hughes Fork	Recreation
39	235	Kootenai River	Recreation
40	236	Pack River	Recreation
41	237	North Fork Coeur d'Alene River	Recreation
41	237	North Fork Coeur d'Alene River	Wild
42/44	238/240	Little North Fork Coeur d'Alene River	Recreation
42/43	238/239	North Fork Coeur d'Alene River	Recreation
43	239	Coeur d'Alene River	Recreation
45/46	241/242	Coeur d'Alene River	Recreation
47/48	243/244	St. Joe River	Recreation
48	244	St. Joe River	Wild
49	245	Little North Fork Clearwater River	Recreation
50	246	Little North Fork Clearwater River	Wild
50	246	Little North Fork Clearwater River	Recreation

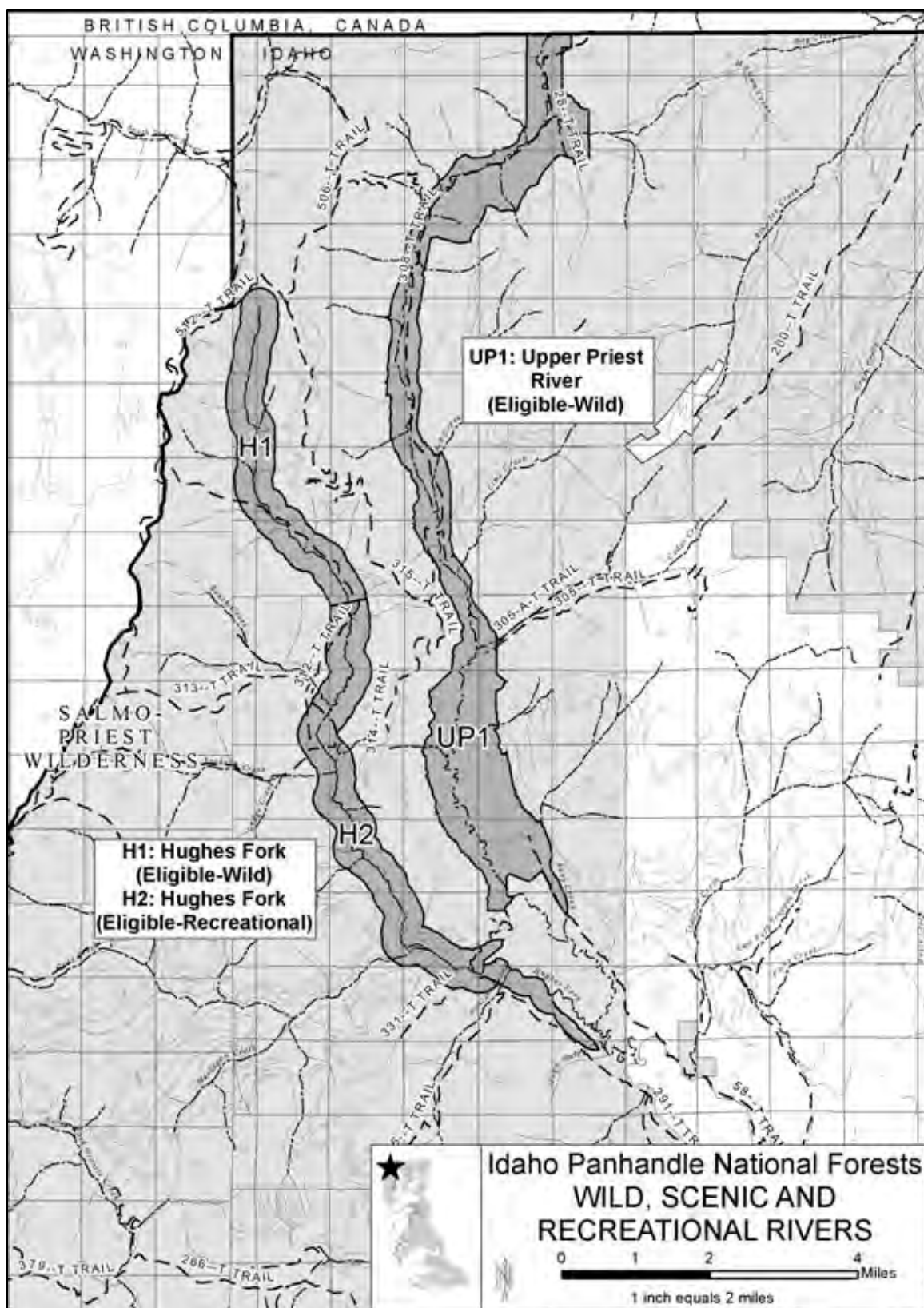


Figure 37. UP1-Upper Priest Wild River, H1-Hughes Fork Wild River and H2-Hughes Fork Recreational River

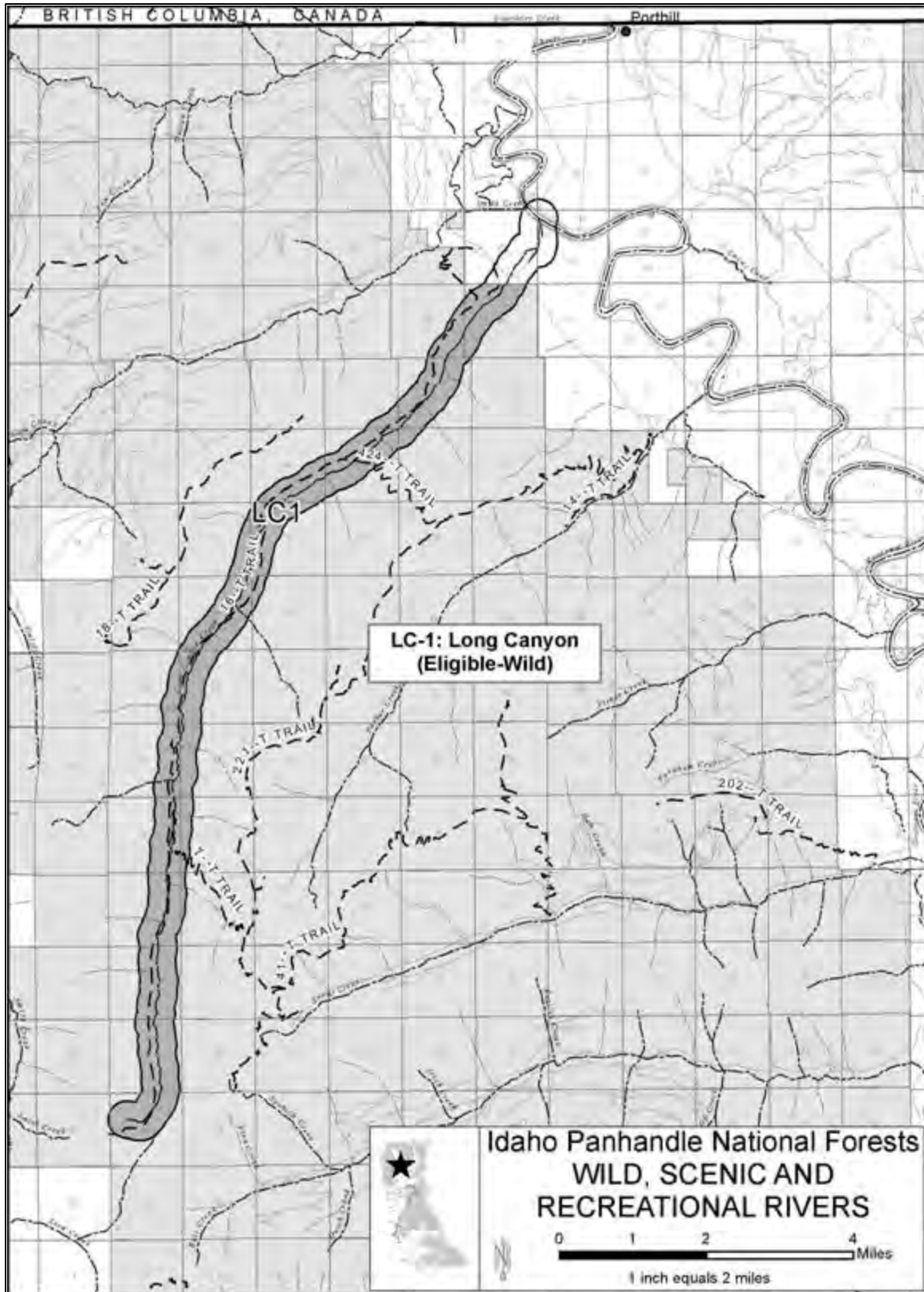


Figure 38. LC1-Long Canyon Wild River

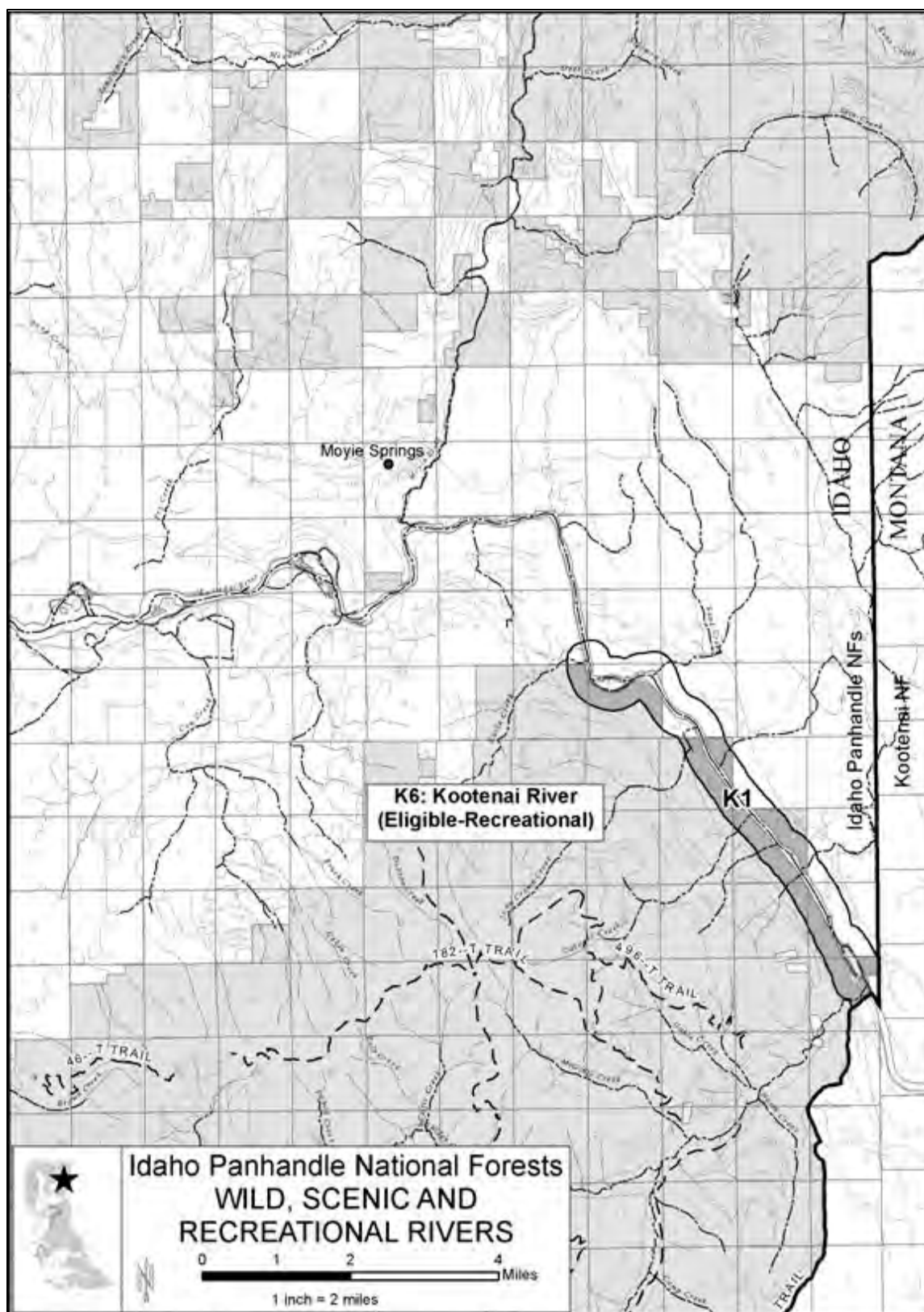


Figure 39. K6-Kootenai Recreational River

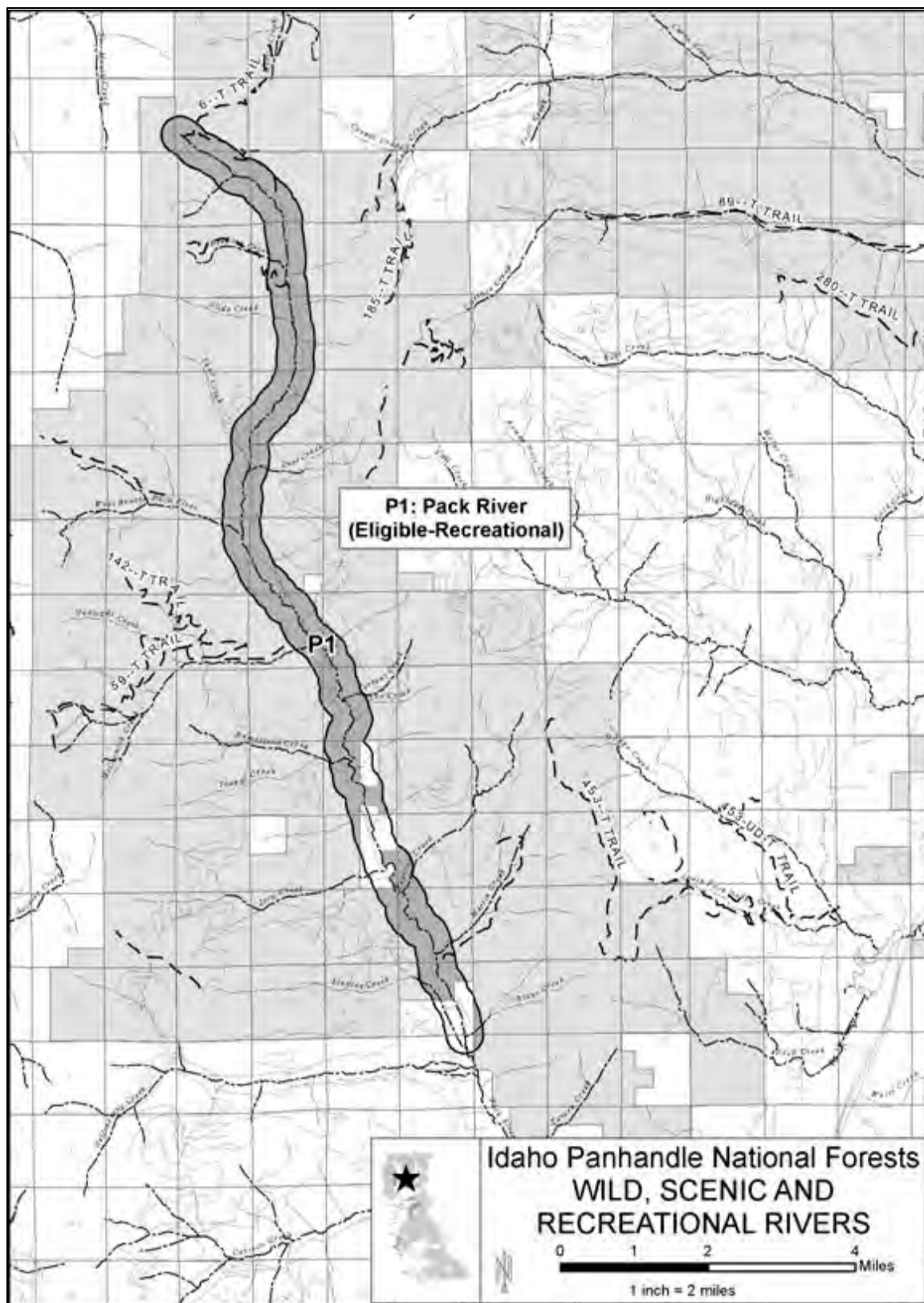


Figure 40. 5: P1-Pack Recreational River

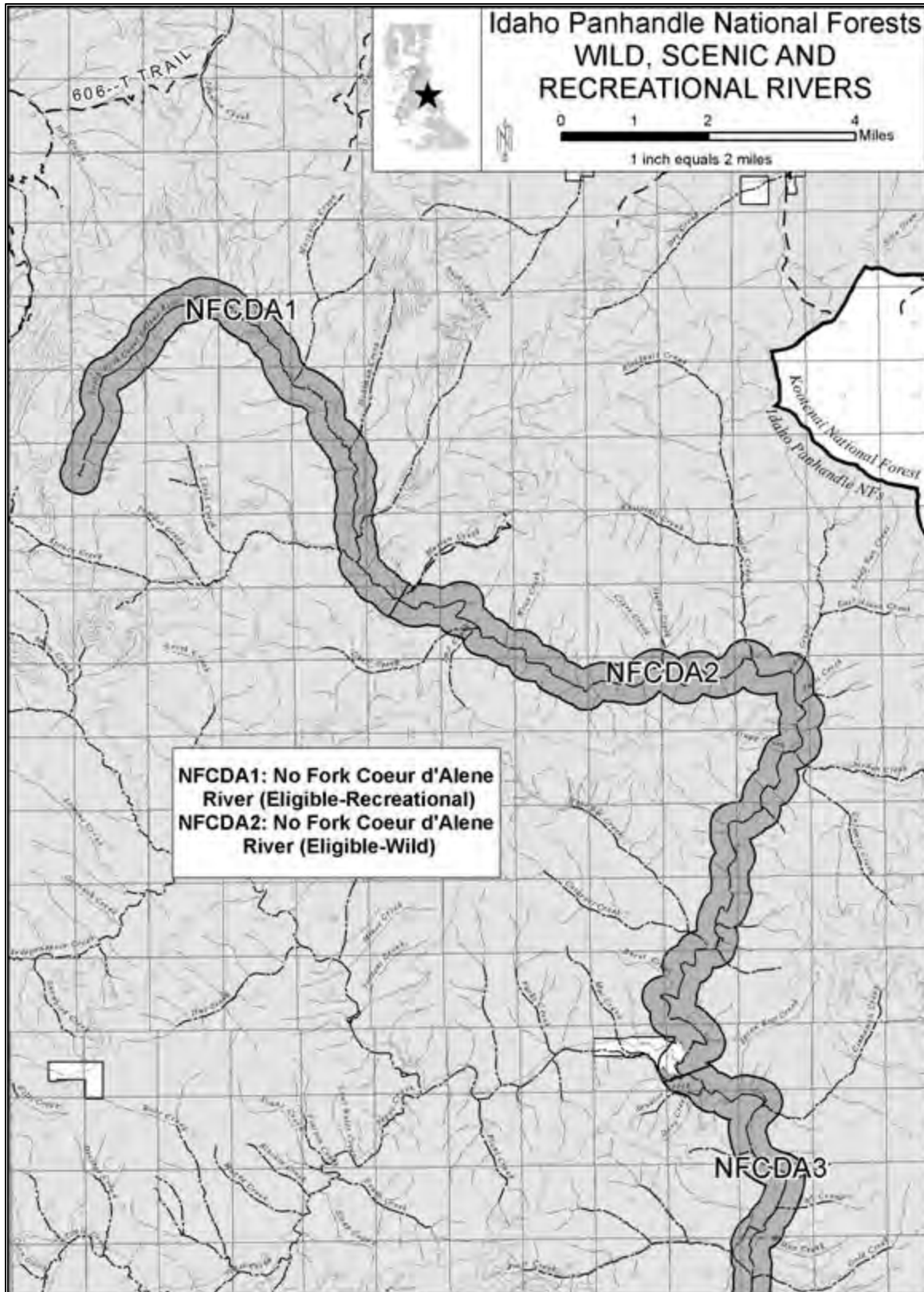


Figure 41. NFCDA1-North Fork Coeur d'Alene Recreational River, NFCDA2-North Fork Coeur d'Alene Wild River

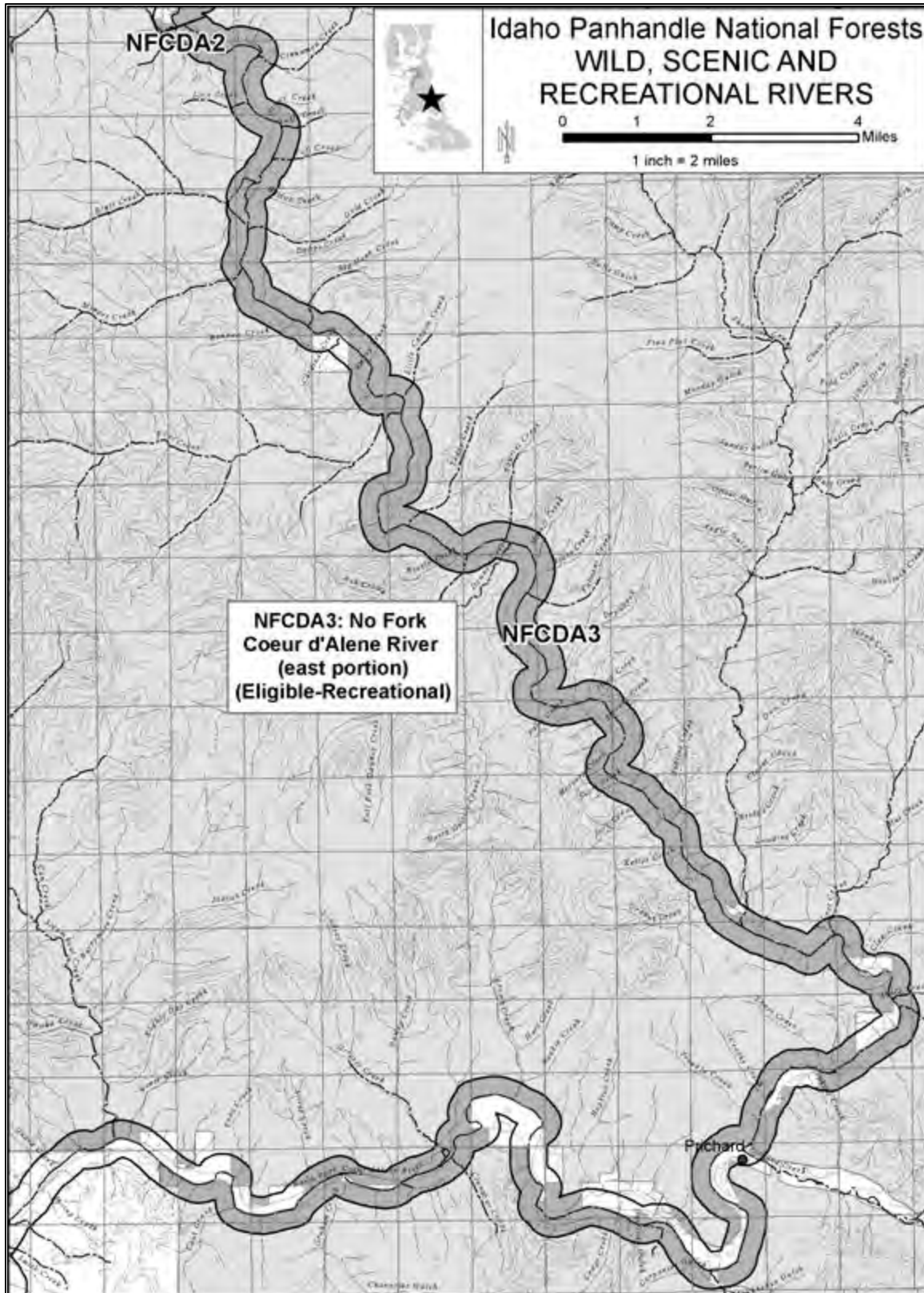


Figure 42. NFCDA3-North Fork Coeur d'Alene Recreational River, East Portion

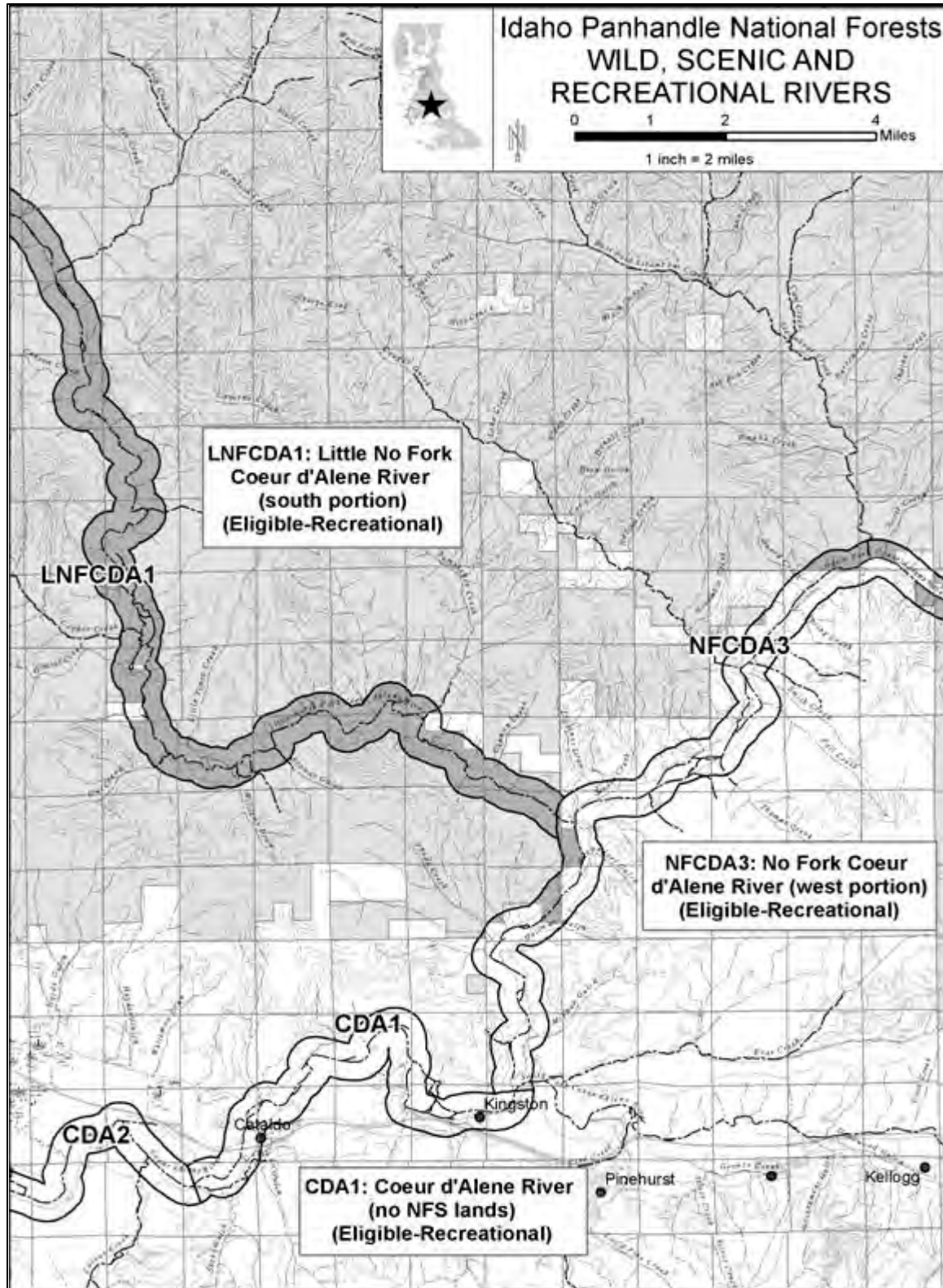


Figure 43. NFCDA3-North Fork Coeur d'Alene Recreational River, West Portion; LNFCDA1-Little North Fork Coeur d'Alene Recreational River, South Portion; CDA1-Coeur d'Alene Recreational River, East Portion

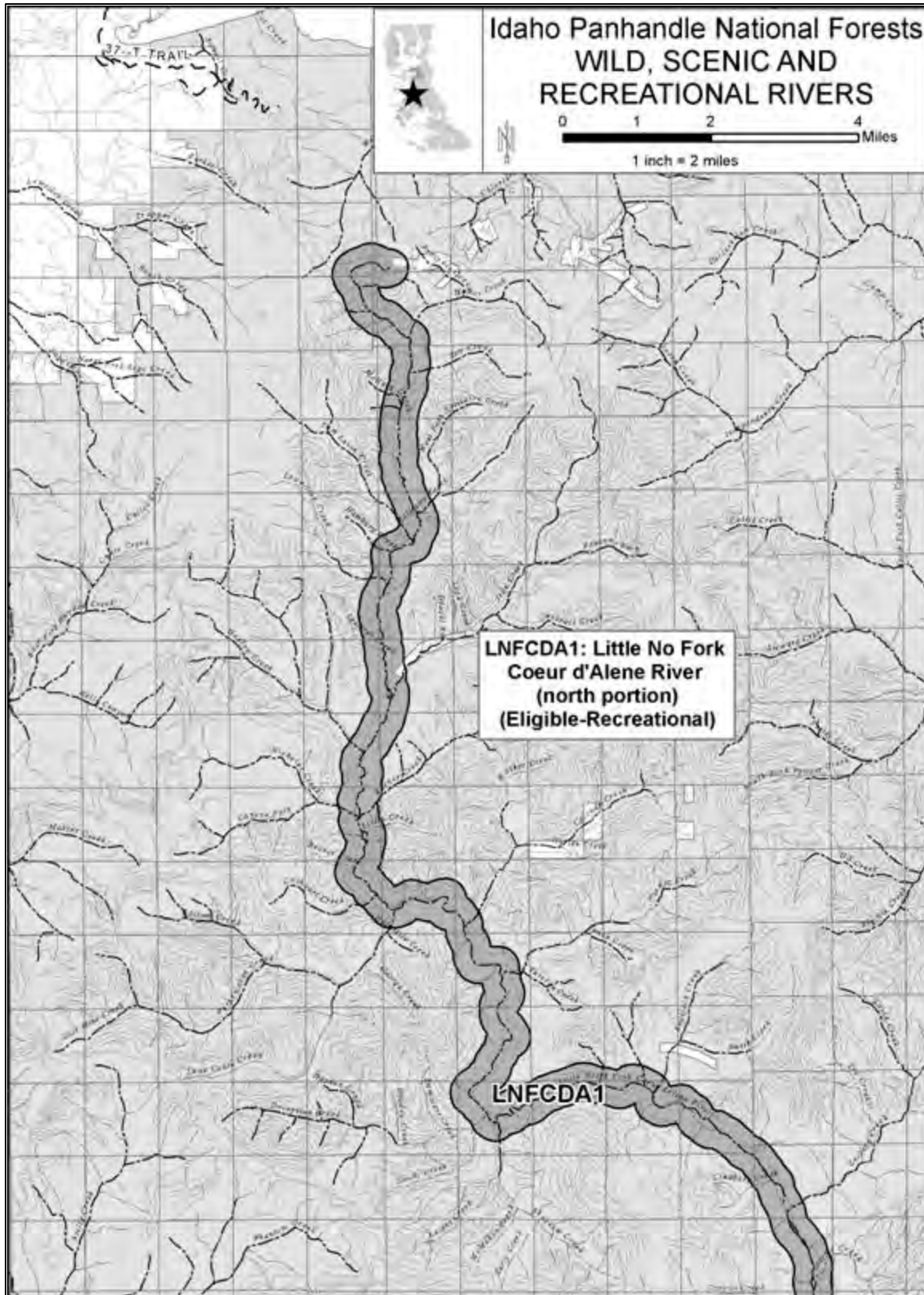


Figure 44. LNFCD A1-Little North Fork Coeur d'Alene Recreational River, North Portion

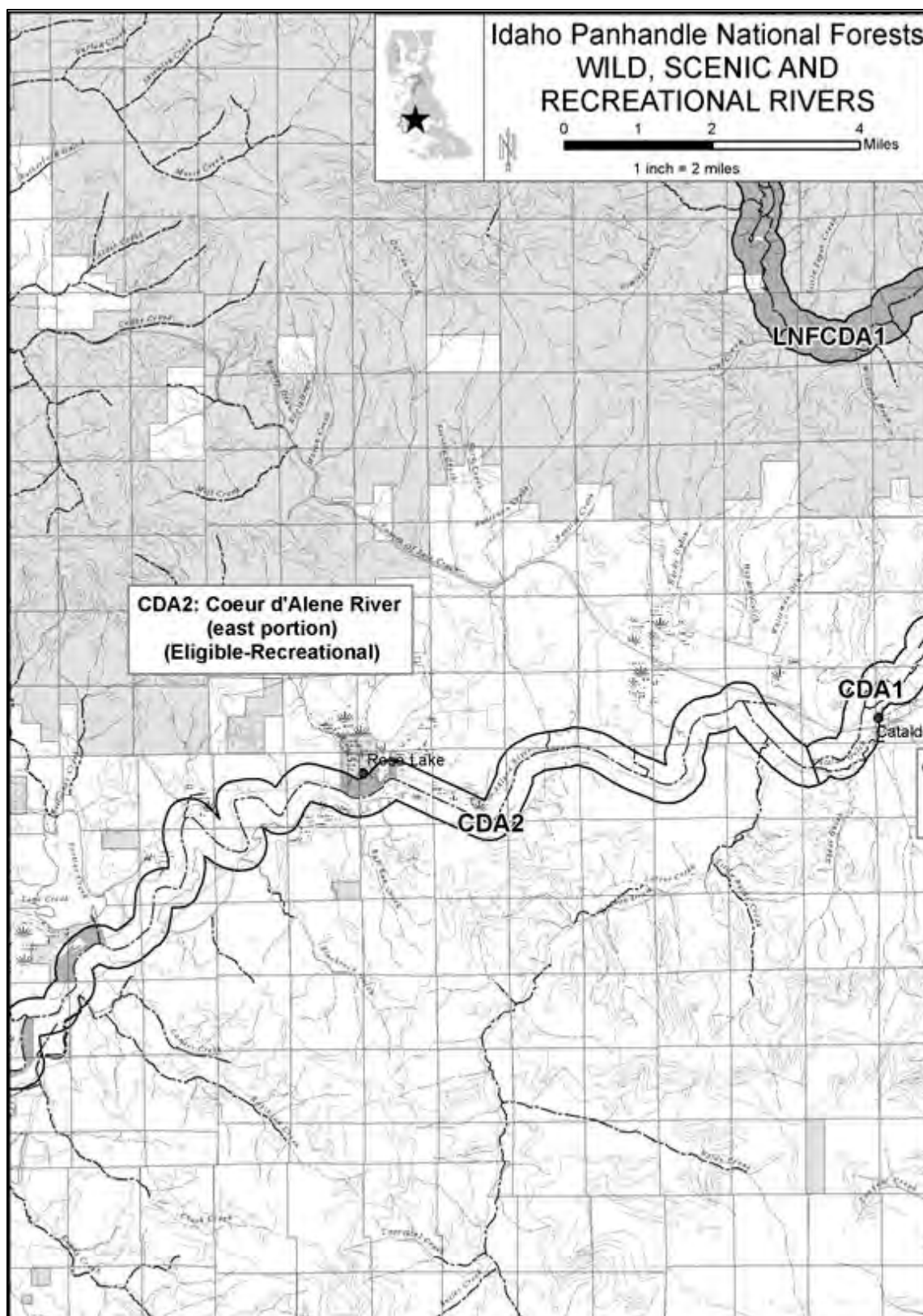


Figure 45. CDA2-Coeur d'Alene Recreational River, East Portion

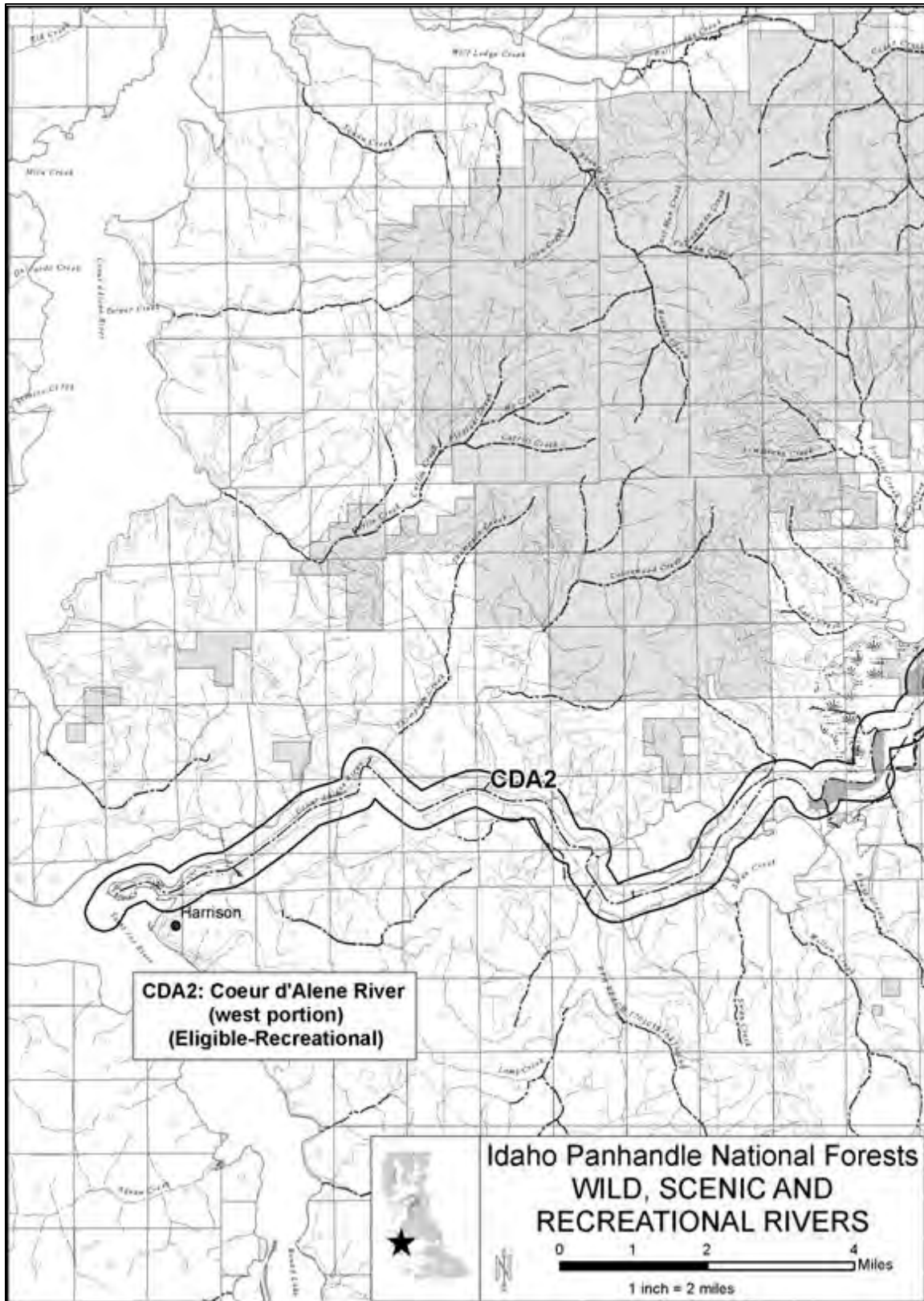


Figure 46. CDA2-Coeur d'Alene Recreational River, West Portion

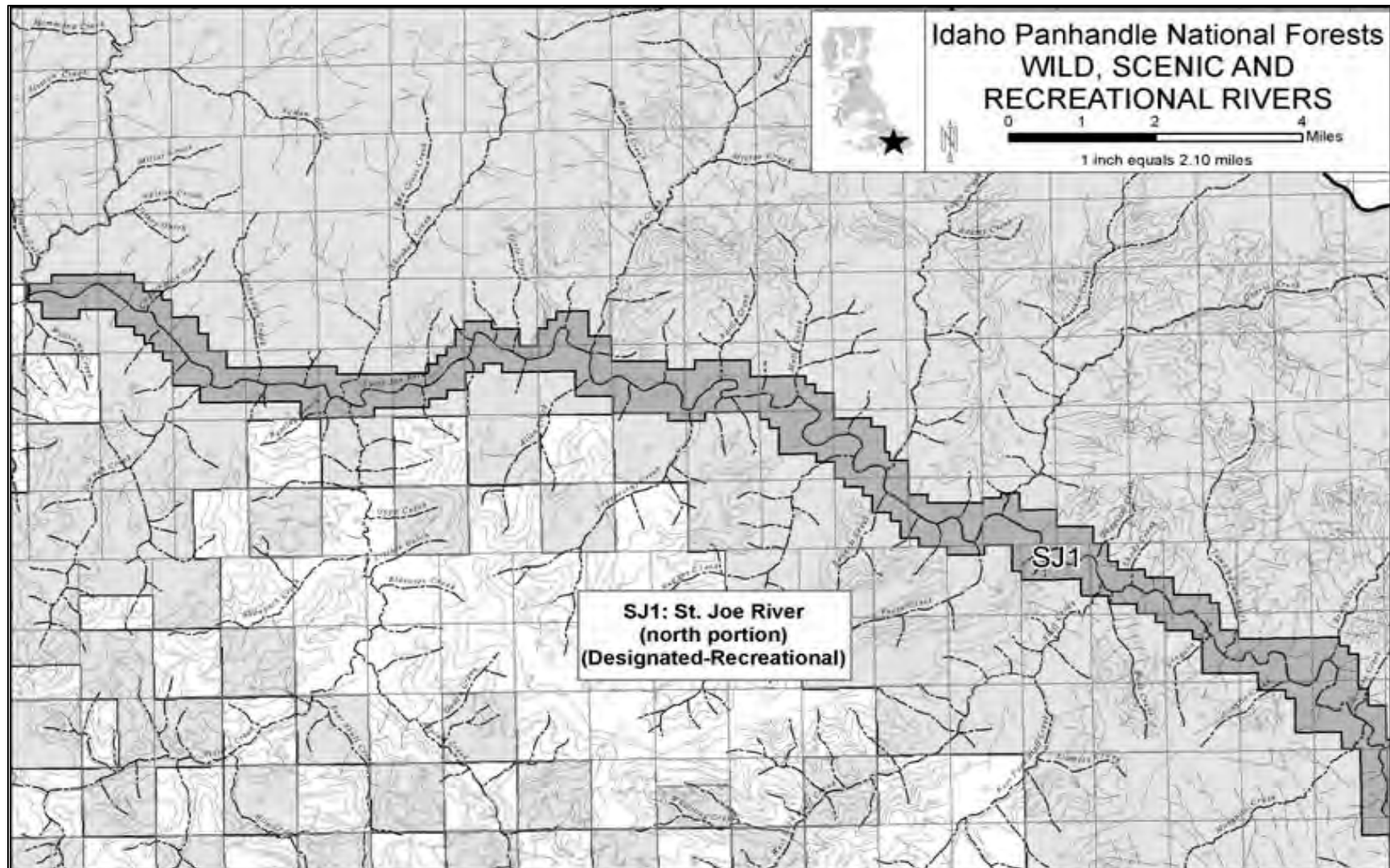


Figure 47. SJ1-St. Joe Designated Recreational River, North Portion

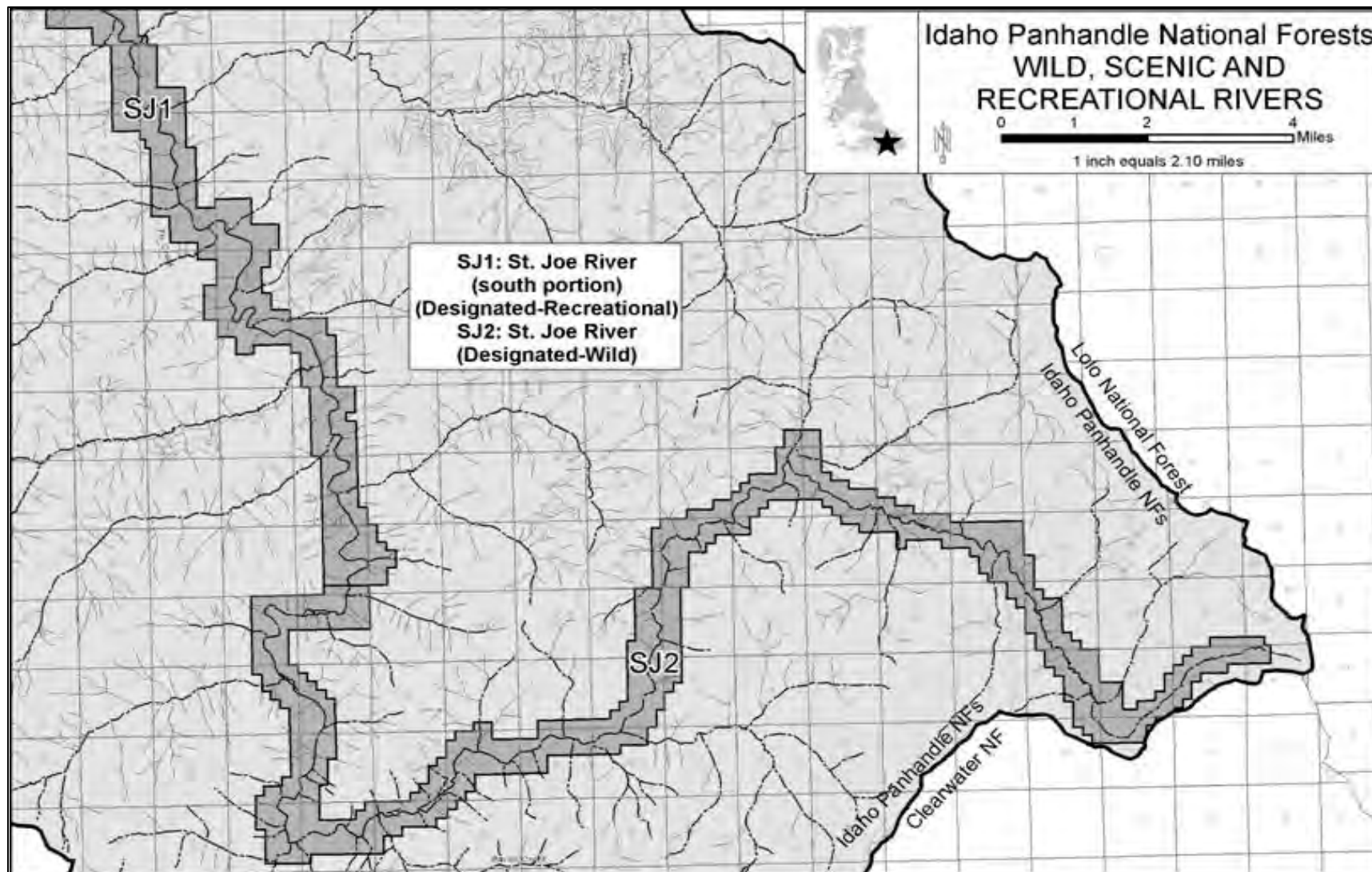


Figure 48. SJ1-St. Joe Designated Recreational River, South Portion; SJ2-St. Joe Designated Wild River

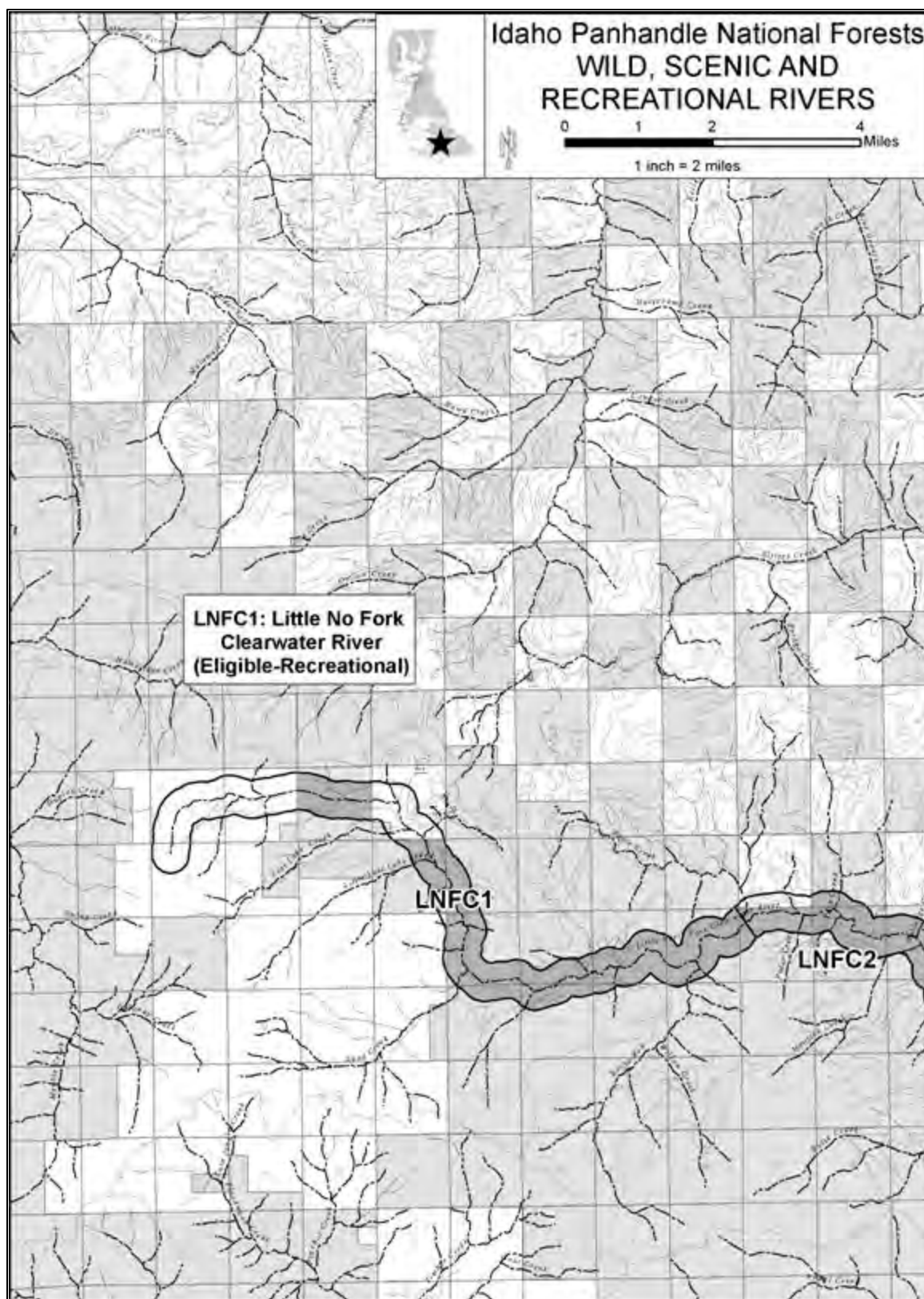


Figure 49. LNFC1-Little North Fork Clearwater Recreational River

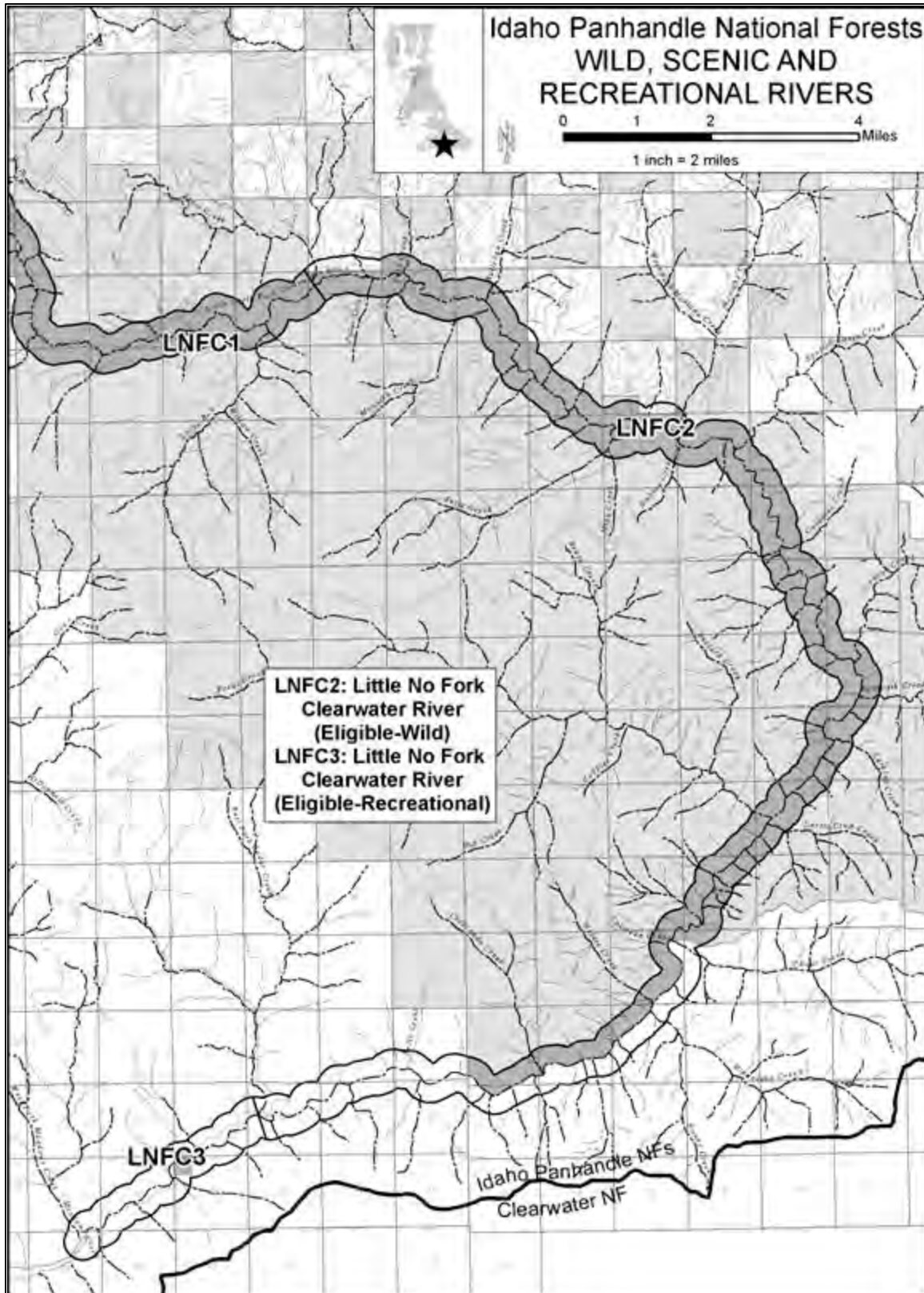


Figure 50. LNFC2-Little North Fork Clearwater Wild River and LNFC3-Little North Fork Clearwater Recreational River

Appendix F – Special and Research Natural Areas

Following is a description of the existing and recommended Special Areas, Research Natural Areas, and Experimental Forests found on the Idaho Panhandle National Forests.

Special Areas

Process

Special Areas were identified for a wide variety of reasons. Special Areas are managed with emphasis on public use and enjoyment while protecting and/or enhancing areas of unusual characteristics. These areas have outstanding natural characteristics or unique recreation or cultural values and are managed to maintain their special values. Special Areas are classified as scenic, geological, botanical, zoological, paleontological, historical, or recreational, depending on their special characteristics or unique values (FSM 2370). In addition, the IPNF has a special area classified as a pioneer area that was designated prior to the latest forest service manual. These classifications are defined below.

The objective of designating special areas is to “protect and manage for public use and enjoyment, special recreation areas with scenic, geological, botanical, zoological, paleontological, archaeological, or other special characteristics or unique values” (FSM 2370.02). Many of the areas have more than one feature type. Many of the areas have more than one feature type.

Areas were identified by district and forest resource specialists. Boundaries of these areas were mapped to be locatable on the ground (using features such as creeks, ridges, roads, etc.). In drawing boundaries to recognizable, some areas may have small inclusions that lack "unique" values. A narrative was developed for each special area to describe the unique or special characteristics and the proposed classification.

Special Area Classifications

Special areas are classified as one or more of the following, depending on their unique values:

1. Scenic Area. A scenic area is a unit of land with outstanding natural beauty that requires special management to preserve this beauty.
2. Geological Area. A geological area is a unit of land with outstanding formations or unique geological features of the earth's development such as caves, fossils, dikes, cliffs, or faults.
3. Botanical Area. A botanical area is a unit of land that contains plant specimens, plant groups, or plant communities that are significant because of their form, color, occurrence, habitat, location, life history, arrangement, ecology, rarity, or other features.
4. Zoological Area. A zoological area is a unit of land that contains animal specimens, animal groups, or animal communities that are significant because of their occurrence, habitat, location, life history, ecology, rarity, or other features.
5. Paleontological Areas. A paleontological area is a unit of land that contains fossils of plants and animals, shellfish, early vertebrates, coal swamp forests, early reptiles, dinosaurs, and other prehistoric plants or animals.
6. Historical Area. A historical area is a unit of land possessing a significant site or a concentration of sites, buildings, structures, or objects united historically or

prehistorically by plan or physical development. Memorial areas are included in this definition.

7. **Recreational Area.** A recreational area is a unit of land that has been administratively designated for particular recreation opportunities or activities such as hiking, rock hounding, recreational mining, photography, or other special activity.
8. **Pioneer Area** – A pioneer area is a unit of land that is recognized for its unroaded, scenic, recreational, wildlife, and watershed values intended to provide a primitive recreation experience and maintain an undeveloped setting

The IPNF did not identify any special areas with zoological, paleontological, or historical values.

Established Special Areas

The following Special Areas were previously established and would continue to be managed as Special Areas under all of the alternatives presented in the FEIS.

Copper Falls: Copper Falls is designated as a Geological Special Area and consists of 40 acres located near the Canadian border on the Bonners Ferry Ranger District. This highest waterfall in Boundary County was first designated on September 17, 1987, for protection of its distinct geologic, historic, and special interest features. An interpretive trail provides access to Copper Creek, which spills over ancient Precambrian Belt Group rocks 80 feet downward into a pool continuing its path until joining the Moyie River.

Hanna Flats Botanical Area: This site is the location of large, old growth western red cedar and was designated as a Botanical Special Area. Other species within the stand are western white pine, grand fir, western hemlock, western larch, Engelmann spruce, and black cottonwood. The dense, overhead canopy is composed of western red cedar, western white pine, grand fir, western hemlock, and western larch, while the understory contains a wide mixture of shrubs, ferns, and forbs. The Hanna Flats National Recreational Trail, established in 1978, is within the area. It also contains a population of rare ferns. The area contains approximately 16 acres.

Hobo Cedar Grove Botanical Area: This Botanical Special Area has well-developed interpretive facilities, including road access, parking area, picnic tables, interpretive signs, and two loop trails marked for self-guided nature tours. To the southeast, and contiguous with the existing Botanical Area, is an even larger area with a complex of ancient cedar groves that contain more and even bigger trees. This is known as the Upper Hobo Cedar Grove. There are five to seven foot diameter trees throughout much of this larger area, and numerous eight to nine foot plus diameter trees. Some trees approach ten feet in diameter. There are populations of large yew in some understories. Other extensive areas have open understories of diverse ferns and wet site forbs. Small incised streams, wet-slump basins, and small springs abound across this north-facing slope. An extensive moist-site vascular plant, moss, and lichen list could easily be compiled, but the full botanical diversity remains to be explored and is likely to yield surprises. Botrychiums have been observed. The overall appearance is spectacular and is ideally suited to development of future interpretive nature trails. Professor Fred Johnson (retired University of Idaho), a recognized authority on cedar groves of the Northern Rocky Mountains, has visited part of this additional area and has declared it “world-class.” This southeast additional area would add approximately 400 acres to the existing Botanical Area. About 60 percent of this proposed addition is within the existing Grandmother Mountain Roadless Area.

Small patches of big old trees are sometimes not sustainable. One known problem is wind breakage in large old trees at the edge of openings. Prevailing winds in this area are from the

southwest. It's also near the top of a major mountain divide. Old wind shearing of tree tops along the south boundary of the Botanical Area was noted in the 1969 establishment report. There is early 1960s-era clearcutting along the southwest corner of the existing Botanical Area. However, uphill and south of Road #3557 the center of the south boundary is occupied by a continuation of big cedar and large old growth spruce and grand fir. The cedars here are not as continuously large as in the existing Botanical Area, but a 90 inch diameter cedar was measured, and numerous three to five foot-plus diameter trees are present. This uphill old growth stand protects the integrity of the existing Hobo Cedar Grove by keeping the prevailing winds from funneling down into the heart of the existing grove; similarly protects the southeast addition; and also contributes to the overall atmosphere of both groves. This additional area is about 50 acres, and is also contiguous with the corner of the southeast addition discussed in the paragraph above.

It is recommended to add 453 acres to the above areas to create an expanded Hobo Cedar Grove Botanical Area. This will capture the full extent of the most spectacular large, old cedars into one of the outstanding Special Interest Areas on this Forest, and maintain the integrity of these outstanding ecological features. If the decision is made to increase the size of this Special Area, the combined area would have a total acreage of approximately 685 acres.

Mallard Larkins Pioneer Area: This Pioneer Special Area lies on the western slopes of the Bitterroot Mountains. It is mostly subalpine type on the divide between the North Fork and the Little North Fork of the Clearwater River. The high country is dotted with glacial lakes. The principal tree species are mountain hemlock and subalpine fir with some whitebark pine and an understory of shrubs and forbs. It is mostly rocky with steep slopes. Elevations range from 2,600 feet to over 7,000 feet. The area supports mountain goats, elk, mule deer, black bear, and various small fur bearers. Rainbow and cutthroat trout are found in the lakes and streams. The Heritage Cedar Grove, located at the southern edge of the area, provides an outstanding example of several majestic groves of ancient cedars. The area contains approximately 13,949 acres.

Northwest Peaks Scenic Area: The area includes the high ridgeline setting and the upper, glaciated basins of West Fork Yaak River and American Creek in the northwestern-most corner of Montana. There are several small alpine lakes. Vegetation includes all the high, cold habitat types and contains moderately open stands of trees that include subalpine larch, subalpine fir, whitebark pine, and Engelmann spruce. The IPNF and KNF share the area with 1,972 acres on the Idaho Panhandle side and 4,714 acres on the Kootenai side.

Roosevelt Grove of Ancient Cedars Scenic Area and Granite Falls Geologic Area: The Granite Falls Geologic Area is nestled within the larger Roosevelt Grove of Ancient Cedars Scenic area. Currently these two Special Areas occupy a combined area of approximately 139 acres. Two waterfalls, pools and associated riparian areas occur along the North Fork of Granite Creek and are surrounded by a forest containing very large, old growth western red cedar trees. The cedars range in size from four to twelve feet in diameter with estimated heights of 150 feet and average ages of approximately 800 years. Two large groves of ancient cedars occur within this area and contain very diverse fern, forb, and devil's club plant communities within their understories. The upper cedar grove is particularly spectacular and contains a small peatland.

Granite Falls Geologic Area was first recognized for its unique values as early as 1919 and the falls were described as a feature of the Roosevelt Grove of Ancient Cedars in 1943. Two popular hiking trails follow along the North Fork of Granite Creek and provide stunning views of the sheer rock walls of the lower Granite Falls and upper La Sota Falls over which the water pours into the cascading, boulder-filled streambed.

The existing boundary for the area is drawn as a rectangular stair-step line based on legal land descriptions and is not readily locatable on the ground. In addition, the current boundary omits a grove of large cedars on a bench just above the “upper grove.” Because of these issues, changes are being recommended that would increase the size of the combined area in order to encompass an additional ancient cedar grove and to establish more appropriate boundaries. These proposed changes are discussed in more detail in the section titled “Recommended Special Areas”.

Sandhouse Cedar Grove: An ancient cedar grove located in the upper reaches of the West Fork of Fishhook Creek. The stand is dominated by near climax stands of exceptionally large and old western red cedar with scattered, residual, large and old spruce, grand fir, subalpine fir, and western white pine. Five to six foot diameter cedars are numerous, and some of the largest cedars are in the seven foot to nine foot diameter range. This Botanical Special Area is very moist with scattered small streams and springs throughout. The predominant habitat type is western red cedar/ladyfern. The understory is dominated by ferns and moist-site forbs, with some yew. Ladyfern is the most common fern species, but several other fern species are present, including Botrychiums. There are some absolutely beautiful stretches of almost pure ancient cedar groves with an open-fern understory. The beauty of this area is so obvious to any observer, that even when much of the surrounding area was logged in the mid/late 20th century, people protected this grove. Sandhouse Cedar Grove is adjacent to the junction of the Fishhook Creek Rd. (No. 301) and Road 201. The area contains approximately 120 acres.

Settlers Grove of Ancient Cedars Botanical Area: This Botanical Special Area is the location of large, old growth western red cedar and western white pine. Many of the cedar range in size up to seven feet in diameter. The trail through the area is lined with ferns, devil’s club, and mountain maple. The area was designated in 1970. The area contains approximately 182 acres.

Upper Priest Lake Scenic Area: This Scenic Special Area is a unique area as it is a cooperative scenic area shared with the state of Idaho. The area completely surrounds Upper Priest Lake and all but a few hundred yards of the Priest Lake Thoroughfare. The area was established in 1968. There are 2,117 acres of state of Idaho land and 4,696 acres of Forest Service land.

Recommended Special Areas

Recommended Special Areas and additions to existing Special Areas are discussed below. Alternative A does not include new Special Areas and does not include the expansion of any existing Special Areas. Unless otherwise specified in the descriptions below, all of the Action Alternatives include the new recommended Special Areas or expansions. The maps that are provided of the Special Areas in this appendix represent the boundaries that would occur under Alternative B Modified.

Bath Creek Gorge: This proposed geological area is located near the Washington/Idaho state line. The Gorge is rugged terrain carved up to 600 feet deep in an otherwise gently-sloping, broadly-incised landscape composed of granite bedrock. Its position in the landscape suggests it may be a remnant outlet of a glacial lake(s). Surrounding views from the rim extend as far as the Selkirk Mountains and include benches and valleys that stretch and connect with the main stem of Lamb Creek and allow for a broad overview of the glaciated history of the area. Alternative B Modified contains approximately 407 acres for this Special Area while Alternatives C and D each contain approximately 254 acres.

Emerald Creek: The area is known for its star garnets and is proposed as a recreational Special Area. The star garnet is the state gemstone for Idaho. There are 39 acres of private land within

the boundaries of the Special Area. The area contains approximately 2,350 acres of National Forest lands. .

Hobo Cedar Grove Botanical Area: It is proposed to add approximately 453 acres to this existing Botanical Area. As previously explained, the expansion would capture the full extent of the most spectacular large, old cedars into one of the outstanding Special Interest Areas on the IPNF. The total area would become 685 acres. .

Huff Lake: This proposed Botanical Special Area contains a unique assemblage of sensitive plants. Huff Lake occurs in a glacial kettle adjacent to the North Fork of Granite Creek, 19 km northwest of Nordman in the Selkirk Mountains of northeastern Washington. Huff Lake is an excellent example of a low-elevation valley peatland with high community diversity. It contains several types of peatland. Sphagnum-rich and Sphagnum-poor peatlands occur at this site as well as open water with aquatic vegetation. Sphagnum-rich communities occur on floating mats and on hummocks that support conifers. Sphagnum-poor communities consisting of carr occur on fixed mats around the lake's margin. In addition, Huff Lake supports at least five rare plant species: bristle-stalked sedge, creeping snowberry, northern starflower, bog willow, and bog cranberry. The wetlands are surrounded by young coniferous forest.

Huff Lake Fen is accessible by vehicle. This site provides exceptional educational, interpretive, and scientific values. A cooperative project between the IPNF and the Native Plant Society constructed a high quality interpretive display with an overlook and boardwalk. The boardwalk also serves to protect the botanical features of the site. Detailed studies of the flora, paleoecology, and water chemistry of the site have been completed. This work provides valuable data for monitoring long-term environmental and ecological changes. Although not previously classified as a Special Interest Area, both the natural features and ongoing management of Huff Lake exemplify what a Special Area should ideally be, and is now being formally recognized and designated. The area contains approximately 70 acres.

Mallard Larkins Pioneer Area: Alternatives C and D include the proposal to increase the size of this Pioneer Area by approximately 9,004 acres, while Alternatives A and B Modified would not expand the area. The potential additions include high quality features similar to the existing site and also help to better define the boundaries. The area lies on the western slopes of the Bitterroot Mountains. It is mostly subalpine type on the divide between the North Fork and the Little North Fork of the Clearwater River. The high country is dotted with glacial lakes. The principal tree species are mountain hemlock and subalpine fir with some whitebark pine and an understory of shrubs and forbs. It is mostly rocky with steep slopes. Elevations range from 2,400 feet to over 7,000 feet. The area supports mountain goats, elk, mule deer, black bear, and various small fur bearers. Rainbow and cutthroat trout are found in the lakes and streams. The Heritage Cedar Grove, located at the southern edge of the area, provides an outstanding example of several majestic groves of ancient cedars. If Alternatives C or D were selected, the total area for the established (13,948) and the proposed (9,004) addition would become 22,952 acres.

Northwest Peak Scenic Area: Additions would be made to both the Idaho Panhandle and the Kootenai portions of the Scenic Area for all action alternatives. The additions include larger portions of the glaciated basins and several lakes and the boundary is extended to the Canadian line. The area includes the high ridgeline setting and the upper, glaciated basins of West Fork Yaak River and American Creek in the northwestern-most corner of Montana. There are several small alpine lakes. Vegetation includes all the high, cold-habitat types and contains moderately open stands of trees that include subalpine larch, subalpine fir, whitebark pine, and Engelmann

spruce. This addition for the IPNF is approximately 2,639 acres which would bring the total to 4,611 acres on the IPNF.

Roosevelt Cedar Groves/Granite Falls Scenic Area: Alternative B modified recommends an addition of 193 acres to the existing Special Area while Alternatives C and D would increase the Special Area by 152 acres.

In order to address the two overlapping Special Interest Areas and simplify the management of the area, a single 332 acre Special Interest Area (Alt. B Mod. would create a 332 acre area while Alt.'s C and D would create a 291 acre area) is now being recommended. The new recommended area includes all of the ancient Cedar Groves in the 1987 Roosevelt Grove of Ancient Cedars Scenic Area boundary, the additional cedar grove on the upper bench, the entire Granite Falls Geologic Area, and some buffer areas of mature and old growth forest. The recommended boundaries also use existing trails, streams, and topographic breaks (where feasible) to be more readily identifiable on the ground and omit a few of the angular corners that formed the previous boundaries. In addition, a slightly different name for this combined Special Area is being recommended. If the recommended changes are implemented, the new name for this area would be "Roosevelt Cedar Groves/Granite Falls Scenic Area". In addition to the scenic qualities of this combined area, geologic and botanical values are also very unique. However, the single most important attribute of the area is scenery, thus the combined area would be classified as a Scenic area.

Upper Priest River Botanical Area: This Botanical Special Area stretches along both sides of Upper Priest River, from about two miles north of Upper Priest Lake, and twelve miles north to the Canadian border. The Upper Priest River Botanical Area occupies the riparian areas, old stream terraces, toe slopes, and some adjacent lower slopes on both sides of Upper Priest River in the bottom of a steep, high-relief, relatively narrow glacial trough. Regional weather patterns along with a deep-trough bottom location combine to produce an extremely moist environment that receives unusually high precipitation for its elevation. A high relative humidity is present most summer days.

The focus of this botanical area is the combination of extensive, very moist, old growth forests with an extremely rich understory of very moist ferns, forbs, and shrubs. The virtually pristine twelve mile extent of Upper Priest River is also a key feature. An outstanding scenic feature (Upper Priest River Falls) lies near the northern boundary. Most of the botanical area is occupied by old growth western red cedar/western hemlock/grand fir forests. Significant portions of the botanical area are dominated by Ancient Cedar stands (these contain trees >5 feet DBH with ages 500 plus years). The biggest trees are ten plus feet in diameter. This is the largest contiguous area of old growth cedar/hemlock/grand fir forests in the interior western United States. Habitat types are consistently moist to wet, ranging from western red cedar/queencup beadleily in the driest sites to western hemlock/oak-fern, western red cedar/lady-fern, western red cedar//lady-fern/maidenhair fern, and western red cedar/devil's club across most of the area. The forest understory is dominated by an extremely rich, moist community of coastal-disjunct ferns, forbs, and shrubs with some boreal elements. There are significant populations of a number of uncommon, sensitive, and rare plant species. These include the rare plant species northern beechfern, Braun's sword-fern, Krushea twisted-stalk, and black snake-root. The area also contains what are likely the most extensive populations in the IPNF of maidenhair fern and deerfern.

The area is within the Upper Priest Wild and Scenic River corridor. It is being high-lighted due to the large western red cedars located at the north end of Upper Priest Lake. A popular trailhead and

non-motorized recreation trail provides access to the upper 2/3 of this area. The area contains approximately 5,090 acres.

Research Natural Areas (RNAs)

Process

Research Natural Areas and Experimental Forests are part of a national network of ecological areas designated in perpetuity for research and education and/or to maintain biological diversity on NFS lands. RNAs are for non-manipulative research, observation, and study. Many of these areas protect either outstanding examples of late-successional plant communities, pristine examples of plant communities that are relatively rare, or unusual complexes of plant communities in very good condition. RNAs may also maintain natural situations that have special or unique characteristics, such as a rare geologic formation. They also may assist in implementing provisions of special acts, such as the Endangered Species Act and the monitoring provisions of the National Forest Management Act. The prime consideration in managing RNAs is maintenance of unmodified conditions and natural processes.

The RNAs designated in this Forest Plan were identified during the plan revision process as unique natural situations and/or habitats or prime examples of habitat types that would enhance the representativeness of the natural area network as they are not currently identified in existing RNAs. The Forest Service Manual (FSM 4063) and individual RNA Establishment Records provide specific direction concerning RNA management.

The selection and establishment of RNAs in Region 1 is guided by priorities identified in the following two documents: “Representativeness Assessment of Research Natural Areas on National Forest System Lands in Idaho” (Rust 2000) and “Research Natural Areas of the Northern Region: Status and Needs Assessment” (Chadde et al. 1996). The potential for additional RNAs is not precluded during the life of this Forest Plan. Establishment of any additional RNAs would require site-specific NEPA and an amendment to the Forest Plan.

Established Research Natural Areas

Binarch Creek: This RNA consists of a low gradient stream, with beaver dams and ponds, inhabited by a pure strain of westslope cutthroat trout, and of adjacent steep forested slopes containing habitat types dominated by grand fir, western red cedar, Douglas-fir, and western hemlock. The stream and ponds harbor an unusually high diversity of aquatic invertebrates and plants. Established in 1989 the RNA contains approximately 653 acres.

Bottle Lake: This RNA consists of Bottle Lake, a 15 acre sphagnum fen and lake, and adjacent slopes. The primary feature of the RNA is the sphagnum fen. Rare plants found in the fen include maidenhair berry, marsh clubmoss, scheuchzeria, water clubmoss, and swamp cranberry. A dense forest of old growth western red cedar, western hemlock, and western white pine is co-dominant with grand fir and Douglas-fir in the overstory and is located in the surrounding area. Established in 1982 the RNA contains approximately 258 acres.

Canyon Creek: This RNA lies at the southern end of the Selkirk Mountains. Most of the RNA is forested with near-climax stands, primarily of western hemlock, western red cedar and subalpine fir. Other tree species found in the RNA are western white pine, Douglas-fir, grand fir, western larch, lodgepole pine, ponderosa pine, Engelmann spruce, and whitebark pine. About 30 acres of the southern slope are an upper-elevation “bald” (grassland dominated by green fescue and

patches of beargrass). Huge rockslides occur throughout the RNA. A cold spring on the west slope of the RNA is the origin of Benton Creek. Canyon Creek originates from several springs within the RNA. Established in 1937 the RNA contains approximately 895 acres.

Five Lake Butte: This RNA is a subalpine glaciated basin containing two lakes, moderate to steep gradient streams, and forest stands dominated by mountain hemlock. Bacon Lake, the larger of the two lakes, contains fish; the smaller lake does not. Other tree species found in the RNA include whitebark pine, Engelmann spruce, subalpine fir, lodgepole pine, and an occasional western white pine. Much of the basin burned in 1910 and perhaps later stands of trees of various ages are present. Established in 1988 the RNA contains approximately 325 acres.

Hunt Girl Creek: This RNA encompasses the upper portion of the Hunt Girl Creek drainage in the Cabinet Mountains, extending from elevations below 4,000 feet to nearly 6,300 feet on Boulder Mountain. Most of the slopes above 4,500 feet are covered with vegetation that is, or potentially will be, dominated by subalpine fir. Western hemlock and western red cedar forests occur at the lowest elevations within the RNA.

Divide Lake, located near the southwestern boundary, is a system of wetland sites. The wet sedge meadows, fens, and streams increase the area's diversity and wildlife habitat. Rainbow trout and cutthroat trout are present in the Hunt Girl Creek drainage. Established in 1978 the RNA contains approximately 1,426 acres.

Kaniksu Marsh: This RNA consists of an undisturbed, 90 acre, crescent-shaped marsh and wet meadow, and adjacent forested slopes. Open water, less than six feet deep, with submergent aquatic plants surrounds an "island" of emergent vegetation at the lower end of the marsh. The central portion of the marsh ranges from shallow water to saturated soil with sedges and rushes interspersed with beaver ponds. This habitat grades into a spruce-hemlock forested wetland and sphagnum fen to progressively drier sites with margins of bog birch and alder and a forest setting at the upper end. Rare plants found in the fens include green keeled cotton-grass, northern starflower, maidenhair berry, swamp cranberry, and inundated clubmoss.

The old growth and second growth forests are composed of ponderosa pine, western white pine, western larch, grand fir, Douglas-fir, western hemlock, western red cedar, Engelmann spruce, and lodgepole pine. Habitat types within the RNA include western hemlock/queencup beadlily, grand fir/queencup beadlily, and Douglas-fir/ninebark. Established in 1981 the RNA contains approximately 172 acres.

Montford Creek: This RNA is a typical small drainage on the Coeur d'Alene National Forest. The RNA contains Montford Creek, a small perennial riffle-pool, spring-fed stream. Ridges, V-shaped valleys, and steep to moderate mountain slopes comprise the topography of the area. All of the RNA is forested with old growth stands of relatively pure or various mixtures of western hemlock, grand fir, western white pine, western larch, Douglas-fir, and occasional Engelmann spruce and subalpine fir. Western hemlock is the potential climax tree species over most of the RNA.

Within this rather narrow ecological framework, most of the RNA supports the moist habitat types of the western hemlock series. At least five habitat types are represented in the RNA. The understory shrub, forb, grass-like, and grass vegetation is rich and diverse. The RNA was originally established as an example of undisturbed old growth white pine. Since its establishment in 1937, there has been very heavy mortality of western white pine due to infestation by the mountain pine beetle and white pine blister rust. Today, very little western white pine forest type

remains. This RNA provides an excellent opportunity to observe ecosystem response to the loss of white pine, in the absence of any other human disturbance. The RNA contains approximately 299 acres.

Pond Peak: This RNA is an upper-elevation watershed basin of old growth mountain hemlock surrounding a small pond. The near-pure mountain hemlock stands are in the climax stage of succession. Habitat types included in the RNA are mountain hemlock/menzie Special Area and mountain hemlock/beargrass. Sapling- to pole-size, mixed-stands of mountain hemlock, lodgepole pine, subalpine fir, occasional whitebark pine, western larch, Douglas-fir, and western white pine are also present and resulted from a large, severe fire in 1931.

There is a small pond without an outlet that is fed by springs and melting snow banks. The pond is fringed with Sitka alder and sedges. The area also contains talus slopes of very old sedimentary rocks, with a variety of ripple marks showing on cleavage faces. Established in 1988 the RNA contains approximately 269 acres.

Potholes: This RNA is an example of a diverse, aquatic-wetland area resulting from Pleistocene glaciation and surrounded by forests of western hemlock and associates. The area contains a large upwelling cold spring. The spring ponds drain into a spring stream which supplies water for a complex of wet meadows, a fen, and several beaver ponds. Three streams drain the ponds. Two of these unite on a lower bench of alder meadows, marshes, and sphagnum moss fen. A number of rare and interesting plant species are found in the area, including northern starflower, swamp cranberry, poor sedge, maidenhair berry, and swamp willow-herb. Two uncommon plant communities, western red cedar/skunk cabbage habitat type and western red cedar/common horsetail community type, also occur in the RNA. The area contains approximately 305 acres.

Round Top Mountain: This RNA includes and surrounds Round Top Mountain (elevation 6,466 feet) in extreme northeastern Washington State, on a Selkirk Mountain divide between the Priest Lake watershed and Sullivan Creek (which drains into the Pend Oreille River about ten miles south of the Canadian border). It contains multiple high elevation vegetation types including: subalpine parkland dominated by green fescue grassland in excellent condition; old growth mixed subalpine fir forest with a white rhododendron shrub layer; and whitebark pine krummholz. It also contains habitat for woodland caribou, grizzly bear, lynx, wolverine, boreal owl, and wolf. The total RNA contains approximately 212 acres, 96 acres of which are on the IPNF, and 116 acres administered by the Colville National Forest.

Scotchman #2: This RNA contains a high mountain peak (elevation 6,989 feet) in the panhandle of Idaho with surrounding subalpine conditions, including rock cliffs, ledges, talus slopes, and subalpine vegetation. The RNA is representative of the complex geology of low-grade metamorphism of Precambrian sedimentary rock strata that have been folded, tilted, fractured, and glaciated. Scotchman #2 RNA contains subalpine fir forests in various mixtures with Engelmann spruce, lodgepole pine, whitebark pine, western larch, western white pine, and Douglas-fir.

Other features of the RNA include a small pond without fish in a glacial cirque and many avalanche paths, some of which are well vegetated with Sitka alder. Grizzly bear occur in the area, which is considered to be important habitat within the Cabinet Yaak grizzly bear ecosystem. Established in 1988 the RNA contains approximately 1,312 acres.

Smith Creek: This RNA contains undisturbed sphagnum fens and associated ponds, along with other areas dominated by sedges, cotton-grass, Engelmann spruce, and subalpine fir. Subalpine fir

forest communities are present, especially the subalpine fir/white rhododendron community type. Three rare plant species are found in the fens: northern starflower, poor sedge, and sundew. Maple-leaf currant occurs in higher elevation sites. The area contains habitat for the woodland caribou (Endangered Species) and the grizzly bear (Threatened). Established in 1988 the RNA contains approximately 1,248 acres.

Snowy Top: This RNA is steep, mountainous high-elevation country near the United States/Canada border. The RNA represents near-alpine conditions of the Selkirk Mountains. It contains at least four subalpine fir habitat types, a southeastern slope of green fescue, a wet meadow dominated by undergreen willow, alpine and subalpine plant species, and at least two rare plant species: alpine arnica and Sitka mistmaiden. The area is habitat for the woodland caribou (Endangered) and the grizzly bear (Threatened). Established in 1991 the RNA contains approximately 846 acres.

Spion Kop: This RNA is located on the floodplain of the Coeur d'Alene River and provides an example of complex river channel features, associated wetlands and river terraces, and riparian hardwood communities in excellent natural condition. Channels of the river and Tepee Creek have changed over the years due to flooding; resulting in a number of dry channels and sloughs. Beavers have dammed some of the sloughs, resulting in ponds and small marshes. River otters have been observed in the area. The RNA contains stands and scattered individual trees of very large northern black cottonwood, abundant hawthorn, and riparian shrub and grass/forb communities that have been relatively undisturbed except by natural events. The hawthorn provides a high quality late summer/fall food source for numerous species of wildlife, and the extensive hardwoods provide quality habitat for numerous bird species.

The area was severely burned in 1931, although most of the moist valley bottom escaped the fire. Stands of mixed coniferous species on the slopes adjacent to the valley bottom originated after the 1931 fire. The slopes are primarily potential western hemlock climax. Western white pine planted in the mid-1900s once dominated many of the slopes, but white pine blister rust has decimated the trees, with the result that other native species that seeded in naturally dominate the stands. Established in 1988 the RNA contains approximately 480 acres.

Tepee Creek: This RNA contains the Tepee Creek drainage and consists of a rather flat valley, a few short tributary gulches, and low, rounded ridges. The soil is a deep, sandy loam overlying schistose rocks of the Kaniksu Batholith. The area was subjected to continental glaciation. The RNA was established for its stands of three hundred-year old white pine, western red cedar and western hemlock. The older stands are encircled by younger pole stands of white pine resulting from previous fires. Blister rust, mountain pine beetle, and wind throw have taken a heavy toll on the white pine providing an opportunity to observe natural ecosystem response in the forest type in the face of these disturbances. Established in 1935 the RNA contains approximately 613 acres.

Therriault Lake: This RNA consists of a small lake surrounded by mountain hemlock forests within four habitat types. Old growth forests in the RNA are predominantly mountain hemlock, but also contain subalpine fir and Engelmann spruce. Adjacent to the lake are two meadows, one at the inlet of the lake and the other at the outlet, each dominated by a different species of sedge. Established in 1991 the RNA originally contained approximately 111 acres however an expansion of approximately 195 acres is included in the revised Plan. The original and additional acreage total approximately 306 acres.

Three Ponds: This RNA is a small, heavily glaciated basin containing three productive lakes or ponds. Each pond is shallow, between three to five acres in size, without fish, and with the pond

level controlled by beavers. About one third of the RNA is mature forest that originated about 1850, and approximately two-thirds is a mixture of older trees and young stands that originated following a 1929 fire. The RNA contains Douglas-fir, grand fir, western red cedar, and western hemlock habitat types. An excellent stand of western paper birch occurs on the northern side of East Pond. A sharp, deep valley near the western boundary of the RNA marks a fault line. Sitka alder and lady-fern border a small stream in this valley. Established in 1988 the RNA contains approximately 243 acres.

Upper Fishhook: This RNA is located in the upper basin of the East Fork Fishhook Creek. The area occurs on granitics of the Kaniksu Batholith and is characterized by broken, rolling topography, rushing streams, beaver ponds, and fens. The RNA contains one of the few remaining areas of climax western red cedar in the St. Joe River drainage. The cedars are 200 plus years old, averaging four feet diameter breast height (DBH), with several trees greater than seven feet DBH. Mature western white pine, western larch, Douglas-fir, and grand fir occur with western red cedar toward the south edge of the area. Western white pine has a high incidence of heart rot and blister rust. Established in 1971 the RNA contains approximately 319 acres.

Upper Shoshone Creek: This RNA encompasses a small, undisturbed watershed in the Upper Shoshone Creek drainage on the crest of the Bitterroot Range. The RNA contains a diversity of aquatic features. Both western and mountain hemlock habitat types occur in the area; including old growth stands of each species. Two un-described western hemlock-dominated communities occur on wet sites: western hemlock/devil's club and western hemlock/lady-fern. The RNA contains two un-described western yew phases of drier western hemlock types that occur on lower north slopes and two subalpine fir habitat types. Also included is a subalpine bald dominated by green fescue, elk sedge, and bluebunch wheatgrass. Established in 1988 the RNA contains approximately 1,306 acres.

Wellner Cliffs: Wellner Cliffs RNA is comprised of 305 acres on the Priest River Ranger District, and lies wholly within the Priest River Experimental Forest. This RNA was officially designated in 2005. The primary feature of the RNA is approximately 1.5 miles (2.4 km) of cliffs, talus slopes, and dry forests embedded in a fine-scale matrix with adjacent wet riparian forests. The dry forests contain scattered, remnant, old growth ponderosa pine, Douglas-fir, and western larch. High-quality examples of dry forest habitat types with remnant historic old growth have become rare in this generally moist area. Uncommonly steep environmental gradients under geological control result in a very wide range of habitat types and vegetation communities in close proximity, along with very high plant species diversity for such a small area. The cliffs, along with the adjacent dry forests and talus slopes, form a very diverse complex of habitat types that was previously poorly represented in the northern Idaho RNA network. Moss and lichen diversity is particularly high. This RNA also serves as a baseline natural reference area for the active research that's going on elsewhere within the Experimental Forest. Established in 2005 the area contains approximately 305 acres.

Proposed Research Natural Areas

Fortynine Meadows: This RNA encompasses approximately 178 acres near the headwaters of the Little North Fork of the Clearwater River, south of Avery, Idaho. The aquatic ecosystem is bounded on three sides by regularly traveled forest roads, with forest cover in the areas between the fen meadows and the roads. Fortynine Meadows is an undisturbed, high quality, high-elevation peatland (fen) ecosystem with a low-gradient stream running through it; of the total area, approximately 51 acres is peatland habitat. A substantial portion of the surrounding forest is

on very wet mountain hemlock habitat types, and includes plant species dependent on saturated soils. An additional quarter of the peatland habitat extends west onto BLM lands.

Peatlands are uncommon habitats in northern Idaho, and Fortynine Meadows is the only peatland RNA on the IPNF south of the Kaniksu National Forest and south of the area influenced by continental glaciation. This RNA represents the bog birch (*Betula glandulosa*) shrubland type and also support a large population of intermediate-leaved sundew (*Drosera intermedia*), a sensitive plant species in the Northern Region. A number of other plant species found on this site are specialists largely restricted to saturated soils such as peatlands. The presence of two invasive plants, orange hawkweed (*Hieracium aurantiacum*) and Canada thistle (*Cirsium arvense*), was noted, but they are currently limited in area and number, and are not having a significant impact on the natural vegetation.

Red Horse Mountain: Red Horse RNA encompasses approximately 1,657 acres in the upper reaches of Blue Lake Creek, reaching to the top of Red Horse Mountain at the head of the drainage. It lies approximately five miles east of Lake Coeur d'Alene, and approximately three miles north of the lower reaches of the Coeur d'Alene River. Its outstanding features are the upper slopes of several southerly and westerly facing ridges with extensive areas of dry plant communities in unusually pristine condition. One south facing ridge above Cottonwood Creek contains an extensive area of open-grown, old growth ponderosa pine with bunchgrass and low shrub understory. In-growth of Douglas-fir or dense young pine is relatively minimal. Multiple fire scars are present on some of the older trees. Other dry upper ridges contain significant areas of Idaho fescue, bluebunch wheatgrass, numerous dry site forbs, and low shrubs, with minimal evidence of forest domination. Bank monkeyflower is present.

Dry forests and plant communities like this were once extensive at low elevations in northern Idaho, but are now relatively rare, and examples in good condition are very rare on national forest lands in the IPNF. This RNA was nominated by Chuck Wellner in 1992, and was one of the last he proposed on Forest Service lands in northern Idaho.

Therault Lake expansion: The expansion to this existing RNA is approximately 195 acres, to include the south and southwest face of Marble Mountain. The area was increased to include the water source for Therault Lake as well as unique geologic and ecologic features, such as large quartzite rocks, a talus slope, and a dwarf quaking aspen forest. The additional acreage, added to the original approximately 111 acres, totals approximately 306 acres.

Upper Priest River: Upper Priest River RNA encompasses approximately 1,394 surveyed acres³ of floodplain and river terraces, along and between the lower two miles of Upper Priest River and the Hughes Fork down to the mouth of Upper Priest Lake. This RNA was originally proposed in the mid-1970s by the Northern Region Natural Areas committee, and included as a candidate RNA in the 1987 IPNF Forest Plan. The region supported establishment, but awaited completion of a necessary land exchange. That land exchange was completed in 1998 for the specific purpose of establishing this RNA. Included are riparian floodplain lands along the two rivers, isolated oxbows in various stages of filling, and a series of old river terraces that become drier with increasing elevation. This RNA features some of the most outstanding Ancient Cedar Groves in the Northern Rocky Mountains. Included are extensive areas of old growth cedar/hemlock forest, in conjunction with unusually diverse rare plant communities; some unique plant populations for northern Idaho, 21 different vegetation stand types; pristine shrub carr and riparian hardwood

³ GIS-calculated acres show an approximate size of 1,394 acres (as listed in the Forest Plan table 18) for the Upper Priest River RNA, a 2008 professional survey resulted in on-the-ground boundaries of 1,394 acres.

communities; several miles of pristine river channel; and a rich wildlife presence. Five rare plants species are known from the area: northern beechfern, Braun's sword-fern, arrowleaf coltsfoot, black snake-root, and *Krusheia twisted-stalk*. The northern beechfern population is the largest known for Idaho. Unusually large populations of skunk cabbage and maidenhair fern, and moonworts are also present.

Harlequin duck are suspected to be breeding on Hughes Fork and the Upper Priest River. Flocks of Boreal chickadee, a state species of special concern, have been observed within the area. The area supports grizzly bear and provides potential habitat for caribou and fisher. Other significant wildlife species include great gray owl, bull trout, and bald eagle.

The great diversity in vegetation, outstanding Ancient Cedar Groves, large rare plant populations, numerous rare and threatened and endangered animal species, and pristine riparian and wetland features all combine to make the Upper Priest River Proposed RNA one of the outstanding RNA locations in the Northern Rocky Mountains.

Experimental Forests

Introduction

The IPNF contain two Experimental Forests: the Priest River and Deception Creek. These Experimental Forests are part of a national network of experimental forests, ranges, grasslands, and watersheds that have been authorized by Congress and designated by the Chiefs of the Forest Service since as early as 1908.

Priest River Experimental Forest: Established in 1911, the Priest River Experimental Forest (PREF) has a long history of research in a variety of natural resource disciplines. The PREF contains approximately 6,300 acres of mountainous forestland, with small areas of talus and alpine grassland. Within its boundaries is a diversity of forest successional stages that are representative of forested ecosystems found in the northern Rocky Mountains. There are two Research Natural Areas within the PREF: Canyon Creek, which was established in 1937, and Wellner Cliffs, established in 2006. At the headquarters area, there is housing, laboratory space, and a conference building. Long-term data sets of daily weather (1911), snow pack (1937), tree growth (1914) and streamflow (1938) have been collected and archived. PREF became a monitoring site (site # ID02) of the National Atmospheric Deposition Program (NADP) in 2003.

The site contains a variety of managed and reserve areas, a multitude of ecological site choices from wild to extremely disturbed situations, and all of the significant forest types and habitat associations of the region.

Deception Creek Experimental Forest: This experimental forest is located in the Coeur d'Alene Mountains of northern Idaho and is one of the most productive forests in the Rocky Mountains. The Deception Creek Experimental Forest (DCEF) is approximately 3,500 acres and is in the heart of the western white pine forest type. When established in 1933, large old-age western white pine were important for producing lumber products. Therefore, research at DCEF focused on the ecology and silviculture of western white pine and its associated species.

Since the 1940s, western white pine on the forest has decreased due to white pine blister rust. However, regeneration, vigor, growth, and genetic studies on western white pine and other species have continued. Research has also included work on site preparation, fire effects, insects and disease, and watershed studies. The legacy of past research and high forest productivity has

created a diverse and lush forest, making DCEF an ideal location for conducting research. The Montford Creek RNA is located inside the experimental forest.

Maps

Following are maps of the special areas, RNAs, and experimental forests. Figure 51 displays these areas forestwide and table 220 indicates the name of the area along with its designation,, page number and figure number for detailed maps

Table 220. Special Areas, Research Natural Areas, and Experimental Forest Maps Index

Map Ref #	Special Areas	Figure #	Page #
1	Bath Creek Gorge Geological Area	52	263
2	Copper Falls Geological Area	54	265
3	Emerald Creek Recreational Area	56	267
4	Hanna Flats Botanical Area	52	263
5	Hobo Cedar Grove Botanical Area	58	269
6	Huff Lake Botanical Area	66	277
7	Mallard Larkins Pioneer Area	61	272
8	Northwest Peak Scenic Area	62	273
9	Roosevelt Grove of Ancient Cedars Scenic/Botanical Area & Granite Falls Geological Area	66	277
10	Sandhouse Cedar Grove Botanical Area	68	279
11	Settlers Grove of Ancient Cedars Botanical Area	70	281
12	Upper Priest Lake Scenic Area	77	288
13	Upper Priest River Botanical Area	78	289
	Experimental Forests		
14	Deception Creek Experimental Forest	55	266
15	Priest River Experimental Forest	81	292
	Research Natural Areas		
16	Binarch Creek RNA	53	264
17	Bottle Lake RNA	74	285
18	Canyon Creek RNA	81	292
19	Five Lakes Butte RNA	57	268
20	Fortynine Meadows RNA	68	279
21	Hunt Girl Creek RNA	59	270
22	Kaniksu Marsh RNA	60	271
23	Montford Creek RNA	55	266
24	Pond Peak RNA	63	274
25	Potholes RNA	64	275
26	Red Horse Mountain RNA	65	276
27	Round Top Mountain RNA	67	278
28	Scotchman #2 RNA	69	280
29	Smith Creek RNA	71	282
30	Snowy Top RNA	72	283
31	Spion Kop RNA	73	284
32	Tepee Creek RNA	74	285
33	Therault Lake RNA	75	286
34	Three Ponds RNA	76	287
35	Upper Fishhook RNA	68	279
36	Upper Priest River RNA	79	290
37	Upper Shoshone Creek RNA	80	291
38	Wellner Cliffs RNA	81	292

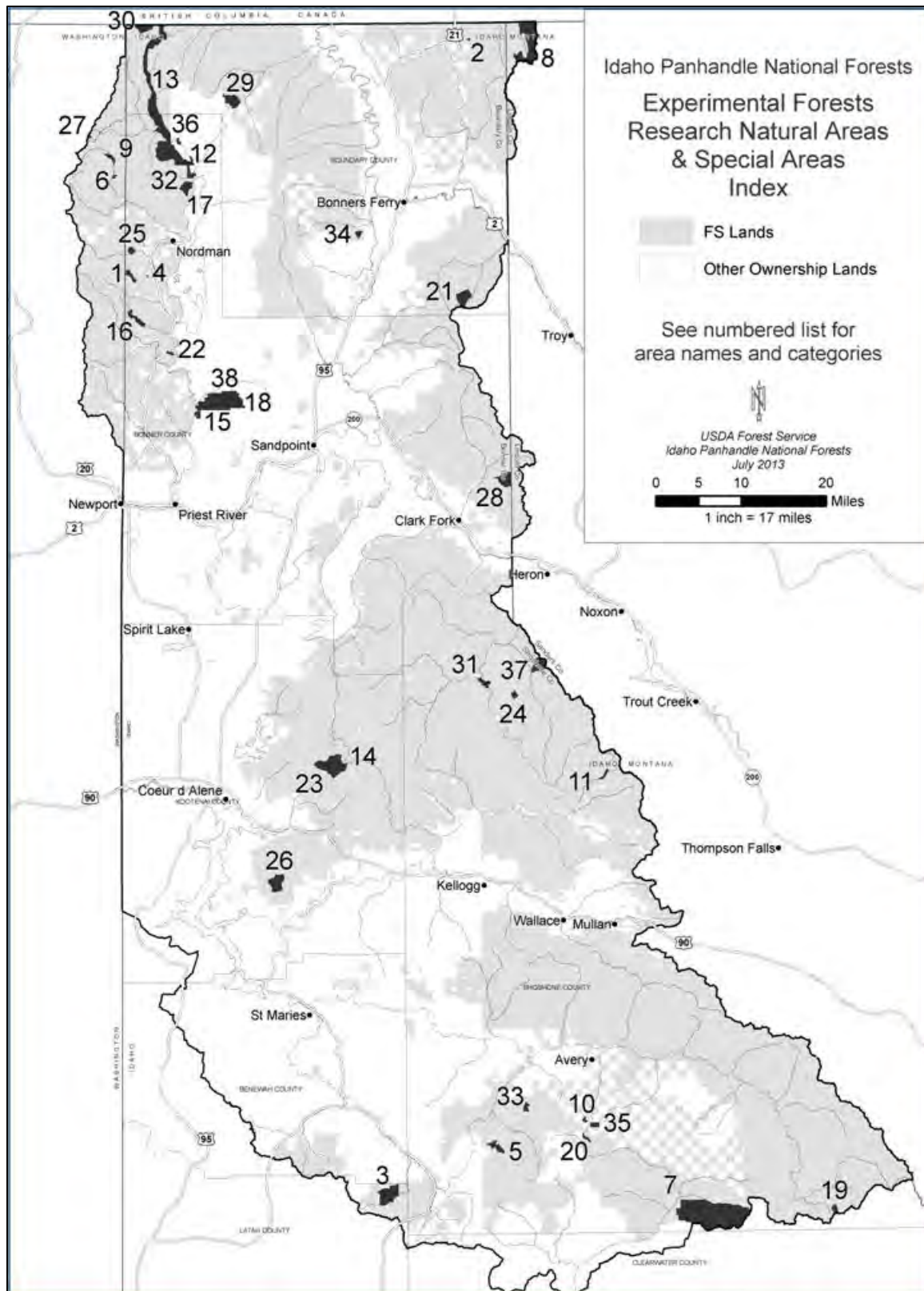


Figure 51. Index of Special Areas, Research Natural Areas, & Experimental Forests Maps

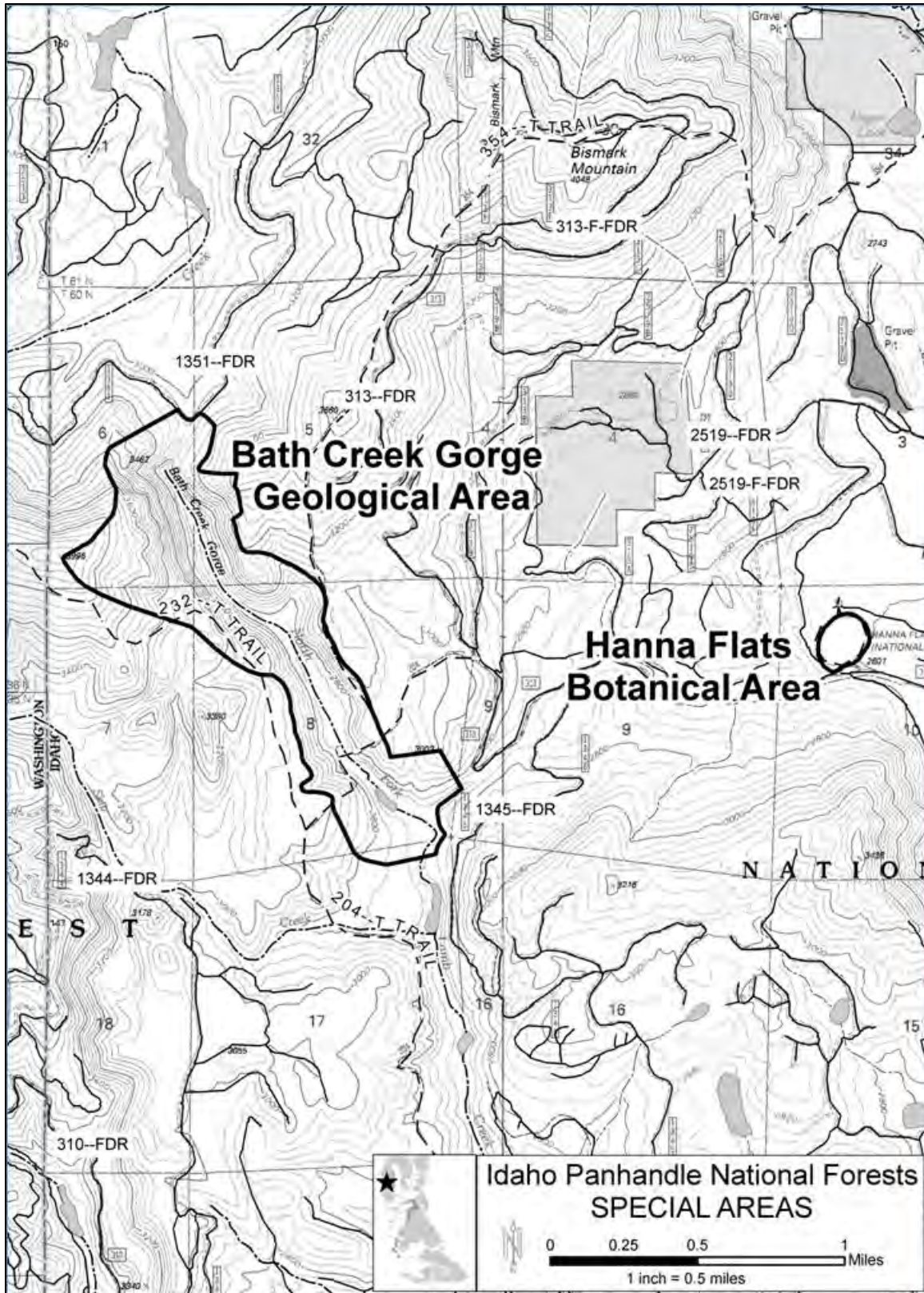


Figure 52. Bath Creek Gorge Geological Area/Hanna Flats Botanical Area

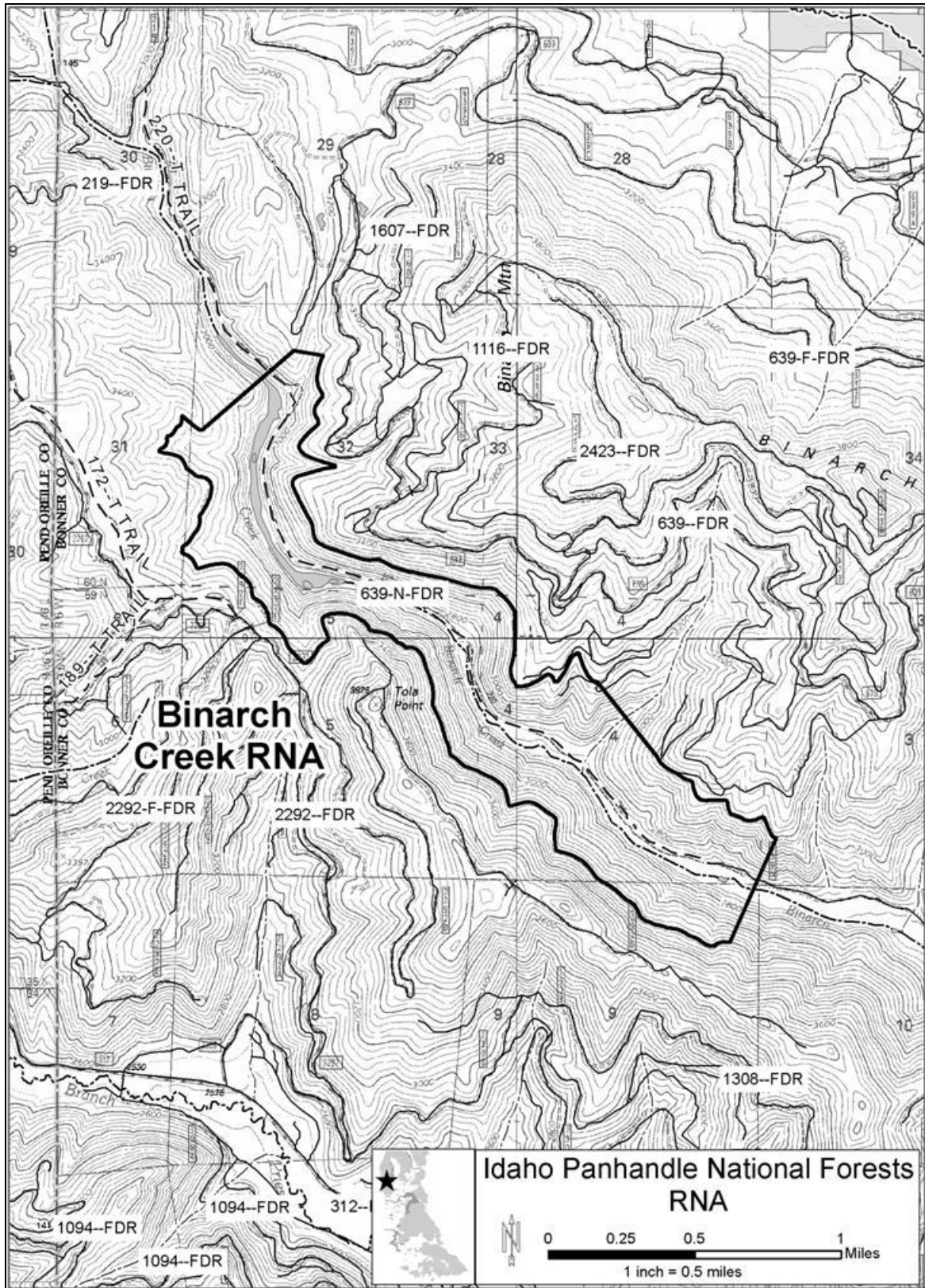


Figure 53. Binarch Creek RNA

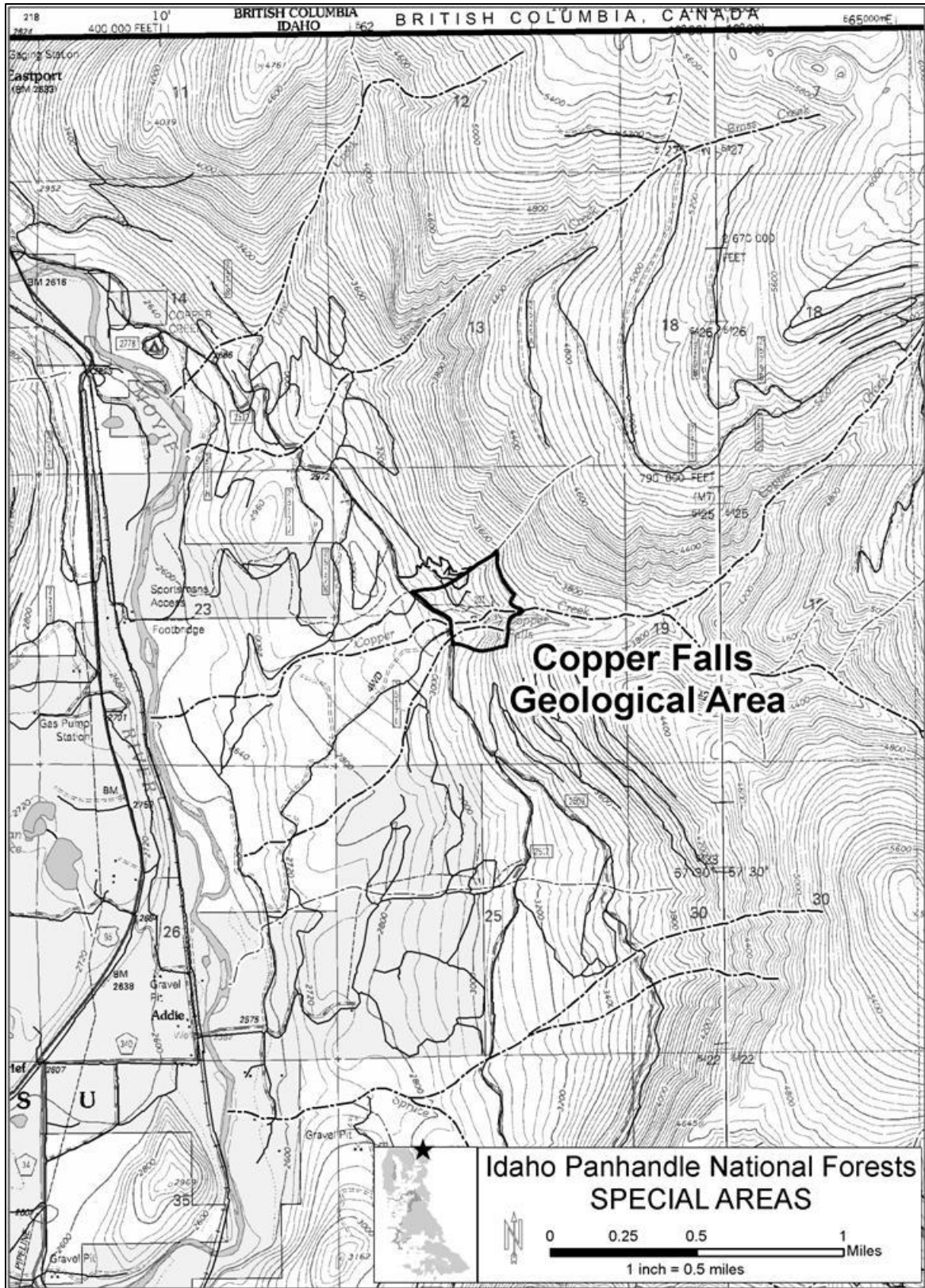


Figure 54. Copper Falls Geological Area

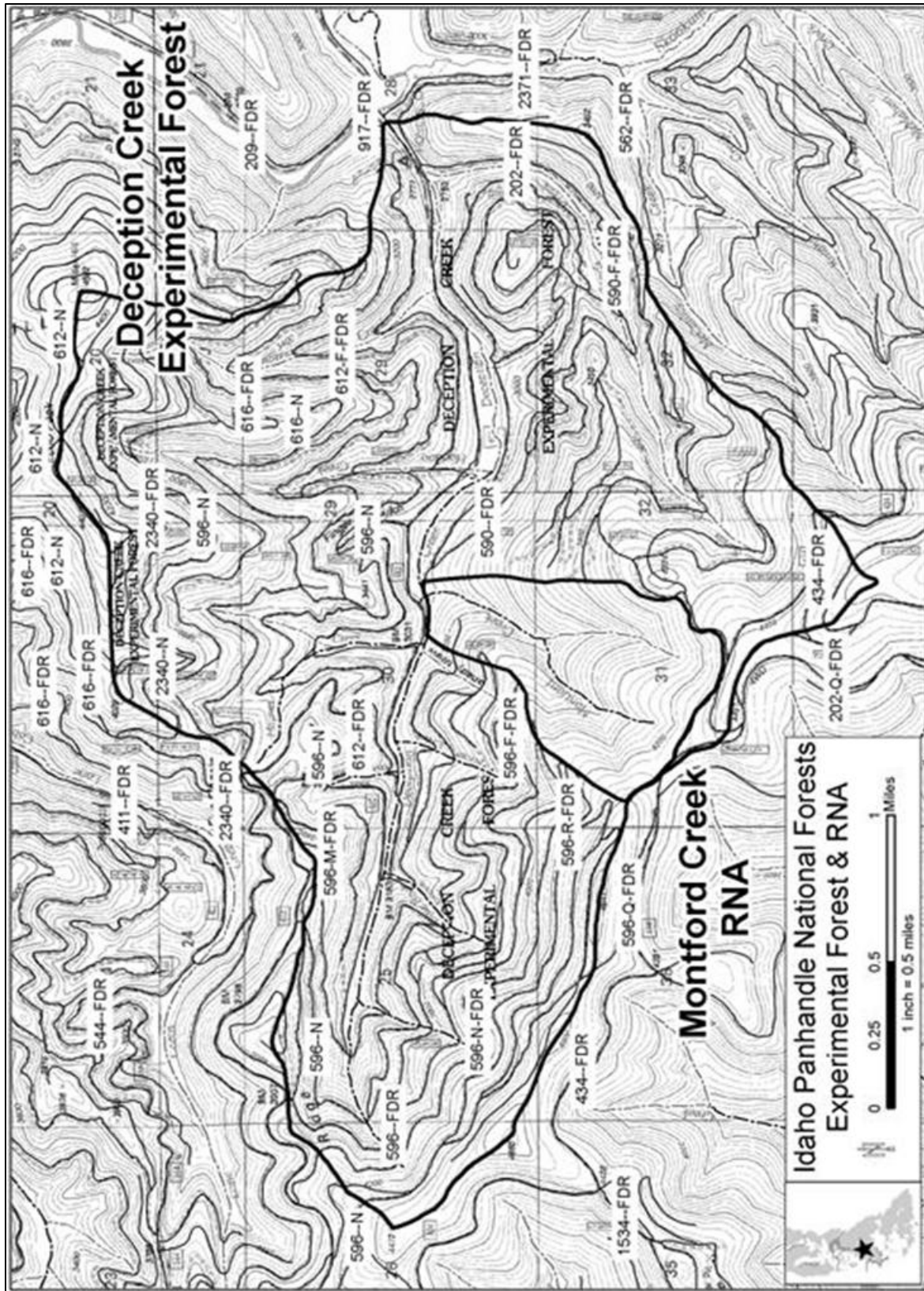


Figure 55. Deception Creek Experimental Forest/Montford Creek RNA

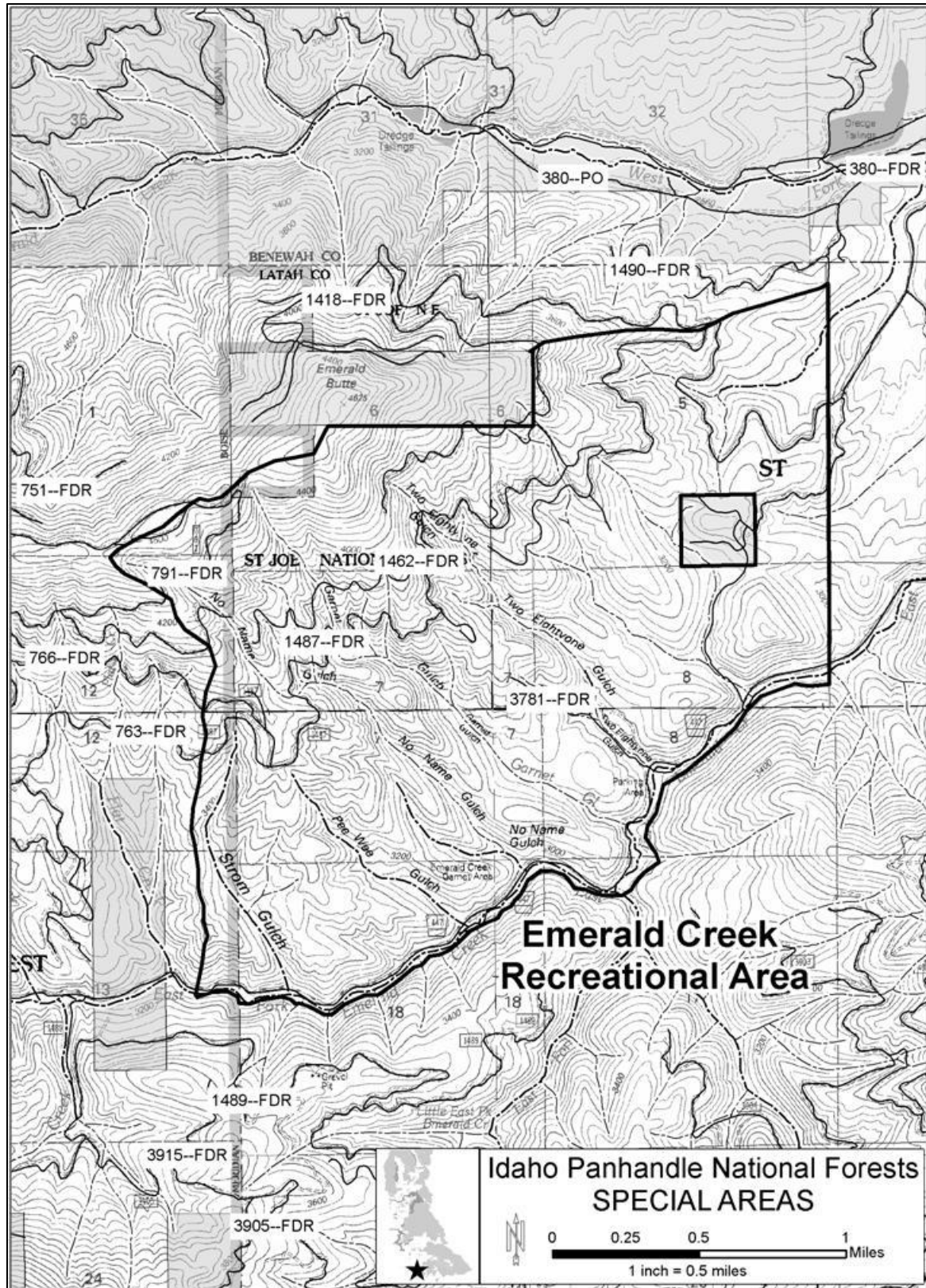


Figure 56. Emerald Creek Recreational Area

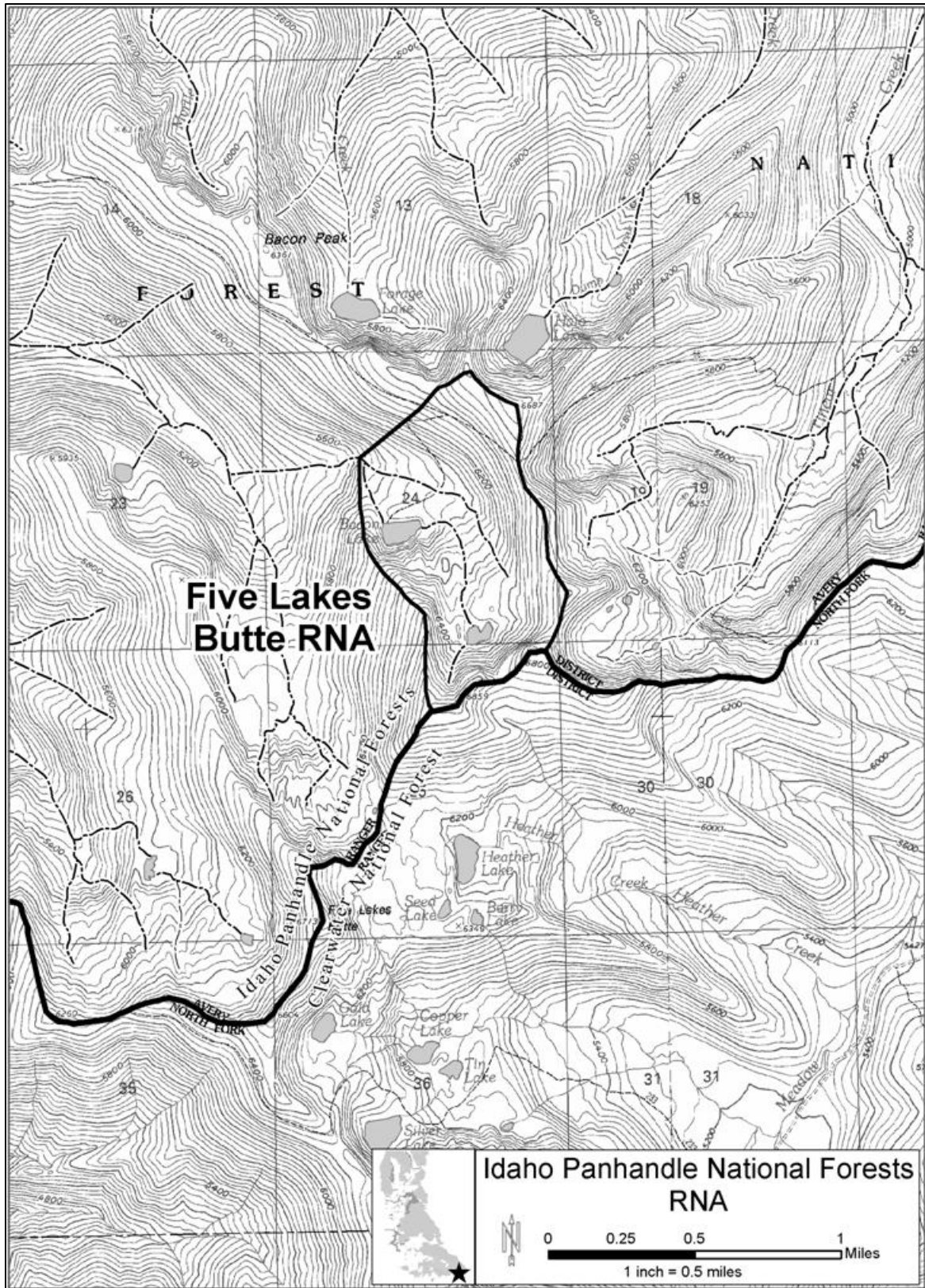


Figure 57. Five Lakes Butte RNA

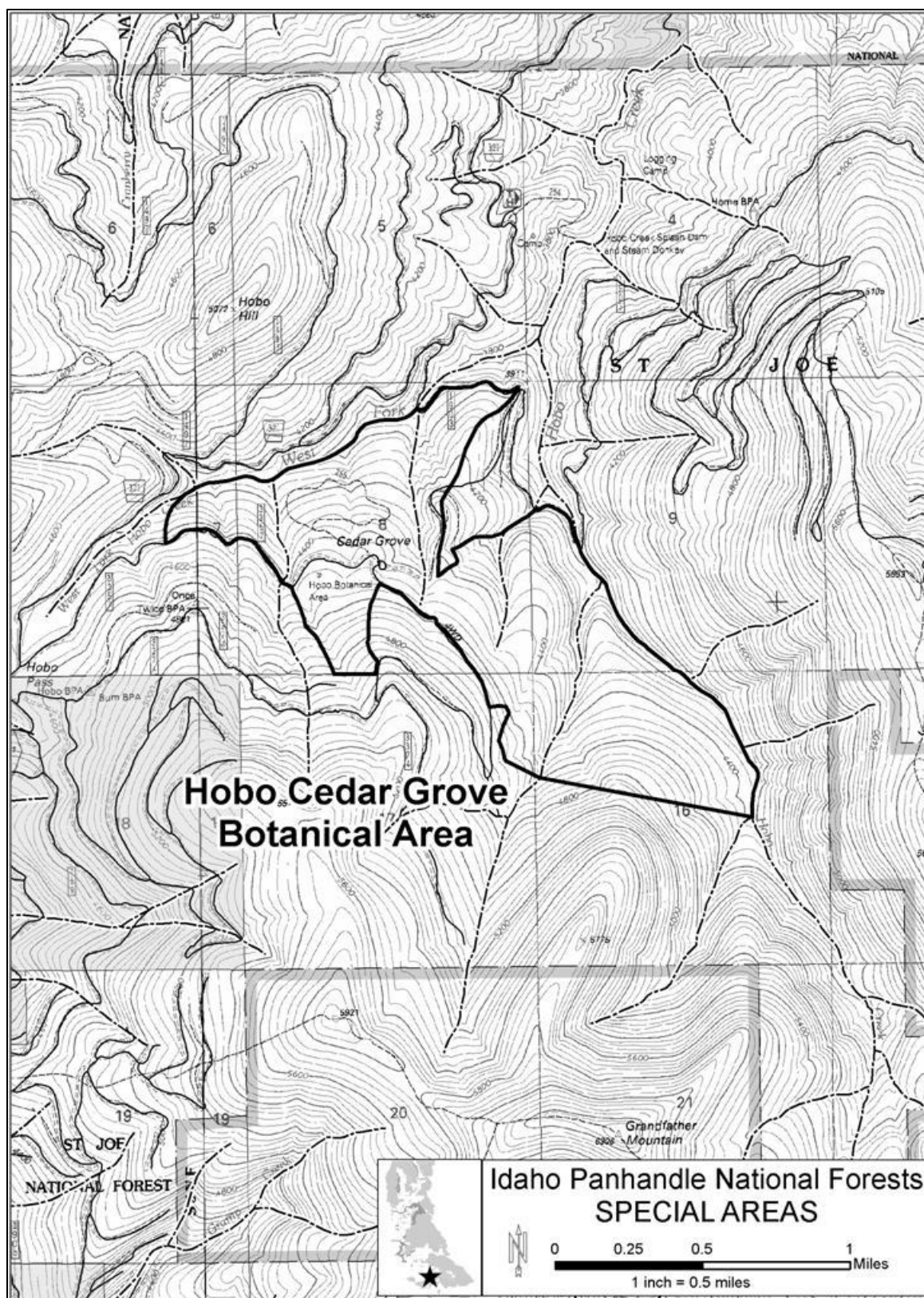


Figure 58. Hobo Cedar Grove Botanical Area

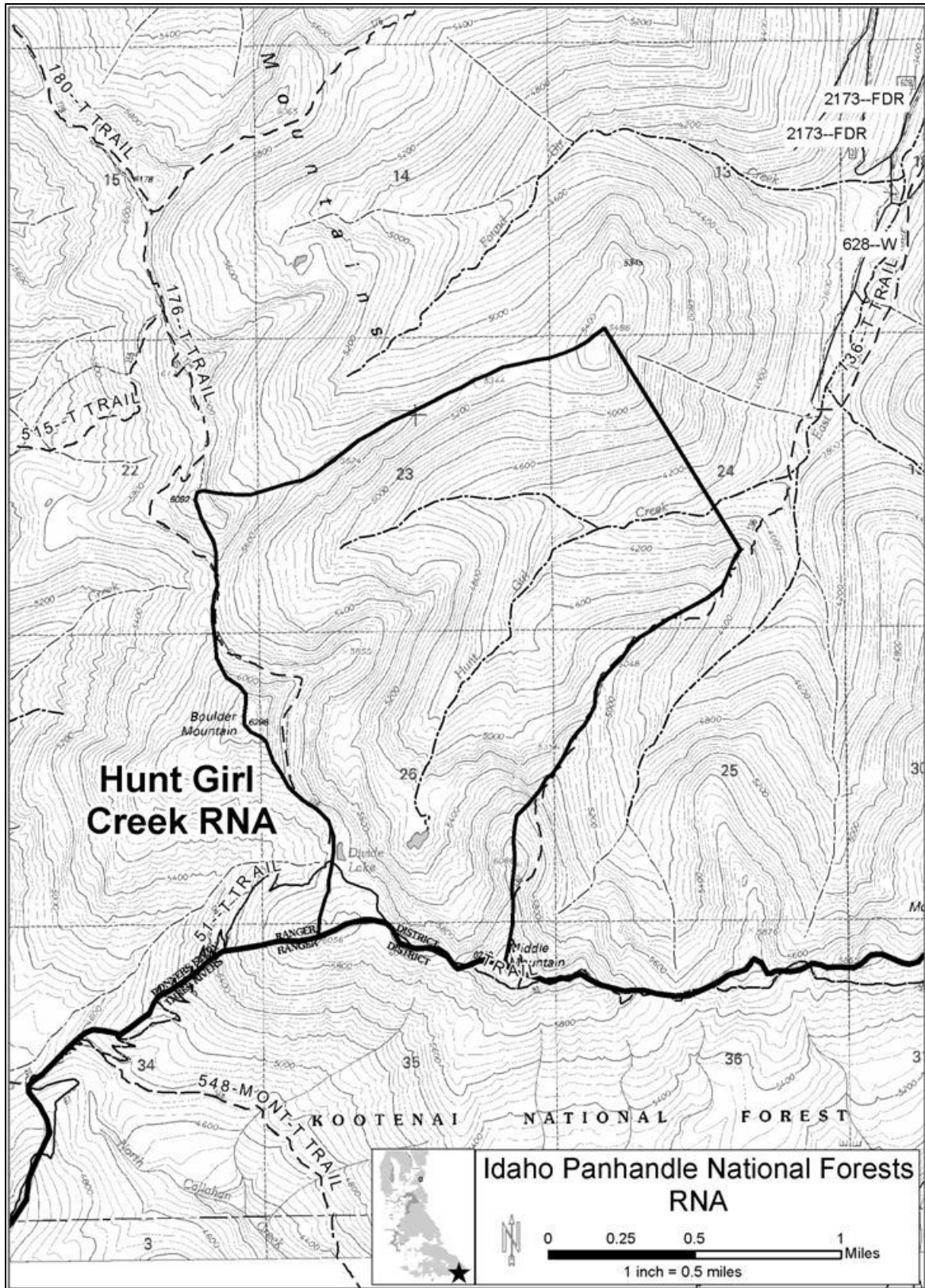


Figure 59. Hunt Girl Creek RNA

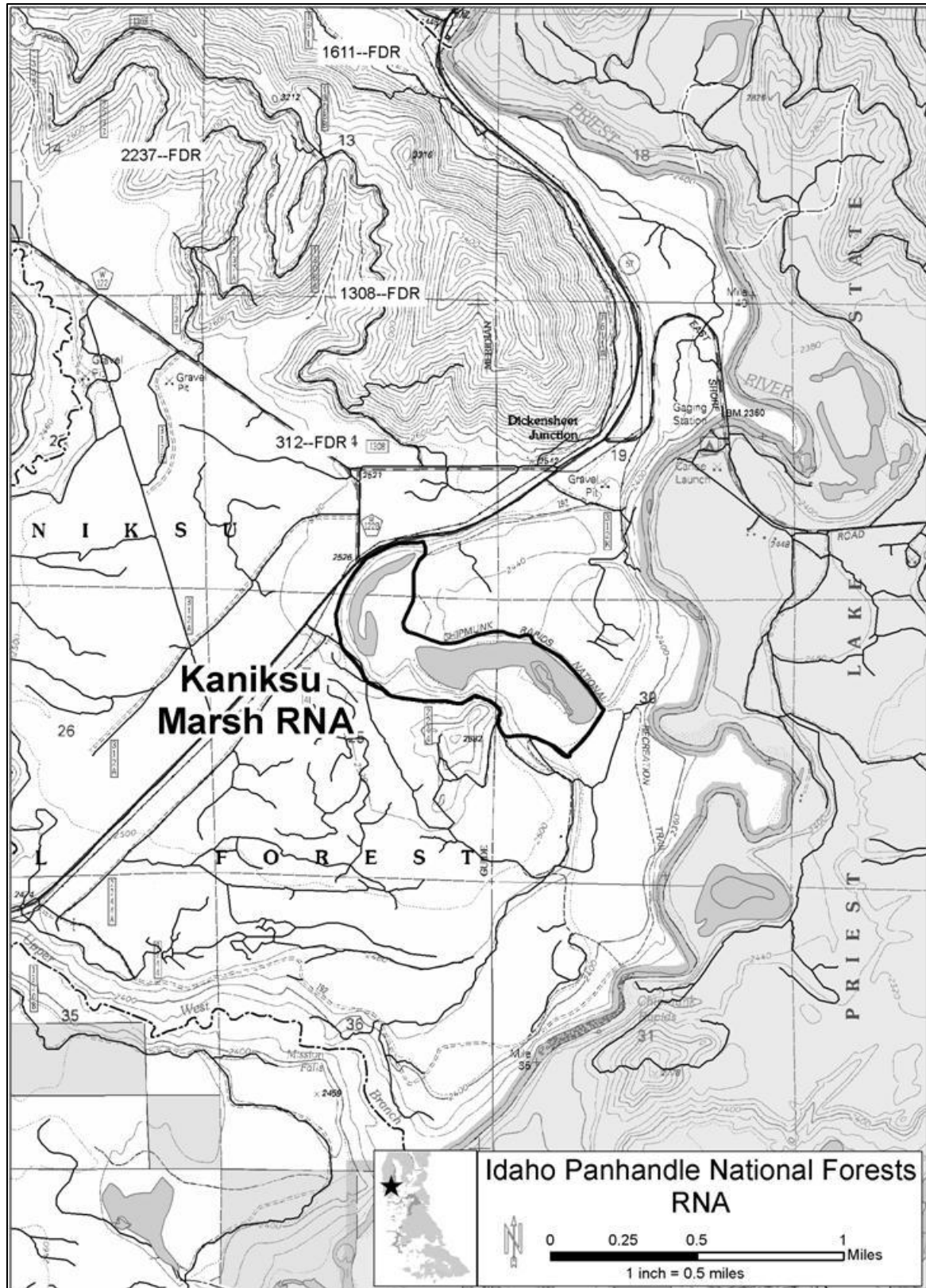


Figure 60. Kaniksu Marsh RNA

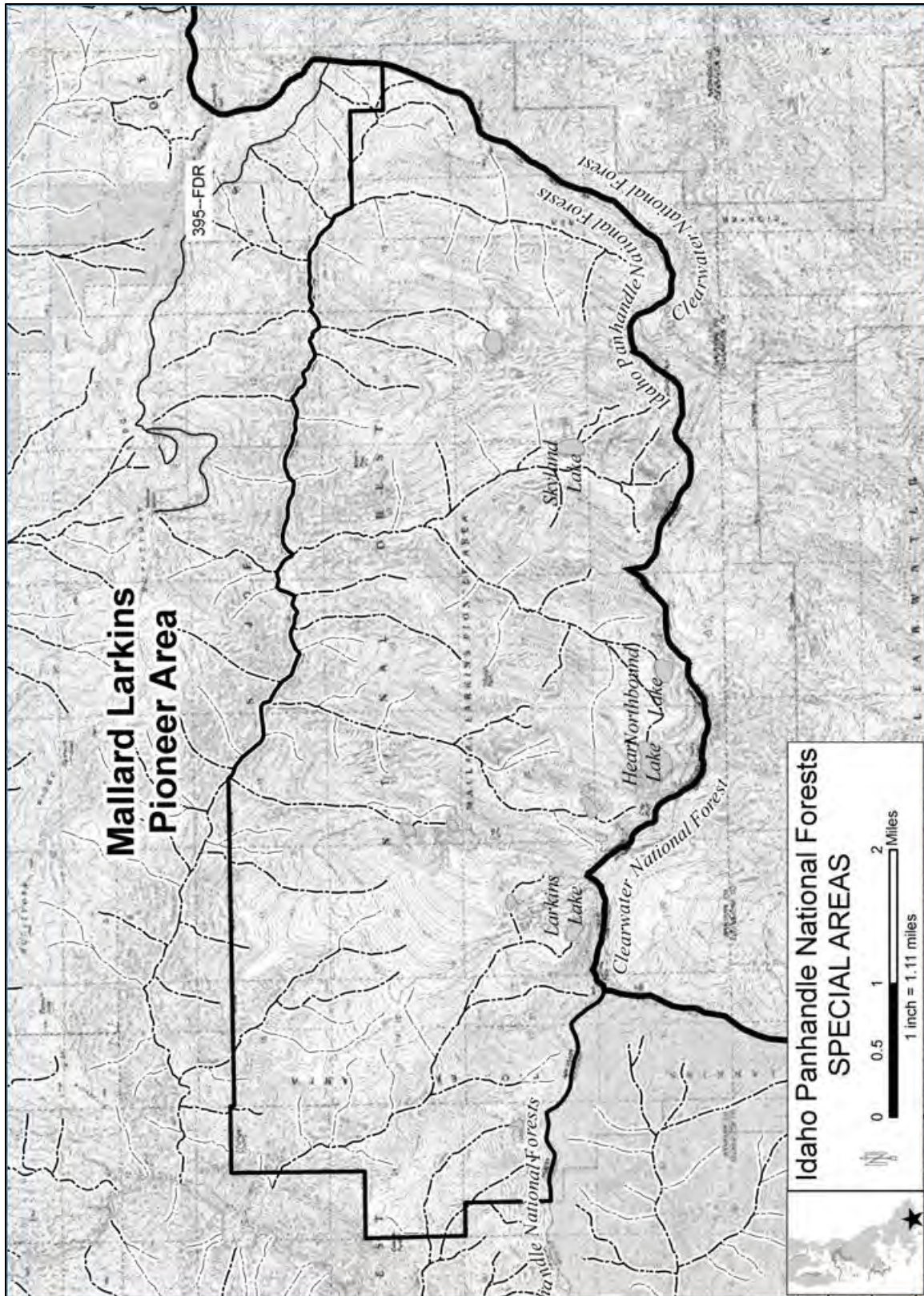


Figure 61. Mallard Larkins Pioneer Area

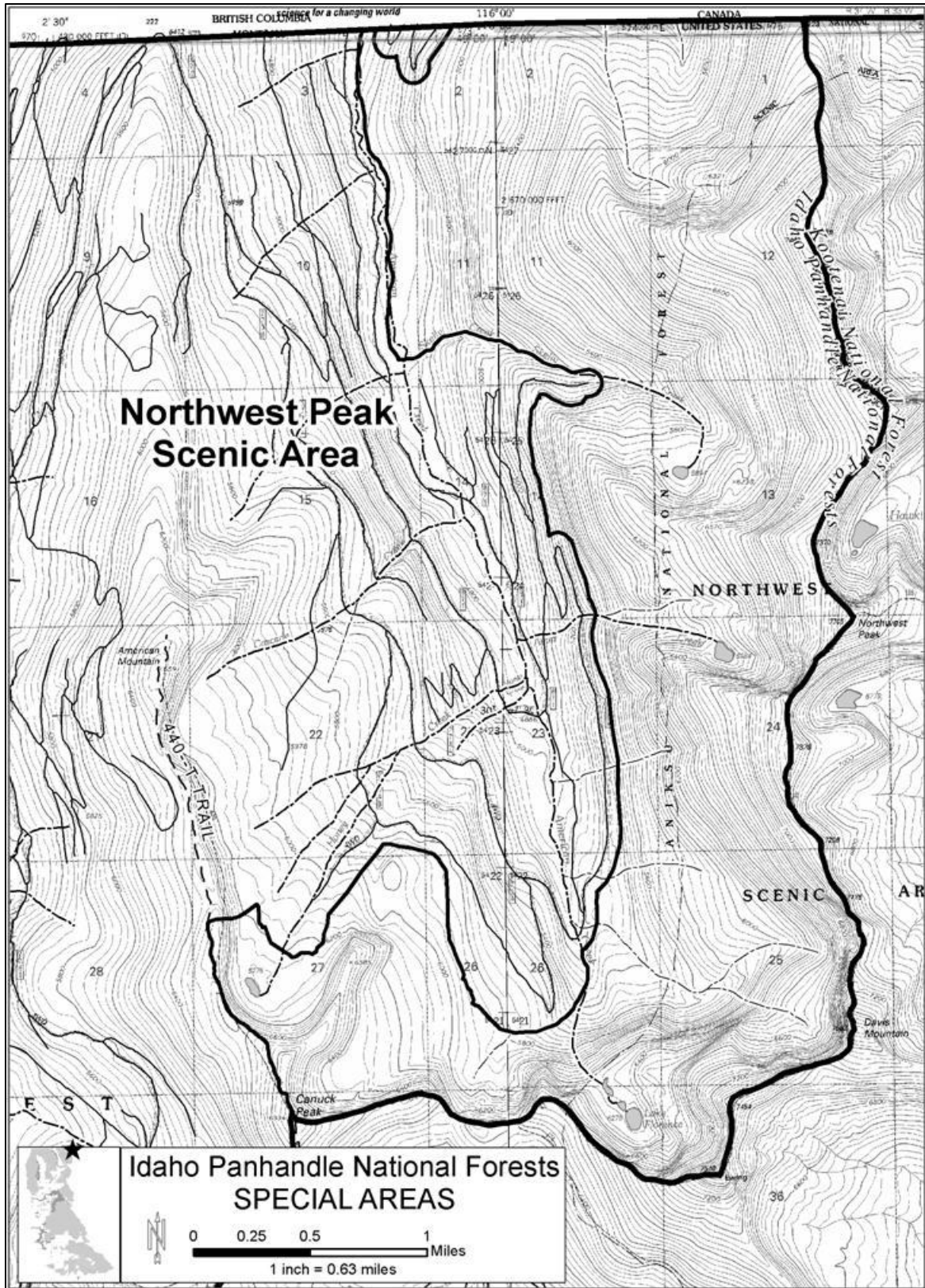


Figure 62. Northwest Peak Scenic Area

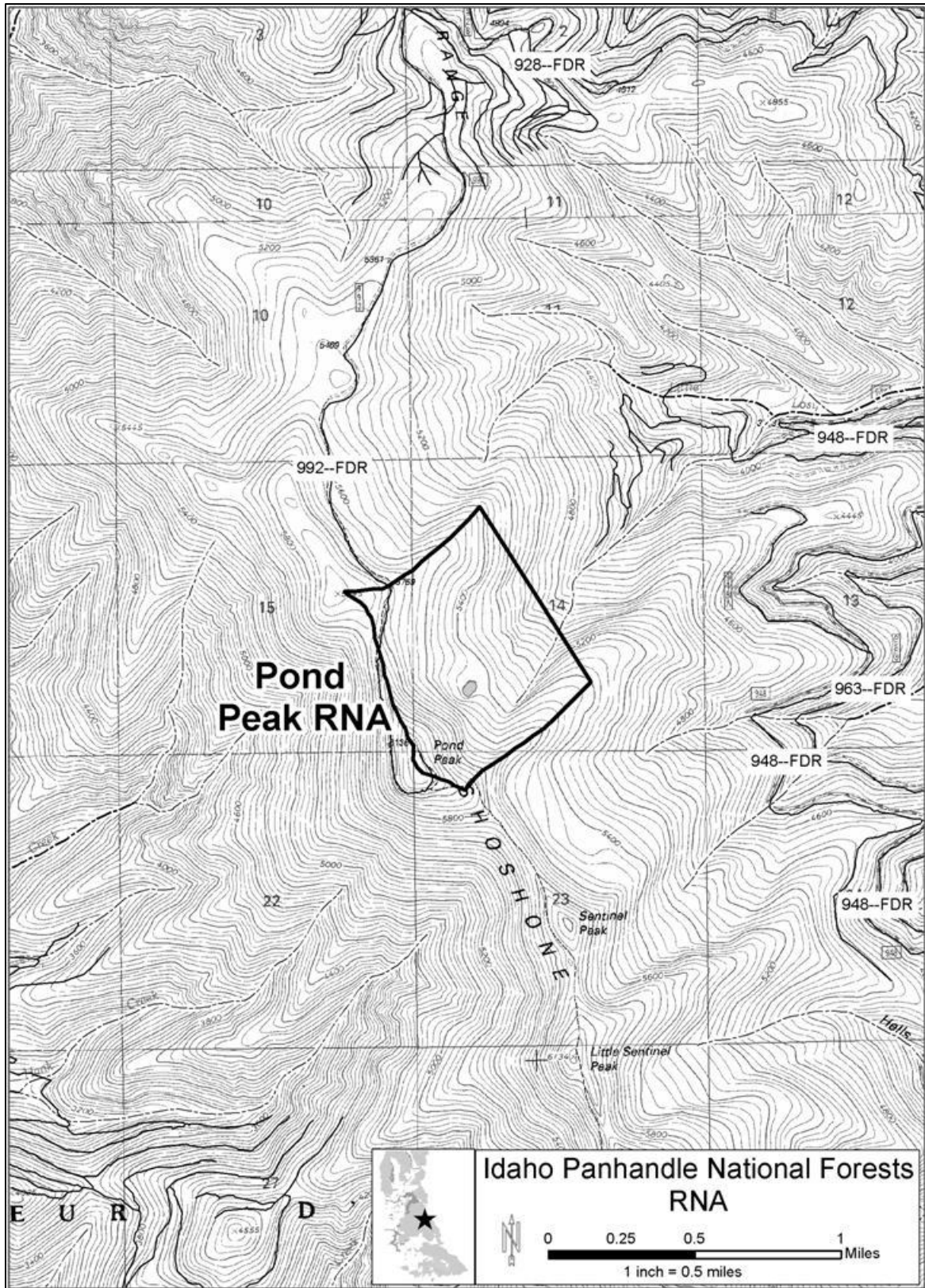


Figure 63. Pond Peak RNA

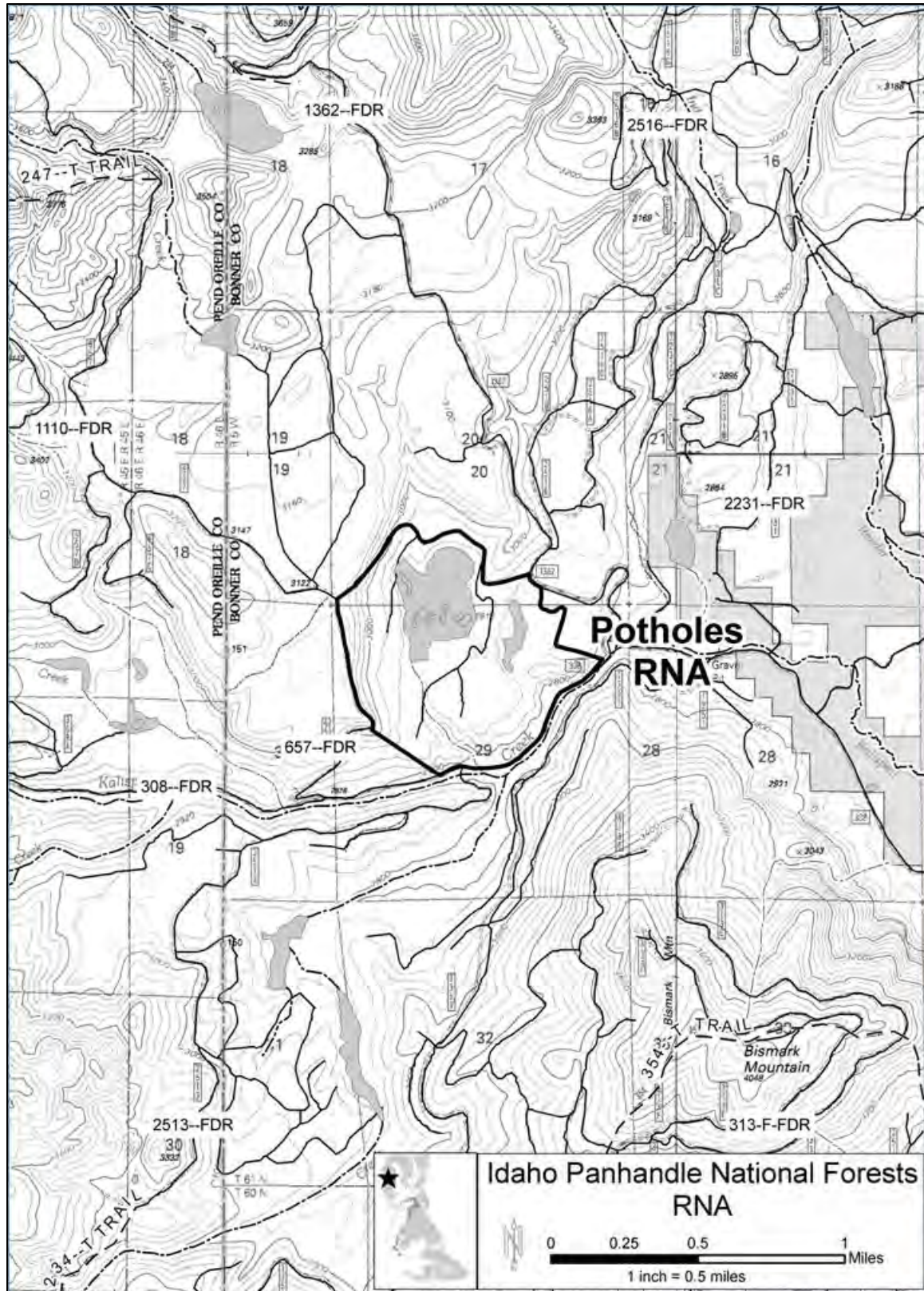


Figure 64. Potholes RNA

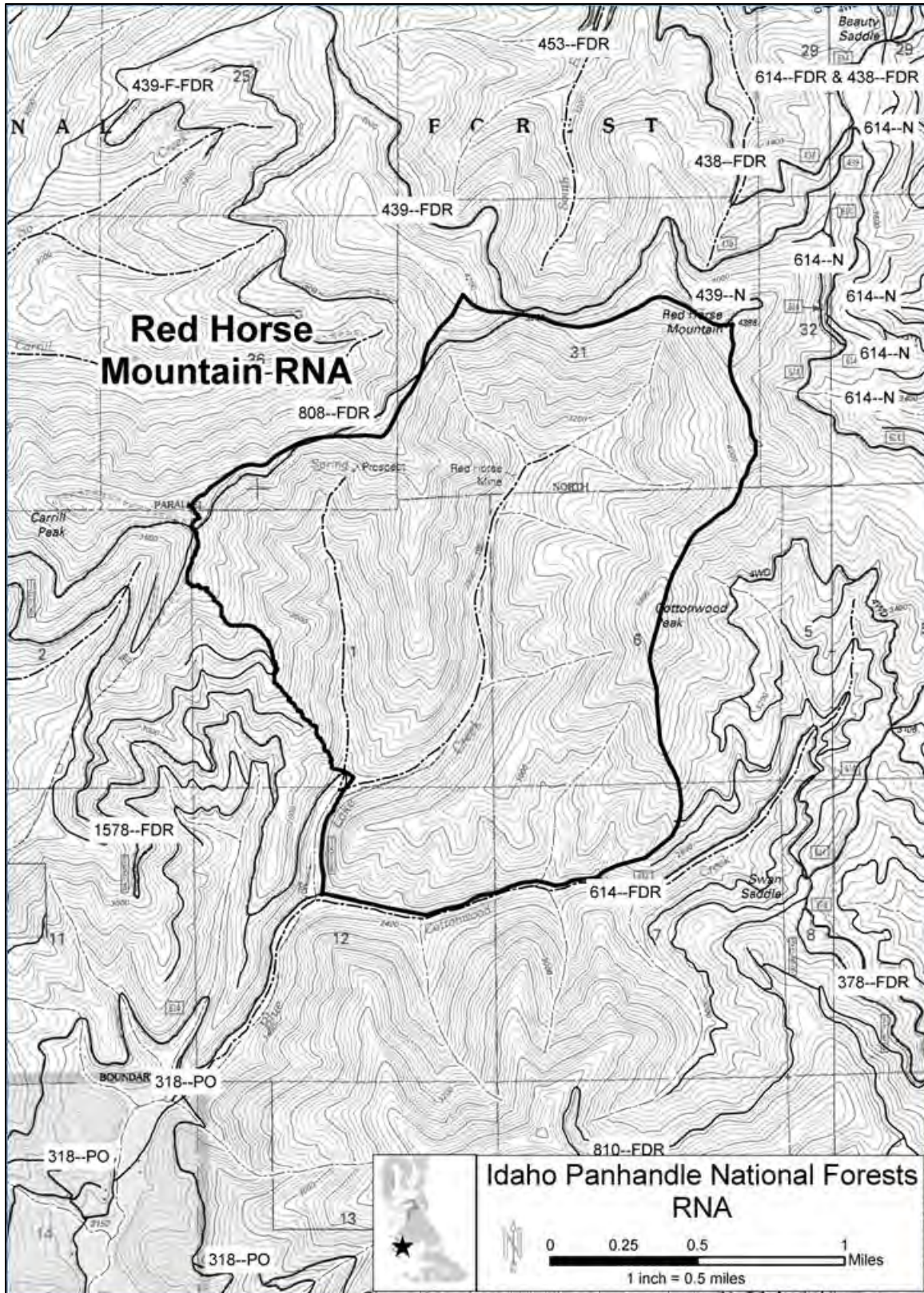


Figure 65. Red Horse Mountain RNA

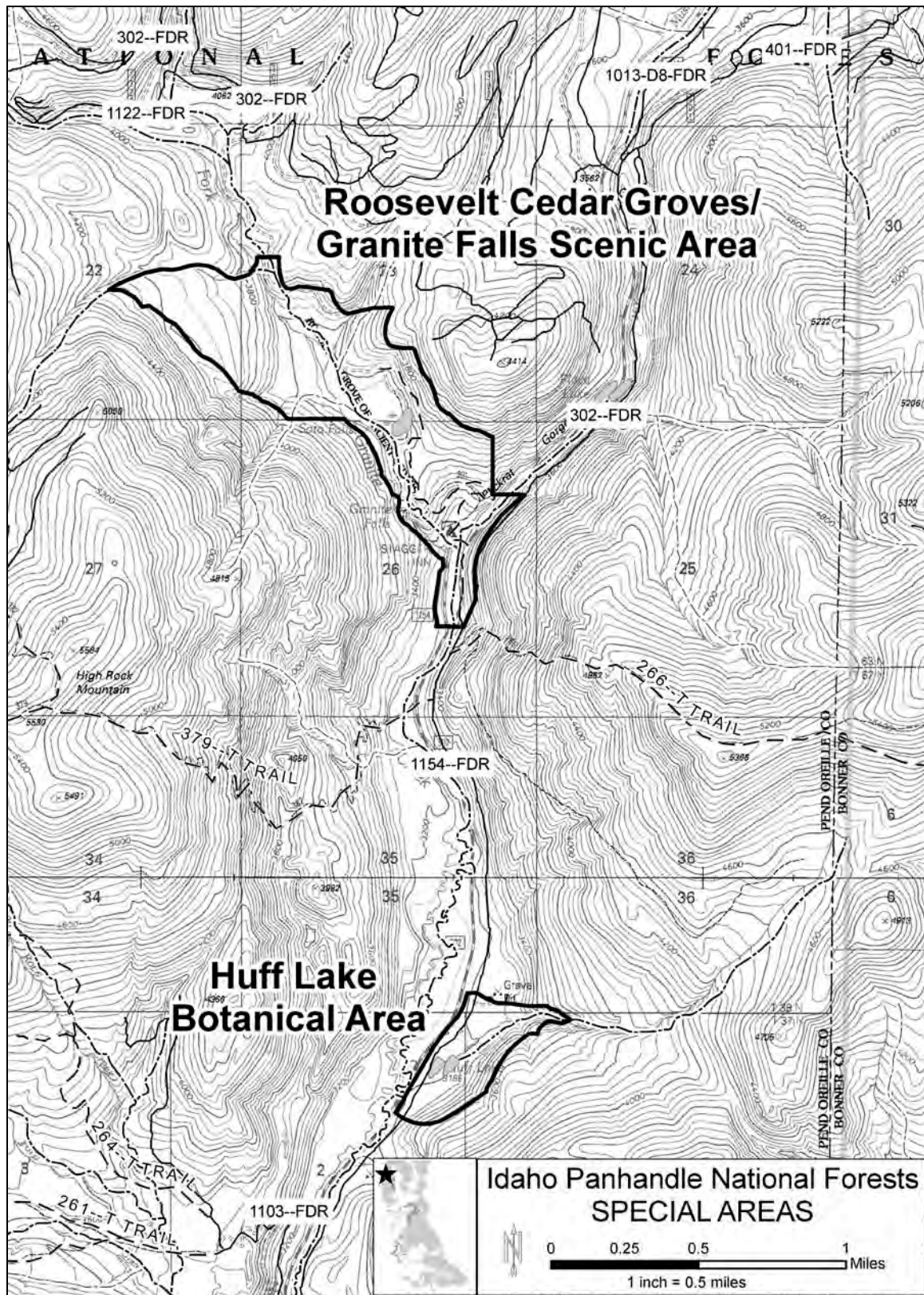


Figure 66. Roosevelt Grove of Ancient Cedars Scenic/Botanical Area/Huff Lake Botanical Area

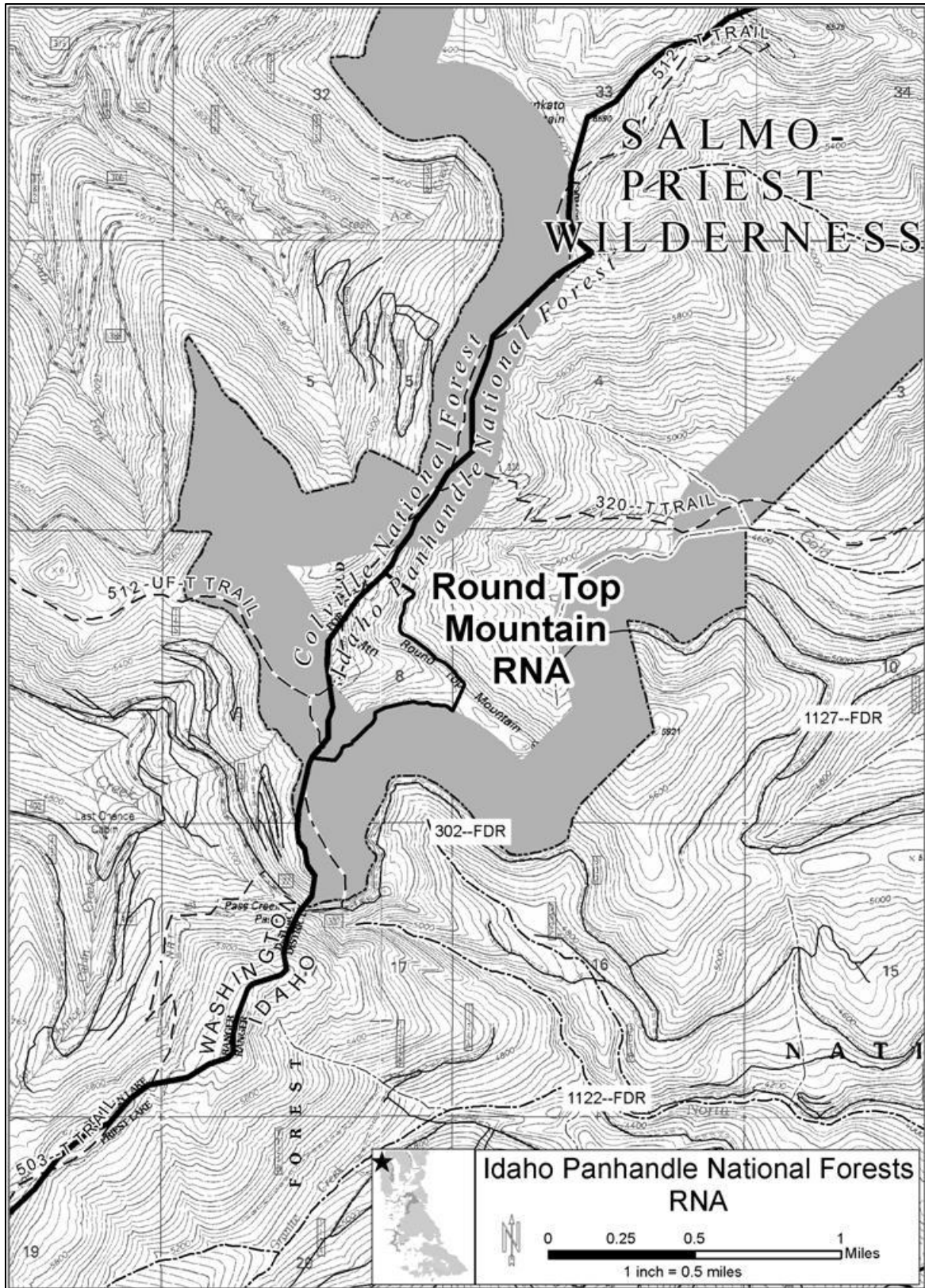


Figure 67. Round Top Mountain RNA

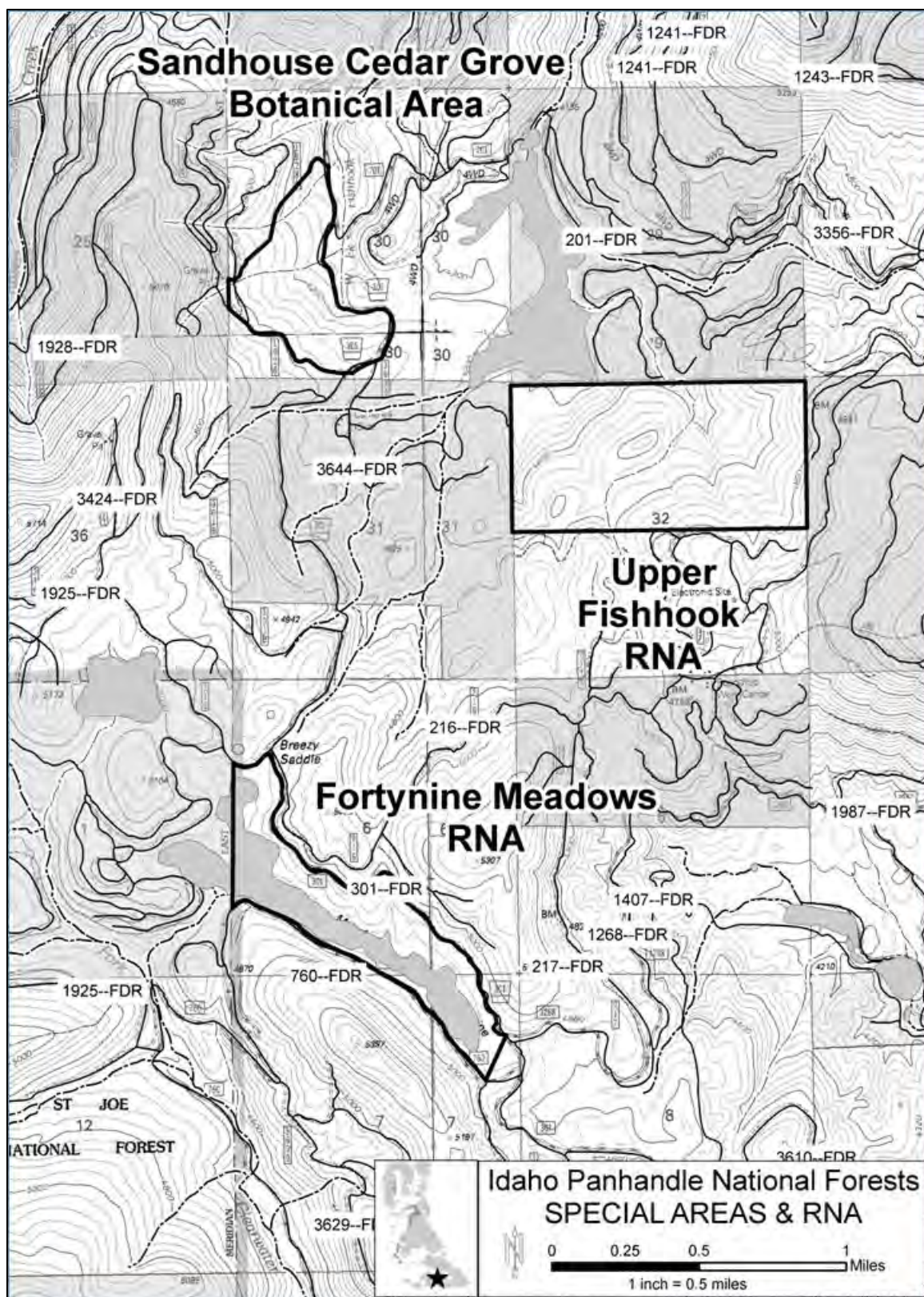


Figure 68. Sandhouse Cedar Grove Botanical Area/Upper Fishhook RNA/Fortynine Meadows RNA

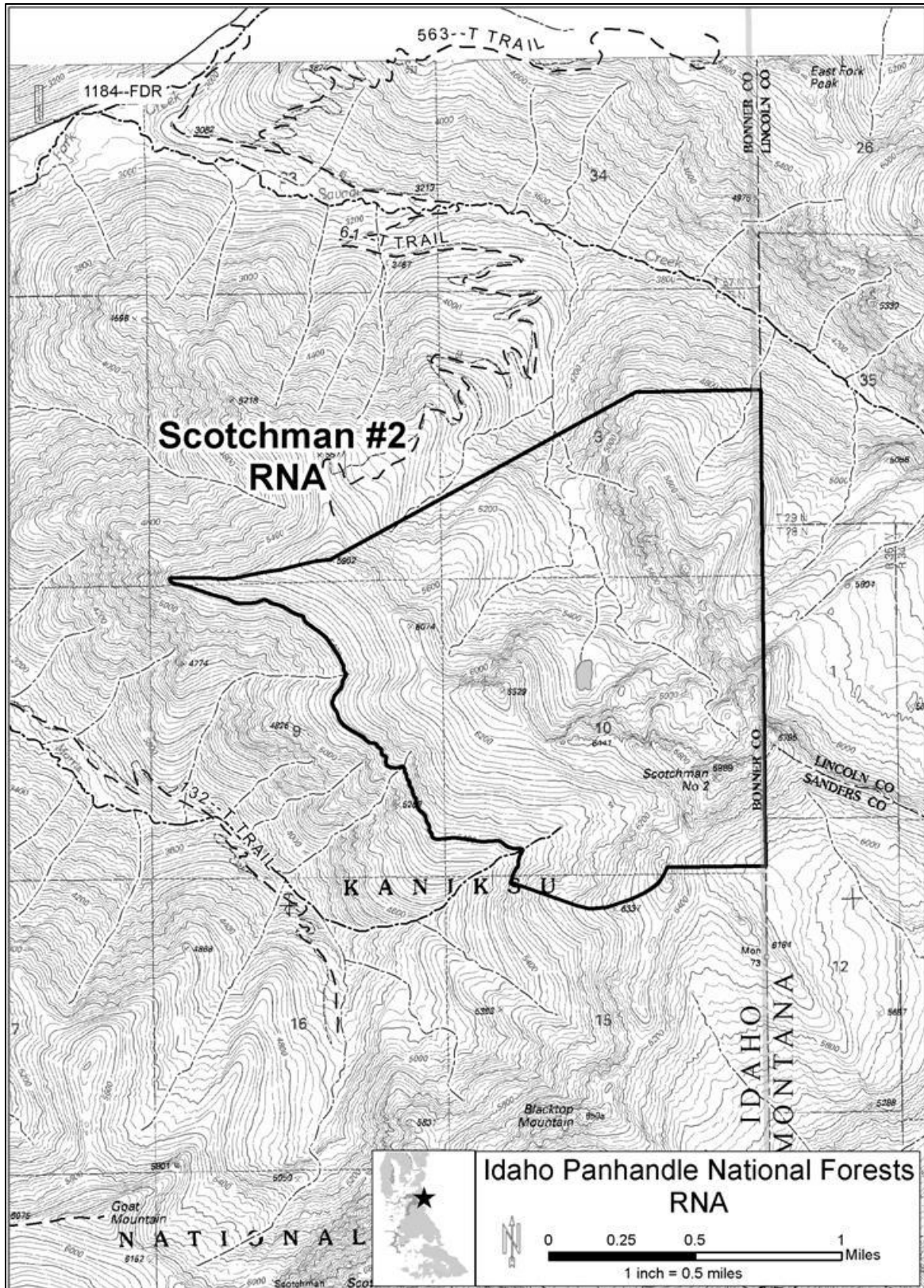


Figure 69. Scotchman #2 RNA

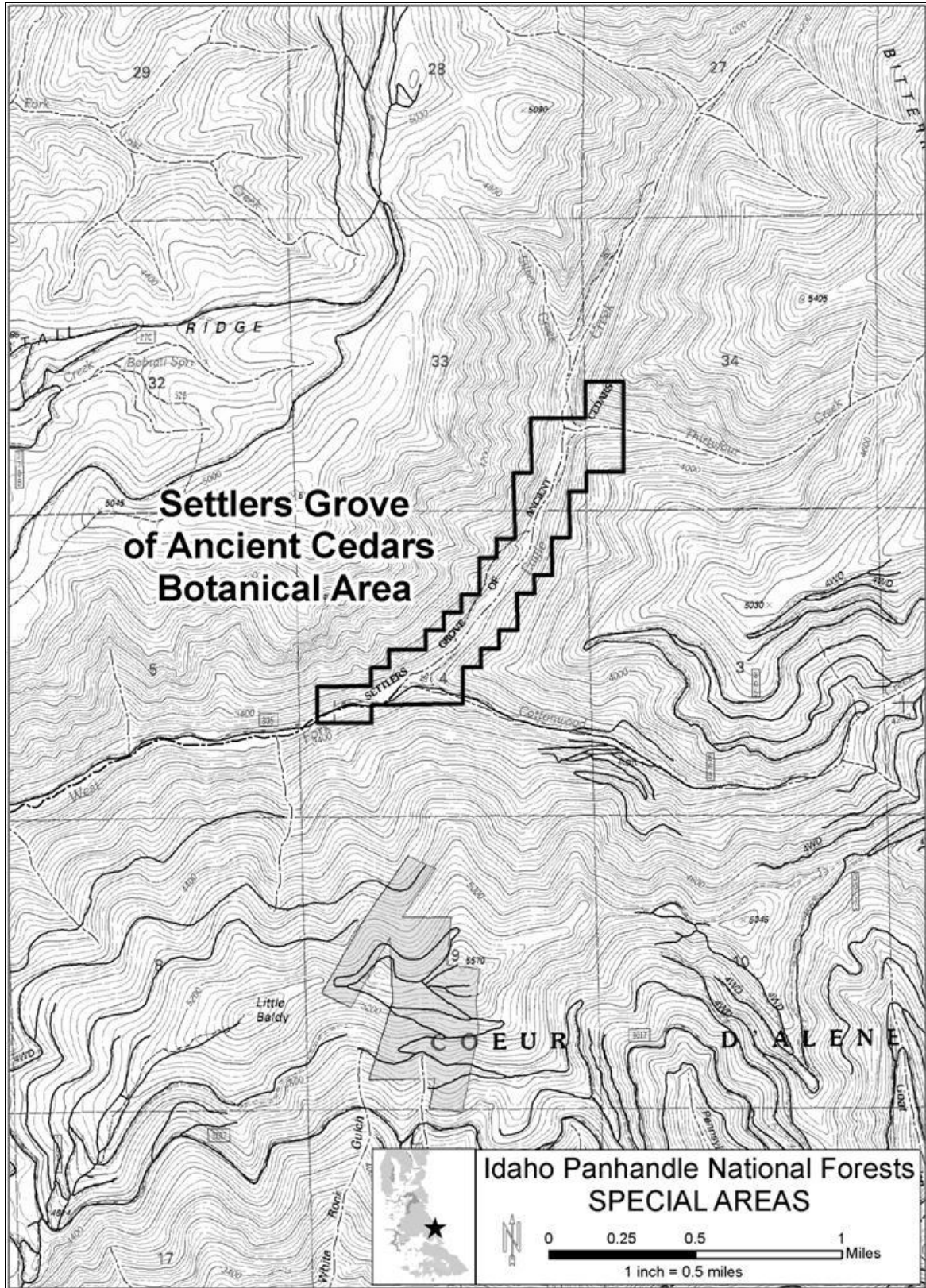


Figure 70. Settlers Grove of Ancient Cedars Botanical Area

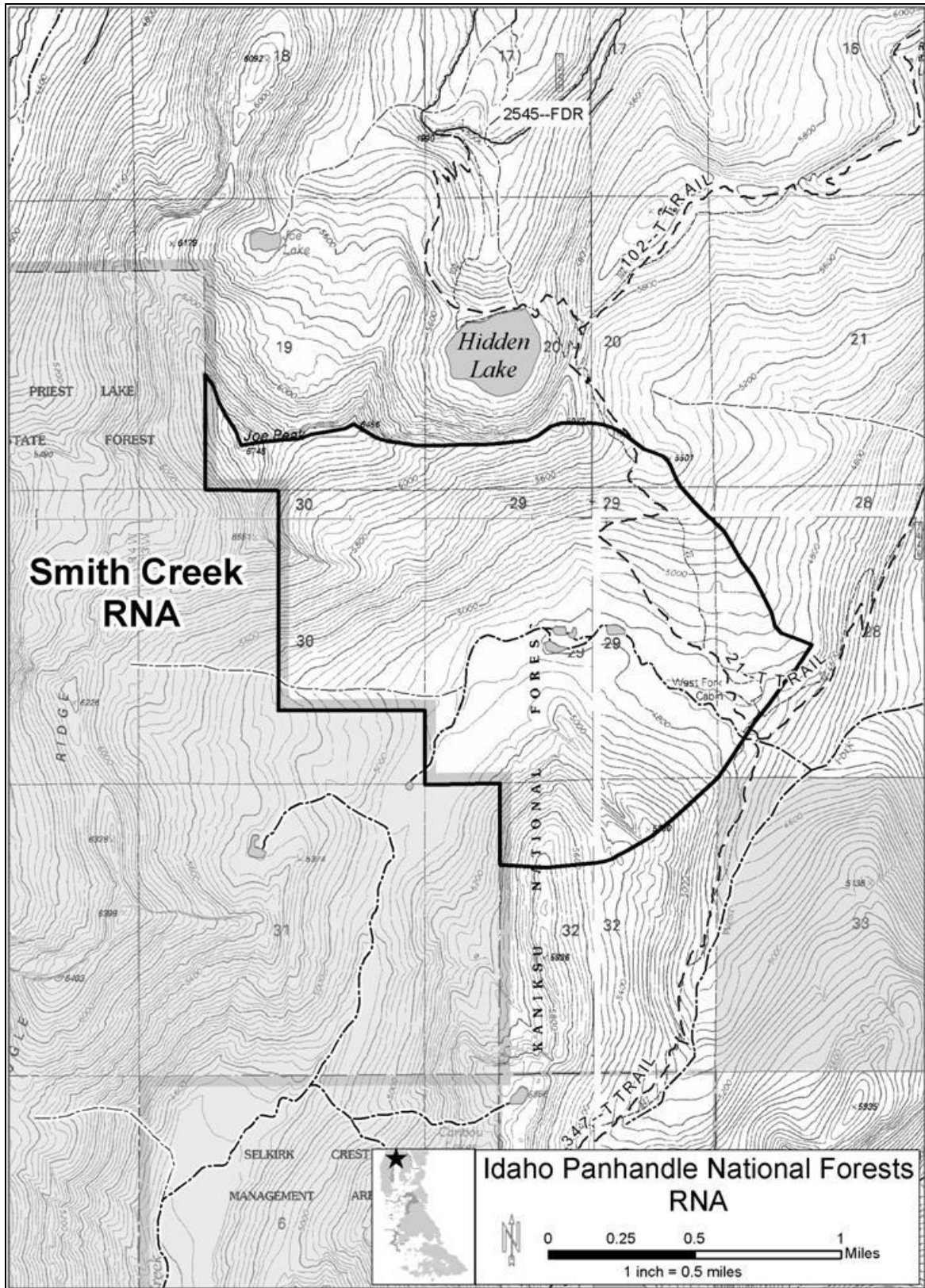


Figure 71. Smith Creek RNA

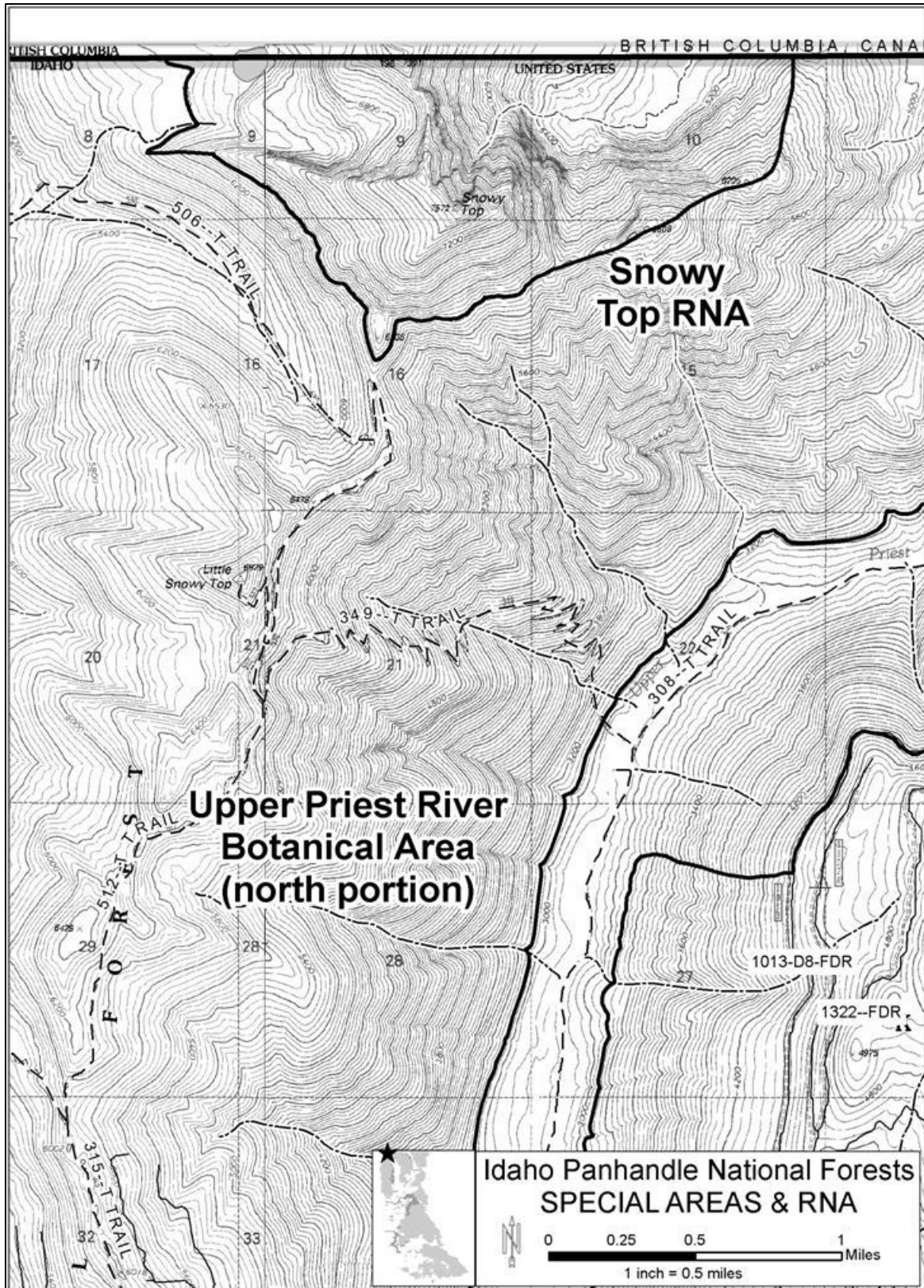


Figure 72. Snowy Top RNA/Upper Priest River Botanical Area (northern portion)

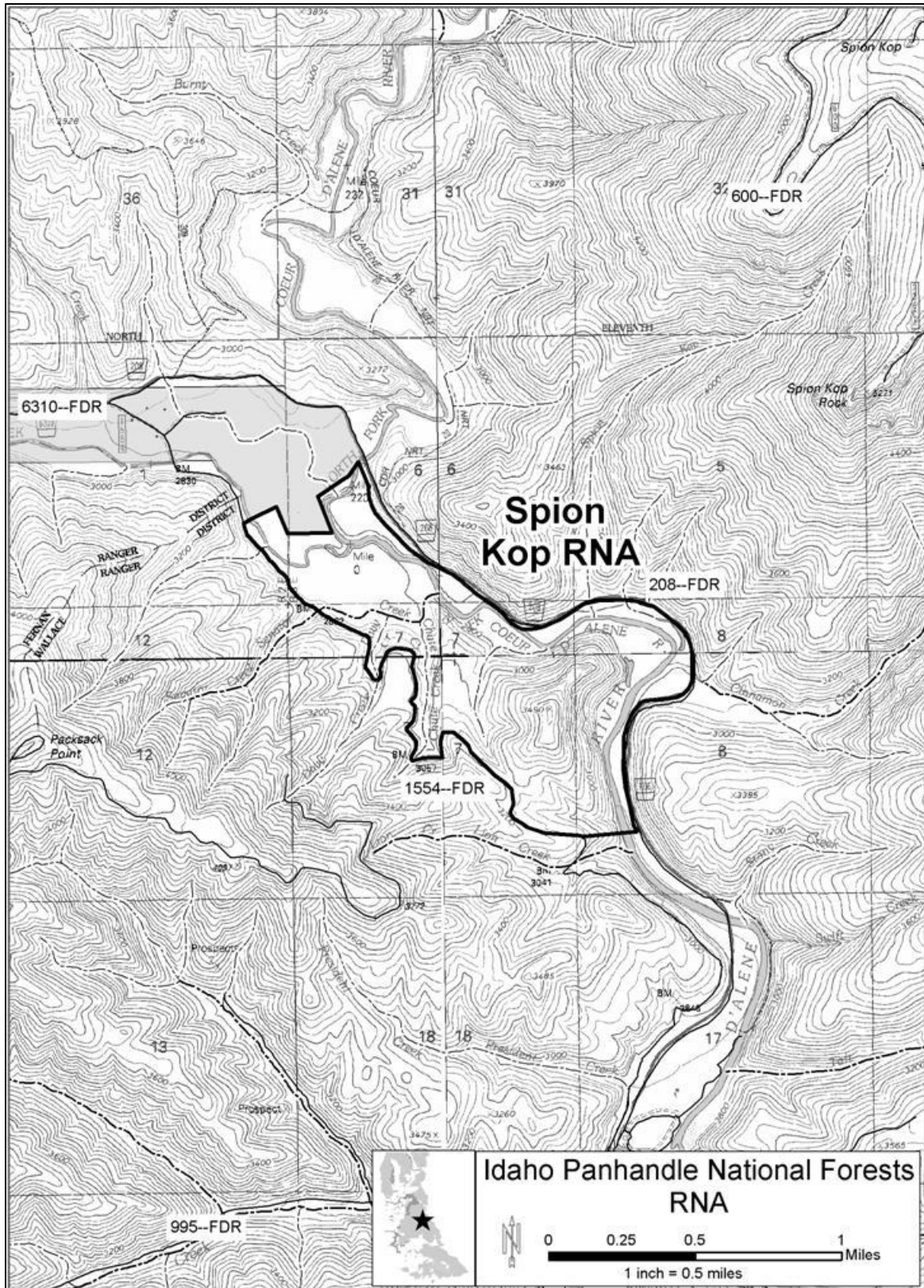


Figure 73. Spion Kop RNA

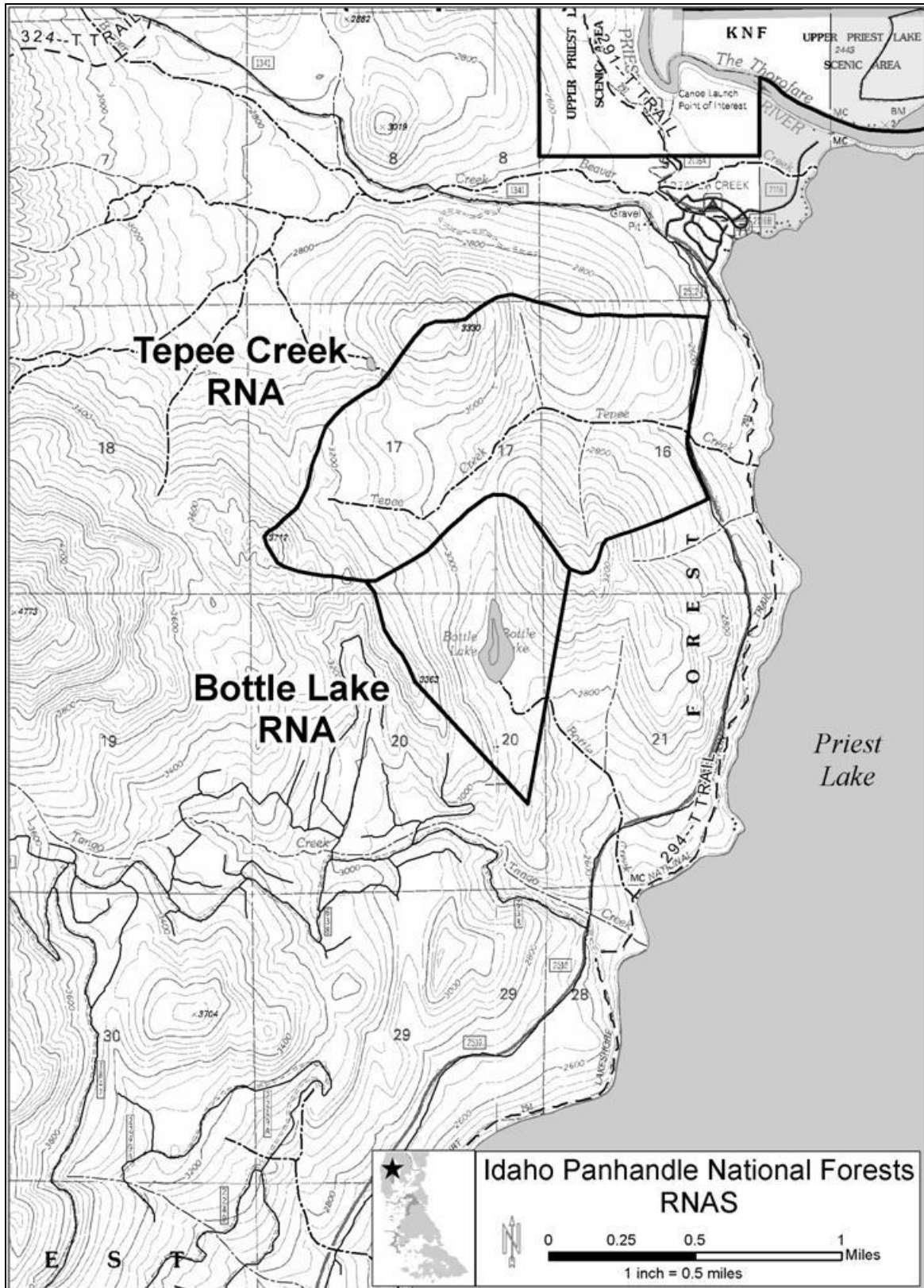


Figure 74. Tepee Creek RNA/Bottle Lake RNA

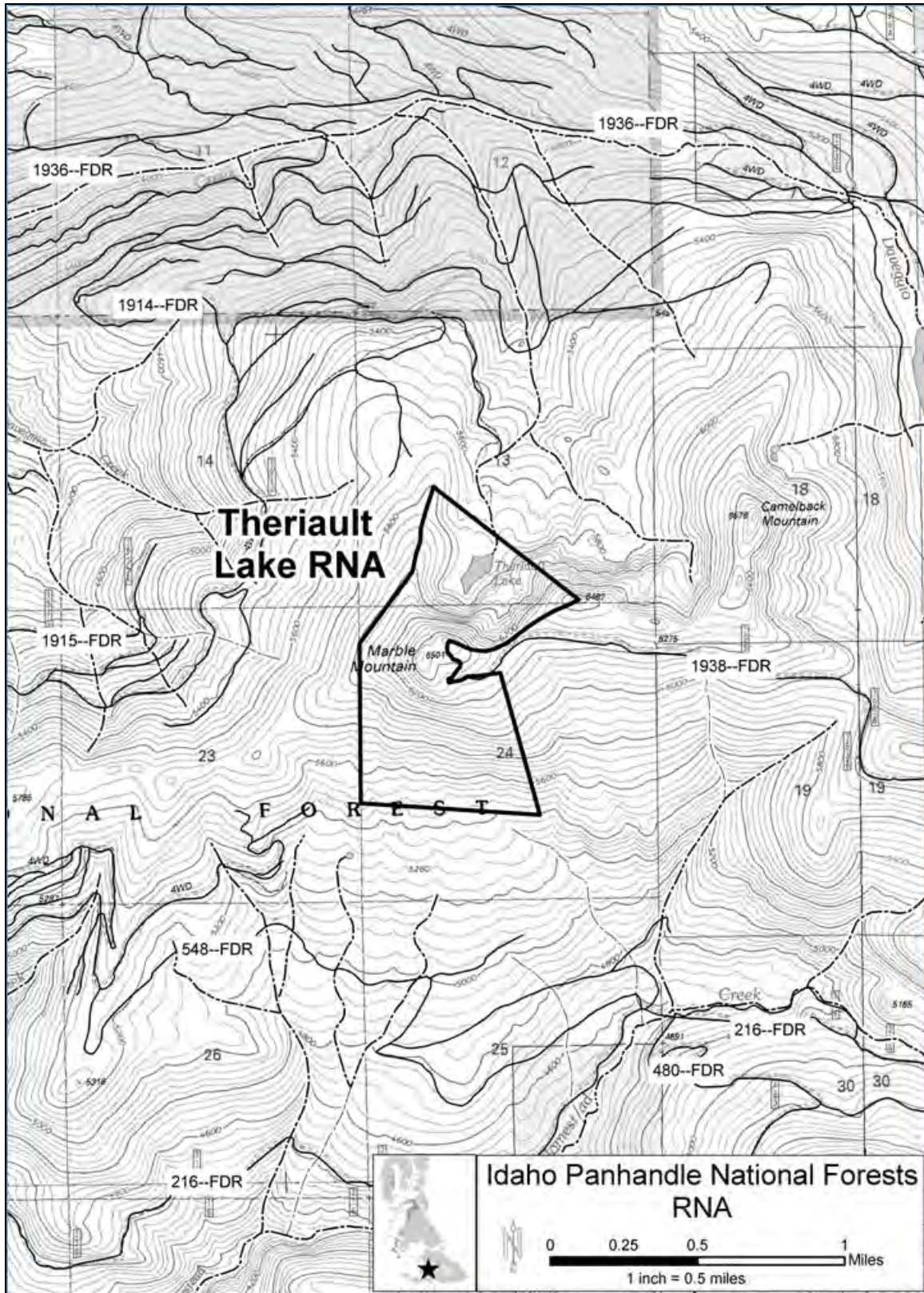


Figure 75. Theriault Lake RNA

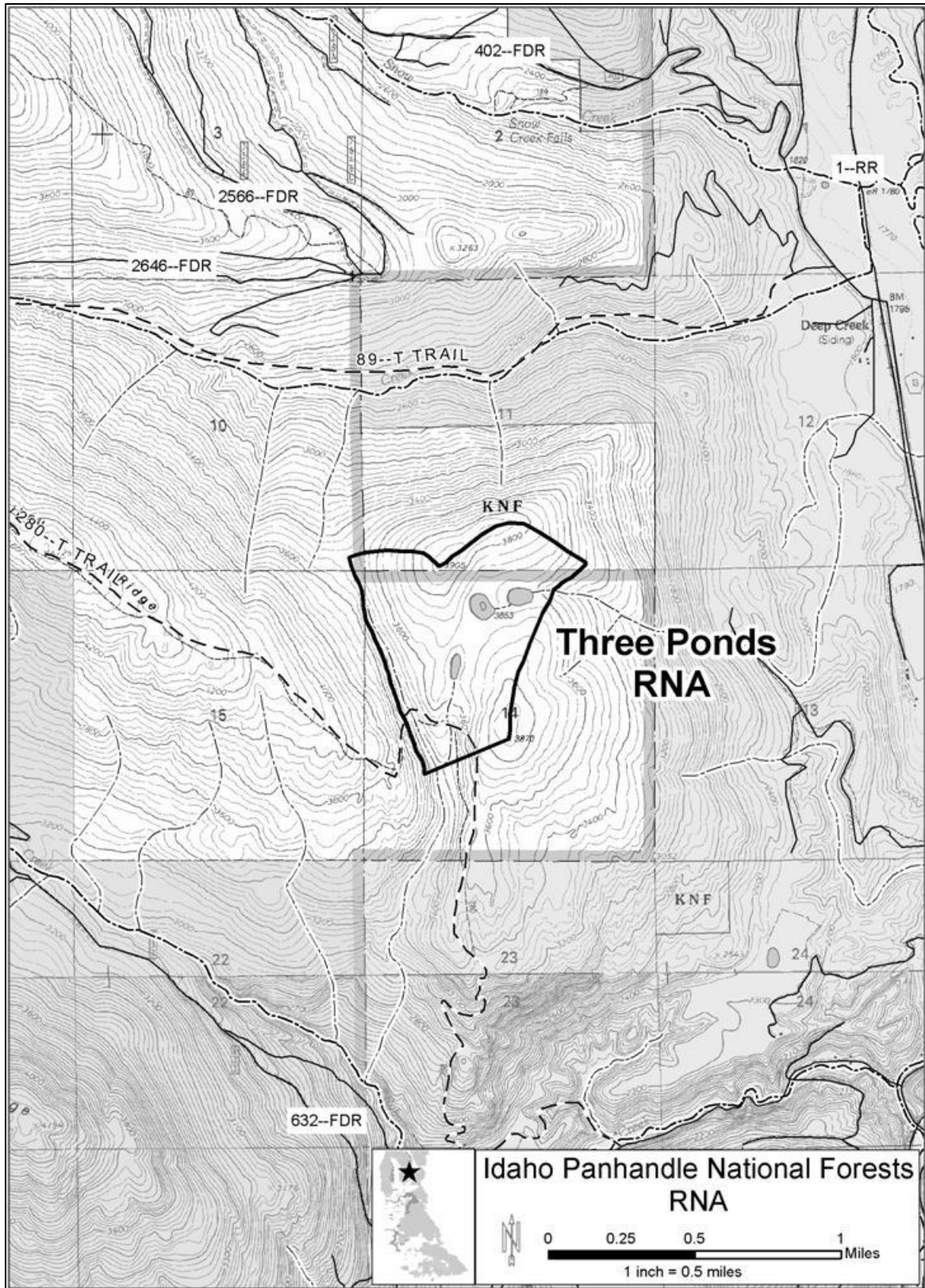


Figure 76. Three Ponds RNA

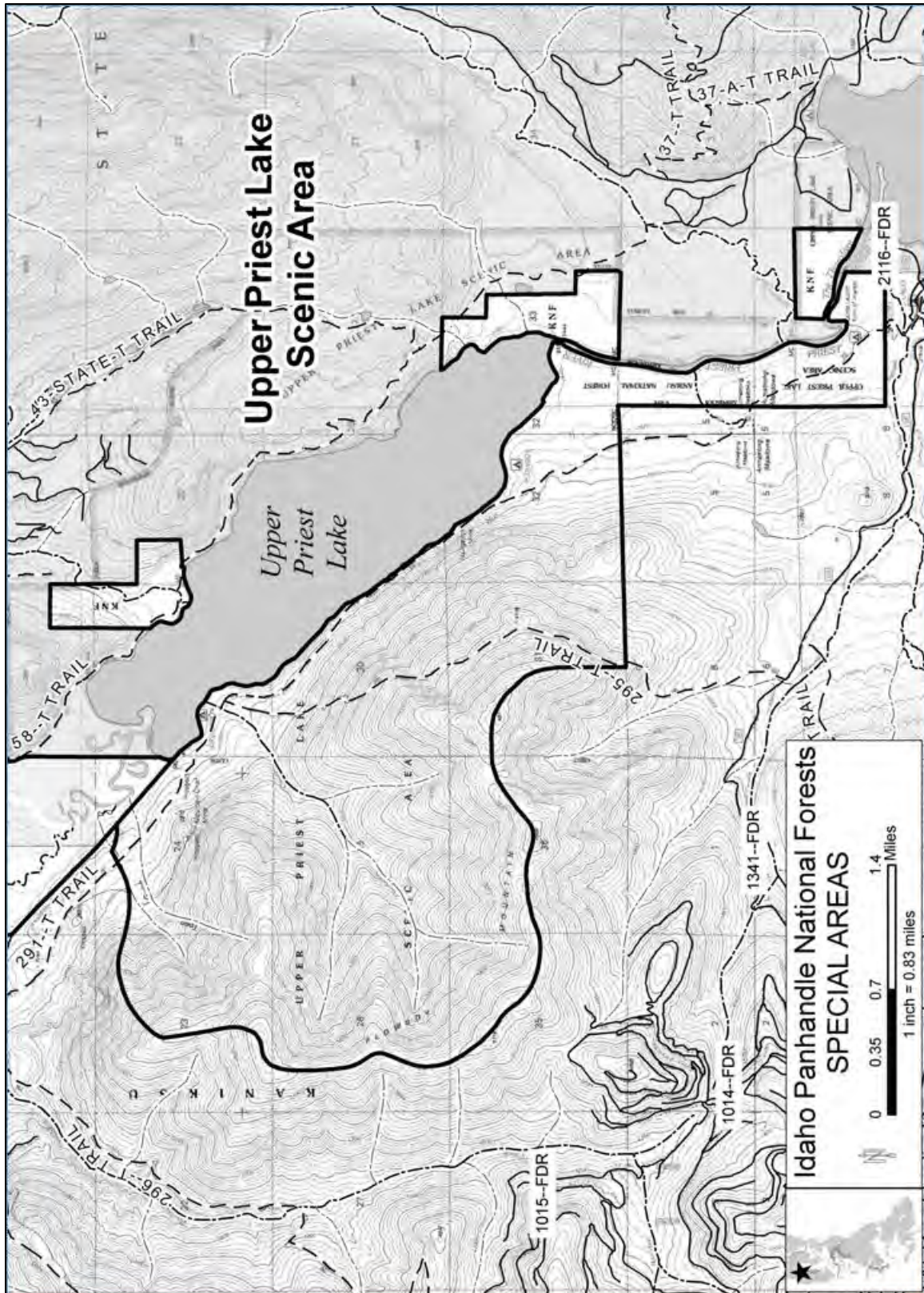


Figure 77. Upper Priest Lake Scenic Area

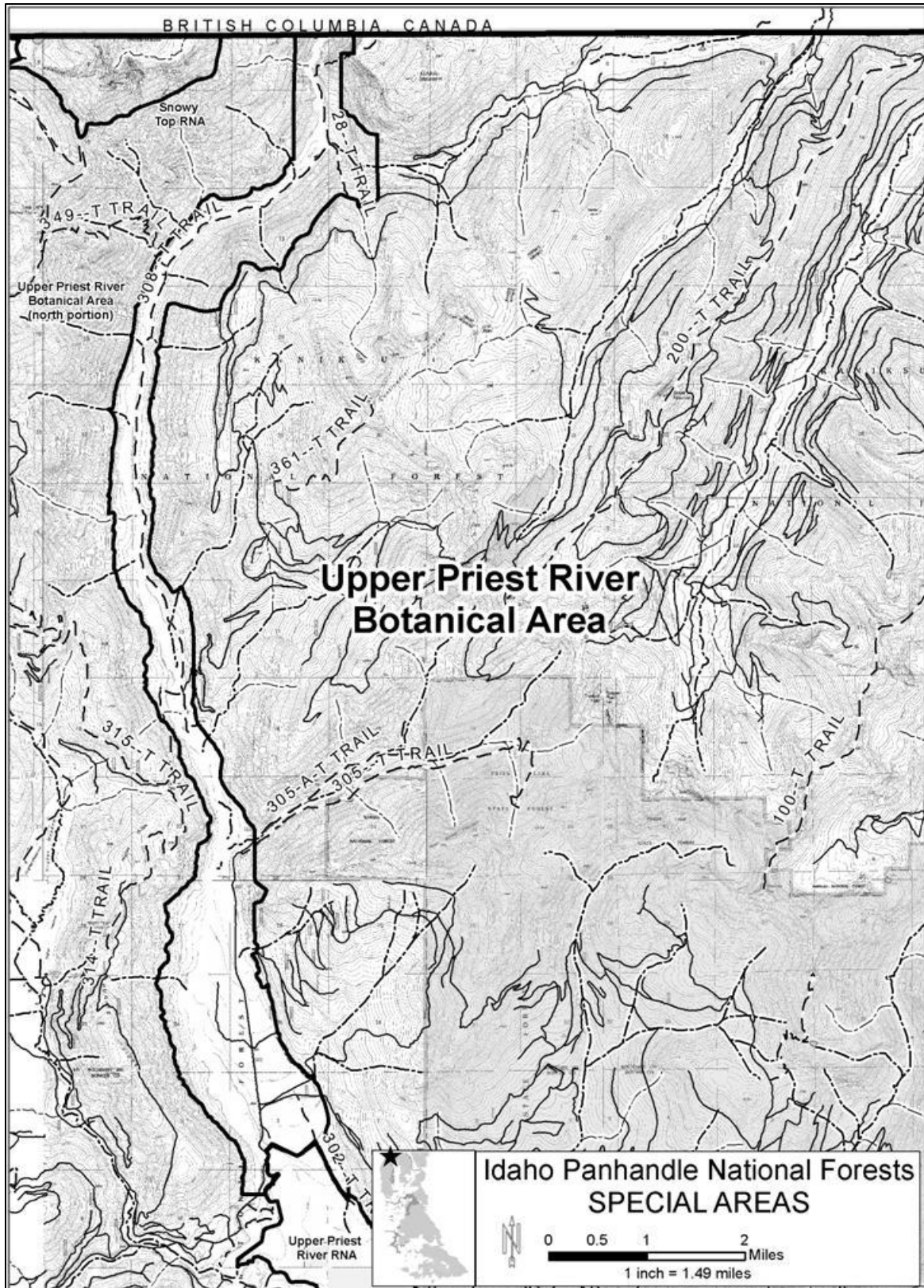


Figure 78. Upper Priest River Botanical Area

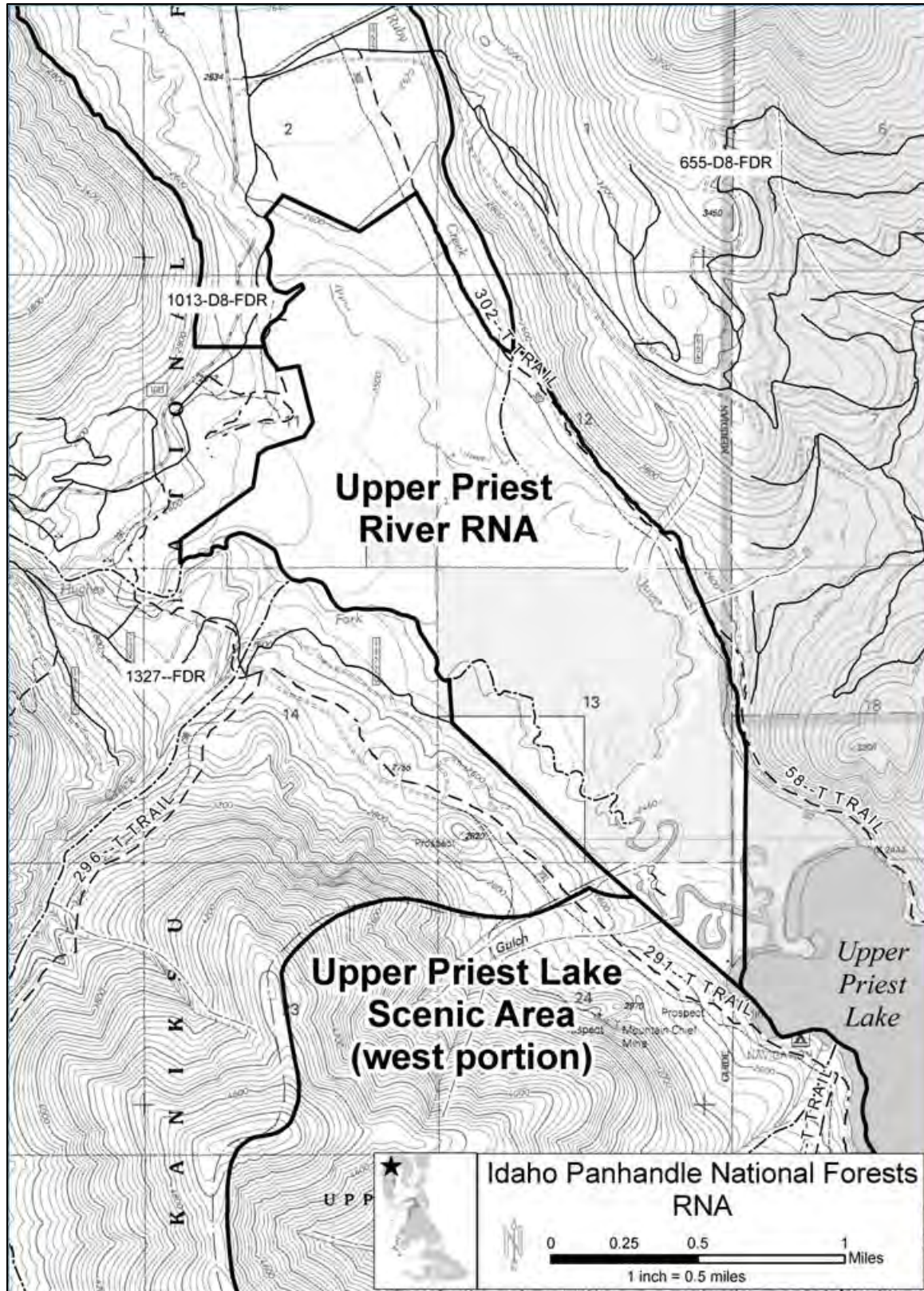


Figure 79. Upper Priest River RNA

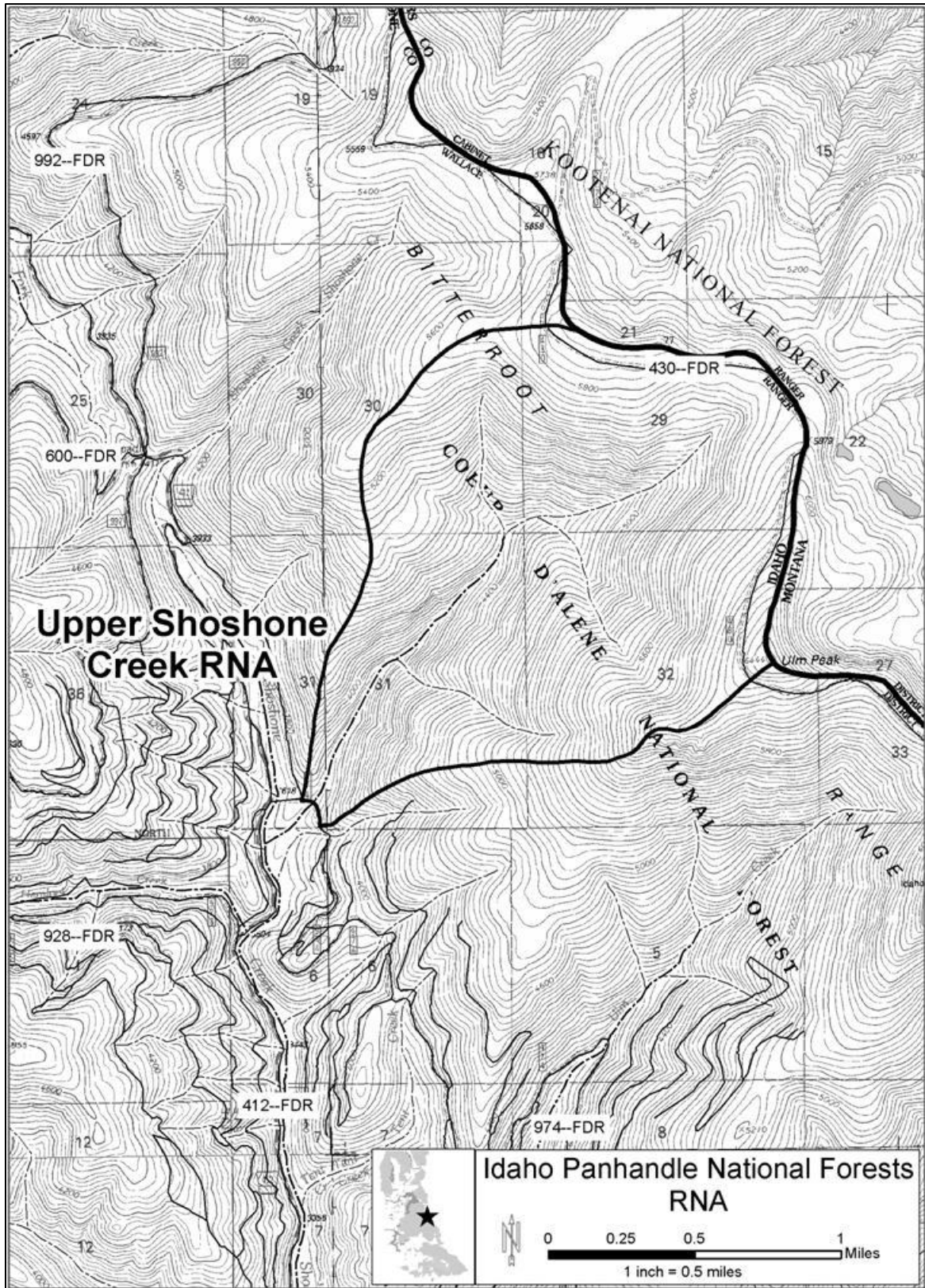


Figure 80. Upper Shoshone Creek RNA

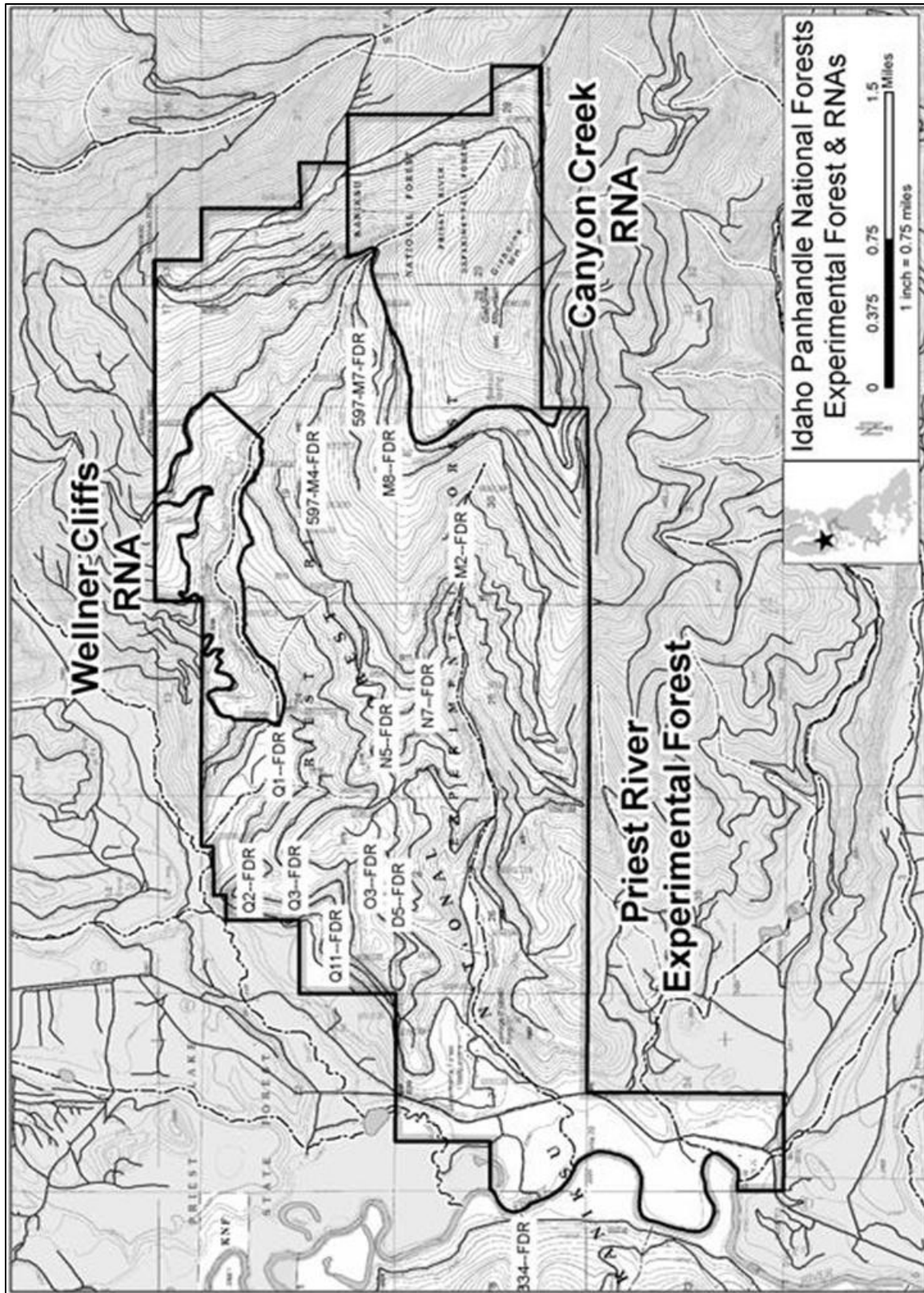


Figure 81. Wellner Cliffs RNA/Priest River Experimental Forest/Canyon Creek RNA

Appendix G — Response to Public Comments

Introduction

This appendix includes either direct comments or representative comments and agency responses to the substantive comments received during the public comment period of January 6 to May 7, 2012. A variety of methods were used to inform the public about the DEIS and Proposed Revised Plan. These included direct mailings to interested and potentially affected individuals and organizations, news releases, newsletters, media interviews, open houses, contacts with other federal and local agencies, publication of the Notice of Availability in the Federal Register and website posting at www.fs.usda.gov/kootenai.

The IPNF received 895 responses: 288 unique letters, with 607 letters coming from 9 form letters. The nine form letters had the following number of responses:

- Form 1 – 334 via postal
- Form 2 – 22 via email
- Form 3 – 23 via email
- Form 4 – 20 via email
- Form 5 – 26 via postal
- Form 6 – 30 via email
- Form 7 – 3 via email
- Form 9 – 44 via email

Responses were analyzed using a process called “Content Analysis,” which is described in the section below.

Content Analysis Process

Content analysis is a method commonly used by specialists to gather information regarding various types of messages. Each unique letter was read and substantive comments identified and coded by major topic. The substantive comments and their coding were entered into a database, allowing for reporting of all substantive comments by topic. Similar comments were then combined into a “public comment statement.” Therefore, while not every comment is listed in this Appendix exactly as written by each respondent, each comment was considered individually. Comments and responses are arranged alphabetically according to resource or topic.

In considering the comments, it is important for readers and decision makers to understand this process makes no attempt to treat input as if it were a vote. Instead, the content analysis process ensures that every comment is considered at some point in the decision process.

Considering Different Types of Comments (Substantive/Non-substantive)

Agencies have a responsibility under the NEPA to first “assess and consider comments both individually and collectively” and then to “respond... stating its response in the final statement.” The content analysis process considers comments received “individually and collectively” and equally, not weighting them by the number received or by organizational affiliation or other status of the commenter. Public comment statements and supporting quotes from public input form the basic summary of public comment and were the primary focus of the interdisciplinary team in considering comments.

In completing the content analysis, comments were identified that fell outside the scope of the forest plan revision. Generally, the types of comments that were considered outside the scope include those that:

- Do not address the purpose, need, or goals of the revised Forest Plan;
- Address concerns that are already decided by federal law or national policy;
- Suggest an action not appropriate for the forest plan decision (such as site-specific decisions to construct new roads, campgrounds or facilities, to offer special use permits, or the sale of timber resources);
- Propose untenable restrictions on management of the Forest or conflict with approved plans not being revised in the Forest Plan revision process; and
- Did not consider reasonable and foreseeable negative consequences.

These types of comments are outside the scope and do not require a response.

Once comments were identified as being within the scope, they were identified as being substantive or not. Based on the Council of Environmental Quality's regulations, a substantive comment is one that:

- Questions, with a reasonable basis, the accuracy of the information in the environmental impact statement;
- Questions, with a reasonable basis, the adequacy of environmental analysis as presented;
- Presents reasonable alternatives other than those presented in the DEIS that meet the purpose and need of the proposed action and address significant issues; and
- Cause changes or revisions in the proposal.

Non-substantive comments, or concerns identified from them, include those that simply state a position in favor of or against an alternative, merely agree or disagree with Forest Service policy, or otherwise express an unsupported personal preference or opinion.

A response is only required for substantive comments or the concerns identified from them. Responses to substantive concerns are typically more extensive, complete, and most importantly, offer an explanation of why or why not and where the concern may have resulted in changes to the Forest Plan or analysis. If several concerns are very similar, they have been grouped for response purposes. Public comments that identified editorial or other errors in the presentation of information in the DEIS were used to revise text and make corrections for the FEIS.

Commenters and Coding Numbers

Table 221 lists the unique letters. It includes the individuals and organizations that submitted unique letters. It also includes a single copy of each form letters. If an individual or organization sent in a form letter with additional comments (that were substantive and different from the form letter), those letters are listed with the form number noted. The names of those submitting form letters without additional substantive comments are not included in this table; their concerns are captured through the coding of the form letter listed in the table. Some letters were submitted from different organizations or individuals, but were identical (but not considered a form letter). In that case, the letter was coded once. See the column "number coded" for the number of each letter used in the coding. These are the numbers that are found in the public comments following.

Table 221. Unique Comment Letters with Coding Letter Number

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
119		ABELIN	DOUG	CAPITAL TRAIL VEHICLE ASSOCIATION	119
165		ANDERSON	DON		165
207		ANDERSON	JOSH	VAAGEN BROTHERS LUMBER	207
261		ANDERSON	TIM		261
9		ARTLEY	DICK		9
159		ASHMORE	ANDREW	SPOKANE MOUNTAINEERS	159
220		ASHMORE	ANDREW	SPOKANE MOUNTAINEERS	220
202		AXTELL	FRANK	NORTH IDAHO ATV ASSOCIATION	202
122		AXTELL	JIM		122
107		BAIRD	DENNIS /LYNN		107
188		BARCKLAY	RODERICK		188
244		BEARDSLEE	GREG	MONTANA MOUNTAIN BIKE ALLIANCE	244
166		BERGQUIST	JUNE	IDAHO DEPT OF ENVIRONMENTAL QUALITY	166
135		BLACKBURN	DEL/BERNADEAN		135
44		BLOOD	ANGELA		44
207		BOEH	BOB	IDAHO FOREST GROUP	207
222		BOEH	ROBERT	IDAHO FOREST GROUP	222
131		BOLIN	GAIL	KINNIKINNICK NATIVE PLANT SOCIETY	131
136		BOSWELL	DEBRA		136
173		BOWSER	MATT	YAAK VALLEY FOREST COUNCIL	173
262		BRANCH	CHARLES		262
134		BRASHER	BRIAN		134
174		BRIMACOMB	STEFANIE		174
79		BROOKS	BRAD	THE WILDERNESS SOCIETY	79
238		BRUBAKER	ERIK		238
205		BUELL	JACK	COUNTY COMMISSIONERS - BENEWAY	205
21		BURKHART	JULIE		21
137		BUSSING	LINDA		137
58		CAKKY57			58

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
128		CALDWELL	RICHARD		128
39		CALLAWAY	MARIE		39
45		CALVERT	ANDY		45
241		CANNON	CHUCK		241
263		CARPENTER	PAM		263
264		CARPENTER	TERRY		264
101		CASE	ROBERT/BETTY JO		101
259		CASILE	ALMER		259
178		CELLARIUS	DORIS		178
55		CHALFANT NOKKENTVED	PAM		55
130		CHICKEN LIPS			130
226		CHINN	BRAD		226
157		CLINTON	JACK		157
96		COLBURN	KEVIN	AMERICAN WHITEWATER	96
207		CONNOLLY	JEFF	MIKE REYNOLDS LOGGING	207
278		CONOVER	SARAH		278
163		COOK	JEFF	IDAHO STATE PARKS AND RECREATION DEPT	163
265		COOPER	BRENDA		265
110		CORK	MARYLYN		110
145		CORSI	CHIP	IDAHO DEPT OF FISH AND GAME	145
142		CORWIN	RICK		142
172		COSTELLO	JIM	ROCK CREEK ALLIANCE	172
160		COSTIGAN	CHERYL		160
3		CREE	ANTHONY		3
25		CUNNINGHAM	ERIN		25
279		DALSASO	JULIE		279
104		DAVIDSON	LARRY		104
169		DAVIDSON	MATTHEW		169
80		DAVIS	MARCIA		80
140		DAVIS	STANLEY		140
183		DEAVER	LARRY		183
13		DENNER	BOB	ROCKY MOUNTAIN RESEARCH STATION	13
266		DENNIS	DONN		266

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
204		DEXTER	FORREST	PACIFIC NW 4WD ASSOCIATION	204
158		DINGMAN	DAVID		158
217	DUPLICATE	DONDEE	TODD	COUNTY COMMISSIONERS - KOOTENAI	214
176		DUNFIELD	TODD		176
85		DUNHAM	BRIAN		85
31		DURRANT	MATT		31
74		DYSART	DON		74
27		EMERICH	LORNA		27
245		ENTZ	RAY	KALISPEL TRIBE OF INDIANS	245
219		FANCHER	JEREMY	INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION	219
126		FEGELEIN	SUZANNE		126
59		FENNESSY	ANN		59
22		FERRELL	PETER		22
206		FINNEY	JOHN		206
8		FITZNER	LISA		8
141		FLYNN	TIA		141
162		FOOTE	CAM		162
239		FRANK	DEBBIE		239
87	05+	FRANZEL	MARY		87
223		FRITZ	JANE		223
53	01+	FULLER	ELIZABETH		53
54	01+	FULLER	ROB		54
99	04+	FULLING	JIM		99
82		GARVEY	LYDIA		82
231		GERTH	JEAN		231
123		GEYERMAN	BRANDT		123
254		GILBERT	BRAD	KOOTENAI KLIMBERS	254
280		GILL	KATHLEEN		280
281		GILL	LEROY		281
56		GLAZA	BRANDON		56
111		GORMLEY	SHEILA	WEST BONNER WATER & SEWER DISTRICT	111
5		GORMLEY	SHEILA		5
211		GRACE	CELESTE		211

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
267		GUARDIPEE	KEN		267
112		GUNDLACH	JOHN		112
268	DUPLICATE	HALLEY	LARRY		267
127		HAMILTON	TINA		127
282		HANSON/SHAFFER	WES/THERESA		282
283		HARBUCK	JOHN		283
92	03+	HARRIS	SHIRLEY		92
246		HARRIS	TERRY	KOOTENAIE ENVIRONMENTAL ALLIANCE	246
2		HARRISON	JOA		2
149		HARVEY	GEOFFREY	PANHANDLE NORDIC SKI AND SNOWSHOE CLUB	149
143		HARVEY	GEOFFREY		143
108		HARWOOD	TERRY	BASIN ENVIRONMENTAL IMPROVEMENT PROJECT COMMISSION	108
200		HAWTHORNE	BRIAN	BLUE RIBBON COALITION	200
42		HEEP	DAVID		42
144		HENDRIX	TIM/ARLENE		144
6		HENSIEK	JENNIFER		6
100		HIKSON	LLOYD		100
71		HOFFMAN	GREG		71
68		HOKONSON	SUZI		68
29		HOLDER	DAVE /JEANNE		29
62	06+	HORTON & HOLLY	JANE /DOUG		62
207		HOUGH	PHIL	FRIENDS OF SCOTCHMAN PEAKS WILDERNESS	207
208		HOUGH	PHIL	FRIENDS OF SCOTCHMAN PEAKS WILDERNESS	208
198		HOUGH	PHIL		198
269		HOUSE	GERRY		269
26		HUISMAN	CATE		26
14		HUNSICKER	DEB		14
63		INGE	KENZIE		63
270		JANSSEN	SUE		270

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
284		JENKINS	CAROL/IRV		284
37		JENKINS	STACY		37
271		JOHNSON	WILLIAM		271
207		JOHNSON-GEBHARDT	LIZ	PRIEST COMMUNITY FOREST CONNECTION	207
230		JOHNSTON	ALYSOUN		230
36		JOKELA	BRIAN		36
153	03+	JONES	BARBETTA		153
235		JUEL	JEFF	THE LANDS COUNCIL	235
28		KALLAGE	RICHARD		28
30		KAUFMAN	WILLIAM		30
179		KEOUGH	SHAWN	ASSOCIATED LOGGING CONTRACTORS, INC - IDAHO	179
272		KESTER	CHRISTINE		272
113		KING	RAY	CITY OF NEWPORT	113
67	07+	KLIMENT	WENDY		67
185	08+	KLOEFKOM	WALT		185
15		KNOX	DAVID		15
285		KOERNER	TIM		285
154		KRAFT	LINDA		154
34		KUHNS	JEFF		34
43		L HEUREUX DURTSCHI	BONNIE		43
256		LAMBIOTTE	CHRIS		256
168		LANDIS	MARLENE		168
159		LATTA	JOHN	INLAND NORTHWEST BACKCOUNTRY ALLIANCE	159
93	04+	LAUER	ERICH		93
75		LEITZINGER	CURT		75
243		LEWIS	KEVIN	IDAHO RIVERS UNITED	243
38		LEWIS	TONY		38
84	7	LILL	NANCY ENZ		84
69	07+	LINDHOLDT	PAUL		69
35		LIPSCOMB	DIANNE		35
201		LOCKWOOD/OREILLY	STEVE/MOLLY		201
277		LOGAN	DAN		277
11		LONGDEN/MASON	PHIL/CYNTHIA		11

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
170		LOPUSHOK	PETER		170
146		LOUGHLIN	DANIEL/SUSAN		146
78		LYNN	MARK		78
132		MACE	DAISY		132
189		MACFARLANE	GARY	FRIENDS OF THE CLEARWATER	189
77		MARSHALL	JD		77
234		MARSHALL	KIM		234
120		MAY	LARRY		120
70		MCCAIN	MATT		70
159		MCCARTHY	FORREST	WINTER WILDLANDS ALLIANCE	159
129		MCCLAIN	BARBARA		129
224		MCCORMICK	CHAD		224
181		MC GEE	RONNEE		181
73		MC GEEHAN	CHRIS		73
1		MCINERNEY	BRIAN		1
164		MCIVER	JIM	LEWIS-CLARK ATV CLUB	164
171		MCLEOD	PAT		171
192		MELLEN	JIM		192
191		MELLEN	SANDII		191
57		MILLS	RONNIE		57
257		MILOJEVIC	LJUBISA	COEUR D ALENE SNOWMOBILE CLUB	257
258		MILOJEVIC	LJUBISA		258
121		MILTON	JOAN		121
252		MITCHELL	SANDRA	IDAHO STATE SNOWMOBILE ASSOCIATION	252
147		MOSES	ORIN/BENJEAN		147
64		MULLINS	ROBERT		64
229		MUNNICH	DELLA/HANS		229
115		MURRAY	MIKE		115
88		NEWCOMBE	RAY		88
193		NITSCHKE	DAVE	LIBBY SNOWMOBILE CLUB	193
72		NORDEN FAMILY	CHRIS		72
47		O BRIEN	ALLISON	USDI OFFICE OF ENVIRONMENTAL POLICY AND	47

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
				COMPLIANCE	
90	03+	OBRAY	GREG		90
81		OBRIEN	JOHN		81
20		OELRICH	NICK		20
273		OETKEN	RANDY		273
255		OLFERT	RON	SANDERS NATURAL RESOURCE COUNCIL	255
16		OLSEN	ROSMARIE		16
116		ORR	LONNIE	CITY OF OLDTOWN	116
248		OSBORN	JOHN	SIERRA CLUB	248
253		PASCOE	R.D.	ACCESS FUND	253
180		PATIM	TOM	AMERICAN FOREST RESOURCE COUNCIL	180
103		PAVIA	JERRY		103
287		PEIRONE	JIM/JACKIE		287
167		PETERS	GREG		167
76		PETERSON	LEW		76
207		PETERSON	MIKE	THE LANDS COUNCIL	207
148		PHILLIPS	JOHN/LAURA		148
7		PIETZ	DAVE		7
216		PINTO	JEREMY		216
97		PIVER	TIM		97
114		PORTER	JENNIFER	KOOTENAI TRIBE OF IDAHO	114
209		PORTER	JENNIFER	KOOTENAI TRIBE OF IDAHO	209
18		POTTER	DOUG		18
102		PUBLIC	JEAN		102
133		PURPLE	TANEESHA		133
249		RANNELLS	BOB	SHOSHONE COUNTY PUBLIC SCHOOLS	249
32		RATHMANN	DAN		32
109		REEVES	DERRICK	BACKCOUNTRY HUNTERS AND ANGLERS	109
117		REEVES	WYATT		117
221		REICHOTT	CHRISTINE	EPA - REGION 10	221
242		REIGIER	KATHERINE		242
17		REITZ	MICHAEL		17

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
197		RICH	JEFFREY		197
152		RICHARDS	STEVEN		152
125		RICHARDSON	MICHAEL		125
237		RIDDLE	NELSON		237
41		RIDGWAY	ERIC		41
161		RILEY	JIM	RILEY AND ASSOCIATES, LLC	161
212		RINALDI	VINCE	COUNTY COMMISSIONERS - SHOSHONE	212
288		ROBNETT	DOUG		288
156		ROLE	NATHANIEL		156
182		ROSENBERG	BARRY		182
94	04+	RUSNAK	RICHARD		94
247		RYAN	ERIC		247
95		SAVARISE	MARK /YVONNE		95
175		SAYRES	WILLIAMS		175
215		SCARLETT-LYON	JAMES		215
194		SCHAFER	JULIE		194
24		SHELLY	JANE		24
159		SCHMELZER	SARA	SPOKANE MOUNTAINEERS	159
227		SCHULTZ	KEITH		227
98		SCHWAMB	DOUG		98
46		SCHWENNESEN	DON		46
235		SEDLER	LIZ	ALLIANCE OF THE WILD ROCKIES	235
12		SHEPPARD	RICK		12
207		SIERACKI	PAUL		207
203		SIMS	DAVID	CITY OF BONNERS FERRY	203
190		SMITH	BRAD	IDAHO CONSERVATION LEAGUE	190
207		SMITH	BRAD	IDAHO CONSERVATION LEAGUE	207
274		SMITH	LINDA		274
214		SMITH	RONALD	COUNTY COMMISSIONERS - BOUNDARY	214
199		SOYARS	DARRELL	AVISTA CORPORATION	199
40		SPENCER	VINETTA RUTH		40

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
232		SPRENGEL	MARK	SELKIRK CONSERVATION ALLIANCE	232
105		STANLEY	LESLEE		105
275		STANLEY	LESLEE		275
249		STANLEY	ROBIN	SHOSHONE COUNTY PUBLIC SCHOOLS	249
240		STANLEY	ROBIN		240
286		STERN	JIM		286
10		STITSEL	MARTY		10
177		STOCKWELL	MARK		177
150		STOTT	BARY		150
151		STUDER	DAN		151
250		SUDNIKOVICH	MIKE		250
159		SWITALSKI	ADAM	MONTANA BACKCOUNTRY ALLIANCE	159
218		TERRA-BERNS	MARY	IDAHO FISH AND GAME	218
33		THEISEN	AARON		33
106		TOLAND	MARY		106
195		TORLINE	JANET		195
66		TRAVIS	JANNELLE		66
251		TRAXLER	FRED		251
124		ULRICH	ROBERTA		124
91	03+	UNZEN	ALLYSON		91
118		VALENTINE	WILL		118
225		VERBANIC	RHEA		225
289		VERNARD	WILL		289
19		VERPOORTEN	NORA		19
276		VINSON	RICHARD/PATRICIA		276
187		WALKER-BICKETT	JERI		187
193		WANDLER	JERRY	TROY SNOWMOBILE CLUB	193
23		WARDIAN	SCOTT		23
4		WEBSTER	RYAN		4
233		WHARTON	HOMER		233
139		WHITE	JANET		139
65		WHITE	LARRY		65
236		WILLIAMSON	SHANNON	LAKE PEND OREILLE WATERKEEPER	236

LTR#	FORM	LAST NAME	FIRST NAME	ORGANIZATION	NUMBER CODED
138		WILSON	SUE		138
210		WIMBERLEY	NEIL		210
196		WINBERLEY	ANN		196
89		WOLF	LAURA		89
249		WOODFORD	WOODY	SHOSHONE COUNTY PUBLIC SCHOOLS	249
260		WUEST	TODD	PANHANDLE TRAILS RIDERS ASSOCIATION	260
60		YAGER	ROBERT		60
155		YELK	PAUL		155
228		ZEMBRYKI/MAMAJEK	DENISE/RONALD		228
48	1			FORM 01	48
49	2			FORM 02	49
50	3			FORM 03	50
51	4			FORM 04	51
52	5			FORM 05	52
61	6			FORM 06	61
83	7			FORM 07	83
184	8			FORM 08	184
186	9			FORM 09	186
86				PLAINS PARADISE CHAMBER OF COMMERCE	86

Access & Recreation

Access and Recreation: Category 101

Public Comment 1: (Letter Number(s): 63, 101, 119, 130, 151, 204, 214, 251, 273, and 275)

The IPNF should provide motorized access for public recreational opportunities (i.e., disabled and all age groups) and safety (i.e., search and rescue, fire suppression, homeland security).

Response:

The IPNF agrees that motorized access is an important component of forest management to meet the needs of many recreating publics. However, a variety of resources are affected by open roads and motorized traffic so the Forest seeks a range of access opportunities while considering resource needs and user safety. See FW-DC-AR-07/08/09.

The Forest Service strives to meet user needs and accessibility guidelines. The Forest Service trail Accessibility Guidelines and the Forest Service Outdoor Recreation Accessibility Guidelines, are legally mandated for use within the NFS (FSM2300).

Access for administrative purposes, fire suppression, homeland security, search and rescue, or other emergencies can be authorized under 36 CFR 261.50(e), and is provided for in FW-DC-CCI-02 and FW-DC-FIRE-01. This same CFR (36 CFR 261.50[e][2&3]) allows land owners and/or residents access to their private inholdings.

Developed Recreation: Category 105

Public Comment 2: (Letter Number(s): 119 and 152)

The IPNF should consider the need for, and impact of, additional developed recreation opportunities as well as the maintenance of existing opportunities. Recreation opportunities can benefit the local community and economy. In addition, the expansion of existing ski areas on NFS lands may be unsustainable.

Response:

There are several programmatic desired condition statements regarding maintaining, improving, or increasing recreation opportunities (FW-DC-AR-01, FW-OBJ-AR-02, GA-DC-AR-CDA-03, & 05, GA-DC-AR-PO-01, GA-DC-AR-SJ-01, 04, & 05, and GA-DC-AR-LK-01 and 04). Any future site-specific proposals for developed recreation will comply with NEPA, FSM2300, and other policy and regulations.

The future trend for annual recreation maintenance and capital improvement funding is level to decreasing. Managing increasing use and more diverse visitors with level to smaller programs will continue to be a challenge. The Recreation Facility Analysis process is one tool to help align the forests developed recreation sites with current and future demands and budgets to meet future desired conditions.

The IPNF partners with many groups and individuals each year to provide for recreation opportunities that would not otherwise be provided. In 2011 organizations, individuals, and groups donated over 14,400 volunteer hours, including campground hosts and trail work. The IPNF has and will continue to partner with groups and organizations, work with volunteers, and look for other funding grants to provide recreation opportunities. See FW-DC-CCI-01, GA-DC-AR-CDA-08, GA-DC-AR-LK-07, and GA-DC-AR-PO-03.

Expansion of ski areas is outside the scope of the forest plan revision. Possible expansion of the one permitted ski area (Lookout Pass) on the IPNF would be analyzed with a separate NEPA process that includes an analysis of skier use and demand for the area.

Dispersed Recreation: Category 106

Public Comment 3: (Letter Number(s): 30, 119, 145, 163, and 253)

The IPNF should not reduce dispersed recreation opportunities such as dispersed camping, climbing, and general forest use. Concerns with other resources should be mitigated so continued or increased opportunities are available.

Response:

We agree that dispersed use (including but not limited to camping, climbing, berry picking, firewood gathering, hunting, and fishing) are important uses on the IPNF. Dispersed (general forest area) use accounts for approximately 85 percent of use on the Forest (table 56, DEIS, NVUM 2009). The IPNF Recreation Facility Analysis niche, or vision, for the recreation program was characterized in the following statement: “Traditional uses include hiking, hunting, fishing, gathering forest products, biking, water-based camping, and boating.” Many of the recreation opportunities on the IPNF are associated with water. The revised Forest Plan includes a forestwide desired condition (FW-DC-AR-03) and several GA specific desired conditions (GA-DC-AR-CDA-03, GA-DC-AR-LK-01, GA-DC-AR-PO-01, GA-DC-AR-SJ-01) that emphasize the importance of providing dispersed recreation opportunities into the future. The revised Forest Plan does contain an objective (FW-OBJ-AR-01) to improve conditions at several heavily used dispersed areas located across the Forest.

Improved conditions at dispersed sites might include the following actions: visitor education, vault toilet installation, limit areas of impact at specific camping spots, provide defined parking areas, limit extent of existing parking areas, or provide minimal improvements to reduce various impacts to other resources. Any of these proposals would require further analysis and site-specific NEPA prior to implementation.

Climbing areas or use is not directly addressed in the Forest Plan. In the revised Forest Plan there are no proposed limitations on this specific use. The recreation resource specialists on the IPNF are not aware of any specific climbing opportunities within the IPNF’s portion of the Salmo-Priest Wilderness Area; therefore no specific direction is needed for this use.

The IPNF MVUMs identify where motor vehicle use is allowed, and where cross-country travel to a dispersed campsite is permissible on the Forest. Motorized travel to a dispersed campsite is allowed within 300 feet of routes designated motor vehicle use (FW-DC-AR-08). The revised Forest Plan does not propose site-specific changes to dispersed campsite access. See Public Comment 12 (road access).

Motorized Recreation: Category 107

Public Comment 4: (Letter Number(s): 63, 65, 78, 85, 119, 120, 122, 123, 132, 139, 141, 144, 164, 202, 204, 264, and 266)

The IPNF should maintain all current recreation uses allowed on the Forest, preserving all reasonable existing motorized recreational opportunities. Existing motorized opportunities should be expanded, and new motorized opportunities should be developed to accommodate the growing need. A new north-south motorized route should be considered running the length of the IPNF. Helicopter use should be allowed and encouraged for additional recreational experiences.

Response:

We agree that motorized recreational opportunities are important, that motorized use on the IPNF has increased since the 1987 Forest Plan, and that motorized recreation opportunities serve a wide variety of users. The Forest provides motorized access on approximately 3,600 miles of road yearlong, 533 miles seasonally (table 53, page 281, DEIS) and 1,454 miles of trail (table 54, page

282, DEIS). The current MVUMs are based on site-specific NEPA analysis and decisions or in the case of the Kaniksu portion of the IPNF the MVUM was based on the current travel plan in effect at that time.

As clarified in the FEIS, the Revised Plan provides the opportunity to consider non-winter motor vehicle use designations on 91 percent of the Forest. While motor vehicle use is allowed in many of the management areas including MA5 and 6 (approximately 88 percent of the total forest acreage) the acreage total is not as meaningful as the total miles of roads and trails open to some sort of motorized use. The IPNF has topography and vegetation that physically limits most cross-country travel and resource concerns, including wildlife habitat and water quality are additional factors that are considered when determining where motor vehicle use is appropriate and shown on the MVUMs.

The only site-specific travel management decision that will be issued in conjunction with the revised Forest Plan is closure of recommended wilderness (MA1b) and Research and Natural Areas (MA4) to motorized and/or mechanized use (draft ROD page 5). Chapter 3 in the FEIS, Access and Recreation, has been updated to include this analysis. There are no changes to roads or trails open to motor vehicle use (excluding over-snow vehicle use).

No other changes to motorized routes are proposed in the revised Forest Plan. Site-specific decisions are addressed at the project level. Comments on site-specific changes (like trails 800, 629, and 28) should be addressed through travel management planning at the site-specific scale. Travel management proposals are predicted as possible actions for site-specific project planning over the life of the Plan. Any future site-specific designations for motorized use will comply with policy, regulations, and law.

The Forest Plan provides programmatic direction as to where motorized recreation may or may not be suitable. This direction can be found at access and recreation Goal-01, FW-DC-AR-05, 07, 08, and 09, FW-OBJ-AR-03, 04, and 05, MA5-DC-AR-01 and MA6-DC-AR-01. The revised Forest Plan desired condition for motorized and non-motorized recreation opportunities meet other resource needs, provide for user safety, and comply with all laws.

Based on the recreation opportunity spectrum (ROS), the desired range of recreation opportunities on the IPNF has more non-motorized (57 percent of area) than motorized recreation opportunities (43 percent of area) during the summer (FW-DC-AR-04). ROS maps the recreation setting available; however because motor vehicle use is limited to designated routes and areas (except over snow vehicles), not every acre mapped in a motorized setting may be available. The FEIS "Recreation" section has been updated with additional information. While the desired condition is to provide for a range of recreation opportunities, we recognize that we may not be able to meet demands of all recreation groups using the IPNF.

Desired conditions for development and maintenance of motorized recreation opportunities are included in GA-DC-AR-CDA-06, GA-DC-AR-PO-03, GA-DC-AR-PR-01, and GA-DC-AR-SJ-07. As mentioned earlier, both winter and summer travel management changes are accomplished at the zone or district level and require a separate NEPA analysis and public involvements process.

The IPNF published the Central Zone Motor Vehicle Use Map (MVUM) in 2009 and the North Zone MVUM in 2011. The South Zone is completing a public travel planning process similar to that of the Central Zone, with a decision expected in 2013 and published maps in 2014. The MVUMs comply with the Forest Service final travel management regulation governing use of OHVs and other motor vehicles on NFS lands. The MVUM displays routes and areas designated for motor vehicle use per 36 CFR 212 Subpart B. The MUVUM is the legal order and travel off designated routes and areas is prohibited.

Installation of signs is designed to show routes that are open for some type or season of use. Route signing is outside the scope of the revised Forest Plan.

Analysis of a North-South route is outside the scope of the Forest Plan. A site-specific proposal could be entertained, analyzed, and scoped with the public as a separate effort to see if a combination of forest and public roads and trails could be linked to form a North-South route. Helicopter use is governed by FAA flight regulations 36 CFR part 91. Helicopter use is prohibited in designated wilderness areas (Salmo-Priest Wilderness Area). Commercial use of helicopters landing on NFS lands requires site-specific analysis and a Special Use Permit. See Public Comment 1 (access and recreation) for emergency access.

Public Comment 4A:

The IPNF should make decisions that facilitate motorized use in the St. Joe drainage to maintain access and motor vehicle access.

Response 4A:

These comments are site-specific in nature and not within the scope of forest plan decisions. These decisions will be made in the St. Joe Travel Management Plan decision. They are part of that site-specific analysis and went through a rigorous scoping and analysis process with broad public input.

Motorized Recreation: Category 107

Public Comment 5: (Letter Number(s): 119, 160, 174, 204, and 211)

The Forest Service should provide an adequate distribution and quantity of opportunities for motorized and non-motorized recreation.

Response:

Travel management on federal lands has been a challenging management issue since the late 1970s, when Executive Order 11644 was issued establishing policy and procedures "... that will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resource of those lands, to promote the safety of all users of those lands and minimize conflicts among the various users of those lands." What is a fair allocation between different forest users will continue to be an issue that all land managers face. We recognize that we are not able to meet the needs of all recreation groups on the IPNF.

The FEIS Access and Recreation (chapter 3) has been updated, and reorganized to show comparisons between motorized and non-motorized recreation opportunities. Various comments, reports, and statistics were provided in comments on the DEIS and Forest Plan, this information was reviewed and used as appropriate. As displayed throughout the FEIS, recreation is one of several resources considered in travel management. We recognize that areas or trails, where motorized use is restricted, have increased over the years; this is due to a variety of reasons that vary from protection of threatened and endangered species to Forest Service budget limitations to maintain roads and trails to appropriate standards for safe use.

The "Recreation Setting" section of the "Access and Recreation" section of the FEIS describes the recreation opportunity spectrum (ROS) on the Forest. Tables within this section of the FEIS show the spectrum of opportunities based on existing conditions (current legal closure orders) and MA desired condition. These tables have been updated from the DEIS, which used MA desired condition only.

The existing ROS as mapped (Alternative A) display current opportunities as a result of policy, regulation, law, and site-specific analysis across the Forest. There are motorized and non-motorized users who desire more or less motorized access. However without substantive changes in policy, regulation, or law, ROS shows relatively small changes between alternatives. See Public Comment 4 (access and recreation) for site-specific changes.

Motorized Recreation: Category 107

Public Comment 6: (Letter Number(s): 119 and 261)

The Forest Service should consider the positive benefits of motorized recreation and the proper use of OHV funds on Forest Service trails.

Response:

We agree that motorized recreation is an appropriate use of national forest lands and that riding OHVs or over-snow machines have positive physical, emotional, and other benefits for forest users. Opportunities for a variety of recreation activities, motorized and non-motorized, are woven into the alternatives considered in this planning effort. Each alternative has a slightly different mix of motorized versus non-motorized opportunities. The IPNF utilizes OHV funds made available by the state of Idaho and managed by the Idaho Department of Parks and Recreation through a grant system. The Forest competes for these dollars with other entities by submitting annual grant applications. We recognize that these dollars need to be dedicated to the motorized component of our trail system and we honor that commitment. Recreation facilities and opportunities are managed in concert with many other resources and, where appropriate, provide various recreational opportunities. Please see FW-DC-AR-04, FW-DC-AR-05, FW-DC-AR-07 and FW-DC-AR-08.

Motorized Recreation: Category 107

Public Comment 7: (Letter Number(s): 10, 119 141, 146, 171, 193, 198, 201, 211, 221, 228, 246, 247, 256, 262, 273, and 277)

The Forest Service should manage for less motorized opportunities because of: budget constraints, the higher cost of maintaining motorized routes, and resource impacts.

Response:

The trend on the IPNF has been a reduction in motorized recreation opportunities since the 1987 Forest Plan was completed for a variety of reasons including: wildlife management; budget (a decrease in operation and maintenance funding); and other resource impacts and concerns like water quality management. The MVUMs restrict all motorized vehicle use (except over-snow vehicle use) to designated routes and areas. Over-snow use is managed by site-specific closures. Recreation opportunities on the IPNF are integrated with other resources concerns and requirements to ensure the IPNF meets all the various legal and policy requirements while still providing a variety of recreational experiences.

The desired condition is to provide a range of recreation opportunities. Forest direction includes FW-DC-AR-04, 05, and 08 which speak to the continued desired conditions that provide a wide variety of recreational opportunities and experiences for all users. Determining the “need” for a particular recreation opportunity is based on many factors including current use, public demand, and projected future use.

The Forest uses the best information available to estimate current use numbers and what activities visitors participate in. The National Visitor Use Monitoring system (NVUM) is one tool we use to estimate total forest visitation participation. Other sources of visitor participation which supplements NVUM data include: observations, campground receipts, campground host records, outfitter and guide client numbers, trail registers, agreement with clubs and organizations, and recreation events. The FEIS incorporates some of this available supplemental visitor use information.

Our partners and volunteers play an ever increasing role in maintaining our trail systems. Objective FW-OBJ-AR-04 and 05 are for both winter and summer trail maintenance. These

numbers reflect the baseline miles where Forest Service crews combined with our partner groups and volunteers can maintain our trail system given flat or declining budgets.

Public Comment 7A:

Roads have a detrimental effect on wildlife habitat, wildlife movement, water quality, fish habitat, and sensitive areas.

Response 7A:

For the most part roads themselves have little negative impact on terrestrial wildlife species but the use of these roads may have detrimental impacts on some wildlife species. The MVUMs display routes and areas designated for motor vehicle use per 36 CFR 212 Subpart B.. These MVUMs have been developed with wildlife concerns integrated into what routes are open on various parts of the Forest. For example, one of the critical considerations on what routes are open to motor vehicle use on the Kaniksu portion of the IPNF is the location of grizzly bear habitat. Another example is the Coeur d'Alene River Ranger District MVUM where one of the key considerations is elk habitat.

Because of concerns surrounding erosion, water quality, and sensitive areas, there are no areas designated for motor vehicle use on any of the three IPNF MVUMs. The MVUMs limit use to only those routes open seasonally or year long. This has reduced damage to roads and trails thereby reducing erosion and negative impacts to water quality and fish habitat.

Forestwide objective FW-OBJ-AR-03 includes road miles to be maintained and roads to be decommissioned and put into intermittent stored service. Roads that are either decommissioned or “stored” are roads that have been prioritized for these treatments because they are located poorly (i.e., on an unstable land type) or may be a threat to water quality. The IPNF recognizes that some roads were constructed poorly or located in unsuitable locations and are taking steps to remove these roads or make them hydrologically neutral.

Non-motorized Recreation: Category 108

Public Comment 8: (Letter Number(s): 50, 59, 64, 75, 76, 77, 98, 100, 159, 167, 168, 172, 175, 183, 190, 201, 208, 211, 227, 231, 238, 247, 256, 278, and 288)

The Forest Service should provide opportunities for non-motorized recreation, and protection of backcountry, fragile areas, and wildlife habitat.

Response:

The alternatives examined a range of user experiences as measured through the ROS for both motorized and non-motorized uses. The revised Forest Plan provides a spectrum of experiences and opportunities for a variety of users. See Public Comment 5 and 7.

See page 2 of the Forest Plan regarding implementation of this Plan, We are required to follow all federal laws, regulations, and policies including those that may be enacted during the life of this revised Forest Plan.

Enforcement of travel management restrictions is not within the scope of forest plan decisions but is site-specific implementation of travel management guidance. However, the Forest Service enforces existing laws and regulations through law enforcement and forest personnel. The IPNF has published two MVUMs which display where motor vehicle use (except over-snow vehicles) can occur across the Forest. The South Zone is completing a public travel planning process similar to that of the Central Zone, with a decision expected in 2013 and published MVUM in 2014. The Forest Service will continue to work to educate user groups and individuals to prevent violations.

Segregating uses on specific roads or trails is a site-specific decision that is made by local line officers (district rangers) after a thorough analysis of the issues. This is not a forest plan decision. Management area direction includes guidance regarding winter motorized/non-motorized use and summer motorized/non-motorized use. Site-specific planning is required to add additional restrictions to specific areas within various management areas defined in this Forest Plan. Any site-specific changes to allowed or restricted uses would require site-specific analysis and public input.

Much of Steven's Peak is within an Idaho Roadless Area with a management classification of backcountry/restoration. This classification provides limits on management actions and protects the roadless nature of this area. Travel management planning has been completed for this area and is included on the Coeur d'Alene River MVUM map (as per 36 CFR 212 Subpart B). Winter travel planning for motorized and non-motorized uses would require site-specific planning and is not within the scope of this planning effort.

The decision to prohibit motorized and mechanical use (including bicycle) in recommended wilderness will be made in the Record of Decision for this revised Forest Plan. Areas recommended for wilderness will be managed to protect the wilderness character of that area. In appendix C of the FEIS, we have defined outdoor recreation opportunities that are primitive and unconfined to include: hiking, backpacking, stock riding, hunting, fishing, skiing, snowshoeing, and rafting.

The revised Forest Plan recommends over 6 percent of the IPNF land base be recommended for wilderness designation as shown in chapter 3, Management Area Direction (table 7).

National Visitor Use Monitoring (NVUM) Data: Category 109

Public Comment 9: (Letter Number(s): 119 and 253)

The Forest Service should update procedures in collecting and using visitor use data for management decisions, specifically the National Visitor Use Monitoring (NVUM) program.

Response:

Protocols for collecting and analyzing data using the NVUM process is outside the scope of the revised Forest Plan. The NVUM survey and data analysis is scientifically designed to reflect use statistics at the forestwide level, not at the ranger district or site-specific level. NVUM processes may not capture all uses or all activities, for example climbing use. This is a very specific activity which occurs in very few locations on the Forest.

The Forest uses the best information available to estimate current use and how that use is divided into specific recreational activities. See Public Comment 7.

We disagree with some of the data provided by groups and organizations in comments provided. Some of the information provided did not apply to the IPNF.

We agree that user conflicts are few and tend to be isolated incidents. See Public Comment 4 for site-specific travel management decisions.

A management plan for climbing areas is outside the scope of the revised Forest Plan.

Recreation Opportunity Spectrum (ROS): Category 110

Public Comment 10: (Letter Number(s): 85, 119, 159, and 190)

The recreation opportunity spectrum does not reflect the values and needs of users of the IPNF.

Response:

The ROS inventory is helpful in establishing desired future conditions for recreation settings at both the forest and geographic level. It is a macro-analysis management tool, used in forest

planning and other broad-scale planning efforts. ROS can be used to show the general effect of proposed management actions to recreation settings and opportunities over broad landscapes. The desired range of recreation opportunities in the revised Forest Plan has more non-motorized (57 percent of the total forest) than motorized recreation opportunities (43 percent of area) during the summer (FW-DC-AR-04). While the desired condition is to provide for a range of recreation opportunities, we recognize that we will not be able to meet the demands of all recreation groups equally on the IPNF. The primary driver of our summer ROS categories and percentages are our motor vehicle use maps and the routes designated for motor vehicle use (per 36 CFR 212 Subpart B). Winter ROS is characterized by legal closures across the Forest. If not legally closed then the area is legally open to winter motorized use; therefore the ROS percentage categorized for winter motorized use is 81 percent and the area categorized for non-motorized use is 19 percent (FW-DC-AR-04). Looking at what is open and what is closed on the IPNF, this is an accurate portrayal of the ROS categories; however, because of vegetation and terrain the percentage that is actually accessible to winter motorized use is quite less.

ROS is often affected by the implementation of other rules, laws, and regulations like maintenance or management of threatened and endangered species habitat. Because certain laws require some sort of management action, ROS is changed and is a good tool to display those effects. However, there is no requirement to maintain certain or specific ROS categories. We are required to provide an array of recreational opportunities for the public. We have endeavored to do that in the revised Forest Plan. For more information, see the response to Public Comments 4 and 5.

Snowmobiling: Category 117

Public Comment 19: (Letter Number(s): 12, 89, 193, 212, 250, 252, and 263)

The Forest Service should provide more and higher quality, snowmobile recreational opportunities.

Response:

The desired condition for winter ROS on the IPNF is 81 percent of the total forest acreage open to some level of motorized use. We recognize that all these acres are not accessible due to terrain and vegetation; however, the vast majority of the IPNF is legally open to winter motorized use. The IPNF works with both the Idaho State Parks and Recreation Department and the County Grooming Boards to cooperatively provide motorized winter trail systems, much of which is groomed for the snowmobile community. The Coeur d'Alene River Ranger District has the most extensive system due to the proximity to Coeur d'Alene and Spokane and revenue generated from snowmobile registrations and grooming sticker purchases. Portions of the Priest Lake and Sandpoint districts also provide a fairly extensive system. The St. Joe Ranger District provides a more modest system primarily due to fewer folks with registered snowmobiles, generating less revenue to groom and maintain the trails system on the district. The IPNF will continue the cooperative relationship between the state and local grooming boards to provide quality riding opportunities for the winter snowmobile enthusiast.

Another limiting factor not associated with the revised Forest Plan is the budgets that the state and counties have to provide grooming services on the local trail systems. Volunteers operate the majority of the groomers across the IPNF but money is required to purchase fuel, maintain the groomers, and maintain the trail system. These scarce dollars limit the miles of trails groomed and the frequency of grooming each year.

Snowmobile opportunities may be limited to protect threatened and endangered species like the current closure order in place on the Priest Lake and Sandpoint Ranger Districts. This closure order is a result of litigation in 2006 and 2007 and will remain in effect until a separate, site-

specific analysis regarding necessary protective measure of caribou habitat is complete. This revised Forest Plan does not change that current closure or the need to do a site-specific analysis for this particular area.

The only site-specific change in over-snow motor vehicle use addressed in the revised Forest Plan is within MA1b recommended wilderness and MA4a research natural areas. See the response to Public Comment 4 for more information. The revised Forest Plan would close these areas to over-snow motorized use. See the response to Public Comment 124 for information on the process for evaluating inventoried roadless areas.

Snowmobiling: Category 117

Public Comment 20: (Letter Number(s): 10, 35, 34, 53, 54, 55, 64, 98, 100, 106, 112, 123, 150, 152, 156, 157, 159, 167, 168, 183, 188, 194, 220, 231, 238, and 288)

The Forest Service should reduce or regulate snowmobile use based on non-motorized user conflicts and impacts to wildlife.

Response:

The desired condition for winter ROS on the IPNF is 81 percent of the total forest acreage categorized as winter motorized use. However, all these acres are not accessible due to terrain and vegetation; only a portion of those acres are actually available to motorized use. Motorized over-snow users, like non-motorized users, are generally allowed to go cross-country. Many acres across the Forest are inaccessible to both user groups due to topography, vegetation, and precipitation. All of these factors affect where users can effectively recreate. Motorized over-snow users, like non-motorized users, are individuals; some may desire a group outing while others are seeking a solitary remote experience.

Snowmobile opportunities may be limited to protect threatened and endangered species like the current closure order in place on the Priest Lake, Bonners Ferry, and Sandpoint Ranger Districts. This closure order is a result of litigation in 2006 and 2007 and will remain in effect until a separate site-specific analysis regarding necessary protective measures of caribou habitat is complete. This area includes the Upper Pack River area and the area around Harrison Peak. This revised Forest Plan does not change this current closure or the need to do a site-specific analysis for this particular area.

Areas managed for cross-country and snowshoe use is closed to over-snow motorized use like the Fourth of July Summit cross-country ski area (south side of I-90). Willow Creek, on the St. Joe, is no longer in national forest ownership. The lands on the St. Joe side of the divide west of Highway 6 have been traded to the state of Idaho.

Changes have been made in the revised Forest Plan to the boundaries of some areas that would be closed to over-snow motorized use (areas allocated to MA1b recommended wilderness and MA4a research natural areas). See the response to Public Comment 4 for more information.

The IPNF works with both the Idaho State Parks and Recreation Department and the County Grooming Boards to cooperatively provide motorized winter trail systems. Most of the budget to maintain the snowmobile trail systems on the IPNF comes from funds raised through the purchase of snowmobile registrations and county grooming stickers. Very few federal dollars are used on the winter motorized trail system.

Effects to wildlife, including lynx and wolverine, are covered under the “Wildlife” section of the FEIS.

Snowmobiling: Category 117

Public Comment 21: (Letter Number(s): 76, 119, 163, 193, and 252)

The Forest Service should consider the impacts of snowmobiling in a fair and unbiased manner, taking into consideration all research.

Response:

We agree that snowmobilers historically have used much of the IPNF and that ATVs have been around since the early 1970s. Technical advancements in snowmobiles and other types of OHVs, combined with their increased popularity, have resulted in more users accessing areas that were not easily accessible to many users in the past. We agree that research provided indicates over-snow machine use with adequate snow cover may have little impact to soils, soil compaction, and vegetation. We agree that research provided indicates some wildlife can react more to people using non-motorized methods of transportation than a person in a vehicle. We agree that we have had few complaints of noise regarding over-snow machines and that snowmobiles can be relatively quiet.

There is a variety of research, depending on location, of over-snow motorized use effects on various wildlife species. See “Wildlife” sections in the FEIS. The site-specific changes in over-snow motorized use in the revised Forest Plan are with MA1b recommended wilderness and MA4a research natural areas. Appendix C of the FEIS explains in detail the evaluation process for recommended wilderness and the criteria used. The determination of an area being suitable and allocated to recommended wilderness is based on multiple criteria, not recreation use alone. Snowmobile opportunities may be limited in certain areas to protect threatened and endangered species like the current closure order in place on the Priest Lake, Bonners Ferry, and Sandpoint Ranger Districts. This closure order is a result of litigation in 2006 and 2007 and will remain in effect until a separate, site-specific analysis regarding necessary protective measures of caribou habitat is complete. The revised Forest Plan does not change that current closure or the need to do a site-specific analysis for this particular area. Much of the research that is quoted here would be used in site-specific planning when over-snow motorized use is being considered and analyzed in a specific area of the Forest. See the response to Public Comment 10 and 19.

Snowmobiling: Category 117

Public Comment 22: (Letter Number(s): 206, 235, and 252)

The Forest Service should consider changes to the recommended wilderness evaluation criteria in appendix C regarding snowmobiles.

Response:

Winter recreation opportunities are addressed by 4 of the 47 elements in the inventoried roadless areas capability assessment as recommended wilderness. When addressing non-motorized use, an area where wheeled access was several miles away, but access is possible by snowmobile, the rating was “medium.” When addressing motorized use if snowmobile use is permitted on half or less of the area rates as “medium.” Both elements come out as “medium” if snowmobile access is possible in part of the area. The reason for this is that motorized use is not considered a primitive recreation opportunity; any motorized use reduces the capability of the area.

There are two levels of closed areas addressed in the DEIS and FEIS. The first level or kind of closures are defined in the Forest Plan at the management area level. Some management areas would be closed to over-snow motorized use in the ROD (MA 1b and 4a). The second level or kind of closures are at a more site-specific level, and do not occur in the revised Forest Plan. These are areas that have specific legal closures in place for a variety of reasons. Some examples include the Fourth of July Summit cross-country ski area, the Lookout Pass Ski Area, and the large closure on the Priest Lake, Sandpoint, and Bonners Ferry Ranger Districts that was

generated from litigation in 2006 and 2007. The Recommended Wilderness Evaluation, FEIS appendix C, has been updated. See Public Comment 124.

The IPNF FEIS and revised Forest Plan do not use the word “play area” as relating to over-snow use.

Special Uses: Category 118

Public Comment 703: (Letter Number(s): 6, 159, and 209)

The Forest Service should consider the following regarding special uses:

- A) Postponing expansion of the Lookout Pass Ski Area until a comprehensive plan is developed for the Stevens Peak Backcountry Area (including the consideration of its designation as a Scenic Area); and
- B) Prioritizing development of a comprehensive plan for the Stevens Peak backcountry.

Response:

A) Any expansion proposed for the Lookout Pass Ski Area (under a current Special Use Permit) would be analyzed in a site-specific analysis that would allow for public input. Both the expansion of the actual area or terrain used for alpine skiing and the associated infrastructure needed to facilitate that use would be part of this analysis and the public would be invited to comment during several phases of the analysis process; and

B) The Coeur d’Alene Ranger District has initiated talks with a variety of groups regarding the Stevens Peak area and what uses should be reviewed and analyzed for this area. This is not a forest plan level decision but a site-specific analysis for appropriate recreational uses.

Trail Access and System: Category 119

Public Comment 23: (Letter Number(s): 61, 78, 85, 97, 101, 119, 145, 146, 163, 183, 202, 235, 264, and 266)

The Forest Service should provide a motorized trail system that meets the needs of the public.

Response:

See response to Public Comments 1 and 4: The IPNF agrees that motorized access is an important component of forest management to meet the needs of many recreating publics. However, a variety of resources are affected by motorized traffic. The revised Forest Plan seeks a range of recreational opportunities while considering many other resource management needs and responsibilities combined with user safety. Changes to specific routes are not a forest plan decision but an outcome of a site-specific analysis process and corresponding update to local travel management plans like the district specific MVUMs.

See response to Public Comment 2: The IPNF has, and will continue to, partner with groups and organizations, work with volunteers, and look for other funding grants to provide recreation opportunities.

See response to Public Comment 4: The revised Forest Plan provides programmatic direction as to where motorized recreation may or may not be suitable. The revised Forest Plan desired condition for motorized and non-motorized recreation opportunities are integrated to meet other resource needs, provides for user safety, and complies with all laws. The desired range of recreation opportunities on the IPNF has a variety of non-motorized and motorized recreation opportunities during the summer and winter (FW-DC-AR-04). While the desired condition is to provide for a range of recreation opportunities, we recognize that we’ll be unable to meet the demands of all recreation groups equally on the IPNF.

Table 54 in the DEIS was a summary of data that came from the USFS INFRA database. It came from the “Travel Route” module within INFRA and the data was summarized in March, 2011. As site-specific routes are added, changed, or subtracted these number will fluctuate somewhat. See response to Public Comment 4 regarding site-specific changes to travel management. See response to Public Comment 703 regarding the Steven’s Peak backcountry area.

Trail Access and System: Category 119

Public Comment 24: (Letter Number(s): 119)

The Forest Service should use examples of other trail systems to guide development of the forest trail system that is adequate, reasonable, and responsive to a variety of user groups. In addition, the Forest Service should continue to allow motorized use of existing routes in inventoried roadless and wilderness study areas until such time as Congress approves the area as wilderness.

Response:

See response to Public Comment 1: The IPNF agrees that motorized access is an important component of forest management to meet the needs of many recreating publics.

See response to Public Comment 4: The revised Forest Plan provides programmatic direction as to where motorized recreation may or may not be suitable but does not designate specific trails open or closed to specific uses.

Roadless areas classified as MA5 are open to both winter and summer motorized use in this Forest Plan. Site-specific travel planning may close or restrict some uses as determined through the analysis process with public input and comment. Both winter and summer motorized recreational use within the Grandmother Mountain Wilderness Study Area is prescribed in the two legislative land exchanges that added this acreage to the NFS.

Where appropriate, motorized recreation opportunities will be maintained or expanded (see FW-DC-AR-05 and FW-OBJ-AR-04 and 05).

See response to Public Comment 4: The only site-specific changes to travel management are in MA1b recommended wilderness and MA4a research natural areas (closure to over-snow motor vehicle use and mechanized use).

See, Alternatives Considered but Eliminated from Detailed Study in the FEIS, including: Reduction of Roadless Areas, Access and Roads (all trails and roads available to multi-use recreationalist), and Site-Specific Travel Management.

Trail Access and System: Category 119

Public Comment 704: (Letter Number(s): 238, 239, 250, 266, 271, and 273)

The Forest Service should provide the largest multi-use trail system possible.

Response:

See response to Public Comments 1 and 4: The IPNF agrees that both motorized and non-motorized access opportunities are an important component of forest management to meet the needs of many recreating publics. However, a variety of resource management requirements need to be considered in providing these opportunities. The revised Forest Plan seeks to provide a range of recreational opportunities while considering many other resource management needs and responsibilities combined with user safety. Please refer to FW-DC-AR-04, 05, 06, and 08.

Currently there are no huts or yurts on the IPNF that provide for a “Hut-to-Hut” Nordic skiing opportunity.

The IPNF works with a significant number of user groups, as well as the state of Idaho, to cooperatively provide a wide array of motorized and non-motorized trail opportunities. This emphasis will continue with the implementation of the revised Forest Plan.

Trail Maintenance and Decommissioning: Category 120

Public Comment 27: (Letter Number(s): 119)

The Forest Service should consider constructing and maintaining water bars with equipment and enlisting assistance from user groups to maintain OHV trails.

Response:

The IPNF takes advantage of the Idaho State Parks and Recreation Department Trail Cat Program and hosts the cat and operator for several hitches on several districts every year. In addition, the Forest utilizes the State Trail Ranger program which opens between 75 to 150 miles of single track and OHV trails annually. This partnership with the state of Idaho has become a critical part of our trail maintenance program,

The IPNF will continue to partner with groups and organizations, work with volunteers, and look for other funding and grants to provide recreation opportunities across the Forest. This is addressed in our Plan and included in desired conditions: FW-DC-CCI-01 and GA-DC-AR-CDA-07, GA-DC-AR-LK-07, GA-DC-AR-PO-03, and GA-DC-AR-SJ-06.

Recreation residences: Category 124

Public Comment 701: (Letter Number(s): 124)

The Forest Service should change the language in the draft Forest Plan to include permitted recreation residence cabins along with rentals.

Response:

Recreation residences are much different than rentals. Recreation rentals are open to public use and recreation residences are not open to the public. They are managed under the special use program and considered an exclusive use permit. They are addressed under the following areas of the Forest Plan: MA7-DC-AR-01 and FW-DC-LND-01.

DEIS General: Category 125

Public Comment 35: (Letter Number(s): 119 and 200)

The Forest Service should provide an adequate quantity of motorized recreation opportunities including both roads and trails open to a wide variety of motorized users.

Response:

The revised Forest Plan provides programmatic direction as to where recreation opportunities may or may not be suitable. While the desired condition is to provide for a range of recreation opportunities, we recognize that we will not be able to meet the needs of all recreation groups equally on the IPNF.

The IPNF agrees that motorized access is an important recreation use to meet the needs of many recreating publics. However, a variety of resources are affected by motorized traffic. The revised Forest Plan seeks a range of recreational opportunities while considering many other resource management needs and responsibilities combined with user safety. Changes to specific routes are not a forest plan decision but an outcome of a site-specific analysis process and corresponding update to local travel management plans like the district specific MVUMs.

We agree that technical advancement of snowmobiles, ATVs, and mountain bikes, along with an increase in the popularity of these sports, has resulted in more users accessing more areas than they have in the past.

We agree with research provided that the interest and desire to participate in OHV recreation in the outdoors is increasing and that motorized recreation is expected to have a beneficial effect on health and fitness. These activities promote mental and physical health of the public.

See response to Public Comment 4 for site-specific changes to travel management and Alternatives Considered but Eliminated from Detailed Study for Access and Roads. Where appropriate, motorized recreation opportunities will be maintained or expanded (with site-specific analysis and public input).

While the revised Forest Plan does not make site-specific route decisions, we disagree that we have limited the desired condition to existing routes only. See the response to Public Comment 4, where appropriate, motorized recreation opportunities will be maintained or expanded. Desired conditions for development and maintenance of motorized recreation opportunities are included in GA-DC-AR-CDA-06 and GA-DC-AR-PO-03. In addition, FW-OBJ-AR-05 Summer Trails includes the objective to annually maintain 150 to 300 miles of summer motorized trails.

Thank you for information showing the national OHV web site is not current. This national information was not used in the revised Forest Plan.

DEIS Alternatives: Category 127

Public Comment 37: (Letter Number(s): 85, 119, 202, 230, 260, and 266)

The Forest Service should consider analyzing an alternative for the maximum amount of motorized recreational opportunities.

Response:

This type of alternative is similar to alternatives not considered in detail in the DEIS, the “Access and Roads” and the “Site-Specific Travel Management” alternatives. The FEIS includes an additional alternative, the “Pro-Motorized Recreation” alternative to address this concern. Similar to the “Access and Roads” alternative, the pro-recreation alternative would not provide wildlife security. Similar to the “Site-Specific Travel Management” alternative, this type of alternative desires site-specific decisions that are not made in the Forest Plan.

DEIS Cumulative Effects: Category 128

Public Comment 38: (Letter Number(s): 119 and 184)

The Forest Service should carefully consider the loss of motorized routes that provide access to a wide variety of users.

Response:

Please refer to the response to Public Comment statements 1, 6, 23, and 704 for more discussion and explanation regarding routes (road and trail system) on the IPNF open to motorized use.

We agree that motorized recreational opportunities are important, that motorized use on the IPNF has increased since the 87 Forest Plan, and that motorized recreation opportunities serve a wide variety of users. The Forest is accessible with approximately 3,600 miles of road open yearlong to motorized use and another 533 miles open seasonally (table 53, page 281, DEIS). In addition, approximately 1,454 miles of trail are open to some type of motorized use (single track, OHV, or high clearance 4x4 trails) (table 54, page 282, DEIS). The current MVUMs are based on site-specific NEPA analysis and decisions or in the case of the Kaniksu portion of the IPNF the MVUM was based on the current travel plan in effect at the time the MVUM was printed.

The IPNF has topography and vegetation that physically limit most cross-country travel and resource concerns including wildlife habitat and water quality are additional factors that are considered when determining where motor vehicle use is appropriate and shown on the MVUMs. This is described in “Access and Recreation” section of the FEIS.

The Forest Plan provides programmatic direction as to where motorized recreation may or may not be suitable. This direction can be found in the revised Forest Plan under access and recreation Goal-01, FW-DC-AR-05, 07, 08, and 09, FW-OBJ-AR-03, 04, and 05, MA5-DC-AR-01, and MA6-DC-AR-01. The revised Forest Plan desired condition for motorized and non-motorized recreation opportunities meet other resource needs, provide for user safety, and comply with all laws (FW-DC-AR-05).

The desired range of recreation opportunities on the IPNF has more non-motorized (57 percent of the Forest) than motorized recreation opportunities (43 percent of the Forest) during the summer (FW-DC-AR-04). While the desired condition is to provide for a range of recreation opportunities, we recognize that we may not be able to meet the demands of all recreation groups using the IPNF.

The existing ROS as mapped (Alternative A) display current opportunities as a result of policy, regulation, law, and site-specific analysis across the Forest. There are motorized and non-motorized users who desire more or less motorized access. However, without substantive changes in policy, regulation, or law, ROS shows relatively small changes between alternatives.

The IPNF published the Central Zone Motor Vehicle Use Map (MVUM) in 2009 and the North Zone MVUM in 2011. The South Zone is completing a public travel planning process similar to that of the Central Zone, with a decision expected in 2013 and published maps in 2014. The MVUMs comply with the Forest Service final travel management regulation governing use of OHVs and other motor vehicles on NFS lands. The MVUM display those roads, trails, and areas designated for motor vehicle use in compliance with the Travel Management Rule (36 CFR 212 Subpart B). The revised Forest Plan does not make any changes to the MVUMs.

Travel management on federal lands has been a challenging management issue since the late 1970s, when Executive Order 11644 was issued establishing policy and procedures “... that will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resource of those lands, to promote the safety of all users of those lands and minimize conflicts among the various users of those lands.” What is a fair allocation between different forest users will continue to be an issue that all land managers face.

The FEIS Access and Recreation chapter 3 has been updated and reorganized to show comparisons between motorized and non-motorized recreation opportunities. Various comments, reports, and statistics were provided on the DEIS and draft Forest Plan. This information was reviewed and used as appropriate. As displayed throughout the FEIS, recreation is one of several resources considered in travel management. We recognize that areas or trails where motorized use is restricted have increased over the years; this is due to a variety of reasons that vary from protection of threatened and endangered species to Forest Service budget limitations to maintain roads and trails to appropriate standards for safe use.

DEIS Environmental Consequences: Category 129

Public Comment 39: (Letter Number(s): 119 and 221)

The Forest Service should provide an adequate quantity of motorized recreation opportunities and provide a proper analysis in the EIS.

Response:

The revised Forest Plan provides programmatic direction as to where recreation opportunities may or may not be suitable. Site-specific travel management planning analyzes effects that

specific road and trail closures have on users as well as the effects of open routes on other resources such as wildlife and water quality. The FEIS provides an analysis and comparison of recreation opportunities between the various action alternatives and explains the integration with other resource areas. See the “Access and Recreation” section of Chapter 3 of the FEIS.

The IPNF agrees that motorized access is an important recreation use to meet the needs of many recreating publics. However, a variety of resources are affected by motorized traffic. The revised Forest Plan seeks a range of recreational opportunities while considering many other resource management needs and responsibilities combined with user safety. Changes to specific routes are not a forest plan decision but an outcome of a site-specific analysis process and corresponding update to local travel management plans, like district specific MVUMs. See response to Public Comment 4 for site-specific changes to travel management and Alternatives Considered but Eliminated from Detailed Study for access and roads. Where appropriate, motorized recreation opportunities will be maintained and may be expanded under the revised Plan (with site-specific analysis and public input).

Another factor considered in the development of this Plan is the limitation of current and future budgets. Forestwide objectives FW-OBJ-AR-03, 04, and 05 were developed considering that our budgets will be, at best, flat or continue to decline over the life of this Plan. This scenario will make maintenance and operation of our road and trail system difficult and severely limit additional development to either the road or trail system.

Travel management on federal lands has been a challenging management issue since the late 1970s, when Executive Order 11644 was issued establishing policy and procedures “... that will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resource of those lands, to promote the safety of all users of those lands and minimize conflicts among the various users of those lands.” What is a fair allocation between different forest users will continue to be an issue that all land managers face.

Forest Plan Goals: Category 132

Public Comment 42: (Letter Number(s): 119, 124, 159, 163, 190, 204, and 252)

The Forest Service should consider modifying Goal-01 on page 9 of the draft Forest Plan to be more inclusive and address both remote and front country recreational opportunities. In addition, recreation residences should be mentioned.

Response:

We believe that we have addressed the need to provide motorized recreation opportunities. That is specifically addressed in forestwide desired condition FW-DC-AR-05. This desired condition addresses both summer and winter motorized and non-motorized opportunities.

The recreation residences are not included here because they are not open to the public. What is addressed under Goal-01 and the associated desired conditions are those opportunities that the IPNF is working to provide the general public and general recreation user. These are managed under special use permits and they will be honored under this Forest Plan. Please refer to the section labeled “Rights and Interests” on page 17 of the Forest Plan. It states that, “This Plan does not change existing permits and authorized uses.” Recreation residences and the rental program are vastly different programs and one is open to the public and the other is not.

We do address both motorized and non-motorized (human-powered) recreational opportunities in several desired conditions (FW-DC-AR-04, 05, 06, and 08).

Site-specific planning has been completed for the Kaniksu and Coeur d'Alene area for summer motorized use and the MVUM map is the outcome of that planning effort. The South Zone is completing a public travel planning process, with a decision expected in 2013 and published MVUM maps in 2014. Specific areas open or closed to winter motorized use will need to go

through a similar process as the summer uses. Site-specific analysis will be needed to determine appropriate uses during the winter (snow season) months. This Plan does not make site-specific motorized travel management decisions with the exceptions of the closure of recommended wilderness (MA 1b) and research natural areas (MA 4a) to over-snow vehicle use.

Forest Plan Desired Conditions: Category 133

Public Comment 43: (Letter Number(s): 163, 166, 202, and 252)

The Forest Service should consider the following changes or adjustments to the Forest Plan or FEIS:

- 1) Changing the language in chapter 2, page 9 of the draft Forest Plan under Goal 01 desired condition FW-DC-AR-01 to “Day use access is available by a variety of means, motorized and non-motorized, for viewing scenery and wildlife and for water and snow-based play and relaxation;
- 2) Changes to Goal FW-DC-AR-06;
- 3) Ensure that new trails are constructed in a more sustainable manner and that the current system is modified to be more sustainable are require less maintenance; and
- 4) Change target percentages of several ROS categories.

Response:

- 1) The language in FW-DC-AR-01 is neutral towards motorized and non-motorized use and this edit is not needed;
- 2) Forestwide desired condition FW-DC-AR-06 does mention non-motorized opportunities are available in both remote settings as well as more developed settings;
- 3) Before trails are constructed or reconstructed they are analyzed through a NEPA process that includes both environmental and cost analysis. In addition, these proposals are scoped with the public. One primary component of these evaluations is to incorporate trail construction/reconstructing techniques that will reduce the need for long-term maintenance. Many of the trails on the IPNF that are currently considered “recreation” trails were constructed for fire protection, many in the CCC era. Since they were built for fire protection and access by pack train they were not designed for the current use and not engineered to be sustainable. Sustainable designs are now considered in every trail reconstruction project (and the few new construction projects), following manual and handbook direction; and
- 4) The desired distributions for both the winter and summer forestwide ROS categories were updated for the revised Forest Plan and FEIS. These numbers were developed using the inventoried condition along with the MA ROS desired conditions.

Forest Plan Desired Conditions: Category 133

Public Comment 46: (Letter Number(s): 221)

The Forest Service should revise FW-DC-AR-07 to quantify and shorten the timeline for achieving this desired condition.

Response:

This desired condition provides part of the framework to manage our transportation system in an environmentally sensitive and responsible manner. Unfortunately, the ability to achieve this desired condition is primarily a function of the Forest budget and ultimately the agency’s budget. The importance of aquatic ecosystems will continue to play a key role in the management of our roads and trails but the timeline to achieve this desired condition is highly variable and dependent on future funding.

Forest Plan Desired Conditions: Category 133**Public Comment 726:** (Letter Number(s): 228)

The Forest Service should include more opportunities for quiet, non-motorized recreation away from motorized recreation during the winter months.

Response:

The desired distributions for both the winter and summer forestwide ROS categories were developed using a combination of the current inventory and the MA ROS desired conditions. Please refer to the response to Public Comment 43 and Public Comment 727.

Although the ROS percentages indicate a large number of acres open to winter motorized use, this does not reflect what is truly “available” to winter motorized users. Access, elevation, topography and vegetation limit where over-snow motorized users can actually travel and therefore limit the actual acres that are used by winter motorized recreationists. Specific areas that should be open or closed to winter motorized use have been mentioned in a number of public comment statements. Decisions regarding what is open or closed to over-snow motor vehicle use would be decided in site-specific winter travel management decisions made by the district rangers with help from the public and a variety of users. These decisions would be made using public input and the NEPA process to analyze alternatives and arrive at a decision following full public scoping and input. A limited number of decisions have been made in this Forest Plan as part of the MA allocation and associated standards and guidelines in MAs, with Recommended Wilderness (MA1b) and Research Natural Areas (MA4a) closed to winter motorized use.

Forest Plan Desired Conditions: Category 133**Public Comment 727:** (Letter Number(s): 228)

The Forest Service should include more opportunities for quiet, non-motorized recreation away from motorized recreation to be consistent with draft Forest Plan, chapter 2, desired condition FW-DC-AR-03: “Opportunities for outdoor recreation, such as hunting, fishing, wildlife viewing, berry picking, firewood gathering, and bird watching are available for a wide variety of users... and promote a land ethic that preserves the cultural and natural resources of the Forest for future generations.” This desired condition seems to be in contradiction to the “Desired Distribution” (as shown in table 1) when it comes to percent allocated for summer verses winter recreation opportunities of motorized and non-motorized use, with motorized use increasing from 18 percent to 67 percent and non-motorized use decreasing from 53 percent to 14 percent. The quiet of the environment is an integral component of the experience, and is at odds with nearby motorized recreation, as sound carries quite dramatically in the snow covered forest.

Response:

FW-DC-AR-03 includes a wide array of activities and user groups. Recreationists taking part in these various activities are often motorized users. Many users pursuing activities such as berry picking or hunting do so by accessing areas using motorized vehicles on routes open to motorized use. We agree that there should be opportunities for all recreation users of the Forest and creating this balance will continue to be a challenging and controversial process. The “Recreation Setting” section of the “Access and Recreation” section of the FEIS describes the recreation opportunity spectrum (ROS) on the Forest. Tables within this section of the FEIS give an estimate of the ROS categories by alternative. These categories paint a picture of what is available across the Forest during the winter and summer seasons but not the actual use by various users. These figures are based on what is currently open and closed to motorized uses during the two primary use seasons. The winter ROS categories that represent the portion of the Forest that is closed to motorized use

is only 19 percent under Alternative B Modified; however, actual over-snow use is much lower because elevation, topography and vegetation limit access to much of the IPNF to winter motorized vehicles. Including acres limited to winter motorized use due to elevation, vegetation and topography are not included in these figures. This would require expensive and sophisticated modeling that was not available for this analysis. In essence, there are many more acres than what is displayed in the ROS numbers that would provide quiet recreation opportunities during the winter months. Also, please note that the analysis of ROS provided in the FEIS shows that all action alternatives would increase the amount of non-motorized winter categories, indicating an increase in areas available for non-motorized over current conditions.

Forest Plan Objectives: Category 134

Public Comment 48: (Letter Number(s): 155, 163, 204, and 259)

The Forest Service should increase objective numbers in FW-OBJ-AR-05 to address the growing use by ATVs and mountain bikers.

Response:

Forestwide objective FW-OBJ-AR-05 is not an upper limit for trail maintenance or the creation of new motorized trail loop opportunities, but is rather an expected level. All objectives are set to give forest managers a goal to accomplish specific work in various resource areas (like recreation management) over the life of the Plan or another specific time frame. The objectives are based on current budget levels. Budgets are expected to remain flat or decrease in the future. The budget line item for trails (CMTL) has been decreasing over the past several years and is expected to decrease in future years. To develop objectives without consideration of expected budgets would be a misrepresentation of expected outcomes.

Forest Plan Objectives: Category 134

Public Comment 705: (Letter Number(s): 163)

The Forest Service should rewrite the objective on pages 2-1 and 2-2 ("Over the life of the Plan, 5 percent of the concentrated use areas are improved or closed or the appropriate actions taken to reduce deferred maintenance.") to include the number of sites that would be improved over a 5 year or annual period.

Response:

Improvements to recreation sites are included in forestwide objective FW-OBJ-AR-01.

Forest Plan Objectives: Category 134

Public Comment 706: (Letter Number(s): 163)

The Forest Service should modify FW-OBJ-AR-04 to account for the existing groomed winter trail systems (1,240 miles on the IPNF and surrounding state lands) and should recognize the partnerships with snowmobile groups who assist in maintaining the trails.

Response:

Forestwide objective AR-04 is not an upper limit, but what is expected given current budget levels. We recognize that our county partners, grooming boards, and local snowmobile groups coordinate grooming on the winter snowmobile trail system across the Forest and actually do all the grooming to provide this winter recreation opportunity. The number appears low because of concerns with both Forest Service budgets as well as county budgets. Many western counties depend on federal payments from the Secure Rural Schools and Community Self-Determination

Act of 2000 that was renewed in July of 2012 for one additional year ending on September 30th, 2013. The continued decrease in this funding source, as well as other challenges western counties face regarding budgets, will continue to create trade-offs that counties will have to wrestle with regarding various services they provide. Much of the funding to groom trails comes from grooming stickers sold locally but the cost of grooming continues to increase with the cost of fuel to run the groomers as well as general maintenance and operation costs (maintaining the groomer and costs associated with keeping the routes open for winter use). We determined that we would set the objective low, but at the same time, we wanted to ensure that this critical part of our recreation program was retained in the Forest Plan and recognized in the objectives. This objective counts trail miles on national forest lands only and does not include groomed trail miles on other ownerships, including Idaho State Department of Lands.

Forest Plan Standards: Category 135

Public Comment 50: (Letter Number(s): 155 and 221)

The Forest Service should include standards and guidelines in the “Access and Recreation” section that address protection of other resources by better managing the road system and its use.

Response:

Direction from INFISH is retained in the revised Forest Plan. This direction protects watersheds, water quality, and fish habitat. In addition, direction to manage both existing roads as well as planned roads that will be constructed are adequately addressed in current Forest Service policies. They include:

- 36 CFR Part 212 – Travel Management
- FSM 7700 – Transportation System
- FSH 7709.55 – Transportation Planning Handbook
- FSH 7709.56 – Road Preconstruction Handbook
- FSH 7709.56b – Transportation Structures Handbook
- FSH 7709.57 – Road Construction Handbook
- FSH 7709.58 – Transportation System Maintenance Handbook
- FSH 7709.59 – Transportation System Operations Handbook

Forest Plan Guidelines: Category 136

Public Comment 51: (Letter Number(s): 221)

The Forest Service should add guidance to the Forest Plan to protect water quality and watersheds from the current road system and future road construction.

Response:

INFISH (Inland Native Fish Strategy) is retained in this Forest Plan as existing direction that will continue to be followed as the new Forest Plan is implemented. This direction protects watersheds, water quality, and fish habitat when management proposals are implemented. In addition, direction to manage both existing roads as well as planned roads that will be constructed are adequately addressed in current Forest Service policies. They include:

- 36 CFR Part 212 – Travel Management
- FSM 7700 – Transportation System
- FSH 7709.55 – Transportation Planning Handbook

- FSH 7709.56 – Road Preconstruction Handbook
- FSH 7709.56b – Transportation Structures Handbook
- FSH 7709.57 – Road Construction Handbook
- FSH 7709.58 – Transportation System Maintenance Handbook
- FSH 7709.59 – Transportation System Operations Handbook

Forest Plan Standards: Category 135

Public Comment 707: (Letter Number(s): 235)

The Forest Service should recognize that under MA1c-STD-AR-01, page 48, the standard: "Wheeled motorized vehicle use is limited to single-track vehicles" may be in conflict with the Wilderness Act of 1964 if it refers to any type of motorized single-track vehicle since they are not currently allowed in designated wilderness areas. And, if they are mechanized and allowed in an area that is part of Wilderness Study Area (WSA) which is being considered for addition to the Wilderness Preservation System, the WSA where they are allowed is not eligible for inclusion in the Wilderness Preservation System. Therefore, it appears this objective is invalid.

Response:

This standard is required due to language that created this Wilderness Study Area. The two congressionally designated land exchanges (please refer to the final EIS pages 337 – 344) required that existing uses in place at the time of the land exchange would be allowed to continue. The Wilderness Act of 1964 does not apply to this specific area. The IPNF does not have discretion to change federal law (the two land exchange acts).

Forest Plan Guidelines: Category 136

Public Comment 708: (Letter Number(s): 163)

The Forest Service should add GA-DC-AR-CDA-06 into the overall Forest Recreation Guidelines or the planning team can add this guideline to the North and South Zones of the Forest. Examining old roads for trail opportunities is a key to enhancing public recreation trail opportunities.

Response:

The Geographic Area desired conditions were developed through a public process that included groups working with local rangers prior to 2006 to develop these Geographic Desired Statement Conditions.

We agree that analyzing roads for possible conversion to trails is important across the Forest. However, many other resource concerns are weighed when these decisions are made. This can still be done when site-specific planning is accomplished for a specific area on a ranger district. This is a site-specific decision that can be done anywhere on the Forest.

Forest Plan Guidelines: Category 136

Public Comment 709: (Letter Number(s): 163)

The Forest Service should consider more guidelines for recreation, such as: 1) Prior to decommissioning roads, opportunities related to those roads for potential development of use as travel routes for ATVs, mountain bikes, or other alternative forms of transportation should be considered; 2) Recreation strategies and developments should be coordinated with state and local recreation planning efforts; 3) Establish a geocaching policy (where geocaching is allowed and where it is not); 4) Damage to or loss of Forest System trails from timber harvest, road

construction, mining, special uses, and prescribed fire should be repaired or mitigated by the appropriate party. Several of these guidelines could also be considered as potential Watershed and Water Quality Guidelines.

Response:

- 1) We agree that analyzing roads for possible conversion to trails is important across the Forest. This is normally addressed when a road or roads are proposed for decommissioning. The recreation departments, who manage the trails system, analyze proposals to decommission any road(s) for both the effects to access as well as potential for conversion to a trail. However, many other resource concerns are weighed when these decisions are made. This can still be done when site-specific planning is accomplished for a specific area on a ranger district. Budgets are a part of that analysis and the recreation and trail budget continues to decline, causing a major concern when proposing to add to the existing trail system;
- 2) Any change to the travel management plan or proposal for a recreational development will go through an analysis process (NEPA) that includes scoping with the public and interested entities, which includes partners and the Idaho Parks and Recreation Department. The Forest normally communicates with any and all parties who are interested with proposals that involve recreation planning and development;
- 3) Geocaching is done throughout the IPNF and is a popular outdoor recreational activity. The Forest has yet to see resource damage caused by this activity on the IPNF. If resource damage does occur, the Forest may need to restrict this activity in specific areas of the Forest and that would include public scoping and coordination with partners. At this time there is no need to address this at the forest plan level; and
- 4) In most circumstances, damage to trails would be repaired by the contractor, mining company, or permit holder causing the damage. The Forest normally requires trail or access mitigation when issuing a contract, mineral plan of operation, or a special use permit. However, if any of these entities cause damage that was not recognized and planned for ahead of time, these documents (contracts, plans of operations, and special use permits) include clauses that require the holder to repair damage to existing Forest Service facilities. In addition, INFISH is retained in this Plan as existing direction that will continue to be followed as the new Plan is implemented. This direction protects watersheds, water quality, and fish habitat when management proposals are implemented, including trail construction and reconstruction.

Forest Plan Coeur d'Alene GA Desired Condition: Category 137

Public Comment 710: (Letter Number(s): 267)

The Forest Service should designate the area at Jordan Camp as eligible recreational river, MA2b, stretching a quarter mile north and south of the FH412 bridge and the remainder of segment 2 eligible wild river, MA2b, with the northern and eastern borders, respectively, being trail 20. Trail 20 is a national recreational trail and would make an ideal border between eligible wild river, MA2b and backcountry, MA5. Trail 20 would be in backcountry, MA5, and open to mountain bikes.

Response:

Because the Coeur d'Alene River is included in MA2b (eligible wild and scenic rivers) the boundaries were assigned using direction contained in FSH 1909.12 – Land Management Planning Handbook, Chapter 80 – Wild and Scenic River Evaluation. This direction recommends a standard boundary of ¼ mile either side of the river, creating a ½ mile wide protective corridor. Specific boundaries can be refined, discussed, and recommended through the suitability analysis. Rivers within MA2b, assigned a classification of “Wild,” do allow mechanized use.

Forest Plan Lower Kootenai GA Desired Condition: Category 138

Public Comment 711: (Letter Number(s): 163)

The Forest Service should consider the following regarding the Lower Kootenai GA:

- A) Providing loop trail opportunities for both motorized and non-motorized recreationists in this GA. Many of these trail systems can be designed from decommissioned roads systems and connecting trail segments;
- B) Clarifying the GA description to include winter and summer trail mileages, as well as the camping and boating opportunities that exist within this GA; and
- C) Considering Idaho-British Columbia boundary security issues in the desired conditions.

Response:

Loop trail systems can be considered when site-specific project planning is done for any resource management proposal that involves either roads or trails. Motorized loop systems are a possibility in this GA but grizzly bear and caribou management do limit where and when these opportunities can be created and managed. Non-motorized opportunities already exist in both the Selkirks and the Cabinets.

Winter and summer trail mileages can change over time due to many factors, so GA specific trail miles are not included in any of the GA descriptions. Access and Recreation Goal 1 includes a reference to “water-based activities” that applies to the entire Forest. Actual boating opportunities on many of the water bodies are controlled by the state and not the Forest Service.

Page 38 in the revised Forest Plan includes desired condition FW-DC-CCI-02 under Cooperation and Community Involvement that states, “Coordinate with U.S. Border Patrol on issues relating to national security along the northern international border of the United States and Canada.”

Forest Plan Pend Oreille GA Desired Condition: Category 139

Public Comment 712: (Letter Number(s): 163)

The Forest Service should consider the following regarding the Pend Oreille GA:

- A) Providing loop opportunities in the Pend Oreille GA for both non-motorized and motorized use;
- B) Deleting the word “motorized” from the following sentence: "The district works with partners and cooperators to maintain a viable winter and summer motorized trail system." While IDPR provides motorized trail funding through our Off Road Motor Vehicle Fund, we also provide non-motorized trail funding through the Recreation Trails Program; and
- C) Recognizing public support for the desired future condition that recognizes the importance of examining opportunities to link the district's trail system with other trail systems. This GA trail system could be more connected by working with other landowners, particularly on the west side of Lake Pend Oreille.

Response:

- A) Please refer to the response to Public Comment 711 regarding loop trail system opportunities;
- B) The Geographic Area desired conditions were developed through a public process that included groups working with local rangers prior to 2006 to develop these Geographic Desired Statement Conditions. This GA contains non-motorized opportunities; this DC was to emphasize motorized opportunities; and
- C) This portion of the desired condition will be retained as stated.

Forest Plan Priest GA Desired Condition: Category 140

Public Comment 713: (Letter Number(s): 163 and 267)

The Forest Service should consider the following regarding the Priest GA:

- A) Providing loop opportunities for winter non-motorized recreationists and summer recreationists (motorized and non-motorized);
- B) Keeping the Upper Priest River recommended wild river section open to mountain bike use and stopping the recommended wilderness boundary at the Upper Priest River;
- C) Designating the lands east of the Upper Priest River as primitive to Road #1013 to allow this mountain bike loop opportunity to continue;
- D) Designating the eastern border of the Salmo Priest recommended wilderness MA1b (from north to south) as Malcom Creek down to where trail 308 bridges Malcom Creek, then follow the western edge of trail 308 down to the southern end of trail 308 where the trailhead is on FH1013. This would also be the border for the eligible wild river MA2b section. The lands to the east would become backcountry MA5 including trail 308 opening it to mountain bike trails in the middle with drainage on both sides. There are many of these human encumbrances all along trail 308. Trail 308 is more suited for mountain biking now than ever. Any trail repair would be easier in backcountry MA5 designation than in a recommended wilderness MA1b, designation; and
- E) Continuing the western border for the backcountry MA5 down following the western edge of FH1013 to FR665 (Trapper Creek), then following the western edge of trail 302 down toward Upper Priest Lake. All of FH1013 would remain open over Granite Pass.

Response:

- A) Please refer to the response to Public Comment 711 regarding loop trail system opportunities;
- B) This has been changed in the revised Forest Plan. MA1b has been removed and the Upper Priest corridor will remain open to mountain bikes in the revised Forest Plan;
- C) Road #1013 will remain open in the revised Forest Plan as it is currently shown on the Kaniksu Motor Vehicle Use Map. The Forest will retain the recommended wilderness to the edge of the 1013 Road as that is how it was shown in the draft Forest Plan. The majority of the comments regarding the Upper Priest trail wanted it left open to mountain bikes but few, if any, were concerned with the creation of a loop opportunity;
- D) The only change in this GA to the revised Forest Plan will be the change from primitive MA1e in the Hughes Ridge area to MA1b as many commenter's suggested and remove MA1b (recommended wilderness) from the Upper Priest corridor to allow the continued use of mountain bikes. A change in MA1b or MA1e to MA5 would require a rule change under the Idaho Roadless Rule. This proposed change would create the need to change the Idaho Roadless theme from wildland recreation to backcountry. Because this area has gone through many public reviews the Forest is going to retain the recommended wilderness boundary in the same location as the draft Forest Plan; and
- E) Forest Road #1013 will not be closed with the revised Forest Plan. This road will remain open and is recognized as such on the current MVUM. There are no proposed changes to the MVUM due to the finalization of the revised Forest Plan.

Forest Plan St. Joe GA Desired Condition: Category 141

Public Comment 714: (Letter Number(s): 163 and 190)

The Forest Service should consider the following regarding the St. Joe Geographic Area:

- A) Providing recreation trail loop opportunities for both non-motorized and motorized use (summer and winter);
- B) Mentioning winter recreation opportunities in the desired conditions;

- C) Continuing the groomed trail opportunities provided by the Benewah County Snowmobile Program and Shoshone County Snowmobile Program;
- D) Prohibiting motorized watercraft within the designated “wild” segment of the St. Joe River. The Wild and Scenic Rivers Act emphasizes that “wild” river segments are to be managed for “primitive” conditions; and
- E) Prohibiting motorized watercraft in the MA1b section of the Mallard-Larkins Roadless Area where it overlaps the segment of St. Joe that is designated as “wild.”

Response:

- A) Please refer to the response to Public Comment 711 regarding loop trail system opportunities;
- B) Winter recreation opportunities are important in the St. Joe area but were not a focus of the St. Joe GA group that discussed recreation and the proposed Forest Plan. The St. Joe GA will continue to offer some outstanding winter recreation opportunities but the desired conditions defined for this area were developed in cooperation with groups familiar with this area and winter recreation was not in the top tier of notable recreation opportunities. The winter recreation program on the St. Joe Ranger District is much smaller than those programs on the CDA GA and the three northern GAs; thus, it is not emphasized in this GA;
- C) Both county grooming programs will continue under this Plan. There are no planned changes to the routes that are currently groomed in Benewah and Shoshone counties due to this planning effort;
- D) The wild portion of the St. Joe (the portion of the river upstream from Spruce Tree CG) is currently closed to motorized watercraft use and will continue to be closed. There are no planned changes to this closure with this Plan; and
- E) See the previous response to comment D. The wild portion of the St. Joe River is currently closed to water craft and will continue to be closed following the release of this Forest Plan.

Mountain Biking: Category 142

Public Comment 34: (Letter Number(s): 104, 219, and 244

The Forest Service should consider and analyze mountain bike use separately for all areas of the Forest including recommended wilderness areas MA1b. In addition, they should be treated as a unique use from other recreational uses.

Response:

We agree that mountain bike use is a unique use on national forests. But all uses are unique in how the recreationists use the forests and their individual expectations. Bicycle use is a great way to visit many parts of the IPNF but some places do not facilitate such use (i.e., short, special interest trails like the various cedar groves that are scattered across the Forest and some areas where there is proposed wilderness management). Mountain bike use is inconsistent with proposed wilderness management. It is a non-conforming use that could threaten the capability or availability of an area for consideration as wilderness. If use becomes established that is not allowed in designated wilderness, this area may no longer be considered suitable as wilderness. Trail opportunities for mountain bike loops can always be explored and proposed whenever ranger districts are doing site-specific planning for any project. Proposals can be submitted at any time but those proposals do need to be analyzed using a NEPA process that includes public scoping.

The Forest used a management area model for “zoning” the Forest in the planning process because it is an efficient way to categorize various areas of the Forest for management purposes. In addition, it meshes well with other planning efforts that affect national forest management like the Idaho Roadless Rule and fire protection zones that are mapped on Forest Service land.

There are many opportunities for mountain bike use across the IPNF and there will continue to be outstanding mountain biking opportunities. The Forest welcomes any trail maintenance help that any group can offer as the trail maintenance budget continues to decline.

Air Quality

DEIS Environmental Consequences: Category 156

Public Comment 59: (Letter Number(s): 209 and 252)

The Forest Service must meet Tribal air quality standards where applicable. In addition, the effects of wilderness fires on air quality and activities outside of the wilderness should be addressed.

Response:

Under the Clean Air Act (CAA), tribes can have TAS (treatment as state) status and take over CAA responsibilities for their lands. Currently, the Kootenai Tribe has TAS for the 105c grant program under the CAA. EPA has a federal implementation plan for the Kootenai Tribal lands. The CAA requires that an air pollution emitter comply with any applicable air quality standards, air quality requirements, implementation plans, etc. In order to recognize that one or more tribes on the IPNF may take over CAA responsibilities for their lands in the future, the language in two air quality related components (FW-DC-AQ-01 and FW-GDL-AQ-01) has been updated in the revised Forest Plan. The language in these plan components was modified to indicate that in addition to federal, state, and local air quality agencies, the IPNF would cooperate with tribes to meet any applicable Tribal air quality requirements as well.

The air quality analysis that was included in the DEIS did not specifically analyze how wildfires burning in wilderness areas might affect air quality. However, the DEIS did present a discussion on the potential effects that natural, unplanned ignitions that are managed for multiple resource objectives might have on air quality. On pages 271 and 272 of the DEIS, we acknowledge that in “backcountry areas” (this includes wilderness areas, recommended wilderness areas, backcountry MA5 and other similar remote areas) there was a greater likelihood that natural, unplanned ignitions would be managed for multiple resource objectives compared to more developed lands where they would generally be quickly suppressed. Then, a general analysis is presented on those pages as to which alternatives would likely lead to more smoke being emitted from those fires.

Forest Plan Guidelines: Category 163

Public Comment 61: (Letter Number(s): 221)

The Forest Service should add a guideline indicating that the requirements of the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008, <http://www.nwcg.gov/pms/RxFire/rxfireguide.pdf>) would be included into prescribed burn plans.

Response:

The last paragraph on page 268 of the IPNF DEIS contains a description of the 2008 Interagency Prescribed Fire Planning and Implementation Procedures Guide and indicates that the Forest Service Handbook requires that all prescribed burn plans address the elements contained in that document. Element 19 (pg 26) in the 2008 Interagency Prescribed Fire Planning and Implementation Procedures Guide specifically addresses smoke management and air quality (NWCG 2008). Because this is an existing requirement, the IPNF does not feel it is necessary to reiterate that requirement in a specific forest plan component. As indicated on page 2 of the IPNF draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service will follow all existing laws, regulations, and policies relating to the management of the NFS lands,

and the forest plan components are generally designed to supplement, not replace, existing direction.

Alternatives

Alternative A (No action Alternative) - Pro with Rationale: Category 201

Public Comment 63: (Letter Number(s): 104, 144, 215, and 258)

The Forest Service should adopt Alternative A (No-action Alternative) because it:

- A) Is adequate for wildlife and people;
- B) Does not restrict bicycles;
- C) Is the most effective use of public lands; and
- D) Provides the most appropriate allowable sale quantity.

Response:

Thank you for expressing your views on Alternative A. All views were carefully considered during development and evaluation of the alternatives in the Forest Plan process.

Alternative B (Preferred Alternative): Category 203

Public Comment 67: (Letter Number(s): 165 and 270)

The Forest Service should adopt Alternative B (Preferred Alternative) with the following suggested changes or modifications:

- A) Remove the boundary setbacks that create unnecessary buffers particularly in the following areas: southwestern border near Goat Mountain and Scotchman Peak, the E. Fork Blue Creek drainage and the southeastern boundary near Pillick Ridge;
- B) Remove the upper Priest lake area from recommended wilderness and designate it MA1e Primitive which would protect its wilderness characteristics, allow snowmobiling, and still provide for special management protection.

Response:

- A) The boundaries for the Scotchman Peaks recommended wilderness area were mapped to be manageable and locatable on-the-ground; and
- B) The recommended wilderness area in the far northwest corner of the IPNF has been allocated to recommended wilderness since the 1987 Forest Plan and does not have snowmobile use. This area is adjacent to the Salmo Priest Wilderness Area and is rated high as recommended wilderness (see appendix C of the FEIS). Other areas around the recommended wilderness area allow snowmobiling, including Idaho State lands.

Alternative B (Preferred Alternative) - Pro with Rationale: Category 204

Public Comment 66: (Letter Number(s): 30, 89, 145, 147, 149, 176, 199, 209, 222, 244, 245, 247, 236, 264, 267, and 273)

The Forest Service should adopt Alternative B (Preferred Alternative) because it:

- A) Designates appropriate areas as recommended wilderness or primitive;
- B) Attempts to balance recreation, resource extraction, and conservation; reflects compromise;
- C) Places a proper amount of emphasis on restoration of vegetation, protecting terrestrial and aquatic habitat, and improving watershed conditions;
- D) Provides good access and an acceptable future travel plan;

E) Correctly reflects the special use permit granted to the Panhandle Nordic Ski & Snowshoe Club to manage the Fourth of July Park N Ski Area for skiing and snowshoe use in the winter, while the same trails and facilities are used by hikers, mountain bikers, and horsemen from spring through the fall;

F) Is similar to the current 1987 Forest Plan.

Response:

See response to Public Comment 63.

Alternative B (Preferred Alternative) - Con with Rationale: Category 205

Public Comment 65: (Letter Number(s): 119, 172, 226, and 282)

The Forest Service should not adopt Alternative B (Preferred Alternative) because it:

- A) Focuses too much on ecological sustainability without supporting science or data;
- B) Lacks minimum protections for public values such as water quality, wilderness, backcountry, and fish and wildlife habitat;
- C) Values motorized recreation and resource extraction too greatly; and
- D) Insufficient amount of recommended wilderness.

Response:

A – D) See response to Public Comment 63; and

B) Also see response to Public Comment 249C.

Alternative C: Category 206

Public Comment 70: (Letter Number(s): 131 and 198)

The Forest Service should adopt Alternative C with the following suggested changes or modifications:

- A) Modify boundaries of recommended wilderness areas to better incorporate warm moist western redcedar and western hemlock forests; and
- B) Explanation of why changes to roadless areas are not valid options and why Alternative C is not a “real” alternative.

Response:

A) Boundaries of recommended wilderness areas have been mapped to be identifiable on-the-ground and manageable. Western redcedar and western hemlock forests are included within all of the recommended wilderness area boundaries on the IPNF under Alternative B. In addition, western redcedar and/or western hemlock forests are included within the boundaries of 7 Special Area (MA3) and 11 Research Natural Area (MA4a) boundaries.

B) Alternative C is part of the range of alternatives for the Forest Plan and is considered a “real” alternative. However, to adopt Alternative C, the IPNF would have to go through rule changes on the Idaho Roadless Rule. The rule changes would require additional NEPA and possible changes to the design of the alternative. The management area allocation in Alternative C is important for displaying a range of alternatives for recommended wilderness. See DEIS page 324 for an explanation of this.

Alternative C - Pro with Rationale: Category 207

Public Comment 68: (Letter Number(s): 11, 131, 148, 172, 188, 195, 198, 228, 246, 279, 282, and 283)

The Forest Service should adopt Alternative C because it:

- A) Offers the most recommended wilderness;
- B) Offers protection and security for wildlife, fish, plants, threatened and endangered species, and the habitat in which they depend;
- C) Protects important wildlife habitat and vital travel corridors, while designating adequate forest land for sustainable timber production;
- D) Provides for compliance with environmental laws; and
- E) Provides a balance between protecting undisturbed natural resources for future generations and quality of life with a balanced economy.

Response:

See response to Public Comment 63.

Alternative C - Con with Rationale: Category 208

Public Comment 69: (Letter Number(s): 89, 165, 205, 260, 261, and 280)

The Forest Service should not adopt Alternative C because it:

- A) Designates too much backcountry and recommended wilderness and restricts access for timber harvest and recreation use;
- B) Does not align with or conform to the Idaho Roadless Rule;
- C) Designates a WSA at or near Bunco Road (322) and the upper N. Fork of the CDA River; this would force the closure of several existing roads and motorized trails in the area and this area does not meet the criteria for Wilderness; and
- D) The recommended wilderness designation in the Magee Peak area is not appropriate for a high access area. A recommended wilderness designation will limit the ability to manage big game winter range habitat.

Response:

See response to Public Comment 63.

Alternative D - Pro with Rationale: Category 210

Public Comment 71: (Letter Number(s): 82)

The Forest Service should adopt Alternative D because it has the least amount of recommended wilderness.

Response:

See response to Public Comment 63.

Alternative D - Con with Rationale: Category 211

Public Comment 72: (Letter Number(s): 89)

The Forest Service should not adopt Alternative D because it does not balance logging and motorized use with the need for improving forest resiliency and wildlife habitat.

Response:

See response to Public Comment 63.

Alternative Comparison: Category 213

Public Comment 501: (Letter Number(s): 163)

The Forest Service should revise table 64 to show what roads and trails would be closed to motorized use. Furthermore, page 300 of the DEIS states that “These MVUMs do not change by alternative,” yet table 64 shows acres that will be closed under the range of alternatives. MVUMs will change as a result of this Forest Plan. The FEIS needs to clearly document how the MVUMs will change.

Response:

Table 64 in the DEIS reflects the number of acres where motorized or mechanized recreation opportunities exist. It does not reflect acres where existing routes will be closed to motorized use. It reflects acres where it may be possible to create new motorized routes. Current motorized routes will not change under any alternative. The statement on page 300 of the DEIS is correct. There is no change to the MVUM under any alternative.

Alternative Suggestions: Category 215**Public Comment 79:** (Letter Number(s): 119 and 163)

The Forest Service should consider the following suggestions regarding alternatives:

A) Developing a Pro-Recreation Alternative that addresses the increased demand for OHV and motorized recreation opportunities. The alternative needs to include access to existing routes and areas and as well as additional, new routes and areas. The quantity and quality of motorized routes should be at least equal to the quantity and quality of non-motorized routes. In addition, concern with noise from motorized recreation should be addressed through mitigation for a reasonable decibel limit for exhaust systems; and

B) Removing “special designations,” such as critical waterways, geological areas, unroaded areas, botanical areas, and national scenic areas from the proposed action because the Forest Service has no statutory authority to designate and manage such areas.

Response:

A) The “Pro-Recreation” alternative reflects a desire for increased motorized recreation. This type of alternative is similar to alternatives not considered in detail in the DEIS, the “Access and Roads” and the “Site-Specific Travel Management” alternatives. The FEIS includes an additional alternative, the “Pro-Motorized Recreation” alternative to address this concern. Similar to the “Access and Roads” alternative, the pro-recreation alternative would not provide wildlife security. Similar to the “Site-Specific Travel Management” alternative, this type of alternative desires site-specific decisions that are not made in the Forest Plan.

B) The Forest Service cannot designate wilderness areas or wild and scenic rivers. Only Congress can make these designations. The 1982 Planning Rule and manual direction require forests to recommend wilderness areas to Congress and identify and protect eligible wild and scenic rivers. The IPNF is operating within these requirements. Other special areas, such as (botanical, geological, historical, recreational, scenic, and zoological areas) may be designated by the regional forester. Research Natural Areas may be designated by the regional forester with concurrence by the research station director.

Range of Alternatives: Category 216**Public Comment 80:** (Letter Number(s): 9, 163, 179, 189, 190, 205, and 235)

The Forest Service should consider the following regarding a full range of alternatives:

A) The DEIS only presents four alternatives (the no-action) and the proposed action. Under the 1982 Planning Rules, more alternatives need to be considered.

B) Include a true conservation alternative such as the Conservation Alternative described on page 29 of the DEIS) that recommends more wilderness and emphasizes ecosystem management; the rationale for dismissing this alternative from detailed analysis is not sound. The current alternatives do not represent enough variation in the amount of areas designated as recommended wilderness, wilderness study, or wilderness;

C) Provide for a credible range in regards to the percentages of NFS land suitable for timber production, potential volume of timber to be produced, and the amount of land where motorized and mechanized vehicle use is allowed. There should be an alternative with no recommended wilderness. There should be an alternative that allocates more of the roadless areas to general forest or other less restrictive forest management themes, to contrast with Alternative C that allocates roadless areas to more recommended wilderness;

D) Include an alternative that is based on a scientifically-evolved habitat conservation and restoration strategy promoting a network of old-growth reserves such as that described by Juday (1978);

E) None of the four alternatives adequately address timber harvest, vegetation management, and reduction in fire risk. None of the alternatives include a treatment program sufficient to address and protect the health and safety of local residents and provides timber harvest close to levels in the 1987 Forest Plan;

F) The range of alternatives needs to be improved by looking at endpoints versus process in coming up with desired future condition. Mechanical treatments will likely result in press disturbances for watersheds. Natural processes tend to have pulse impacts on watersheds, even if the end result is the same vegetative structure. These systems evolved with pulse, not press, disturbances;

G) There is no range of alternatives for various management areas. For example, there isn't a primitive non-development allocation dedicated to semi-primitive non-motorized recreation. There isn't an area dedicated to maintenance of rare or unique species, which may move about; and

H) The FEIS and final Forest Plan will need to show that reasonable alternatives to the written management direction have been considered.

Response:

A) The 1987 Planning Rule does not require more than 4 alternatives to be considered in detail. No policy or regulation requires a set minimum number of alternatives. Given the alternatives considered in detail and the alternatives considered but eliminated from detailed study, the range of alternatives is adequate and meets the requirements of NEPA;

B) Several "conservation" alternatives were considered in the DEIS, including the "Forest Restoration" Alternative, the "Conservation" Alternative, and the "Defenders of Wildlife" Alternatives. The DEIS describes why these alternatives were not considered in detail. The Defenders of Wildlife Alternative was renamed in the FEIS as "Wildlife Linkage" Alternative and further detail included as to why this alternative was not analyzed in detail. Alternatives B, B Modified, and C provide improved habitat and protection for wildlife species and increased non-motorized opportunities over the 1987 Forest Plan;

C) Given the alternatives considered in detail and the alternatives considered but eliminated from detailed study, the range of reasonable alternatives was carefully evaluated and designed to meet the requirements of NEPA and NFMA. Alternatives were considered from a full spectrum of very little management and emphasizing preservation to highly-managed with an emphasis on commodity outputs and motorized access. The alternatives considered in detail were developed from this range and represent a realistic subset of alternatives proposed. The action alternatives were developed to be realistic and implementable and respond to the revision topics. There were no unreasonable alternatives considered in detail. Acres of lands suitable for timber production

and timber harvest levels varied by alternatives. In the FEIS, timber suitability varies from a low of 36 percent of the Forest in Alternative C to a high of 46 percent in Alternative A. ASQ ranges from a low of 115.9 MMBF/year in Alternative C to a high of 131.3 MMBF/year in Alternative D. When output levels were calculated based on current budgets, the variation between alternatives diminished. This is because of the influence of budget and its effect on output level. Under current budget levels, Alternative C has the low at 43.3 MMBF/year and Alternative A the high at 46.8 MMBF/year. The alternatives also emphasize varying levels of motorized access, with Alternatives A having the highest levels and C the lowest. Alternatives B and D emphasize motorized access, while implementing the management area direction defined in the revised Forest Plan. The revised management direction results in a slight decrease in motorized access opportunities from Alternative A under these two alternatives. However, as described in the DEIS, there is no change to existing motorized vehicle use (excluding over-snow vehicles) on designated routes and areas. Alternatives B and D have reduced levels of recommended wilderness as compared to Alternative A, while Alternative C has more recommended wilderness. An alternative with less recommended wilderness than present in the Idaho Roadless Rule was not considered. This alternative was considered but eliminated from detailed study (see FEIS chapter 2, Wilderness/Roadless Related Alternatives);

D) The DEIS includes an alternative with this type of direction. This alternative was not considered in detail. See the DEIS for an explanation of why this alternative was eliminated from detailed study;

E) The No Action alternative (Alternative A) reflects current management; with timber harvest levels at 46.8 MMBF/year (under current budget levels) and an ASQ of 124.9 MMBF/year. Alternative D provides an ASQ above Alternative A. As shown in the FEIS, the ASQ for Alternative D is 131.3 MMBF/year. The ASQ is dependent on a much higher budget than current. Timber harvest under current budget levels in Alternative D (46.3 MMBF/year) are similar to those predicted in Alternative A. Budget levels have a large effect on the Forest's ability to conduct vegetation treatments on the ground. All action alternatives emphasize an increased use of natural and planned ignitions to treat vegetation along with mechanical treatment within current budget levels. See the response to subconcern C for more information on the range of action alternatives;

F) Neither endpoint nor processes were considered in determining desired future conditions (DFCs). Rather, vegetation DFCs were developed based on historic range of variability in the context of climate change. See appendix B of the DEIS for a description of the analysis process used in determining the historic range of variability. In moving towards DFC, the Forest will use both endpoint (mechanical treatment and planned ignitions) and processes (natural succession and disturbance). The alternatives present a range of the amount of mechanical and non-mechanical treatments and the amount of acres with no treatment;

G) These suggested management areas are addressed by management area 5 (backcountry, with semi-primitive non-motorized/motorized and limited development), management area 1e (primitive lands, non-motorized in summer, and no development), and management area 1b (recommended wilderness, non-motorized year-round, and no development); and

H) Comments were considered in developing the forest plan direction in the revised Forest Plan.

Pro/Con without Rationale: Category 217

Public Comment 81: (Letter Number(s): 177,180, 195, 245, 259, 285, and 289)
Several commenters expressed support for Alternative B or C, without rationale.

Response:

Thank you for your comment.

Pro/Con without Rationale: Category 217

Public Comment 500: (Letter Number(s): 104 and 258)

Several commenters expressed opposition to Alternative B, C, or D without rationale.

Response:

Thank you for your comment.

American Indian Rights & Interests

Treaty Rights: Category 251

Public Comment 83: (Letter Number(s): 209 and 245)

The Forest Service should consider the following regarding American Indian Treaty rights:

- A) Ensuring coordination and cooperation with Tribal governments as co-managers of wild game, wetland plants, and waterfowl;
- B) Edit the Lower Kootenai GA to separate the names of the Kootenai Tribe of Idaho and the Confederated Salish and Kootenai Tribes of the Flathead Reservation, two separate federally recognized Indian tribes. The Kootenai Tribe of Idaho has the right to hunt, fish, and gather within this GA under the Treaty of Hellgate of 1855;
- C) Recognizing the treaty rights of the Kootenai Tribe of Idaho and Confederated Salish and Kootenai Tribes of the Flathead Reservation in the Pend Oreille and Priest GAs introduction, as well as the cultural and religious significance of the area to the tribes;
- D) Support and recognize the Tribe's ability to access and use forest lands consistent with established traditional cultural properties and practices. We want to make sure that considerations are given to individual tribal members and their personal access needs consistent with the Forest Service's Trust Responsibility to the Tribe and its membership; and
- E) There needs to be ongoing consultation on recommended wilderness. The FEIS needs to explain the reasons for the change in boundaries and reduction in acreage to recommended wilderness from the 1987 Forest Plan.

Response:

- A) Tribal governments are not “co-managers” of NFS lands. Management of NFS land is the responsibility of the Forest Service. However, Forest Service officials consult with tribal governments on a government-to-government basis regarding the management of NFS lands. The revised Forest Plan contains direction to consult and coordinate with the Tribes and protect or enhance treaty rights;
- B and C) These edits have been made to the revised Forest Plan;
- D) Access needs for tribal members are considered in the revised Forest Plan direction and the analysis in the FEIS. See FW-DC-AI-01, FW-DC-AI-02, and FW-OBJ-AI-01; and
- E) The FEIS includes an explanation of changes to recommended wilderness from the 1987 Forest Plan. The Forest will continue to consult with the Tribes.

DEIS General: Category 252

Public Comment 84: (Letter Number(s): 209)

The Forest Service should consider the following regarding American Indian Rights and Interests when developing the FEIS:

- A) Correcting statements describing the Kootenai-Salish as these are separate peoples with separate histories, cultures and languages;

B) Correcting the “Cultural Resources” section which contains an inaccurate description of the Kootenai Nation. There are seven bands of the Kootenai or Ktunaxa Nation located in what is now known as Idaho, British Columbia, and Montana. The majority of the 149 citizens of the Kootenai Tribe of Idaho reside on the Kootenai Reservation and in Boundary County, Idaho. The Kootenai Reservation consists of a number of allotments reserved from the public domain in the late 1800s, a 12.5 acre parcel deeded to the Tribe after the 1974 War and a number of other scattered parcels. Portions of the Kootenai Reservation are immediately adjacent to the IPNF. The Kootenai Tribe exercises Treaty rights on the Idaho Panhandle and Kootenai National Forests, such as hunting, fishing, and berry picking and uses the Forests for cultural and religious ceremonies;

C) Seeking additional information and clarification to better understand and communicate the complex Federal-Tribal relationship and the responsibilities federal agencies have to Tribal Nations and revising or replacing the Tribal Interest and Treaty Rights section with more accurate information. At a minimum, the section should be revised to acknowledge that the Kootenai Tribe of Idaho and the Confederated Salish and Kootenai Tribes of the Flathead Reservation are two separate federally recognized tribes;

D) Revising the description of the Kootenai Tribe of Idaho (“an executive order Tribe”). The descriptions attempts to simplify the Tribe’s history and force tribes into being categorized as either executive order or Treaty tribes;

E) Revising the MA Summary by Alternative for Kootenai Tribe of Idaho (DEIS page 409) which uses the incorrect name of the Tribe, which should be “of Idaho” rather than “of Indians”; and

F) The description of the IPNF and its distinctive features must recognize the Tribal communities not only for protection and enhancement of Treaty rights, but also to recognize that reservation lands are immediately adjacent to and in the vicinity of the NFS lands. Edit GA-DC-FIRE-LK-01 (page 85) to specifically state that threat of wildfire to the Kootenai Tribal community is reduced in addition to the other communities listed. To highlight the importance of the Tribal communities, the Community Ideal Types for Boundary County (DEIS page 462) must recognize the Kootenai Tribal community separately from the other communities.

Response:

A) This has been corrected in the FEIS;

B) This section has been updated in the FEIS;

C) This section has been updated in the FEIS;

D) This section has been re-worded in the FEIS;

E) This has been edited in the FEIS; and

F) The revised Forest Plan has been updated to include the Kootenai Tribal community in GA-DC-FIRE-LK-01. The table in the FEIS containing community ideal types is from cited literature (Russell et al. 2006), so it cannot be updated.

DEIS Affected Environment: Category 253

Public Comment 85: (Letter Number(s): 209)

The Forest Service should consider the following regarding the American Indian Rights and Interests Affected Environment:

A) Including specific reference to the following in the Legal and Administrative Framework for Access and Recreation in the FEIS: the Treaty of Hellgate of 1855, Executive Order 13175, USDA and Forest Service regulation and policy, as well as the National Historic Preservation Act of 1966, American Indian and Religious Freedom Act of August 11, 1978 (42 U.S.C. § 1996), Archaeological Resources Protection Act of October 31, 1976 (16 U.S.C. § 470aa), Religious

Freedom Restoration Act of 1993, Native American Graves Protection and Repatriation Act of 1990;

B) Mentioning in the “Affected Environment” section that Kootenai Territory takes in the Priest Lake and Sandpoint Ranger Districts and revising the description of the Tribe’s rights and status;

C) Revising the Legal and Administrative Framework for Tribal Interest and Treaty Rights to include reference to 36 C.F.R. §§ 223.239 and 223.240 recognizing Tribal Treaty harvest without permit;

D) Acknowledging the hard work jointly performed by the Kootenai Tribe and the Forest Service to protect the widespread cultural resources in the Forests and the mutual understanding of what such protection means; and

E) Revising the statement that “the majority of the 100 or so American Indian sites should probably be allocated to scientific study or preservation category given their rarity in forested, mountainous terrain that characterizes much of the IPNF” since the statement appears to disregard the understanding of confidentiality for tribal sacred and cultural sites (DEIS page 375).

Response:

A) The American Indian Religious Freedom Act has been added to “Access and Recreation” section in the FEIS. The Hellgate Treaty, Executive Order 13175, and the other acts listed were not added, as they are not directly related to the Access and Recreation topic. These legal requirements are included under the American Indian Rights and Interests section. These, and all other legal requirements, will be followed by all management activities on the Forest;

B) Edits have been made to the FEIS to address this comment;

C) This has been added to the FEIS;

D) Edits have been made to the FEIS to address this comment; and

E) Edits have been made to the FEIS to address this comment.

DEIS Cumulative Effects: Category 255

Public Comment 86: (Letter Number(s): 223)

More areas need protection as recommended wilderness to protect the heritage of the Tribes.

Response:

The revised Forest Plan provides direction that promotes ecological conditions and improved forest health, while recommending certain areas as wilderness. The revised Forest Plan also contains direction to consult and coordinate with the Tribes and protect or enhance treaty rights. All projects, including any commercial or extractive activities, undergo consultation with the Tribes.

DEIS Key Indicators: Category 257

Public Comment 88: (Letter Number(s): 209)

The Forest Service should plan for active and passive management to improve forest conditions affected over the last century through fire suppression policies, overharvest, and other policies. Forests need active management to resolve this man-made problem. Passive management as a tool is also important to allow natural wildfire to become part of the ecosystem. This passive management and allowance for wildfire; however, must take into account the needs of the Tribal and non-Tribal communities on and near the Forests who depend on vital resources, such as drinking water, from these lands.

Response:

Direction in the revised Forest Plan seeks to balance passive and active management. The Forest is limited in the amount of active management that is possible, given budget levels. Decisions on where wildfire will be managed for resource benefit will be based on many things, including potential effect to other resources and water quality.

Forest Plan Goals: Category 259

Public Comment 89: (Letter Number(s): 209)

The Forest Service should add a goal to the revised Forest Plan: Respect Indian tribal self-government and sovereignty, honor tribal Treaty and other rights through protection and enhancement of such, and meet the responsibilities that arise from the unique legal relationship between the Federal Government and Indian tribal governments. Manage the Forests to address and be sensitive to traditional American Indian religious beliefs and practices.

Response:

This goal has been added under the American Indian Rights and Interests section of the revised Forest Plan.

Forest Plan Desired Conditions: Category 260

Public Comment 90: (Letter Number(s): 209)

The Forest Service should add a new access and recreation desired condition in order to ensure accommodation of Tribal needs: Provide access to traditional and Treaty resources and sacred sites, balancing the need for motorized access essential for reaching more distant locations, especially for elders who can no longer walk long distances, with protection of tribal resources from use and vandalism by non-tribal members.

Response:

A desired condition has been added to the revised Forest Plan to address the concern of access for Tribal members.

Forest Plan Desired Conditions: Category 260

Public Comment 91: (Letter Number(s): 209)

The Forest Service should edit FW-DC-AI-02 to be consistent with Goal-01 and federal law. Change the ending of the desired condition that says “not significantly impacted or diminished” with “protected and enhanced.”

Response:

This change has been made to the revised Forest Plan.

Best Available Science

Category 280

Public Comment 92: (Letter Number(s): 119, 212, and 244)

The Forest Service should consider the following in regard to the use of the best available science:

A) Evaluating impacts in a fair and unbiased manner, including natural sources of disturbance and a sense of the relative magnitude of possible causes of the impacts; the impact of recreation on

such things as soils, sedimentation, and noxious weeds should be fairly compared to the impact of floods, wildfire, and other natural events on all resource areas. The monitoring and evaluation must be consistent with and pursuant to the best available scientific information, techniques, and methods, and basing any conclusions on statistically significant data;

B) Considering the numerous studies showing that mountain biking has no more impact than hiking/equestrian use; and

C) Basing forest management policies on the best available science.

Response:

A) The revised Forest Plan does not make travel management decisions or close areas to motorized use, with the exception of closing areas to over-snow vehicle use in recommended wilderness and research natural areas. Because the Forest Plan does not make site-specific travel management decisions, there was no analysis showing impacts from motorized recreation on soil, sediment production, or noxious weeds. Forest Plan evaluation and monitoring of effects to soils is based primarily on vegetation management activities and effectiveness of best management practices. See chapter 5 of the revised Forest Plan;

B) We agree that restricting motorized or mechanized uses in MA1b recommended wilderness is not based on science related to impacts on physical resources. The restrictions in MA1b were based on the desired conditions (MA1b-DC-AR-01, 02, 03) and the wilderness character and potential for the area to be included in the National Wilderness Preservation system remain intact until Congressional action is taken.

A white paper provides consistency for management of recommended wilderness and Wilderness Study Areas across the region¹. In addition, FSM 1923.03 provides direction on management of recommended wilderness “A roadless area being evaluated and ultimately recommended for wilderness or wilderness study is not available for any use or activity that may reduce the area’s wilderness potential. Activities currently permitted may continue, pending designation, if the activities do not compromise wilderness values of the roadless area.”

In some areas across the region uses have become established over the years that have now precluded the area from being recommended. Some public may come to expect motorized or mechanized uses will continue, and there may be an economic dependency by local communities on those uses¹.

The regional office guidance is to be consistent in management of recommended wilderness. If it is determined that the area is best suited to wilderness designation the desired condition and standards in the revised Forest Plan should support those conclusions by restricting uses that would jeopardize the capability and availability of the area as designated wilderness. If there are existing uses that may threaten the capability and availability of the area, forest should choose to implement one of the following actions¹:

1. Eliminate those uses that threaten the capability and availability;
2. Adjust the management area boundary to eliminate the area with established uses; or
3. Not recommend the area for wilderness designation.

In the revised Forest Plan we did not recommend some areas that had been recommended wilderness in the 1987 Plan, and modified boundaries of some areas that had established motorized/mechanized use. In those areas that are recommended wilderness, the decision was made to restrict motorized and mechanized uses, to maintain the wilderness characteristic including outstanding opportunities for solitude or primitive and unconfined recreation.

¹Regional Consistency for Management of Recommended Wilderness and Wilderness Study Areas, 2007; and

C) The Forest utilized the best available science in determining forest plan direction and analysis of effects in the FEIS, as documented in methodologies, literature cited, and the project record.

Climate Change

Climate Change: Category 300

Public Comment 93: (Letter Number(s):67, 83, 84, 189, 231, and 248)

The Forest Service should consider the following regarding climate change:

- A) The function that old growth forests provides in mitigating climate change through carbon sequestration;
- B) That global warming makes past vegetation conditions irrelevant and that climate change should be a major factor considered in the Forest Plan;
- C) The IPNF needs to describe what actions will be taken regarding the Chief's climate change score card as well as what monitoring will be done for the Forest Plan regarding climate change;
- D) The effects that using wildland fire would have on climate change; and
- E) The impacts that climate change may have on stream and river hydrographs.

Response:

A – E) As discussed on page 13 of the IPNF DEIS, KIPZ prepared a comprehensive report on climate change (USDA 2010). The report is over two-hundred pages in length and serves to compile and synthesize scientific information on past and projected trends in regional climate and climate-related impacts to forest resources. Possible management options to reduce ecosystem vulnerability to climate change are presented in the report as are options for increasing ecosystem resilience to both climate and non-climate stressors. The KIPZ Climate Change Report went through a science consistency review by specialists from two Forest Service Research Stations (Rocky Mountain Research Station and the Pacific Northwest Research Station), the U.S. Geological Survey and universities. An appendix to the KIPZ Climate Change Report provides a list of the comments from those specialists and changes that were made in response (see pages 110-165 of that report). The project record contains a more detailed description of the science review process as well as the specific comments that were received during the review (2009KIPZSciRevProc.docx, 20090521KIPZSciConsRevLetter.pdf and 20090513KIPZSciConsRev.pdf).

The climate change report served to inform the development of the components in the draft Forest Plan and the report was cited throughout numerous resource sections of the DEIS. During the public comment period for the draft Forest Plan, the climate change report was available via the KIPZ website at: http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5345936.pdf. Since the KIPZ Climate Change Report was completed in 2010, additional publications and research related to the topic of climate change and adaptation opportunities for national forests has been published and these were reviewed by KIPZ (e.g., Peterson et al. 2011, Daniels et al. 2012);

A – B) In regards to the need to preserve old growth or other undisturbed forests in order to sequester more carbon and mitigate global warming, the KIPZ Climate Change Report contains an entire chapter on the subject of carbon sequestration and forest productivity (see pgs 57-70). In addition, the IPNF DEIS contains a discussion of carbon sequestration in the affected environment section (pgs 76 and 77) and the environmental consequences (pgs 98 and 99). As discussed in the KIPZ Climate Change Report, the rate of carbon sequestration and net ecosystem productivity generally peaks in a forest stand at an intermediate stage of stand development, and then declines as they get older. As discussed in detail on pages 64 and 65 of the KIPZ Climate Change Report, the idea of allowing the stands to get older (either by continued or increased fire

suppression or by not harvesting them) in order to sequester more carbon can be problematic for a number of reasons. For example, that strategy could increase the risk of carbon loss from wildfires, bark beetle outbreaks or even root disease pathogens (pgs 64-65, 73-84 and 85-90 of the KIPZ Climate Change Report). As discussed in the DEIS (pgs 75, 76, and 94-98) as well as the KIPZ Climate Change Report, one of the more substantial climate change adaptation options is to promote the resistance and resiliency of the forests to disturbance and stress agents. For example, the following in the KIPZ Climate Change Report (page vi) states: Increase the resilience of forest vegetation by reducing the potential severity of wildfire and insect outbreaks. Managing the density of trees can improve forest resiliency by reducing water stress, decreasing susceptibility to insect and disease mortality, and decreasing the likelihood of stand-replacing wildfires. Management actions that increase the diversity of stand ages, size classes, and tree species in currently homogenous landscapes can reduce the extent and severity of bark beetle outbreaks and wildland fires. Mechanical treatments, prescribed fire, and managing wildland fires for resource benefits are all potential tools for increasing the resiliency of forest vegetation to climate and other stressors. In addition, existing programs to reduce the vulnerability of whitebark pine and western white pine to white pine blister rust will also improve the resistance of these species to the added stresses associated with climate change.

Numerous forest plan components were developed to respond to this issue (e.g., Vegetation Goal-01, FW-DC-VEG-01, 02, 03, 04, 05, 06, 11; FW-OBJ-VEG-01, FW-STD-VEG-01, 02; and FW-GDL-VEG-01);

C) As was discussed on page 13 of the IPNF DEIS, the climate change performance scorecard is one part of a larger national forest service policy for responding to climate change. Much more information on that effort may be found at the following internet sites and documents:

<http://www.fs.fed.us/climatechange/>, <http://www.fs.fed.us/climatechange/pdf/roadmap.pdf> and <http://www.fs.fed.us/climatechange/advisor/scorecard.html>. As discussed above in the general response to this Public Comment, as part of the Plan revision process, a substantial climate change report was written for the KIPZ planning zone and was relied on in the development of the revised Forest Plan;

Climate change is a national priority and a priority for the Chief of the USFS, the regional forester and all of the forest and grassland supervisors in Region One. Each year, all of the national forests (including the IPNF) and grasslands report on the scorecard elements. As directed by national policy, we are working to be able to respond yes to 75 percent of the 10 USFS climate change scorecard elements by 2015. The ability to employ adaptive management strategies and monitor for climate change is dependent on vulnerability assessments and the region is at the beginning of its journey in developing these vulnerability assessments and understand where we are vulnerable on each national forest and grassland and responding to it. The region is developing technical reports, in the form of primers that should be published in 2014. This is a well-funded effort across many scientific areas using the Climate Impact Group data out of the University of Washington resulting in studies and analysis in: fire climate synthesis, aquatics and watershed, carbon sequestration in harvested wood and soils, watershed vulnerability assessments and a Northern Region climate change primer to explain the underlying current and projected data. These “Primers” will then be compiled into a “technical report” which will allow the region to better monitor climate change impacts and create adaptive strategies. These will educate the workforce to better address climate change and incorporate the climate change science for the regions into routine project activities and follow up monitoring protocols. This will in turn help all of the forests and grasslands in the region to respond “yes” to the scorecard elements.

For more information on the climate change performance scorecard and efforts being taken to respond to this issue please see the internet sites that are noted above;

D) On page 136 of the DEIS for the IPNF, there is a discussion of how climate change may influence wildfires and/or the use of wildland fires for resource benefits. In addition, that discussion cites the KIPZ Climate Change Report (USDA Forest Service 2010.) That report discusses how climate change may influence wildfires and other disturbances (see pages 85-90) and how carbon sequestration strategies may or may not be effective in reducing GHGs. Regarding the internet links cited by the author of the comment, the first appears to be linked to an article titled “Emission factors of hydrocarbons, halocarbons, trace gases and particles from biomass burning in Brazil” (Ferek et al. 1998). Regarding that paper, it is not likely that there is much applicability of a study conducted in Brazil to the forests on the IPNF. The second internet link provided in the comment lead to a site operated by the International Society of Environmental Botanists and the 1998 newsletter article is titled “Forest Fire and Ecosystem-Health.” The short article appears to be focused on the adverse impacts that deforestation can have on climate change and carbon sequestration. However, because the IPNF does not conduct deforestation activities, the article is not relevant; and

E) Climate change was considered as mentioned by the commenter, and the KIPZ Climate Change Report (USDA Forest Service 2010) is rife with discussions about climate change and predicted response of streamflows. It is also unclear what conclusions the commenter is trying to draw. On one hand, there seems to be an acknowledgement of climate change and the potential for large scale fires, but followed up by concerns about the effects of removing vegetation via logging and roads and effects on streamflows. The commenter also attempts to draw conclusions from a television program that was produced over 30 years ago, during a period of high intensity land management, which is not how the agency currently conducts land management practices.

Collaboration/Public Involvement

Collaboration with Public and Workgroups: Category 353

Public Comment 98: (Letter Number(s): 119)

The Forest Service should avoid forcing motorized recreationists into consensus and collaborative processes that cannot by nature produce reasonable results and where they are guaranteed to lose.

Response:

Collaboration is a process to try to achieve consensus and agreement. During collaboration, no group has more influence or power than any other group and no group is guaranteed to loose. Consensus or agreement can often be reached in some areas and not in others. Where there is no consensus, the decision maker must make the decision.

General: Category 356

Public Comment 103: (Letter Number(s): 189, 205, 212, 214, 250, and 282)

The Forest Service should consider the following regarding collaboration:

- A) Explain how public input was gathered. It is important for all citizens, not just locals, to have input;
- B) Continue to coordinate with county governments through the planning process and during projects;
- C) Include input from public groups, but base management on science and not on politics; and
- D) Allowing for open public review of major Forest Service decisions, including working with local recreation groups, businesses and those who contract to extract or remove resources from public lands.

Response:

A) The public involvement process was summarized in the DEIS on pages 8-11. The Forest Plan revision has been through a long process, with extensive public involvement. GA working groups were used to help formulate desired conditions for the geographic areas and seek consensus on management area allocations for the proposed action, while addressing the purpose and need. However, they were not the sole source in developing this direction. Publics were involved at all stages, including scoping, comment on the 2006 Proposed Plan, scoping on reinitiating plan revision, and comment on the draft Forest Plan and DEIS. Alternatives were built around the proposed action in response to public comment and to address the plan revision topics. No one group's input was weighted more than another;

B) The IPNF will continue to coordinate with the counties in implementing the revised Forest Plan;

C) Management direction is based on best available science and public input; and

D) All major Forest Service land management decisions undergo NEPA and public scrutiny. The public is notified regarding impending projects and decisions through news releases and our web page. Any interested public is invited to be involved.

*Cultural Resources***DEIS General: Category 400****Public Comment 104:** (Letter Number(s): 253)

The Forest Service should not restrict climbing access to cultural and sacred sites without a thorough understanding of public use patterns and their effects on the specific cultural resources in those areas. Protection measures can be done to minimize access restrictions while protecting specific locations.

Response:

The Forest Plan does not make site-specific decisions limiting access to specific cultural or sacred sites. Laws, regulations, and forest plan direction require protection of cultural and sacred sites. How these sites are protected is determined at a project scale.

Forest Plan General: Category 406**Public Comment 106:** (Letter Number(s): 119)

Current management practices are not adequately protecting western culture and heritage including historic mines, cabins, settlements, railroads, access routes, and other features used by pioneers, homesteaders, loggers, settlers, and miners.

Response:

Management direction for cultural resources is included in the Forest Plan as desired conditions (see FW-DC-CR-01 and FW-DC-CR-02) and objectives (see FW-OBJ-CR-01 through 04). This direction provides for protection and enhancement of cultural resource sites.

Forest Plan Goals: Category 407**Public Comment 107:** (Letter Number(s): 209)

The Forest Service should consider adding the following Cultural Resources Goal-01 since resource and sacred site protection is of paramount importance to the Kootenai Tribe: Reduce looting, vandalism, and incidental damage through increased patrols to protect cultural resources

and increase education about the importance of protecting cultural resources and the consequences for unlawful damage to or taking of cultural resources.

Response:

This goal has been added to the revised Forest Plan.

Forest Plan Objectives: Category 409

Public Comment 108: (Letter Number(s):209)

The Forest Service should not limit FW-OBJ-CR-01, 02, 03, and 04 to a certain number. If such restrictions are necessary, then we recommend stating that the figures used are minimums.

Response:

Our objectives in the draft Forest Plan were developed to move towards a variety of desired future conditions in the various resource areas. The quantity or amount of each objective was based largely on our current and recent past budget levels. We expect future budgets to stay relatively flat or decrease. It would be disingenuous to portray unrealistic objectives based on unconstrained or much higher budget levels. The objectives are realistic projections of what we expect to accomplish annually or over the life of the Plan. An explanation of the role of budget in developing objectives has been included in the revised Forest Plan. Also, an explanation of the role of constrained budgets in completing the effects analysis has been included in the introduction of Chapter 3 of the FEIS.

Fire & Fuels

Wildland Urban Interface (WUI): Category 451

Public Comment 110: (Letter Number(s): 161, 179, 189, 205, 207, 212, 235, and 246)

The Forest Service should consider the following regarding the WUI:

- A) Providing information on how the figure of 40 percent was determined for the area of the IPNF within the WUI;
- B) Increase the timber and fuel treatment programs to help protect the health and safety of county residents;
- C) The need to cooperate with county governments to protect communities and individuals from wildfires;
- D) Providing information on what the distribution of MAs is within the WUI;
- E) Adding additional strategic and programmatic direction in the Forest Plan regarding treatments in the WUI;
- F) Provide more information on the WUI in order to analyze the effects of the Forest Plan;
- G) Including a wildland fire plan that delineates where and under what circumstances natural, unplanned ignition may be allowed to burn; and
- H) Restricting fuel treatments to close proximity of communities.

Response:

A) On page 132 of the DEIS there is a summary of the process that was used to determine approximately how much of the IPNF area occurs in the WUI. Based on that analysis, approximately 40 percent of the Forest occurs within that area. Since the DEIS was published, a more refined method was used to calculate and map the WUI area. That method utilized all of the various County Wildfire Protection Plans (CWPP's) that occur within the boundaries of the IPNF. Maps of the WUI in those CWPP's were consolidated into a GIS layer and over-laid onto a map

of the IPNF. That process led to an estimate of approximately 33.8 percent of the IPNF occurred with the WUI areas. This is equivalent to approximately 844,158 acres. The revised Forest Plan and FEIS were edited to reflect this more accurate estimate. If the only values to protect from wildfires were structures, Cohen’s research would be more applicable. However, the WUI is an area where there are many more values that are typically at risk due to hazardous fuels than structures. The glossary (page 509) of the DEIS contains a definition for WUI;

B) The timber and fuel treatment programs that are anticipated during the life of the revised Forest Plan were estimated based on likely budget levels. However, as discussed on page 41 of the DEIS, a “unconstrained” budget scenario was also modeled in the event that a substantial amount of additional funding becomes available in the future. As was presented in the draft Forest Plan, there are many plan components associated with reducing hazardous fuels, producing timber products, and helping to protect the safety of communities and individuals (within the draft Forest Plan, see pg 7 under the Wildland Urban Interface heading, and pages 23, 25 and 41);

C) As presented on page 7 of the draft Forest Plan, “Recognizing community wildfire protection plans and working in cooperation with counties is an important part of public safety and the Forest’s fuels reduction program.” Forest Plan components FW-DC-FIRE-01, 02, FW-OBJ-FIRE-01 and FW-DC-SES-04 all focus on the need to reduce hazardous forest fuels and contribute towards the protection of communities, individuals and firefighters (see pages 25 and 41 of the draft Forest Plan);

D) Forest plan components associated with the WUI are listed above in the response for C. Regarding the distribution of the WUI area within MAs, please see the table below. It provides a GIS generated approximation of how many acres of the WUI area occur within each MA;

MA	Description	Acres
1b	Recommended Wilderness	15,109.6
1e	Primitive Lands	2,458.4
2a	Wild and Scenic Rivers	8,962.2
2b	Eligible Wild and Scenic Rivers	14,699.1
3	Botanical, Geological, Pioneer, Recreational, or Scenic Areas	1,384.0
4a	Research Natural Areas	4,664.2
4b	Experimental Forests	4,565.9
5	Backcountry	107,795.7
6	General Forest	667,397.2
7	Primary Recreation Areas	12,203.0
Grand Total		839,239.2

E) As discussed on page 1 and 2 of the draft Forest Plan, the purpose of the Plan is to guide programs, practices, uses and projects. The Plan does this by establishing goals, desired conditions, objectives, standards, and guidelines. The Plan is not designed to provide details on specific projects that would be implemented nor instructions for how to achieve the goals or

desired conditions. Due to budget uncertainties, staffing issues, ongoing national and regional shifts in program priorities, and many other factors, the IPNF needs to maintain a reasonable amount of operational flexibility when it comes to what projects and programs would be worked on from one year to the next and how they would be accomplished.

The Forest Plan provides a framework to guide the development of more specific project-level decisions. As previously discussed in the response to B and C above, a number of plan components were presented in the draft Forest Plan that are associated with the WUI. The IPNF does not believe additional, more specific or detailed plan components are needed to address this WUI topic;

F) The definition for the WUI was presented in the glossaries of both the draft Forest Plan (page 126) as well as the DEIS (page 509). The definition for WUI came directly from the Healthy Forest Restoration Act of 2003 (Public Law 108-148-Dec. 3, 2003). Each county within the IPNF has developed a County Wildfire Protection Plan (CWPP) and has delineated where their WUI areas are located. Neither that definition of the WUI nor the county plans are decisions that are being made in the Forest Plan. The IPNF has consolidated the various county maps of their WUI areas and by using the GIS system, has created a map layer that depicts where those areas occur on the IPNF. The programmatic level effects of potential fuel treatment projects in the WUI were presented on pages 131-137 of the DEIS, and at the broad level of a forest plan, they were adequately evaluated;

G) Fire Management Plans (FMP's) are not part of forest plans. Rather, FMP's are developed from direction in forest plans and other higher level decisions and policy. A thorough explanation of FMP's may be found in Forest Service Handbook (FSH 5109.19); and

H) Please see the response to A above for an explanation of the WUI delineation. Just because a natural, unplanned ignition occurs in the WUI area, it does not mean that the only response available is to quickly suppress the fire. There are no forestwide plan components that prohibit managing a natural, unplanned ignition in the WUI for resource objectives. Most of the MAs and the vast majority of the acres on the Forest occur in areas where the Forest Plan does not prohibit the use of natural, unplanned ignitions. While we would anticipate that most natural, unplanned ignitions would be suppressed in the WUI area due to values that would be put at risk if the fire were allowed to burn, there will likely be circumstances where natural, unplanned ignitions occurring in the WUI would be allowed to burn based on low risks to values and the resources benefits that could be achieved by allowing it to burn.

Forest Plan General: Category 459

Public Comment 112: (Letter Number(s): 190, 218, and 235)

The Forest Service should consider the following regarding the management of fire:

- A) Remove the distinction between lightning caused fire ignitions and human caused;
- B) Provide the reasoning for using a percentage objective for the use of natural, unplanned ignitions to meet resource objectives; and
- C) Establishing stronger Plan direction regarding the use of natural, unplanned ignitions in order to trend the vegetation towards the desired condition.

Response:

A) The distinction between natural, (i.e., lightning caused) unplanned ignitions and human caused unplanned ignitions is an important one. National Policy (FSM 5130) requires that the initial response to all human-caused unplanned ignitions be one of suppression, while responses to natural, unplanned ignitions may vary. That same policy is stated on page 7 of the document that the commenter referenced (i.e., Guidance for Implementation of Federal Wildland Fire Management Policy, 2009);

B) The intent of that forestwide objective (i.e., FW-OBJ-FIRE-02) is to encourage agency administrators (e.g., district rangers and/or forest supervisors) and fire managers on the IPNF to utilize unplanned, natural ignitions when the circumstances are appropriate to trend the Forest towards the desired conditions that are articulated in the Forest Plan. Compared to the entire acreage on the IPNF, the relatively small amount of prescribe fire and mechanical vegetation treatments that are predicted to occur during the life of the Forest Plan is simply not enough to make substantial gains towards reaching the desired conditions. Budget and staffing levels will likely be too low given the large workload that is necessary to conduct the required environmental analysis and implement projects. Therefore, in order to make a moderate amount of headway towards the desired conditions during the life of the Plan, it will be necessary to use unplanned, natural ignitions as another tool. Because of the potential risk of harm to people, private property, air quality, TES habitat, cultural resources, community infrastructure, water quality, and numerous other resources, we anticipate that the most appropriate action to take on most of the unplanned, natural ignitions will be to quickly suppress them. However, we foresee that for a relatively small percentage of natural, unplanned fires, they will occur in a location and under circumstances that are conducive to managing the fire in ways that would help achieve desired conditions. Based on local experience and knowledge, we estimate that roughly 10 percent of the natural, unplanned fire ignitions that occur on the IPNF could be managed (rather than immediately suppressed) in ways that would help the Forest towards desired conditions. By allowing natural, unplanned ignitions to burn in some areas and under some circumstances, the intent is that the fires will help reverse the undesirable trends that have been occurring to the composition, structure, and landscape pattern of forest vegetation across the IPNF; and

C) In order to achieve the desired future conditions that are articulated in the Forest Plan for both the vegetation and fire related resources, we agree that wildland fire needs to occur over a fairly large number of acres. However, the issue over how much fire use is needed in order to meet desired conditions is also partially dependent upon how much wildfire (i.e., unplanned ignitions that escape suppression efforts) occurs in the future and what the effects of those fires are in combination with effects from the prescribed fires and the natural, unplanned ignitions that are allowed to burn. Between the development of the draft Forest Plan/DEIS and the revised, additional modeling was conducted to better predict how much wildlife might occur in the future, and how it would influence the attainment of the desired future condition for vegetation as well as wildlife habitat. That analysis has been added to the FEIS.

As noted on page 2 of the draft Forest Plan, one factor to consider in establishing objectives in a forest plan is the likely budget. Objectives should be realistic based on likely funding and staffing levels. To set objectives at levels that obviously could not be achieved given likely budgets would only create false expectations and if used in the analysis of environmental effects, unrealistic predictions regarding impacts. In addition to the brief information in the draft Forest Plan on this topic, additional discussion was added to the revised Forest Plan and FEIS. See the response to Public Comment 48 for additional general information on how objective levels were determined.

Forest Plan Desired Condition: Category 461

Public Comment 113: (Letter Number(s): 89 and 209)

The Forest Service should consider whether the estimated 2,600 acres of anticipated wildfire is accurate or not, given the thousands of acres that have burned in the Lower Kootenai GA alone. In addition, the Forest Service should describe the condition of the vegetation stages that was created by the historic fire regime.

Response:

As described in more detail in appendix B as well as the fire section of chapter 3 in the FEIS, a more comprehensive analysis was conducted for the FEIS regarding how much wildfire was projected in the future. We agree that it will be necessary to suppress many wildfires in order to protect various values that would be at risk.

As indicated above, the amount of wildfire that was predicted to occur in the future on the IPNF has been updated through additional modeling simulations. We agree that more wildland fire use is needed in order to trend the vegetation towards the desired condition. Multiple fire and wildlife related forest plan components were developed for that purpose. Regarding the request that the Plan clearly describes the condition of the vegetation stages that was created by the historic fire patterns, the desired conditions described in FW-DC-VEG-01 and FW-DC-VEG-02 (as well as other components) does provide an approximation of the historic vegetation conditions. This was discussed at length in the DEIS on pages 49-52.

Forest Plan Desired Condition: Category 461

Public Comment 114: (Letter Number(s): 235)

The Forest Service should provide an explanation of why FW-DC-FIRE-03 was written in a way that both acknowledges that wildland fire can help to trend the vegetation towards the desired condition, while at the same time recognizing that some wildfires would be suppressed.

Response:

FW-DC-FIRE-03 states: “The use of wildland fire (both planned and unplanned ignitions) increases in many areas across the Forest. Fire plays an increased role in helping to trend the vegetation towards the desired conditions while serving other important ecosystem functions. However, wildfires continue to be suppressed where necessary to protect life, property, and key resources.” The last sentence of this desired condition was included in order to acknowledge that some wildfires would be suppressed due to the unacceptable risk that they could pose to human life and other important values.

Forest Plan Desired Condition: Category 461

Public Comment 115: (Letter Number(s): 190)

The Forest Service should consider modifying the language in FW-DC-FIRE-02 so that the reader does not get the impression that the Forest Service is allowing the counties to set fire policy on national forest lands.

Response:

The intent in the language of the draft Forest Plan for FW-DC-FIRE-02 was to recognize that the Forest Service has a duty to work with the counties whenever possible to lessen wildfire risks in the WUI. That responsibility is articulated in many higher level policies such as the “Guidance for Implementation of Federal Wildland Fire Management Policy (2009) document. On page 12 of that document, it states: “Agencies will support the development and implementation of Community Wildfire Protection Plans.” However, after reviewing the language that was included in the draft Forest Plan for that component, the Forest does understand the point that is being made. As a result, the language was modified for FW-DC-FIRE-02 in the revised Forest Plan.

Forest Plan Desired Condition: Category 461

Public Comment 116: (Letter Number(s): 235)

The Forest Service should disclose where fire suppression activities would occur to protect public and firefighter safety, and where natural, unplanned ignitions would be allowed to burn because private property and human safety were not at risk. In addition, the environmental effects of those decisions should be disclosed.

Response:

To the degree that it is possible and reasonable to do so, the Forest believes that the suite of plan components that was presented in the draft Forest Plan that address wildland fire provides the proper amount of guidance on this issue. The guidance in this programmatic plan, in combination with direction at higher levels (e.g., National and/or Regional direction), provides the overall framework in which decisions would be made on what kind of actions to take in individual circumstances, for natural, unplanned ignitions.

The forestwide plan components (FW-DC-FIRE-01, 02, 03 and FW-OBJ-FIRE-01 and 02) basically serve the following four functions; 1) stress that the public and firefighters are always the first priority; 2) express the desire to reduce hazardous fuels in the WUI in order to lower the intensity of potential wildfires in that area and risks to values; 3) acknowledge the desire and need for the use of more wildland fire in order to trend the forest vegetation towards desired conditions; and 4) establish quantitative objectives that could be reached under the current budget assumptions.

Regarding where the use of natural, unplanned ignitions may be considered to achieve resource objectives, as well as a general idea on how important the use of that “tool” may be in achieving the desired conditions, see the MA specific forest plan components. For each MA (chapter 3 of the Forest Plan), there are desired condition statements for fire and vegetation, as well as standards/guidelines. One of the objectives for creating those specific plan components was to articulate the role that wildland fire (including the use of natural, unplanned ignitions) would have in those specific MA areas. Because the decision of whether or not to allow natural, unplanned ignitions to burn depends on many specific circumstances, not just the location of the fire. It would be virtually impossible to specify all of the conditions and circumstances under which a natural, unplanned ignition would be allowed to burn and do so prior to the event.

Regarding the disclosure of effects in a NEPA document, to the extent that a programmatic level decision like this Forest Plan can predict impacts, they have been disclosed in the EIS.

Forest Plan Objectives: Category 462

Public Comment 56: (Letter Number(s): 131 and 209)

The Forest Service should consider modifying the fire related objectives associated with the draft Forest Plan (FW-OBJ-FIRE-01 and FW-OBJ-FIRE-02) to increase the amount of fire that is used (both prescribed and natural, unplanned ignitions) to achieve the desired future conditions.

Response:

As noted on page 2 of the draft Forest Plan, one factor to consider in establishing objectives is the likely budget. Objectives should be realistic based on likely funding and staffing levels. To set objectives at levels that could not be achieved given likely budgets would only create false expectations and if used in the analysis of environmental effects, unrealistic predictions may be made regarding impacts. In addition to the information in the draft Forest Plan on this topic, additional discussion was added to the revised Forest Plan and FEIS. See the response to Public Comment 48 for additional general information on how objective levels were determined.

The objective (FW-OBJ-FIRE-01) of treating fuels on approximately 6,000-16,000 acres annually was based less on how much was needed, and more on how much would be possible given the recent past budget levels and likely future levels. In order to achieve the desired future conditions

that are articulated in the Forest Plan for both the vegetation and fire related resources, we agree that a higher number of acres would likely be needed. However, the issue over how much fire use is needed in order to meet desired conditions is also partially dependent upon how much wildfire (i.e., unplanned ignitions that escape suppression efforts) occurs in the future and what the effects of those fires are in combination with effects from the prescribed fires and the natural, unplanned ignitions that are allowed to burn. Between the development of the draft Forest Plan/DEIS and the revised Forest Plan, additional modeling was conducted to predict how much wildlife might occur in the future, and how it would influence the attainment of the desired future condition for vegetation as well as wildlife habitat. That analysis has been added to the FEIS.

Forest Plan Objectives: Category 462

Public Comment 117: (Letter Number(s): 209)

A more thorough discussion of FW-OBJ-FIRE-01 should be provided to better understand the objective and how it would help the IPNF meet restoration goals.

Response:

The intent of FW-OBJ-FIRE-01 is to encourage agency administrators (e.g., district rangers and/or forest supervisors) and fire managers on the IPNF to utilize natural, unplanned ignitions when the circumstances are appropriate to trend the Forest towards the desired conditions that are articulated in the Forest Plan.

Compared to the entire acreage on the IPNF, the relatively small amount of prescribe fire and mechanical vegetation treatments that are predicted to occur during the life of the Forest Plan is simply not enough to make substantial gains towards reaching the desired conditions. Budget levels will likely be too low given the large workload and costs that are necessary to conduct the required environmental analysis and to implement projects. Therefore, in order to make a moderate amount of headway towards the desired conditions during the life of the Plan, it will be necessary to use natural, unplanned ignitions as another tool.

Because of the potential risk of harm to people, private property, air quality, TES habitat, cultural resources, community infrastructure, water quality, and numerous other resources, we anticipate that the most appropriate action to take on most of the natural, unplanned ignitions will be to quickly suppress them. However, we foresee that for a relatively small percentage of natural, unplanned fires, they will occur in a location and under circumstances that are conducive to managing the fire in ways that would help achieve desired conditions. Based on local experience and knowledge, we estimate that roughly 10 percent of the natural, unplanned fire ignitions that occur on the IPNF could be managed (rather than immediately suppressed) in ways that would help the Forest towards desired conditions. By allowing natural, unplanned ignitions to burn in some areas and under some circumstances, the desire is that the fires will help reverse the undesirable trends that have been occurring to the composition, structure, and landscape pattern of forest vegetation across the IPNF. Please see the DEIS for more information on this topic (primarily in the forest vegetation, wildlife and aquatics sections).

When considering the use of a natural, unplanned ignition for resource objectives, the IPNF would follow the extensive direction that currently exists for the use of these types of fires. For example, the Wildland Fire Use Implementation Procedures Reference Guide (NWCG 2005) would be followed as would the numerous other sources of existing direction that is relevant. During the life of the Forest Plan, some lightning caused fires may be allowed to burn until precipitation extinguishes them, while other fires may be allowed to burn in some directions while suppression activities occur on portions of the fire perimeter where values and risks warrant control measures.

Forest Plan Objectives: Category 462

Public Comment 719: (Letter Number(s): 89, 190, and 235)

The Forest Service should revise FW-OBJ-FIRE-02 to read: Manage wildland fires for resource benefits on at least 10 percent of the area burned over the life of the Plan.

Response:

Please refer to the responses for Public Comment 112 (B) and Public Comment 117.

Forest Plan Guidelines: Category 464

Public Comment 118: (Letter Number(s): 221)

Additional guidelines should be considered in order to avoid or lessen the effects that fire management activities can have on aquatic and other resources.

Response:

All of the suggested guidelines are already part of the existing management direction for the Forest Service. Regarding the use of fire retardant, the “Implementation Guide for Aerial Application of Fire Retardant” provides direction for the protection of aquatic resources when applying retardant aerially (USDA 2012). Chapter 12 of the “Interagency Standards for Fire and Fire Aviation Operations” provides policy direction for the use of various types of chemicals (e.g., retardants, foams, gels) during ground based fire suppression efforts with respect to aquatic resources (USDA and USDI 2012). Lastly, the INFISH retained existing decision contains a guideline for the protection of aquatic resources from chemicals as a result of fire suppression activities. See guideline FM-3 on page 223 of appendix B of the IPNF draft Forest Plan for more detail.

The use of Minimum Impact Suppression Tactics (MIST) is already part of policy for the Forest Service and the importance of using those tactics in and around water is emphasized (NWCG 2004, Appendix I). In addition, there is already a guideline in the Forest Plan (see FW-GDL-RIP-03, page 36 of the draft Forest Plan) stating that MIST should be used within riparian conservation areas (RCAs).

Guidance for the stabilization, rehabilitation, and restoration of wildfire control lines is already provided by Burned Area Emergency Response (BAER) direction in FSH 2509.13, FSM 2520, 2523 and the Interagency Burned Area Emergency Response Guidebook (USDI and USDA 2006). In addition, INFISH retained existing decision contains a standard that requires a rehabilitation treatment plan for wildfires in order to protection aquatic resources. See guideline FM-5 on page 223 of appendix B of the IPNF draft Forest Plan for more detail. The stabilization of fire lines that are constructed for prescribe burns is one of the elements that would be considered in order to meet INFISH direction in the guideline FM-1 on page 223 of appendix B of the IPNF draft Forest Plan.

Regarding the location of fire camps, helibases, etc., the INFISH retained existing decision contains a guideline for the protection of aquatic resources from these types of areas. See guideline FM-2 on page 223 of appendix B of the IPNF draft Forest Plan for more detail. Because the suggested guidelines are already part of the existing management direction, the IPNF does not feel it is necessary to reiterate that direction in forest plan components. As indicated on page 2 of the draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service will follow all existing laws, regulations, and policies relating to the management of the NFS lands, and the forest plan components are generally designed to supplement, not replace, existing direction.

Forest Plan Coeur d’Alene GA DC: Category 465

Public Comment 723: (Letter Number(s): 190)

The Forest Service should remove desired condition GA-DC-FIRE-CDA-03. This desired condition basically enables county governments to set fire policies for federal lands.

Response:

Please see the response for Public Comment 115. The language for GA-DC-FIRE-CDA-03 was modified to eliminate the perception that the Forest Service was allowing the counties to set fire policy on national forest lands. The intent of the original language was simply to express the Forest Service’s responsibility to support the implementation of Community Wildfire Protection Plans (CWPP) as required by policy.

Grazing

Suitability: Category 501

Public Comment 724: (Letter Number(s): 235)

The Forest Service should disclose what factors would be considered when doing a project-specific suitability analysis for rangeland suitability.

Response:

In addition to the discussion presented in the livestock grazing section of the DEIS (pages 440-442) on the methods used to determine suitability, more detailed information is presented in appendix B (pages 40-41) of the DEIS. The factors used in the determination are presented on those pages. That analysis was conducted using a GIS system and data layers. In the event that a project-level evaluation is done for suitability, those same factors would be evaluated at a more detailed scale. The findings of a site-specific evaluation may or may not warrant changes to the suitability. As illustrated on page 41 of appendix B of the DEIS, riparian areas were excluded from the suitable rangelands.

DEIS General: Category 502

Public Comment 725: (Letter Number(s): 89)

The Forest Service should consider closing vacant allotments and conducting weed management and monitoring.

Response:

On page 39 of the draft Forest Plan, a forest plan component (FW-DC-GRZ-03) states: “Vacant allotments are evaluated and closed when there is either a lack of demand for forage, a shortage of forage for a viable allotment, or the likelihood of a significant resource conflict.” Weed management and monitoring activities are part of the Forest Plan’s monitoring program (see chapter 5 in the revised Forest Plan) and are already required per Forest Service Manual direction (e.g., FSM 2080 and 2900).

DEIS Cumulative Effects: Category 505

Public Comment 119: (Letter Number(s): 145)

The Forest Service should consider closing abandoned allotments and measures to protect aquatic resources from grazing impacts.

Response:

Regarding closing abandoned allotments, please see the response to Public Comment 725 above. Regarding protecting aquatic resources from detrimental impacts from grazing, please see the response to Public Comment 123 below.

Forest Plan Guidelines: Category 513**Public Comment 123:** (Letter Number(s): 221)

Grazing guidelines should be added to the Forest Plan that would provide protection to the various aquatic resources.

Response:

The watershed, soil, riparian and aquatic species standards and guidelines that are on pages 30-37 of the draft Forest Plan, plus the INFISH retained existing decision (appendix B, page 213 of draft Forest Plan) already provide ample protections for those resources.

*Inventoried Roadless Areas - IRAs***Evaluation for Wilderness Potential: Category 550****Public Comment 124:** (Letter Number(s): 9, 69, 119, 121, 136, 189, 193, 207, 208, 226, 235, 248, and 269)

The Forest Service should re-evaluate the wilderness potential of Inventoried Roadless Areas.

Response:

We disagree that the wilderness evaluation in appendix C is biased or arbitrary. The 1982 planning procedures state that “roadless areas within the NFS shall be evaluated and considered for recommendation as potential wilderness areas during the forest planning process.” Appendix C of the FEIS describes the process followed in evaluating inventoried roadless areas including a summary for each areas capability, availability and need. Areas not recommended for wilderness in the revised Forest Plan could still be considered for wilderness by Congress.

Documentation has been added to appendix C. IRAs are allocated to various MAs by alternative as shown in tables 71 and 77 in the FEIS. Although 18,125 of the 850,999 acres of IRAs are allocated to MAs that allow vegetation management, all IRAs will continue to be managed in accordance with laws, regulations, and policies that govern these areas. If within the state of Idaho, the Idaho Roadless Rule governs the use and management of these areas.

We agree that public opinions regarding the use of these areas vary greatly, and future management of roadless areas is a controversial and polarizing issue. Please see updated appendix C for specific information on the suitability determination made for recommended wilderness. FSM 1909.12 outlines the recommended wilderness process, including that the recommendation is a preliminary administrative recommendation that will receive further review and possible modification by the Chief of the Forest Service, Secretary of Agriculture, and the President of the United States. Congress has reserved the authority to make final decisions on wilderness designation.

The FEIS considers a range of alternatives for managing roadless areas. Alternative C addresses additional recommended wilderness and Alternative A addresses slightly less recommended wilderness.

Edits to appendix C, recommended wilderness evaluations, were made based on public comments received on the DEIS and draft Forest Plan. There is variety research, depending on location, of

over-snow motorized use effects on various wildlife species. Several references provided by the commenter were considered.

We disagree that the wilderness evaluation in appendix C rates snowmobiling as primitive recreation. See Public Comment 22.

The majority of the IPNF IRAs are allocated to MA5 (624,781 acres classified as backcountry) and the revised Forest Plan allows over-snow motorized use within these areas.

We disagree that the five characteristics identified in FSH 1909.12, and expanded elements process as described in appendix C, was not a valid exercise. Specific features listed in an element (e.g., trail) may have been evaluated differently depending on the characteristic being addressed. A trail under “natural and free from disturbance” was defined as a minor disturbance. Under “primitive and unconfined recreation” two or more trails was defined as High opportunities to provide primitive recreation.

We disagree that ratings for Needs elements 4 and 5 in appendix C should not have been considered in the final scoring. In regards to the Need process for element 4, Ecological Sections represented in wilderness, the rating was determined for the entire Forest.

Capability Element 20 in appendix C considers threatened and endangered wildlife species.

Regarding linkage zones or habitat connectivity, there are several capability elements in appendix C that address the value of connectivity as a wilderness characteristic. This includes elements; 14- located adjacent to existing wilderness or other IRAs, 21- overall wildlife habitat integrity rating of high, and 22- provides critical linkage between wildlife areas or habitats.

We agree that desired conditions for MA5 state that timber harvest and road construction are limited and roads would generally be temporary. Most IRAs are proposed to be managed as backcountry (MA5). These areas, if within the state of Idaho, also match up with the Idaho Roadless Rule designation of backcountry/restoration. These Idaho Roadless areas designated as backcountry/restoration include forest plan standards and guidelines that protect the roadless nature of these areas. Direction includes limitations on road construction and reconstruction (MA5-STD-AR-01 also addressed in 36 CFR 294.23); limitations on timber cutting (MA5-STD-TBR-01 also addressed in 36 CFR 294.24); and limitations on mineral leasing activities (MA5-STD-MIN-01 also addressed in 36 CFR 294.25). These protections are designed to preserve these areas as primarily unroaded and unmanaged. Timber harvest is not scheduled in MA5 and does not contribute towards the allowable sale quantity.

Wildlife biologists have reviewed all current information on threatened and endangered species, and the FEIS and Forest Plan have been updated with that information.

Appendix C capability elements 39 and 40 are rated for whether the current boundary, as mapped in appendix C, is easily identifiable, or if it can be easily adjusted.

MA Allocation of IRAs: Category 552

Public Comment 125: (Letter Number(s): 6, 68, 70, 171, 184, 189, and 207)

The Forest Service should protect IRAs for the future, but allow for mechanized use such as mountain bikes. In addition, fuel reduction activities should be allowed within the WUI portions of IRAs.

Response:

Most IRAs are proposed to be managed as backcountry (MA5). These areas, if within the state of Idaho, also match up with the Idaho Roadless Rule designation of backcountry/restoration. These Idaho Roadless areas designated as backcountry/restoration include forest plan standards and guidelines that protect the roadless nature of these areas. Direction includes limitations on road construction and reconstruction (MA5-STD-AR-01 also addressed in 36 CFR 294.23); limitations on timber cutting (MA5-STD-TBR-01 also addressed in 36 CFR 294.24); and limitations on

mineral leasing activities (MA5-STD-MIN-01 also addressed in 36 CFR 294.25). These protections are designed to preserve these areas as primarily unroaded and unmanaged. However, fuel reduction activities can be implemented within the WUI portions of roadless areas under both the Idaho Roadless Rule (36 CFR 294 Subpart C – Idaho Roadless Area Management) and under the revised Forest Plan (for areas outside of Idaho but managed as Forest Plan MA5 areas). Fuel reduction activities would be analyzed in detail at a site-specific level and include public review and comment.

Roadless areas managed under the Idaho Roadless Rule as backcountry/restoration as well as areas on the IPNF outside of Idaho all allows mechanized use, including mountain bikes.

DEIS General: Category 553

Public Comment 126: (Letter Number(s): 189, 207, 212, 235, and 248)

The Forest Service should manage most, if not all, of the IRAs as recommended wilderness including those areas identified in Alternative C.

Response:

The FEIS includes appendix C which describes, in detail, the wilderness evaluation process used to determine which areas were appropriate and recommended for wilderness management (MA1b).

Most IRAs are proposed to be managed as backcountry (MA5). These areas, if within the state of Idaho, also match up with the Idaho Roadless Rule designation of backcountry/restoration. These Idaho Roadless areas designated as backcountry/restoration include forest plan standards and guidelines that protect the roadless nature of these areas. Direction includes limitations on road construction and reconstruction (MA5-STD-AR-01 also addressed in 36 CFR 294.23); limitations on timber cutting (MA5-STD-TBR-01 also addressed in 36 CFR 294.24); and limitations on mineral leasing activities (MA5-STD-MIN-01 also addressed in 36 CFR 294.25). These protections are designed to preserve these areas as primarily unroaded and unmanaged.

Idaho Roadless Rule: Category 565

Public Comment 131: (Letter Number(s): 198)

The Forest Service should be transparent regarding the Idaho Roadless Rule and how it may affect the viability of Alternative C.

Response:

The rationale for the selection of Alternative B Modified is articulated in the FEIS. Alternative C was not consistent with the Idaho Roadless Rule. If selected, Alternative C would have had to be put through the modification process outlined in the Idaho Roadless Rule at 36 CFR 294.27.

Idaho Roadless Rule: Category 565

Public Comment 502: (Letter Number(s): 179, 189, 235, and 248)

The Forest Service should revise the alternatives to state that all forest plan MAs that include IRAs will be managed in compliance with the “permissions and restrictions” of the Idaho Roadless Rule and any further standards for road and timber management be deleted because the agency does not have the discretion to change these provisions, including both the permissions and the restrictions, by a forest plan revision. In addition, the Plan should also be clear regarding how IRAs will be impacted and if either more protection or less protection can be given by forest plans than what is provided by the Idaho Roadless Rule.

Response:

Changes have been incorporated into the revised Forest Plan that includes standards and guidelines that address the Idaho Roadless Rule. These changes will more clearly articulate the supremacy of the Idaho Roadless Rule on the IRAs managed on the IPNF. The revised Forest Plan has incorporated new components since the draft Forest Plan was released.

Idaho Roadless Rule: Category 565

Public Comment 503: (Letter Number(s): 248)

The Forest Service should continue to design vegetation management projects in IRAs (in keeping with the Idaho Roadless Rule) that are not likely to adversely affect the caribou or grizzly bear and use the best available science, in consultation with the USFWS, to maintain and manage caribou and grizzly habitat so that vegetation management projects proposed within their habitats pursuant to the proposed action maintains or improves their habitat.

Response:

We agree that all projects (vegetation manipulation projects or other projects) proposed within Idaho Roadless Areas would follow direction contained in the Idaho Roadless Rule (36 CFR 294 – Subpart C). In addition, any management project that is proposed within caribou or grizzly bear habitat would be analyzed thoroughly. Implementation of any project within these areas would only be approved if designed to protect and not jeopardize the continued recovery of these species. All projects within caribou and grizzly habitat are required to be reviewed by the US Fish and Wildlife Service to ensure that proposed activities are not going to threaten or harm these species.

Lands/Special Uses

Acquisitions: Category 600

Public Comment 205: (Letter Number(s): 220 and 254)

Much of the Castle Rock area is on Forest Service land and is used extensively by rock climbers. The Spokane Mountaineers would like to have the private parcels at Castle Rock placed as priority for acquisition in the land exchange program.

Response:

Although included in the 1987 Forest Plan, the revised Forest Plan does not provide direction on priorities for the land exchange program. This direction is no longer included because it indicated where the Forest Service is most interested in exchanging or acquiring lands, which could then drive up the value of the land. This comment will be considered when implementing our annual lands program.

Acquisitions: Category 602

Public Comment 206: (Letter Number(s): 209)

The Legal and Administrative Framework for Lands/Special Uses (DEIS page 304) should include specific reference to the Treaty of Hellgate of 1855, Executive Order 13175 and USDA and USFS regulations and policies related to Tribal Treaty rights and the government-to-government relationship. The Tribal Forest Protection Act (25 U.S.C. § 3101 et seq.) and the Sacred Sites Policy (Executive Order 13007) are also necessary to a full analysis of impacts of landownership administration and adjustments and special uses of NFS lands. In addition, the DEIS fails to mention Tribes as recipients of special use authorizations.

Response:

The Hellgate Treaty of 1855, the Tribal Forest Protection Act, and Executive Orders 13175 and 13007 have been added to Lands and Special Uses Legal and Administrative Framework in the FEIS. The FEIS has also been updated to include Indian Tribes as recipients of special use authorizations.

Forest Plan General: Category 607**Public Comment 207:** (Letter Number(s): 124)

The DEIS references the Cabin User Fee Fairness Act of 2000 (CUFFA), the current law governing cabin fees. If Congress passes the Cabin Fee Act, which would supersede CUFFA, would it be referenced in the EIS in place of CUFFA?

Response:

The revised Forest Plan will be consistent with all laws and regulations. The FEIS lists current laws and regulations.

Forest Plan Guidelines: Category 612**Public Comment 208:** (Letter Number(s): 221)

A) FW-GDL-LND-03 as follows: Require instream flows and habitat conditions for hydroelectric and other surface water development proposals that maintain or restore riparian resources, favorable channel conditions, fish passage, and reproduction and growth. Coordinate this process with the appropriate state agencies. During re-licensing of hydroelectric projects, provide written and timely license conditions to the Federal Energy Regulatory Commission (FERC), that require fish passage and flows and habitat conditions that maintain/restore riparian resources and channel integrity. Coordinate re-licensing projects with the appropriate state agencies; and
B) FW-GDL-LND-04 as follows: Locate new hydroelectric ancillary facilities outside RHCAs. For existing ancillary facilities inside the RHCAs that are essential to proper management, provide recommendations to FERC to assure that the facilities would not prevent attainment of the riparian management objectives and that adverse effects on inland native fish and aquatic species of concern are avoided. Where these desired conditions cannot be met, provide recommendations to FERC that such ancillary facilities should be relocated. Locate, operate, and maintain hydroelectric facilities that must be located in RHCAs to avoid effects that would retard or prevent attainment of the riparian management objectives and avoid adverse effects on inland native fish and aquatic species of concern.

Response:

The retained INFISH decision includes this direction. These guidelines are found as LH-1 and LH-2 within INFISH. This direction has been retained as part of the revised Forest Plan, so there is no need to duplicate the direction.

Management Areas (Chapter 3)**MA1 Desired Condition: Category 701****Public Comment 504:** (Letter Number(s): 163)

The Forest Service should consider revising the desired condition for the Salmo-Priest Wilderness Area (MA1a-DC-AR-02) to semi-primitive, non-motorized instead of primitive because the Salmo-Priest Wilderness Area is small. The primitive ROS class requires that the area be at least

3 miles from a motorized route, and this desired condition may not be possible in the Salmo-Priest Wilderness Area.

Response:

We agree that the actual experience in some parts of the Salmo-Priest Wilderness Area may be more in line with the ROS category of semi-primitive non-motorized, but the national protocol for the desired future condition for established wilderness areas is the ROS category of primitive. There are many factors considered when classifying an area in any ROS category. Some characteristics that are analyzed and applied in the ROS process include the activity characterization, the experience characterization, and the setting characterization which has three components: physical, social, and managerial. With many components being included in mapping ROS polygons, some are not completely homogeneous.

MA1a General: Category 702

Public Comment 133: (Letter Number(s): 189)

The Forest Service needs to explain which management area any new areas designated by Congress as wilderness would be managed under.

Response:

Any new areas designated as wilderness by Congress would be managed under MA1a, through a forest plan amendment.

MA1a: Category 704

Public Comment 135: (Letter Number(s): 2, 8, 95, 163, 189, 209, and 253)

The Forest Service should consider the following suggested changes or modifications to uses to the designated wilderness MA (MA1a):

- A) Permitting the use of bicycles and other forms of human powered transport;
- B) Permitting the use of fixed anchors wherever climbing is allowed with appropriate level of use established on an area-by-area basis and strategically placed to minimize climbing impacts to fragile soils, vegetation, and wildlife in wilderness areas. The government has authority under the Wilderness Act to permit fixed anchors in wilderness, and this use should be permitted as climbing is one of the unique recreation opportunities wilderness is intended to provide. The Forest Service should develop a climbing management plan or rule to accommodate climbing with fixed anchor use while protecting wilderness values;
- C) Restricting off-road use and commercial grazing in wilderness;
- D) MA1a-STD-AR-01 (page 45) contains restrictions on party size for access and recreation. The exercise of Treaty rights and cultural and religious practices by Tribal members should not be restricted in this manner;
- E) Ensuring the EIS is clear regarding the protection of cultural resources in wilderness. MA1a-DC-AR-06 states, “Preservation of historic properties is common, although buildings and other structures are rare.” Is protecting cultural resources more important than protecting wilderness character? This is vague and confusing and needs clarification. This should be removed unless it can be stated in a way that is both clear and consistent with the Wilderness Act;
- F) Ensuring the EIS is clear in how wilderness character is provided for and monitored. The “Monitoring” section should be revised to focus on wilderness character; and
- G) Gathering firewood and other special forest products from within wilderness could be problematic unless they are being used within the wilderness.

Response:

- A) The Wilderness Act of 1964 prohibits the use of “mechanical transport” (see Section 4(c) of the Act). A bicycle is considered mechanical and is thus prohibited by the Wilderness Act;
- B) We agree that use of climbing anchors in wilderness is an issue, but it is not a forest plan issue. There continues to be debate nationally on fixed anchors in wilderness, with fixed anchor rules expected in 2013. There has not been any controversy or request to utilize anchors in the Salmo-Priest Wilderness. The primary use in the Salmo-Priest Wilderness on the IPNF is hiking and some horseback use;
- C) The Wilderness Act of 1964 prohibits motor vehicle use (roaded and off-road) in designated wilderness. Grazing is not allowed in designated wilderness under the revised Forest Plan and the Salmo-Priest Wilderness has never been part of any grazing allotment. See MA1a-STD-GRZ-01;
- D) Tribal members may exercise their treaty rights;
- E) As specified in regional supplemental direction to FSM 2323.8, historic and prehistoric districts, sites, buildings, structures, and objects occur in many wilderness units in the Northern Region. As directed in FSM 2323.8, “These cultural properties must receive the same attention in our planning and management, as do the more familiar resources of soil, water, vegetation, wildlife, and so on. All resources, including the cultural resource, must be managed under the principle of no degradation of the wilderness resource.” The regional supplemental direction goes on to state “Normally, the prevailing natural processes will be allowed to act on cultural properties unimpeded, thereby integrating cultural resources into the general wilderness concept and value. Occasionally however, a wilderness unit may contain cultural resources which are of National Register quality. In these instances, preservation, restoration, stabilization, or maintenance may be necessary to prevent unacceptable loss of these cultural values. Thus, in these cases the cultural values will take precedence over the wilderness value of letting nature take its course. The need for restoration, stabilization, or maintenance of a particular cultural property will be determined through a project environmental assessment if not already specified in an approved wilderness management plan or interim wilderness management direction.” Thus, no restoration will occur without site-specific NEPA or direction under a wilderness management plan;
- F) The monitoring questions have been changed in the revised Forest Plan. In designated wilderness, the indicator is wilderness managed to standard, which follows the Chief’s Ten Year Wilderness Challenge (from 2005). This measures 10 elements for wilderness, including “untrammeled.”; and
- G) Collection of special forest products for personal use is allowed to permit people to collect firewood, huckleberries, etc. for use while in the wilderness. However, it is possible some people may take huckleberries or other special forest products out of the wilderness for use at home. This type of use is expected to be small or minimal.

MA1a Guidelines: Category 707**Public Comment 505:** (Letter Number(s): 189)

The Forest Service should consider removing the MA1a-GDL-VEG-01 that states, “Non-native invasive plant species may be treated where significant values inside or outside wilderness are clearly at risk, including recovery of TES Species” because there is not an exception in the Wilderness Act that permits this kind of over- trammeling and manipulation of wilderness.

Response:

Treatments will be consistent with wilderness character, the Wilderness Act, and used to restore the natural condition of vegetation. Treatments to remove non-native invasive species have been done throughout the wilderness system to maintain the natural condition of wilderness. Most

treatments are accomplished in concert with wilderness character like hand pulling of specific plants and occasionally the spraying of individual plants with herbicides. To use herbicides within wilderness requires a site-specific analysis and NEPA decision.

MA1a Guidelines: Category 707

Public Comment 506: (Letter Number(s): 189)

The Forest Service should consider removing the MA1a-GDL-FIRE-02 that states, “Prescribed fire may be used when necessary to contribute to the survival of a threatened and endangered species or, if necessary to allow fire to play its natural role in wilderness” because this manipulation is not permitted in the Wilderness Act.

Response:

Planned ignitions are allowed in wilderness and may be used as a tool to restore natural conditions in vegetation.

MA1b: Category 710

Public Comment 138: (Letter Number(s): 131, 159, 172, 181, 188, 190, 235, 244, 246, and 259)

The Forest Service should consider the following suggested changes or modifications regarding the recommended wilderness MA (MA1b) allocation:

A) Support for designation of recommended wilderness to Scotchman Peaks, Salmo-Priest, Selkirk, and the Mallard Larkins areas. In addition, designate the following IRAs as recommended wilderness: Grassy Top, Magee-East Cathedral, Lost Creek/Trout Creek, Spion Kop, Meadow Creek-Upper North Fork/Sheep Mountain, Mt. Willard-Lake Estelle, and Packsaddle IRAs. These additional areas provide critical wildlife habitat and opportunities for prime opportunities for primitive and unconfined types of recreation on the landscape. These changes would not require a modification of the Idaho Roadless Rule. The preamble to the rule is specific when it says, “the final rule does not make any recommendations for potential wilderness.” As such, there is no requirement to modify the boundaries associated with the Idaho Roadless Rule themes. Further, the rule at 36 § CFR 294.28(d) provides direction that “[l]and management components that are not inconsistent with this subpart will continue to provide guidance for projects and activities within Idaho Roadless Areas.” Because designation of recommended wilderness does not compel actions that would be contrary to the Idaho Roadless Rule, the direction is not inconsistent with the rule and therefore would not compel modification;

B) Designate Grandmother Mountain as recommended wilderness rather than Wilderness Study Area. Also, designate the adjacent roadless lands as recommended wilderness. This would ensure that the wilderness character of the overall area is maintained, consistent with statutory and regulatory provisions associated with the WSA. Recommending portions of the Grandmother Mountain Roadless Area for wilderness would not require a modification of the Idaho Roadless Rule. The preamble to the rule is specific when it says, “the final rule does not make any recommendations for potential wilderness.” As such, there is no requirement to modify the boundaries associated with the Idaho Roadless Rule themes. Further, the rule at 36 § CFR 294.28(d) provides direction that “[l]and management components that are not inconsistent with this subpart will continue to provide guidance for projects and activities within Idaho Roadless Areas.” Because designation of recommended wilderness does not compel actions that would be contrary to the Idaho Roadless Rule, the direction is not inconsistent with the rule and therefore would not compel modification;

- C) Designate corridors within recommended wilderness that allow for motorized and non-motorized uses. This would be consistent with many other wilderness areas, is a good problem solving tool, and would be very beneficial at this stage of the forest planning in defining wilderness boundaries;
- D) Designate all of the NFS lands classified backcountry in Alternative B from Rapid Lightning Creek to the Montana State Line as recommended wilderness;
- E) Exclude wild river corridors from recommended wilderness areas (i.e., Salmo-Priest and Mallard Larkins). Protections of wild river statute are sufficient for the protection of the corridor. An overlapping wilderness designation would prohibit existing mountain bike use, limiting access to one of the few "wild" river trails. This access has existed since 1987 and no travel management addresses the loss of this access in terms of replacement of trail with like recreation, scenic, and solitude opportunities; and
- F) The Wilderness Needs Assessment should include criteria on the need for cedar and hemlock stands to be protected by wilderness.

Response:

- A) The additional areas listed are managed as either recommended wilderness in Alternative C or as backcountry. Alternative C was considered in selecting the preferred alternative for the FEIS. Alternative B Modified allocates most of these areas to the backcountry MA5 and, with the exception of Grassy Top, Idaho Roadless Rule management theme of backcountry/restoration. Grassy Top is not within Idaho, so it is not covered by the Idaho Roadless Rule. The backcountry MA protects the wildlife and other roadless values of these areas, as described in the revised Forest Plan and FEIS. The opportunity for seclusion is also high in the backcountry areas. With the exception of Grassy Top, addition of these areas as recommended wilderness would require a change to the Idaho Roadless Rule. The backcountry/restoration management theme is not consistent with recommended wilderness, requiring a rule change to Wild Land Recreation. For more information regarding the Idaho Roadless Rule management themes and compatibility with forest plan MAs, see pages 334-340 of the DEIS;
- B) The Grandmother Mountain Wilderness Study Area was acquired from the BLM as part of two separate legislative land exchanges. The initial 5,200 acres was acquired as part of the Arkansas-Idaho Land Exchange Act of 1992 (Public Law 102-584). The second parcel totaled 1,700 acres and was acquired as part of the Idaho Land Enhancement Act of 2006 (Public Law 109-372). At the time these laws were enacted and the lands exchanged, the BLM was managing both parcels as part of the Grandmother Mountain WSA established under the Federal Land Policy and Management Act (FLPMA) of 1976 (43 U.S.C. 1782). Both the Arkansas-Idaho Land Exchange Act (1992) and the Idaho Land Enhancement Act (2006) require that this area be administered to maintain the existing wilderness character and potential for inclusion in the National Wilderness Preservation System. Since this area was designated as a WSA under the FLPMA, the IPNF is unable to change this area from MA1c, Wilderness Study Area, to other management area allocations;
- C) See the response to Public Comment 92. Motorized use is restricted in recommended wilderness in order to maintain the capability and availability of the area for wilderness designation;
- D) The boundary for the Scotchman Peaks recommended wilderness area was drawn to be manageable and identifiable on the ground. The southwest corner of the Scotchman Peaks IRA is more appropriately managed as MA5, as shown in Alternative B Modified;
- E) Adjustments have been made to Alternative B Modified, removing MA1b from the Upper Priest eligible wild river (MA2b), leaving this corridor open to mountain bike use. Other corridors remain the same as the draft Forest Plan, to retain wilderness character and manageability; and

F) Cedar and hemlock were considered in the need for recommended wilderness. The Needs Assessment step in the wilderness evaluation process included a review of under-represented plant communities (question #6) as part of the evaluation for wilderness. See appendix C of the FEIS.

MA1b: Category 711

Public Comment 513: (Letter Number(s): 252)

The Forest Service should use the same desired condition for MA1b as is found under MA1c (MA1c-DC-AR-01). Congress, in designating the WSA, recognized that some uses, incompatible with designated wilderness, would have no effect on wilderness. This should be applicable to recommended wilderness.

Response:

See the response to Public Comment 138 B. Because this WSA was established when it was under BLM management, uses allowed before the Forest Service acquired this land are allowed to continue and are required under the two legislative land exchange acts that brought a portion of this WSA into Forest Service ownership. Motorized use is restricted in recommended wilderness in order to maintain the capability and availability of the area as designated wilderness. See the response to Public Comment 92. Motorized use is restricted in recommended wilderness in order to maintain the capability and availability of the area for wilderness designation.

MA1b: Category 712

Public Comment 141: (Letter Number(s): 85, 164, 202, 208, 252, 261, 263, 271, and 273)

The Forest Service should consider the following comments regarding the recommended wilderness MA (MA1b):

A) Explaining in the FEIS how these proposed MA1b areas meet the definition of wilderness. Much of the area identified as “recommended wilderness” or “wilderness study areas” have been logged, have existing roads and/or structures. As such, these areas hardly fit the “untrammeled by man” criteria of the 1964 Wilderness Act;

B) Wilderness is an extreme form of managing the IPNF. Backcountry designation is a more suitable alternative and would provide for more recreational access and still offer a level of protection;

C) The wilderness needs assessment in appendix C of the DEIS fails to consider values foregone and the net economic impact on communities that those values represent. The choice is not wilderness or development. Wilderness is not always the best tool for providing habitat. Managers have many more tools available outside of wilderness to manage the land and its resources well than they do inside of wilderness;

D) The Multiple Use Sustained Yield Act of 1960 (MUSYA) directs the Forest Service to consider wilderness as one of the multiple uses for which it manages the forest and grasslands. The Forest Service has a further obligation under the 1964 Wilderness Act to recommend areas for wilderness. Wilderness remains a vital component of sound, healthy ecological forest management. Roadless, undeveloped wild lands represent some of the rarest landforms on the Forest, and therefore one of the most valuable assets.

Response:

A) The criteria for identification of potential wilderness areas that satisfy the definition of wilderness is found in Section 2(c) of the 1964 Wilderness Act, and further explained in FSH 1909.12, Chapter 70. Potential wilderness areas may contain improvements such as motorized

trails, unauthorized and user-created roads, and evidence of historic logging activities where the use of mechanical equipment is not evident (FSH 1909.12, 71.11). The capability assessment has elements that captured where there has been past disturbance or improvements. See appendix C of the FEIS;

B) The Forest Service is directed to evaluate areas for recommended wilderness (1982 Rule 36 CFR 219.17(a)). A small portion of the Forest (6.5%) is recommended wilderness under Alternative B Modified. The total acreage of recommended wilderness in the revised Forest Plan is 14,400 acres more than the current Forest Plan. The effect of recommended wilderness and wilderness management on other resources is described in the FEIS chapter 3;

C) The wilderness evaluation did take into account competing uses for the areas, such as the need for active restoration activities, under the availability rating for potential wilderness. In response to this revision topic, the amount of recommended wilderness varied by alternative. The effect of each alternative on the local economy is displayed in the FEIS in the “Social and Economics” section of chapter 3. See the “Wildlife” section of chapter 3 of the FEIS for the effect of recommended wilderness on wildlife habitat; and

D) The Forest Service is directed to evaluate areas for recommended wilderness during forest planning (1982 Rule 36 CFR 219.17(a)). Recommended wilderness was also identified as a plan revision topic. Because of this, the amount of recommended wilderness varied by alternative. Effects of the alternatives, including the varying amounts of recommended wilderness, were then evaluated in chapter 3 of the EIS.

MA1b: Category 713

Public Comment 142: (Letter Number(s): 2, 6, 65, 85, 97, 101, 119, 122, 130, 137, 144, 147, 179, 186, 193, 202, 204, 206, 212, 214, 239, 240, 250, 260, 261, 263, 264, 271, 276, and 281)
The Forest Service should designate less (or no) areas to the recommended wilderness MA (MA1b) because:

A) Recommended wilderness in the draft Forest Plan prohibits the use of bicycles and other forms of human powered transport. This excludes bikes from numerous fantastic trails that offer healthy outdoor activities to people all over the world that come to this area to recreate;

B) Recommended wilderness is managed like wilderness. This is an end-run around Congress;

C) Recommending wilderness limits access to the people and reduces the opportunity for recreation, commercial harvest, and other types of management activities; instead designate these areas as backcountry. It is important to provide access, recreation, and management of these areas as a legacy to the next generation. Furthermore, wilderness designation has a severe negative economic impact on local communities;

D) Given the demonstrated underutilization of existing wilderness areas, it is entirely reasonable to conclude that there is adequate wilderness area. Given that vast areas of our forests have been set aside for the exclusive benefit of a relatively small group of quiet visitors, it is not reasonable to set aside more areas and trails for their needs; and

E) There should be no new wilderness designations on the IPNF unless there are permanent and effective programs in place to accomplish commercial timber management, forest health treatments, and WUI area management. A balanced approach to considering more wilderness designations on the IPNF would be to link those designations to simultaneously reclassify some roadless areas currently identified as “backcountry” by the Idaho Roadless Rule as “general forest,” and thereby be released from that rule to support more active management of the IPNF.

Response:

A) It is true that the Forest Plan would close recommended wilderness areas to mechanized use. However, there are many areas that remain open to mechanized use on the Forest. All other MAs

allow mechanized use. The boundary of the Salmo-Priest recommended wilderness area was adjusted in Alternative B Modified, allowing mountain bike use to continue in a portion of this area;

B.) Identifying areas for recommended wilderness is required during plan revision (1982 Rule 36 CFR 219.17(a)). The IPNF is allowed to place restrictions on public use to retain wilderness character. Restrictions or closures are site-specific decisions made after analysis and public comment. In areas allocated to MA1b in the revised Forest Plan, the decision made in the ROD would close the area to motorized and mechanized use. If a use becomes established that could threaten the capability or availability of an area, the area may no longer be considered suitable as wilderness. To protect wilderness characteristics and the ability for Congress to designate these areas as wilderness in the future, the ROD would close recommended wilderness to over-snow vehicle use;

C) See the response to Public Comment 141, items B and C.

D) The Wilderness Act secures “for the American people of present and future generations the benefits of an enduring resource of wilderness.” Wilderness is a resource. In addition to offering primitive recreation opportunities, it is valuable for its scientific and educational uses, as a benchmark for ecological studies, and for the preservation of historical and natural features. The wilderness evaluation includes several elements, not just recreation use. We disagree that ‘vast’ acreage has been devoted to wilderness management. The acreage of established wilderness (Salmo-Priest) and recommended wilderness in Alternative B Modified totals only 171,300 acres and represents only 6.9 percent of the total acreage on the IPNF. See appendix C of the FEIS for more information on wilderness evaluation; and

E) Alternative D presents the least amount of recommended wilderness for the action alternatives, with 8,900 fewer acres than the 1987 Forest Plan. Alternative D was considered in selecting the preferred alternative for the FEIS. Under Alternative B Modified, 161,400 acres are recommended for wilderness, while timber production is suitable on more than 950,000 acres on the Forest. The amount of acres available for active management far outweighs the Forests capability to do management, given current budgets. Alternative B Modified is consistent with the management themes from the Idaho Roadless Rule. No changes are expected to the allocations in the Idaho Roadless Rule.

MA1b: Category 714

Public Comment 143: (Letter Number(s): 2, 6, 56, 104, 159, 163, 189, 190, 219, 244, 252, and 266)

The Forest Service should consider the following comments regarding management and types of uses allowed in recommended wilderness (MA1b):

A) It is not necessary to prohibit mechanized use in recommended wilderness, as there is no damage occurring by this use that would preclude the area from designation as wilderness. Moreover, this decision is not quantified nor addressed in the DEIS in terms of trails. Many times there are only a few trails that local mountain bikers view as valuable experiences that fall within the boundaries of an RWA. Even more frequently there is only a portion of the trail that crosses into the RWA. There are many solutions to the issues such as adjusting the boundary of the RWA, designating particular trails within the area where mountain bicycle use is permitted, or even committing to funding reroutes of trails to avoid the areas where bicycles would be prohibited;

B) Existing motorized trails should remain open in recommended wilderness. If the entire area isn’t open to motorized use, then provide a trail corridor for the following specific trails in the St. Joe area: Trail #263 Copper Ridge (8.2 miles), Trail #279 Line Creek (3.4 miles) and a small upper section of Trail #79 Elbow Ridge (Y4 mile) to access the Needle Peak road (and the

Simmons area of trails). The revised Forest Plan needs to be consistent with travel management planning that has occurred in this area;

C) Motorized and mechanized uses should be allowed in recommended wilderness (MA1b) like it is provided in Wilderness Study Areas (MA1c) and Primitive Areas (MA1e). Motorcycle and mountain bike use on trails and snowmobiling has never changed the status of a proposed or designated wilderness in Idaho. The impacts that mountain biking, motorcycle riding, or snowmobiling has on wilderness character are temporary and not permanent. Nowhere in the Forest Plan or EIS do we find any data or evidence indicating that snowmobiles have had any adverse effect on resources or the potential to do so. Obviously the regional forester's "guidelines" drove this decision and were perceived as leaving no latitude. If the policy guideline was, as stated by Regional Forester Tidwell in his October 4, 2007 letter, intended to "provide consistency across the Region," the entire policy guideline should be followed, including the review of RWA boundaries to ensure that areas with motorized recreation use are not included. Only congress has authority to designate wilderness. By prohibiting motorized and mechanized use from recommended wilderness, the Forest Service is outside its authority;

D) Agreement with the draft Forest Plan direction prohibiting snowmobiling in recommended wilderness. As motorized and mechanized use has grown, these uses have become established in some areas recommended for wilderness. As a result, wilderness attributes such solitude and opportunities for primitive and unconfined modes of recreation have been negatively affected. In some circumstances, ecological values have also been negatively impacted in these areas. Prohibiting uses that are inconsistent with the Wilderness Act will ensure that the unique characteristics of these areas are preserved;

E) Administrative use of motorized equipment should not be allowed in recommended wilderness. The agency must set the example for proper wilderness stewardship. It sends the wrong signal to the public that the agency can use motorized equipment and the public can't; and F) Page 49 of the draft Forest Plan under MA1e, Primitive Lands, states: "These two areas (see table 9) have wilderness characteristics. They may be recommended as additions to the National Wilderness Preservation System in the future. These areas are different from recommended wilderness (MA1b) because winter motorized recreation (snowmobiling) and mountain biking are desirable uses and allowed in these areas." Thus, it is evident that there is actually no conflict between snowmobile use and future designation as wilderness. MA1b should allow snowmobile use.

Response:

A). It is not physical damage from bicycles that may preclude designation as wilderness but non-conforming uses that could threaten the capability or availability of an area. If use becomes established that is not allowed in designated wilderness, this area may no longer be considered suitable as wilderness. The boundary for the Salmo-Priest recommended wilderness area was adjusted in Alternative B Modified, allowing mountain bike access and use to a portion of this area;

B) Motorized use is not allowed in recommended wilderness because it is a non-conforming use that could threaten the capability or availability of an area. If use becomes established that is not allowed in designated wilderness, this area may no longer be considered suitable as wilderness. The travel management planning process on the St. Joe District included alternatives that excluded motorized use on trails that were within the proposed wilderness areas in the draft Forest Plan. The decision on the resulting Motorized Vehicle Use Map excludes those trails from single track motorized use, which is consistent with the revised Forest Plan and recommended wilderness;

C) See response to item A above and Public Comment 92 B;

- D) The revised Forest Plan prohibits non-conforming uses in recommended wilderness;
- E) Hand-held motorized use is only for administrative purposes and does not impact wilderness characteristics. This is not a public use. If designated as wilderness, the Forest Service would stop using chain saws in these areas. The elimination of public uses in recommended wilderness that are not allowed in wilderness helps to retain wilderness characteristics of the area and possible future designation as wilderness; and
- F) Areas managed under MA1e are not recommended as wilderness, but may be recommended as wilderness later. The decision in the ROD would allow snowmobiling and mechanized use to continue in these areas. That doesn't mean that wilderness character will be maintained. Allowing uses to continue that aren't allowed in wilderness affects the area's capability and availability as wilderness. Thus, for areas recommended as wilderness, over-snow vehicle and mechanized use is not allowed. See the response to Public Comment 92 B.

MA1b: Category 715

Public Comment 144: (Letter Number(s): 25, 27, 32, 34, 35, 37, 52, 57, 66, 67, 74, 80, 83, 84, 107, 128, 131, 133, 143, 156, 172, 184, 185, 188, 197, 208, 211, 221, 226, 231, 246, 279, 282, and 284)

The Forest Service should consider designating more of the recommended wilderness MA (MA1b) because designating additional recommended wilderness acreage:

- A) Provides secure winter habitats for lynx, mountain goat, wolverine, and population strongholds and key refugia for listed or proposed species and narrow endemic populations due to their more natural undisturbed character. It serves the best interests of people who depend on these wild places and the generations to come and provides forest health and watershed protection and recovery. Providing additional lands would ensure these and other species would benefit from the protections afforded by MA1b designation. Our wild areas need to remain wild;
- B) All roadless and wilderness values need to be protected as recommended wilderness. Under no circumstances should existing roadless areas be opened to development. Under no circumstances should existing resources managed now for wilderness be released to other uses. These are almost certainly irreversible changes. In the absence of any formal wilderness designation in our Forest, such changes limit the options available to Congress, should it someday decide to take action; and
- C) Additional opportunities for quiet recreation should be identified and protected by the Forest Plan as recommended wilderness. When determining areas suitable for motorized recreation and areas suitable for wilderness, even from a social (non-biological) point of view, a large amount of the region's primary users (hikers, hunters, fishermen, and those interested in relaxing away from civilized sounds) are underserved.

Response:

- A) Areas allocated to recommended wilderness do provide habitat for certain wildlife species. In addition, areas allocated to MA5 backcountry also provide secure habitat for a variety of species including TES species due to their more natural undisturbed character. Approximately one-fourth of the total acreage on the IPNF is allocated to MA5. As described in chapter 3 of the FEIS, areas that allow active management provide opportunities for restoration of vegetation and watersheds, which improves habitat. See the "Wildlife" section of chapter 3 of the FEIS for the effect of the alternatives on wildlife. Alternative C provides the most recommended wilderness. This alternative was considered in selecting the preferred alternative for the FEIS;
- B) Alternative B Modified retains all areas recommended as wilderness under the 1987 Plan with some additions. Under the revised Forest Plan, most roadless areas are managed as either recommended wilderness (MA1b) or backcountry (MA5). Most IRAs will be managed to protect their roadless values, consistent with either the Idaho Roadless Rule (for roadless areas within

Idaho) or the 2001 Roadless Rule. The Idaho Roadless Rule did allocate 17,500 acres of IRA on the IPNF to general forest, which allows timber cutting and road construction following direction under MA6. Approximately 681,200 acres are allocated to MA5 (backcountry) in Alternative B Modified; and

C) Alternative C provides the most recommended wilderness. This alternative was considered in selecting the preferred alternative for the FEIS. There are many locations throughout the IPNF that offer remote and ‘quiet’ recreational opportunities. Many are outside recommended wilderness. We disagree that those recreational users are underserved.

MA1b Mallard Larkins: Category 719

Public Comment 508: (Letter Number(s): 33, 37, 39, 45, 46, 49, 50, 51, 52, 78, 79, 81, 85, 35, 107, 109, 117, 138, 143, 146, 158, 169, 172, 179, 181, 185, 188, 189, 190, 202, 207, 220, 229, 233, 239, 244, 246, 260, and 274)

The Forest Service should consider the following comments regarding designation of the Mallard Larkins Recommended Wilderness Area (MA1b):

A) The full extent of the original boundaries of this IRA should be designated as recommended wilderness, including the western half of the Mallard Larkins. The western half of Mallard Larkins is currently recommended wilderness under the 1987 Forest Plan. This is the heart of this wilderness and the DEIS does not clearly demonstrate the criteria used to remove so much of this area from recommended wilderness designation. This whole area is worthy of designation and should not be made smaller. By the Forest’s own calculation, the Mallard Larkins IRA scored “High” in all three of the evaluation criteria, including suitability, availability and need. The Mallard Larkins could not score any higher under the Forest’s own evaluation to be recommended for wilderness. If the full extent of the IRA isn’t included, then the boundary should follow the allocation shown in Alternative C;

B) Enlarge the area to the north to include the Upper St. Joe;

C) Move the boundary of the recommended wilderness area to exclude Trail #263 Copper Ridge (9.1 miles). This trail is a main connector trail from Red Ives south to Granite Peak. It forms loops with Trail #37 Beaver Creek, #89 Angle Point, #88 Angle/Fly Connector, #629 Fly Creek, and # 28 Wilderness. This is a great trail for entry level riders and family. Also, ensure that road 201 in the vicinity of the proposed Mallard Larkins area remains open;

D) Removing the Pioneer Area from the Mallard Larkins and manage it as general forest and/or managed to allow for existing access and uses;

E) Enlarging the area toward Snow Peak and ensure that Larkins Peak, Surveyors Ridge, Sawtooth Peak, Foehl Creek, and Black Mountain are included in the wilderness designation. The roadless portions of Bad Bear and Spotted Lewis Creeks should also be added; and

F) Removing the overlapping designations of recommended wilderness/pioneer area and wild river designation – they are unnecessary and further restrict bicycle use along the river corridors. The Forest should provide a corridor for the wild river designations through the recommended wilderness and pioneer area, which would then allow bicycle use. A second option would be to adjust the recommended wilderness and the pioneer area boundaries to allow bicycle use.

Response:

A) The western half of the Mallard Larkins IRA has been included as recommended wilderness under Alternative B Modified, similar to the 1987 Forest Plan. However, the entire Mallard Larkins IRA is not recommended as wilderness. The boundary for the recommended wilderness area was drawn to be manageable, locatable on the ground, and meet the characteristics of wilderness;

B) A portion of the Upper St. Joe was allocated to recommended wilderness in Alternative C. The remaining portion of the Upper St. Joe (Midget Peak IRA and remaining area not in an IRA) has moderate capability for recommended wilderness and was determined to not be suitable. See the wilderness evaluation in appendix C of the FEIS. Alternative C was considered in selecting the preferred alternative for the FEIS;

C) Trail 263 is within the boundary of recommended wilderness in the revised Forest Plan. The travel management planning process on the St. Joe District resulted in a decision on the Motorized Vehicle Use Map which excludes trail 263 from single track motorized use. Road 201 is outside the boundary of recommended wilderness;

D) This area was designated as a Pioneer Area in 1969. This area will be retained as a Pioneer Area under the revised Forest Plan. The area was managed as recommended wilderness under the 1987 Plan. Alternative B Modified allocates this area, and some lands directly adjacent, as recommended wilderness. Alternative B Modified also retains the Pioneer Special Area as an MA overlapping with part of the recommended wilderness;

E). See response to item A above. Some of these areas are within the Mallard Larkins recommended wilderness area under Alternative B Modified, including Larkins Peak, Surveyors Ridge, and Sawtooth Peak. Other areas described fall outside the recommended wilderness boundary, but are managed as backcountry MA5; and

F) There is overlap between the wild and scenic river, recommended wilderness, and the Pioneer Area. This overlap provides emphasis and management direction for the different resource values and allows the Mallard Larkins recommended wilderness area to remain as a larger, intact area. Bicycle use is considered a non-compatible use in recommended wilderness; therefore, it is not allowed in MA1b.

MA1b Salmo-Priest: Category 722

Public Comment 509: (Letter Number(s): 37, 49, 50, 51, 52, 95, 107, 131, 169, 172, 188, 190, 191, 192, 198, 206, 207, 220, 246, 265, 272, and 279)

The Forest Service should consider the following comments regarding designation of Salmo-Priest as recommended wilderness (MA1b):

A) Expanding it to include Upper Hughes Ridge and Hughes Meadow (as in Alternative C). These two areas are important from a biological standpoint. Caribou use Hughes Ridge for winter habitat and grizzly bears use Hughes Meadow during the spring when they emerge from hibernation;

B) Including the Grassy Top Roadless Area as recommended wilderness (as in Alternative C), which is consistent with the proposed action for the Colville National Forest Management Plan Revision and is on the portion of the IPNF in Washington State, an area not covered by the Idaho Roadless Rule;

C) Changing all of the MA1b recommended wilderness designation to MA1e primitive lands or MA5 backcountry. Congress, in designating the Salmo-Priest Wilderness, could have included this area as legally designated wilderness, but did not. There is no place in the management plan for defacto wilderness. Unless congressionally designated as wilderness, management should be based upon multiple-use, with decisions made at the travel management plan level, not the forest plan level;

D) Support for protecting the Salmo-Priest area as wilderness; and

E) Allocating portions of the area east of Upper Priest River to MA3 (botanical areas) and MA2b (eligible wild and scenic rivers). This will allow mountain bike use to continue on Trails 308 and 28, while protecting the old growth forests found there.

Response:

- A) The area allocated to MA1e within the Salmo-Priest recommended wilderness area has been changed in Alternative B Modified to recommended wilderness. This makes the recommended wilderness area easier to manage and is compliant with the Idaho Roadless Rule;
- B) This area was allocated to recommended wilderness in Alternative C. Alternative C was considered in selecting the preferred alternative for the FEIS. This IRA was rated as moderate for capability and availability and the preferred alternative allocated this to MA5 (backcountry). This MA is not inconsistent with recommended wilderness on the Colville, if their revised plan makes that decision;
- C) The Forest Service is directed to evaluate areas for recommended wilderness (1982 Rule 36 CFR 219.17(a)). This area rated high for capability, availability, and need. This area was recommended wilderness under the 1987 Forest Plan and there is public support for this area to continue to be recommended as wilderness;
- D) This area has been allocated to recommended wilderness, which protects the wilderness characteristics; and
- E) This change has been made to Alternative B Modified.

MA1b Scotchman Peaks: Category 723

Public Comment 149: (Letter Number(s): 14, 15, 16, 18, 19, 21, 22, 23, 24, 26, 27, 28, 33, 36, 37, 38, 39, 40, 41, 42, 43, 49, 51, 52, 61, 71, 81, 86, 87, 106, 118, 131, 138, 143, 145, 169, 170, 171, 176, 187, 188, 190, 193, 196, 197, 198, 206, 207, 208, 210, 220, 228, 236, 242, 246, 270, 274, 277, 283, 284, and 286)

The Forest Service should consider the following comments regarding designation of Scotchman Peaks as recommended wilderness (MA1b):

- A) Designate the expanded area of Scotchman Peaks as recommended wilderness. This designation would protect the land, animals, and vegetation for the benefit of current and future generations;
- B) Designating the entire Scotchman Peaks #662 IRA as MA1b because it eliminates snowmobiles and ensures that a broader representation of primitive recreational opportunities is available across the landscape, and ensures that the beauty of this area and its solitude will be preserved for future generations to experience and enjoy;
- C) It is not reasonable to define wilderness as only appropriate in those places not desired by snowmobilers. To achieve the objectives for which wilderness is included as a management option, we must evaluate which areas have the highest value as wilderness and then balance wilderness with those other uses, retaining wilderness in some cases where it offers than other competing uses. Relegating wilderness only to areas with no other interest would not achieve the full value of wilderness. Any decrease in the Scotchman Peaks recommended wilderness area would be an abrogation of the Forest Service's responsibility to manage for wilderness (under the Multiple Use and Sustained Yield Act of 1960) as well as its obligation to make recommendations for wilderness under the 1964 Wilderness Act;
- D) Change the designation to allow human-powered travel in this area. Mountain biking is an important use in this area;
- E) Modify the recommended wilderness boundary to allow for existing snowmobile use. Scotchman Peaks is considered one of the centerpieces to the snowmobile community. Furthermore, Alternative B of the draft Forest Plan on the IPNF side includes some previously heavily managed areas in the Scotchman Peaks recommended wilderness area. These areas should be excluded from recommended wilderness, as they contain visible past management activity;

F) Modify the MA1b recommended wilderness boundary on the north end to MA5. The portions of the Scotchman Peaks recommended wilderness lying in T29N, R35W, Sections 11, 12, 13, 14, 23, & 24, and in T29N, R34W, Section 19 and in T57N, R3E, Sections 15, 22, & 27 (the Twin Peaks, Char Creek, Thunder Creek areas) receive existing Motorized – Winter uses. An easily identifiable location on the ground for management and public education for the north boundary of the recommended wilderness is East Fork Creek in that location. This matches up with the existing Motorized – Winter use in the area on the KNF. The area has a large volume of use from the KNF into this portion of the IPNF. From the IPNF this area is a destination for advanced snowmobile users. The opportunity to ride in this type of terrain is needed. The proposed middle ground as to the recommended wilderness boundary by the Forest Service should be tweaked in this area to address the actual on the ground use; and

G) Modifying the boundary in the north to include more of the Lightning Peak area if possible or modify to include at least Bear Mountain.

Response:

A) There is no change to the Scotchman Peaks recommended wilderness area in Alternative B Modified, retaining the boundary as shown in the draft Forest Plan;

B) The boundary for the recommended wilderness area was drawn to be manageable, locatable on the ground, and meet the characteristics of wilderness;

C) See response to item A. Portions of the Scotchman Peaks recommended wilderness area is desirable for snowmobile use and many commenters wanted much more of that area open for over-snow motorized use. The Forest has analyzed and recommended areas for proposed wilderness that have many opponents (because of uses that would be prohibited) as well as proponents;

D) Mechanical use is not allowed within recommended wilderness. See the response to Public Comment 92 B;

E and F) The Forest recognizes the desire to have over-snow vehicle use continue in this area. However, this area is an important portion of the Scotchman Peaks recommended wilderness area. This area is approximately 5,000 acres, or about 8 percent of the recommended wilderness area. Over-snow vehicle use is a non-conforming use and will not be allowed within recommended wilderness. See the response to Public Comment 92 B. We disagree that the areas identified do not meet eligibility requirements. The criteria for identification of potential wilderness areas that satisfy the definition of wilderness is found in Section 2(c) of the 1964 Wilderness Act, and further explained in FSH 1909.12, Chapter 70. Potential wilderness areas may contain improvement such as motorized trails, unauthorized and user-created roads, and evidence of historic logging activities where the use of mechanical equipment is not evident (FSH 1909.12, 71.11). See appendix C of the FEIS; and

G) See response to B above.

MA1b Selkirks: Category 724

Public Comment 150: (Letter Number(s): 3, 7, 11, 20, 29, 31, 33, 35, 37, 39, 44, 48, 49, 50, 51, 52, 57, 58, 81, 85, 88, 95, 103, 106, 107, 110, 112, 115, 125, 126, 127, 129, 131, 132, 134, 136, 138, 143, 153, 156, 159, 169, 172, 174, 181, 185, 188, 190, 191, 192, 198, 201, 202, 206, 207, 214, 216, 220, 223, 225, 228, 230, 234, 236, 246, 258, 265, 267, 272, 274, 279, 283, 284, 286, and 289)

The Forest Service should consider the following regarding designation of the Selkirks as recommended wilderness (MA1b):

A) Modifying the boundary to exclude the Long Canyon Trail. Mountain biking is an important use in this area. Backcountry trails such as this trail and trails of this quality, which are outside of

wilderness, thus open to bikes, are a rare commodity. The area can be protected with other means, such as NRA designation that would provide sufficient protection while still allowing historical, non-motorized use such as mountain biking;

B) The Selkirks recommended wilderness area is important and should be protected (and even expanded) to provide diverse wildlife habitat and wildlands that are protected from harmful human intervention that includes logging and snowmobiling. Retain the Long Canyon and Parker Creek areas within recommended wilderness. Modify the boundary to include the entire Selkirk Crest including the Upper Pack River area, along with Harrison Lake, Beehive Lakes, Chimney Rock, Fault Lake, West Fork Lake, Lionshead, Trout Lake, Pyramid Lake, and Ball Lake.

Recommending any of the NFS lands in the Upper Pack River as wilderness is also consistent with the Idaho Roadless Rule. Do not eliminate existing proposed wilderness from this area;

C) Exclude the Long Canyon and Parker Creek area from recommended wilderness, as this does not have support with the majority of residents of Boundary County. This area should be designated as primitive (MA1e), which will meet the intent of the Idaho Roadless Rule;

D) Modifying the boundaries in order to designate an area for a motorized trail corridor between Priest Lake and Bonners Ferry. Currently the only road across the “Selkirk Crest” north of the Highway 2 is at Sandpoint, on Baldy Mountain Road. There are no other such connections south of the Canadian border;

E) Keeping the boundary as proposed with the Upper Pack River (the lower portion up to and including the trail to Fault Lake) excluded from the boundary;

F) Change MA1b “Selkirk” name to “Long Canyon/Parker.” The western and southern two-thirds of the Selkirk Crest are proposed as MA5 backcountry or MA1e primitive lands. Only a small portion of the Selkirk Crest is actually in the Long Canyon/Parker area. It is necessary to appropriately designate an area to aid in management on the ground and education of the recreating public. Call it what it is, the “Long Canyon/Parker” recommended wilderness; and

G) Change the south boundary for MA1b recommended wilderness to match the existing Travel Management Plan. The south boundary of the Long Canyon/Parker recommended wilderness should match the existing Travel Management Plan with Long Canyon Pass being the southern boundary in Section 30, 36N, R2W. The portion of the Selkirk Crest lying south of that location should be MA1e or MA5, consistent with the remainder of the Selkirk Crest, and particularly to recognize the existing motorized uses, mechanized uses, and motorized tool uses. It does not foster public awareness or consistent management to have the portion of the Selkirk Crest from Long Canyon Pass, south to the Sandpoint Ranger District as MA1b, and then MA1e primitive lands from there south. Also the portion of the Selkirk Crest lying west of Long Canyon is MA5. It is only logical to also change that center portion that connects the areas to recognize existing motorized and mechanized uses, for public education, and for consistent management on the ground.

Response:

A) The Long Canyon Trail remains within the recommended wilderness area under the revised Forest Plan. This area was MA10 under the 1987 Forest Plan and closed to motorized vehicles. We understand this is a change to the mechanized use that has been allowed in this area. However, the Selkirk IRA rated high for capability, availability, and need in the wilderness evaluation. See appendix C of the FEIS for details on the wilderness evaluation. As recommended wilderness, mechanized use is not allowed;

B) The Long Canyon and Parker Creek areas have been allocated to recommended wilderness (MA1b) under the revised Forest Plan. The Upper Pack River area has been allocated to MA1e to provide for existing motorized and mechanized uses while protecting wilderness characteristics. MA1e is not recommended wilderness, and thus does not protect the capability and availability as

wilderness. Alternative C allocated the Upper Pack River area to MA1b. This alternative was considered in selecting the preferred alternative for the FEIS;

C) See the response to A above. This area has been closed to motorized use and unsuitable for timber production since the 1987 Forest Plan. This area is part of the Selkirk IRA and was considered high in all categories analyzed for recommended wilderness;

D) The portion of this area that is in recommended wilderness is currently non-motorized. See the response to A above. This area is important caribou and grizzly bear habitat, with forest plan direction to limit motor vehicle access. The opportunities to create a motorized ‘link’ between Priest Lake and Bonners Ferry is limited due to several reasons mentioned above as well as the barrier of Priest Lake itself as well as non-contiguous ownership of NFS lands;

E) There were no changes to MA allocation for this area between draft and final EIS;

F) We are comfortable with the name as presented in the revised Forest Plan and FEIS. The name is retained due to the name of the underlying roadless area referencing the area in RAREI, RAREII, the Roadless Conservation Rule, and the Idaho Roadless Rule; and

G) Regarding the southern boundary of the recommended wilderness area, there is mechanized use within the northern half of the area allocated to MA1e. In addition, this MA allocation is consistent with the Motor Vehicle Use Map (MVUM) for the Kaniksu portion of the IPNF. There is no winter travel plan for this area. There is a temporary court order that places restrictions on certain areas to over-snow motorized use until such time as the Forest is able to complete an analysis for winter motorized travel and issue a winter travel plan. Regarding the “center portion,” it is not clear what area the commenter is referring to. See the response to A.

MA1c: Category 728

Public Comment 156: (Letter Number(s): 78, 85, 137, 142, 159, 202, 205, 212, and 260)

The Forest Service should consider the following regarding the Wilderness Study Area MA (MA1c):

A) Not including the Grandmother/Grandfather area as a wilderness study area because one of the conditions when this area was acquired by the Forest Service was that the area would remain open for single track motorized use. As such, this does not fit the requirement for wilderness and should be released as a study area and managed for multiple uses. Consider expanding access for ATV operation, either by converting some single track trails to ATV, or creating some new ones;

B) Managing the Grandmother Mountain WSA (6,900 acres) within the Recreation Opportunity Spectrum (ROS) of primitive. If the WSA is managed as semi-primitive motorized, as proposed in the draft Forest Plan, the area’s wilderness potential will be reduced and its wilderness values compromised.

Response:

A) This area is designated as a Wilderness Study Area (MA1c). Under BLM ownership, this area was designated as a Wilderness Study Area under the Federal Land Policy and Management Act. The legislation that accompanied the land exchanges for this area (the Arkansas-Idaho Land Exchange Act of 1992 and the Idaho Land Enhancement Act of 2006) requires the Forest Service to maintain the wilderness character and suitability for designation as wilderness until Congress determines otherwise. Because of the requirement to maintain this suitability until Congress makes a determination, the Forest is required to retain these areas as Wilderness Study Areas (MA1c) and to allow uses that were in place when the land was acquired by the Forest Service. One of the established uses is single track motorized use, which will be allowed in the revised Forest Plan. OHV use, including ATV use, was not an established use when the Forest Service acquired the Wilderness Study Area; therefore, this use is not allowed in the revised Forest Plan; and

B) The ROS inventory found the area to be semi-primitive motorized. Uses occurring prior to acquisition by the Forest Service are allowed to continue. Because of the existing motorized use, this area will remain with the ROS classification of semi-primitive motorized. The ROS classification is largely driven by whether motorized uses are allowed and single track use is allowed within this area.

MA1c: Category 729

Public Comment 157: (Letter Number(s): 159, 188, 189, 190, and 235)

The Forest Service should consider the following regarding types of uses in the Wilderness Study Area MA (MA1c):

- A) Prohibiting motorized and mechanized use to protect wilderness values. This would be consistent with recent Ninth Circuit Court rulings affirming non-motorized use in WSAs;
- B) Prescribed fire should not be allowed in the WSA, as it is incompatible with maintaining an untrammeled condition. The exception in the Wilderness Act allowing measures in control of fire is directed at suppression, not ignition. Wildland Fire Use is the means by which the wilderness environment should be shaped. Gathering firewood of special forest products from within wilderness could be problematic unless they are being used within the wilderness;
- C) Addressing the management discrepancies between BLM and the Forest Service in the area of Pinchot Butte. There is ORV damage taking place on the route to Pinchot Butte from Freezeout Ridge. According to the BLM RMP, this route is closed to motorized use and not a road. However, ATVs travel on this route and the Forest Service considers it a road, according to appendix C of the Forest Plan, The Forest Service and BLM need to coordinate their management of this area;
- D) The revised Forest Plan needs to explain the exact level of allowance of motorized vehicle use in MA1c. This must be no more than the amount at the time Grandmother Mountain WSA was established; and
- E) The shape of the area is very strange, small, and appears impractical to manage. Suggest increasing the size of the area to increase manageability.

Response:

- A) See response to Public Comment 156 A. The Forest will allow uses that existed when the land was acquired. The recent court rulings do not apply to the Grandmother Mountain WSA;
- B) Planned ignitions are allowed in the WSA and may be used as a tool to restore natural conditions in vegetation. Gathering firewood and special forest products for personal use is allowed. Some products might be gathered and carried outside the wilderness boundary. As long as that material is for personal use, it will be allowed under this Plan;
- C) The trail from Freezeout Ridge to Pinchot Butte is neither a system route nor a system trail; the IPNF does not consider this a road and will not be on the South Zone MVUM (expected to be published in 2014). The Forest Service does coordinate with the BLM on the management of this area. We are not clear what appendix you are referring to. Appendix C to the Forest Plan does not have any information on roads or Pinchot Butte. Appendix C of the FEIS refers to the wilderness evaluation and includes Pinchot Butte, but nothing about roads;
- D) The legislative acts that accompanied the two land exchanges to the Forest Service state that existing uses at the time of the exchanges be allowed to continue. The three primary recreational uses that existed at the time of the land exchanges include; snowmobile use, single track motorized use, and mechanized use (mountain bikes). The revised Forest Plan allows uses that existed at the time of the land exchange. There is no language about the amount of use; and
- E) The shape is based on a prior decision by the BLM designating this area as a Wilderness Study Area. We do not have the latitude to change the boundary of this Wilderness Study Area.

MA1c: Category 731

Public Comment 159: (Letter Number(s): 204)

Page 48 of the draft Forest Plan, IPNF MA1c-STD-AR-01, wheeled vehicle is not allowed under the 1964 Wilderness Act and thus such use should preclude such inclusion.

Response:

See response to item Public Comment 156 A and 157 D.

MA1e: Category 733

Public Comment 514: (Letter Number(s): 85, 145, 159, 190, 202, 206, 214, and 289)

The Forest Service should consider the following regarding the allocation of primitive lands (MA1e):

A) Changing the MA1e designation in the area east of Pack River road to general forest or backcountry because there is a trail (not currently on the MVUM, but shown on visitor maps and topo maps) known as the Apache Ridge Trail, located SW of Roman Nose Lake. The proposed primitive area in this area precludes designation of this as an ATV trail. There is an opportunity to connect Apache Ridge to Pack River Road via an abandoned road (shown on old visitor's maps and topo maps). This change also corresponds to current Travel Management Plan boundary, allows for a buffer between Jeru Loop for Motorized – Summer use, and better meets on the ground conditions;

B) Changing the designation for the Snow Peak Wildlife Management Area (SPWMA) to MA1e because this would provide enhanced protection for wildlife, particularly due to its location in proximity to the Proposed Mallard Larkins Wilderness Area, the Upper St. Joe River Wild and Scenic River, and the Little North Fork of the Clearwater River, which is eligible for wild and scenic river designation. This proposed change would also address landscape level habitat connectivity, travel corridors and core areas for sensitive species such as wolverine, fisher, lynx, and grizzly bear;

C) Changing the designation for the two areas allocated to MA1e in the Preferred Alternative, to MA1b (recommended wilderness) not only to preserve the wilderness characteristics of the area and its surroundings, but also to avoid the conflict this MA would create with the ecological values present there, including habitats for caribou, lynx, wolverine, and grizzly bear. Where MA1e falls short of protecting the wilderness character of the two affected areas is the provision allowing snowmobile use (MA1e-GDL-AR-01). As a result, the wilderness character of these areas will suffer, including primeval character and influence, opportunities for solitude or a primitive and unconfined type of recreation, unimpaired condition, and ecological, geological, or other features of scientific, educational, scenic, or historical value. The FEIS must explain the consequences of this allocation on the affected resources. The Forest Service must also “evaluate the significant physical, biological, economic, and social effects” of allocating areas to this MA 36 CFR § 219.12(h);

D) Designating all areas that are within the wildland recreation theme of the Idaho Roadless Rule, that are not designated as recommended wilderness, in the current 1987 Plan, as primitive in the Forest Plan. Also, retain the proposed designation of primitive lands shown in the draft Forest Plan for the Pack River area, which allows snowmobile use;

E) Adopting the MA1e designations in Salmo-Priest and the Long Canyon/Parker Creek areas in the preferred alternative because this MA allows snowmobile and mechanized use;

F) Change all MA1b recommended wilderness to MA1e primitive lands. Congress in designating Wilderness Study Areas has allowed/approved existing motorized summer and winter use, as well as mechanical tools and mechanized uses. These uses have been found to not detract from

possible future inclusion as designated wilderness. There is no place in the management plan for defacto wilderness. Unless congressionally designated as wilderness, management should be based upon multiple-use, with site-specific decisions made at the travel management plan level, not the forest plan level; and

G) Designating the area below Katka Peak and the Selkirk slopes above the Kootenai Valley and any forests that can be easily seen from Highway 1 or Highway 95 as primitive and leave unlogged, especially the steeper areas.

Response:

A) The area immediately southwest of Roman Nose is within an IRA and has an Idaho Roadless Rule management theme of wild land recreation. A change to general forest or backcountry would be incompatible with the Idaho Roadless Rule. In addition, this area is important caribou and grizzly bear habitat, with forest plan direction to limit motor vehicle access;

B) This area is allocated to MA5 under the revised Forest Plan and has an Idaho Roadless Rule management theme of backcountry/restoration. This allocation allows some timber harvest if needed to enhance wildlife habitat, as provided for in the Snow Peak Wildlife Management Area Cooperative Management Plan. A management area allocation of MA1e would be inconsistent with the Idaho Roadless Rule and would not allow timber harvest to enhance wildlife habitat;

C) The allocation of MA1e in the Salmo-Priest area has been changed to MA1b. This area is currently closed to snowmobiling and there is little demand for mountain biking in this area. The changed allocation to MA1b will make the recommended wilderness area more manageable. The MA1e in the Pack River area remains MA1e in the revised Forest Plan. Wildlife habitat is protected through forest plan direction. This area was allocated to MA1b in Alternative C. Alternative C was considered in selecting the preferred alternative. See the effects analysis for wildlife in the FEIS (chapter 3). The FEIS evaluates the significant physical, biological, economic, and social effects of the alternatives;

D) The difference between recommended wilderness between the 1987 Forest Plan and Alternative B Modified is primarily in the Long Canyon and Parker Creek area. Other recommended wilderness areas in the revised Forest Plan are very similar to the 1987 Forest Plan allocation. See the response to Public Comment 150 A and C;

E) See response to item C above;

F) See response to Public Comment 141 B and D; and

G) This area is allocated to a mix of MA5 and MA6 under the revised Forest Plan. Scenic resources are taken into account when planning a timber harvest. Steep slopes are also considered, and appropriate management practices applied to prevent damage to soils from harvest. Areas designated as MA5 backcountry, will be mostly left unmanaged.

MA1e: Category 734

Public Comment 515: (Letter Number(s): 232)

The Forest Service should consider restricting motorized use in primitive lands and modifying this desired condition description (MA1e-DC-AR-03) because opening of primitive lands within caribou habitat to winter motorized use would likely be in conflict with caribou recovery goals. Potential adverse impact may occur to caribou through displacement and avoidance along with potential adverse impacts to grizzly bears during normal or early den emergence.

Response:

See the response to Public Comment 514 C. As described in the DEIS, areas that are currently closed to snowmobiling will be “brought forward and remain in place regardless of alternative selected” (page 293). Thus, the revised Forest Plan will not open areas currently closed to

snowmobiling. A site-specific travel planning effort will be completed to change or revise any winter travel plan restrictions that will include public input.

MA1e: Category 736

Public Comment 516: (Letter Number(s): 139, 146, and 147)

The Forest Service should remove Road 293 (Pack River Road) from primitive land (MA1e) designation because this road should remain open to wheeled travel.

Response:

The Pack River Road (Road #231) is not within MA1e. It is within MA2b, eligible wild and scenic rivers and classified as a recreational river. Motorized use is allowed within MA2b and the Pack River road will remain open under the revised Forest Plan. Road #293 (Jeru lop road) is open to motor vehicle use on the MVUM and will remain open under the revised Forest Plan.

MA1e: Category 737

Public Comment 517: (Letter Number(s): 163 and 205)

The Forest Service should consider the following regarding management of primitive lands (MA1e):

- A) Adopting the management prescription for these primitive lands (MA1e) that allows winter motorized use where snowmobile use currently occurs but within areas with high wilderness attributes because it allows current snowmobile use to possibly continue. Both the Gospel Hump and Frank Church River of No Return Wilderness had some snowmobile use in these areas before they were designated wilderness. Some individuals and groups might say that snowmobile use precludes an area from becoming wilderness, but snowmobile use has not prevented wilderness from being designated in Idaho; and
- B) Making it more clear how other activities might be restricted and if it is an appropriate way to manage these lands.

Response:

- A) See the response to Public Comment 92 B, 143 F, and 149 E; and
- B) Desired conditions and activities allowed or not allowed are described in chapter 3 of the revised Forest Plan under MA1e. The management prescription for this MA is designed to allow or prohibit various uses and those are analyzed in the EIS.

MA1e: Category 739

Public Comment 519: (Letter Number(s): 163)

The Forest Service should change the standard, MA1e-STD-AR-01, to allow wheeled motorized vehicle use on system trails because this primitive management category seems to borrow from the 2008 Idaho Roadless Rule. Primitive lands under this rule can allow motorized or non-motorized uses in both summer and winter. The ROS classification for this area should be semi-primitive motorized in both summer and winter.

Response:

This MA is consistent with the Idaho Roadless Rule management theme of Wild Land Recreation. The Idaho Roadless Rule is silent regarding motorized or non-motorized use. These areas are currently non-motorized (except for over-snow motor vehicle use). This area is important caribou and grizzly bear habitat, with forest plan direction to limit motor vehicle access. The ROS

classification will remain with summer semi-primitive non-motorized and winter semi-primitive motorized.

MA2a: Category 742

Public Comment 520: (Letter Number(s): 252)

The Forest needs to revise desired conditions MA2a-DC-AR-04 and MA2a-DC-AR-05. Nothing in the Wild and Scenic Rivers Act requires that wild rivers be managed as quasi wilderness. Solitude, risk, challenge, and primitive recreation are terms appropriate for wilderness, but not necessary or even desirable for a wild river segment. It is by no means necessary to manage all wild rivers as semi-primitive non-motorized. These decisions should be made on a case by case basis, not as desired condition in the Forest Plan driving the management of all current or future wild river designations. The same is true for eligible, wild, and scenic rivers (MA2b).

Response:

These desired conditions are consistent with the St. Joe W&SR Development and Management Plan and Forest Service manual direction (FSM 2354).

MA2a: Category 745

Public Comment 523: (Letter Number(s): 96, 189, 190, 219, and 244)

The Forest Service should consider the following regarding management of designated wild and scenic rivers (W&SRs) (MA2a):

A) Revising the management prescriptions for designated and eligible W&SRs to ensure that they meet the mandates of the W&SR Act. The final Plan should describe the specific outstandingly remarkable values (ORVs) unique to each stream and require that these values be protected and enhanced. This statutorily defined non-degradation mandate may be supplemented with (and given supremacy over) broader management guidance like that contained in tables 12 and 13 in the draft Forest Plan;

B) Strictly prohibiting motorized watercraft within the designated “wild” segment of the St. Joe River;

C) Ensuring that logging, mining, and other incompatible uses (such as special uses like lodges, administrative motorized equipment, and extensive firewood gathering) are not allowed within W&SRs because these uses would not protect outstanding remarkable values;

D) Designating the upper segment of the Little North Fork inside the Grandmother Mountain roadless area as a wild river, not a recreational river;

E) Removing the restriction on bicycle use in wild river corridors. Bicycling is not a water related activity, and therefore would not impact a wild river itself. Bicycling is an existing use in these corridors. The Wild and Scenic Rivers Act “allows existing uses of a river to continue and future uses to be considered, so long as existing or proposed use does not conflict with protecting river values.” We specifically request that the Forest Plan be revised to only exclude bicycles in wild river corridors if, upon rigorous review, it is found that an important environmental or safety issue can only be rectified by the removal of bicycle use at that location. If a designated wild river passes through a management area that allows bicycles, bicycle use should be allowed to continue (i.e., State Line N.R.T.). If an eligible wild river corridor passes through a management area that otherwise allows bicycles, then upon designation bicycles should continue to be allowed (i.e., N. fork Coeur d'Alene River);

F) Rectifying the confusion regarding the differences in bicycle access between eligible wild rivers and designated wild river segments; bicycling is allowed within eligible segments, but it is

not allowed within designated segments. Bicycle use should be allowed in both of these areas; and

G) Rectifying the boundary of the eligible wild river that overlaps with the special areas MA (MA3) portion of the Mallard Larkins Pioneer Area.

Response:

A) The designated W&SR has a management plan, the St. Joe W&SR Development and Management Plan, which describes in detail the management of the river. For eligible W&SR, the direction is to manage these areas to protect the free-flowing nature of these rivers and the outstandingly remarkable values. The desired conditions, standards, and guidelines provide this kind of protection. Additional management direction for eligible wild, scenic, and recreational rivers is found in FSH 1909.12, Chapter 80. This direction is not repeated in forest plan direction;

B) Powerboats would be incompatible with the ROS of semi-primitive non-motorized. The St. Joe Wild & Scenic River Development and Management Plan describes the wild river portion of the St. Joe as having grade II through V rapids, which are suited only for highly skilled kayakers. There is an extremely short season (less than two weeks), because snow blocks the road to Heller Creek until July and water flow sufficient for boating usually last only until mid-July. The development and management plan provides direction to “Discourage the use of mechanized equipment within the wild river corridor. Impose appropriate restrictions if the use of mechanized equipment seriously threatens wild river values.” This direction is sufficient for limiting use of powerboats on the wild segment;

C) Management uses within the designated river are described in the St. Joe W&SR Development and Management Plan. Allowable uses vary by the classification as wild, scenic, or recreational. The standards and guidelines for MA2a and MA2b describe the uses that are allowed. These standards and guidelines are consistent with Forest Service manual direction (FSM 2354.4);

D) This portion of the river, adjacent to the Grandmother Mountain IRA, is roaded with a developed campground and appropriately classified as recreation;

E) Mechanical use is not allowed within the designated wild river corridor. See the St. Joe W&SR Development and Management Plan. The St. Joe Wild & Scenic River Development and Management Plan states that “Mechanized equipment use is incompatible with a primitive recreation experience.” Furthermore, the majority of the wild river runs through recommended wilderness, which prohibits mechanized use;

F) The designated wild section does not allow mechanized use to be consistent with the St. Joe Wild & Scenic River Development and Management Plan. See the response to E above. Mechanical use is allowed within eligible wild rivers, for those portions that are not within recommended wilderness. Most of these rivers are found within designated or recommended wilderness where this use is not allowed. For those portions of wild rivers that are outside designated or recommended wilderness, this use is allowed to continue until the river is designated; and

G) The Little North Fork Clearwater River is an eligible wild river directly adjacent to the Mallard Larkins recommended wilderness area in Alternative B Modified. The east side of the river corridor that is within the recommended wilderness will not allow mechanized use, as it is within recommended wilderness. The boundary for the Mallard Larkins recommended wilderness area was drawn to be manageable and identifiable on the ground.

MA2a: Category 749

Public Comment 524: (Letter Number(s): 85, 163, 202, and 239)

The Forest Service should consider the following regarding designated W&SRs (MA2a):

- A) Ensuring that road 320 east of Mallard Larkins remains open. It follows the Upper St. Joe River, which is shown as a designated wild river on the Plan map. The presence of this road makes this section of river ineligible for wild designation. This is a commonly used connector between the upper St. Joe and the Clearwater area; and
- B) Change the “wild” segments found below “recreation” segments on the Little North Fork Clearwater and the North Fork Coeur d'Alene River to “scenic.” The scenic designation allows for some motorized trail access to occur in the corridor.

Response:

- A.) The Forest Plan will not close or open any roads. This portion of the St. Joe River was designated as wild by Congress; and
- B) The wild classification for these segments is appropriate, based on the condition of the river and adjacent lands. The majority of these segments are within recommended wilderness, which prohibits motorized use.

MA2b: Category 751

Public Comment 162: (Letter Number(s): 145, 163, 188, 236, 243, and 279)

The Forest Service should consider the following regarding management of eligible W&SRs (MA2b):

- A) Moving forward with your proposals for eligible wild and scenic rivers because this designation will benefit these systems and will extend habitat protection for many fish and wildlife species;
- B) Prioritizing erosion control and rehabilitation from road failures along the Little North Fork and the North Fork of the Coeur d'Alene Wild and Scenic Recreation River corridors; and
- C) Change Segment 2 of the Little North Fork of the Clearwater River from wild to scenic to allow motorized use. The Little North Fork Trail #50 (found within the eligible W&SR corridor) provides one of the only existing long single-track loop opportunities desired by experienced motorcyclists.

Response:

- A) Thank you for your comment;
- B) The Forest Plan does not make decisions on prioritizing site-specific projects. These areas are important and will be considered when prioritizing annual work; and
- C) The wild classification for these segments is appropriate, based on the condition of the river and adjacent lands. Motorized use is not allowed. Trail #50 is not a motorized trail and is not open to motorcycles.

MA2b: Category 752

Public Comment 163: (Letter Number(s): 85, 101, 202, 212, 214, and 261)

The Forest Service should consider designating less of the eligible W&SRs MA (MA2b) because:

- A) Removing the upper North Fork of the Coeur d'Alene River from eligible wild river status because it is crossed by a road and bridge at Jordon Creek (Roads 6310 and 412); and therefore, does not meet the criteria stated for wild river designation. If this section does get designated as a wild river, ensure that these roads (6310 and 412) remain open; and
- B) Do not include any eligible wild & scenic river designations. The land and the waters can be effectively managed to protect the resources without the excessive restrictions on access this designation requires.

Response:

A) The wild classification is appropriate, even though the road crosses the river. There is very little other development in the area and no road parallel to the river. The river remains classified as wild in the revised Forest Plan. The Forest Plan does not make any decisions to open or close roads. Road closures could only occur following site-specific NEPA and public involvement; and B) Section 5(d)(1) of the Wild and Scenic River Act (P.L. 90-542), directs federal agencies to consider and evaluate rivers on lands they manage for potential designation in their planning processes. Forest Service manual direction (FSM 1924) requires evaluation of wild and scenic rivers during forest planning. The Forest followed Forest Service handbook direction (FSH 1909.12 Chapter 80) in identifying eligible, wild, and scenic rivers. See appendix F of the FEIS for a description of the regulations and the process used in identifying eligible, wild, and scenic rivers.

MA2b: Category 753

Public Comment 164: (Letter Number(s): 72, 90, 91, 92, 93, 94, 95, 99, 153, 188, 190, 207, 236, 243, 246, 272, and 279)

The Forest Service should consider designating more of the eligible W&SRs MA (MA2b) as follows:

A) Considering Boulder Creek, Lightning Creek, Big Creek, North Fork St. Joe River, and Marble Creek as eligible wild and scenic rivers. All of these stream and river segments exhibit one or more outstandingly remarkable values as defined by the Wild and Scenic Rivers Act. In some cases, the segments are even threatened by proposed developments that would negatively affect their outstandingly remarkable values. For example, the Federal Energy Regulatory Commission (FERC) is presently considering a preliminary permit application to construct a small hydropower facility on Boulder Creek. If Boulder Creek were designated as eligible for protection under the Wild and Scenic Rivers Act, FERC might be in a position to deny the permit. Lightning Creek is the third largest tributary of Lake Pend Oreille, and includes old growth cedar stands, bull trout habitat, and premier recreational opportunities. Big Creek, North Fork St. Joe River, and Marble Creek are all major tributaries of the St. Joe River that should be considered for wild and scenic river designation. Each tributary provides habitat for bull trout, westslope cutthroat trout, and a variety of recreational pursuits. Allocating these stream and river segments to MA2b would help protect these outstandingly remarkable values. If the Forest Service chooses not to consider these suggested stream and river segments for wild and scenic river segments, then the FEIS should explain why they are not eligible and the effects to their outstandingly remarkable values as a result;

B) Considering several additional streams as eligible for wild & scenic designation. In June and November of 2011, American Whitewater submitted a citizen's inventory of prospective eligible wild & scenic stream segments located within the IPNF. Highlighted in the inventory were: Boulder Creek, Boundary Creek, Cow Creek, Lion Creek, Upper Smith Creek, Marble Creek, and Slate Creek. These streams provide high quality whitewater experiences for regional and national users along with high-quality habitat for many of Idaho's fish and wildlife species; and

C) Designate the Upper Priest River Trail as a wild and scenic river corridor to protect the old growth cedars along the river, while allowing mountain bike use to occur.

Response:

A and B) An Alternative Considered but Eliminated from Detailed Study has been added to the FEIS to address this. See the Additional Wild and Scenic River Designation alternative in chapter 2 of the FEIS for specific information on why these rivers and streams were not included in the revised Forest Plan as MA2b; and

C) Adjustments have been made to Alternative B Modified, removing MA1b from the Upper Priest eligible wild river (MA2b), leaving this corridor open to mountain bike use.

MA3: Category 757

Public Comment 167: (Letter Number(s): 79, 89, 95, 131, 143, 159, 190, 207, 220, 235, 246, 247, 256, 259, 265, 272, and 274)

The Forest Service should consider the following recommendations regarding the allocation of the Special Areas: Botanical, Geological, Historical, Recreational, Scenic, or Zoological Areas (MA3):

A) Removing nearly 20,000 acres of the Mallard Larkins from recommended wilderness protection and calling it a “Pioneer Area” does not protect the wilderness characteristics of the area, nor does it meet the intent of why the Forest Service makes recommendations for areas as wilderness. There is no legal or policy precedent for how to manage a “Pioneer Area,” and the DEIS fails to mention this or explain the consequences. A Pioneer Area is a designation that is entirely unique to Idaho with no direction or requirement to protect wilderness characteristics. Furthermore, there is no requirement under the Pioneer Area to maintain an area’s wilderness suitability as there is under recommended wilderness. This would be nothing short of a downgrade for the Mallard Larkins, in spite of the Forest Service’s own conclusion in appendix C that Mallard Larkins should be included as recommended wilderness;

B) Include the Snow Peak Cooperative Wildlife Management Area in the St. Joe Geographic Area as a special area (MA 3). Snow Peak should continue to be managed as a primitive roadless area with minimal human disturbance, which would maintain security and habitat effectiveness as well as backcountry experiences. This area should be managed in a similar fashion to the Mallard Larkins Pioneer Area, where road construction and motorized use are prohibited;

C) Designating all of the Upper Priest River above the junction of Cedar Creek as MA3 (Botanical Area). This would protect the old growth cedar forests in the Upper Priest River drainage, while allowing mountain bike use to continue on trails 28 and 308;

D) Support the expansion of two existing botanical areas (Hobo Cedar Grove and Roosevelt Cedar Grove) and the designation of two new botanical areas (Huff Lake and Upper Priest Lake) and the continued management of three others as botanical areas (Hanna Flats, Sandhouse Cedar Grove, and Settlers Grove);

E) Managing the Stevens Peak – Lookout Pass area as a Recreation and Scenic Area (MA3) where winter recreation opportunities and experiences are consistent with the ROS classification of primitive to semi primitive non-motorized. Logging has created roads that now allow snowmobiles to travel right through the heart of what was once only accessible on skis or snowshoes. The Lookout Pass Ski Area is proposing expansion that would eliminate more terrain and cut existing routes in half. This area needs to be protected from motorized use;

F) Managing the Pinchot Butte roadless area for protection of its rare bogs and unique plant species in Pinchot Marsh; and

G) Excluding Trail #50 from the MA3 Special Use designation and develop or use an alternate designation that retains all of the MA3 direction except the prohibition of mountain bike use on the trail. The existing management area designation further reduces available trails open to mountain biking with solitude and scenic value.

Response:

A) This area has been allocated to recommended wilderness in Alternative B Modified. The Pioneer Area (MA3) is retained as a secondary MA designation;

B) This area is allocated to MA5 under the revised Forest Plan and has an Idaho Roadless Rule management theme of backcountry/restoration. This allocation allows some timber harvest if

needed to enhance wildlife habitat, as provided for in the Snow Peak Wildlife Management Area Cooperative Management Plan. A management area allocation of MA3 (Pioneer Area) would be inconsistent with the Idaho Roadless Rule and would not allow timber harvest to enhance wildlife habitat;

C) The area along the Upper Priest River has been allocated to MA2b only in Alternative B Modified, and is no longer recommended wilderness. Bicycle use is allowed within MA2b. Old growth cedar is protected in all MAs;

D) Thank you for your comment;

E) Part of this area is allocated to MA7 where the current Lookout Pass area is located. The largest portion of the Stevens Peak area currently used for backcountry skiing is allocated to MA5 (backcountry) and would not be developed for commercial uses under this Forest Plan. Some of this area is allocated to MA6 which is open to a variety of management options. However, any site-specific management proposal would be analyzed through a NEPA process that would include the public.

Both the Lookout Pass Ski Area expansion proposal and the Stevens Peak backcountry area need to be analyzed site-specifically with the appropriate level of NEPA and public input. Neither of these projects/proposals are forest plan decisions. Lookout Pass Ski Area is under a Special Use Permit and any expansion of permitted terrain or infrastructure is subject to NEPA analysis, public scoping and input, and the associated decision.

There is a group beginning to discuss the Stevens Peak area comprised of backcountry skiers, North Idaho College representatives (who use the area for winter courses), and the snowmobile community. The Coeur d'Alene District Ranger has encouraged this group to begin discussions surrounding various management options and work toward an initial agreement and bring that forward. This is a site-specific travel planning decision and not a forest plan decision;

F) This area is allocated to MA5 (backcountry). Bogs and sensitive plants are protected by forest plan direction. See FW-GDL-VEG-09 and FW-DC-VEG-09; and

G) The MA3 Pioneer Area has been allocated to MA1b, recommended wilderness, in Alternative B Modified. The east side of the river corridor is within the recommended wilderness and will not allow mechanized use. See response to Public Comment 523 G.

MA3: Category 763

Public Comment 521: (Letter Number(s): 219)

The Forest Service should consider revising the MA3-STD-AR-02 to allow bicycle use in this management area. There is no justification for a complete prohibition on bicycle use (except in the Upper Priest area) and any conflicts between bicyclists and pedestrians or other uses should instead be mitigated through trail by trail designation or boundary adjustments. While we appreciate the Forest Service's need to manage potential conflicts, none of the alternatives considered mitigation measures other than outright closure. Trail design and construction techniques are commonly used to avoid conflict.

Response:

These are small areas with limited trail systems that receive a great deal of foot traffic. These areas are already being managed to prohibit mechanized use. To provide for safety, these areas will continue to be managed to prevent mechanized use. The one exception is the Upper Priest area, which is a larger area with a long, linear trail system that can accommodate different types of users.

MA3: Category 764

Public Comment 173: (Letter Number(s): 190)

The Forest Service should consider allowing natural fires to burn in Pioneer Areas and amend the guideline MA3-GDL-FIRE-01 to exclude Pioneer Areas from the list of other areas where natural, unplanned ignitions are generally not allowed. Given the fact that the Mallard Larkins Roadless Area is the only location where a Pioneer Area is proposed, allowing natural fires to play a role is not only important from an ecological standpoint, but it also does not directly threaten any WUI areas.

Response:

We agree with your comment. This guideline in the revised Forest Plan has been edited to allow unplanned ignitions within the Pioneer Area.

MA4a: Category 765

Public Comment 175: (Letter Number(s): 131, 163, 188, and 206)

The Forest Service should consider the following regarding allocation to Research Natural Areas (RNAs) (MA4a):

- A) Support for the three new RNAs: Red Horse Mountain, Theriault Lake, and the Upper Priest River;
- B) Changing the MA4a RNA suitability in the Lower Kootenai and Priest GAs to include Motorized – Winter use. RNAs in these GAs receive existing motorized winter use, which does not detract from the areas. The current Travel Management Plan has allowed that use and it should be able to continue, until or unless a specific on the ground decision is to be made; and
- C) Providing the rationale for proposing the new RNAs.

Response:

- A) Thank you for your comment;
- B) Over-snow vehicle use is not allowed within RNAs to protect the natural ecological processes and resources. Forest Service manual direction (FSM 4063.3) states “[t]he prime consideration in managing RNAs is maintenance of natural conditions and processes. To the extent practicable, protect RNAs against human activities that directly or indirectly modify the integrity of the ecological processes;” and
- C) The “Research Natural Area” section of chapter 3 and appendix F of the FEIS describe why RNAs are identified and describes the characteristics and attributes of the proposed RNAs for each alternative.

MA4a: Category 770

Public Comment 177: (Letter Number(s): 131 and 189)

The Forest Service should consider designating more proposed Research Natural Area MAs (MA4a):

- A) Adding a new RNA for the Selkirks, where there are mountaintop “balds” that some climate change models suggest may change in a short period of time to forest cover. Baseline and ongoing botanical surveys, studies, and monitoring would be critical to understanding how native plant habitats may be adaptive and/or resistant to climate change; and
- B) Adding a new 49 Meadows RNA (see Report from Friends of the Clearwater for justification).

Response:

- A) The Forest already has several RNAs that have mountaintop balds, including Roundtop Mountain, Snow Top, Five Lakes Butte, Scotchmans, Upper Shoshone, and Canyon Creek. Thus, the mountaintop balds are adequately represented within the RNAs on the Forest; and
- B) This has been added to Alternative B Modified.

MA4a: Category 771

Public Comment 525: (Letter Number(s): 219)

The Forest Service should clarify MA4a-STD-AR-02, which limits bicycles to designated routes and clarify the definition of designated routes in the final Forest Plan. While we believe this to mean that this is intended to prohibit cross-country travel and limit bicycle use to roads and trails it is unclear. It could also mean that bicycle use is to be limited to select roads and trails designated for bicycle use. If the Forest Service intends for the latter definition, we request that local mountain bicyclists are included in the designation process.

Response:

The standard means that bicycle use is only permitted on designated routes, such as NFS trails or roads, where mechanized use is not prohibited. No cross-country use is allowed. This has been clarified in the revised Forest Plan.

MA4b: Category 779

Public Comment 526: (Letter Number(s): 13)

The Forest Service should consider the following regarding Experimental Forests (MA4b):

- A) Clarifying in the revised Forest Plan that all vehicles are restricted to existing roads;
- B) Correcting direction regarding mineral leasing and removal (page 68) which states mineral materials and mineral leasing is allowed or available. Public Land Order 2377, in the Federal Register of 5/18/1961 - Vol. 26, Page 4333, withdraws several tracts from mineral exploration; it specifically mentions, with legal descriptions, Priest River and Deception Creek Experimental Forests; and
- C) Correcting direction regarding “Special Forest Products and Firewood” section, page 68, which states no commercial use. That is acceptable for mushrooms, berries, etc. but we (the Rocky Mountain Research Station) reserve the right to employ commercial firewood or post and pole sales to achieve a specific objective. We have no objection to personal use to gather mushrooms, berries, etc., but we do not want individuals cutting firewood in the Experimental Forests. The dead wood is part of the forested systems that we study and its removal will hinder our work and damage existing studies on the ground. In a very rare circumstance, we may allow personal firewood cutting from slash piles resulting from our timber sales, when it is to the benefit of the Station and the Forest Service; otherwise, no wood cutting on the Experimental Forests.

Response:

- A) Motorized use is not allowed off designated routes and areas, as shown in the Forest Motorized Vehicle Use Maps;
- B) The withdrawal is for locatable minerals, and does not apply to leasables and mineral materials. For leasables, site-specific NEPA would be required (following any permit applications) to identify required stipulations. There are a variety of stipulations available to protect the Experimental Forest resources, including no surface occupancy or controlled surface use. The removal of mineral materials is allowed, but would require authorization from the Forest

Service. This would be reviewed on a case-by-case basis and would not be allowed in areas that would be of concern to the Experimental Forest; and

C) The revised Forest Plan direction for MA4b has been updated to address this concern.

MA5: Category 781

Public Comment 528: (Letter Number(s): 78, 85, 122, 137, 141, 146, 159, 163, 171, 173, 181, 189, 190, 198, 202, 206, 214, 226, 239, 260, 261, 262, 263, 271, 273, and 279)

The Forest Service should consider the following regarding allocation to and from backcountry (MA5):

- A) Dropping all additional wilderness areas and wilderness study designations and instead replacing them with the backcountry designation. The backcountry designation still allows multiple-use of NFS lands and makes it a lot easier to manage. Wilderness area or wilderness designations allow no mechanical device for maintenance;
- B) Changing a small area on the South Half Proposed Land Management Plan map from the MA5 designation to MA6. This is a small, 40-acre parcel located in the Floodwood State Forest. This area is surrounded by roads and is not suitable for a MA5 designation;
- C) Changing the backcountry MA5 to be similar to the KNF draft Forest Plan MA5a, 5b, and 5c (MA5a (backcountry, non-motorized) MA5b (backcountry motorized), and MA5c (backcountry winter motorized and summer non-motorized)) because without this, there is little clarity about what areas are appropriate for motorized versus non-motorized recreation and in the long run, this will create more areas of conflict than it will resolve;
- D) Ensuring that the MA5 designation is not more restrictive outside of Inventoried Roadless Areas than within IRAs;
- E) Revise the MA to provide protection from logging, roads, mining, and motorized use. Change the designation of all MA5 areas to MA1b or MA1e;
- F) Change the Northwest Peak area from MA3 to MA5. This area receives existing motorized winter use and was collaboratively agreed on as MA5 through the Three Rivers Challenge. Please honor this collaborative agreement and make this area accessible to snowmobiling; and
- G) In the American Creek drainage, there are significant discrepancies between the draft Forest Plan and what was agreed to in the Three Rivers Challenge. This area is currently designated as MA3 in the draft Forest Plan and should be designated as backcountry MA5 (non-motorized).

Response:

A) The Forest Service is directed to evaluate areas for recommended wilderness during forest planning (1982 Rule 36 CFR 219.17(a)). Recommended wilderness was also identified as a plan revision topic. Because of this, the amount of recommended wilderness varied by alternative. Effects of the alternatives, including the varying amounts of recommended wilderness, are evaluated in chapter 3 of the EIS;

B) This has been corrected for Alternative B Modified;

C) The single MA5 was developed through public collaboration on the starting option map. Because travel management decisions are made at the site-specific level following travel management planning, the public requested the Forest use one allocation for backcountry;

D) The revised Forest Plan contains standards in MA5 for areas within Idaho Roadless and for areas not within Idaho Roadless. The proposed standards for both of these areas are similar in their requirements; however, the proposed standards for MA5 areas within Idaho Roadless may provide greater flexibility with respect to the ability to conduct treatments in WUIs because it specifically provides for:

- The cutting, sale, or removal of timber to reduce hazardous fuel conditions within a community protection zone (CPZ); and

- Reduce hazardous fuel conditions outside the CPZ where there is significant risk of a fire adversely affecting an at-risk community or municipal water supply system.

For MA5 areas that are not within Idaho Roadless, the draft Forest Plan direction generally follows the language of the 2001 Roadless Area Conservation Rule (36 CFR § 294). In such areas, timber harvest is limited, and may only occur to: improve habitat for listed or proposed threatened and endangered species; to maintain or restore ecosystem composition and structure; to reduce the risk of uncharacteristic wildfires; or to address insect and disease or other forest health concerns. Timber harvest may also be allowed for administrative uses;

E) Inventoried roadless areas were evaluated for recommended wilderness. Some areas were found to not be suitable for recommended wilderness. See appendix C of the FEIS. Alternative C provides the most recommended wilderness. This alternative was considered in selecting the preferred alternative for the FEIS;

F) Over-snow vehicle use is allowed within MA3 in the Northwest Peaks scenic area. See MA3-STD-AR-02; and

G) Northwest Peaks in the revised Forest Plan is a special area, in keeping with its long-held designation as a scenic area. This area allows over-snow vehicle use. The IPNF does not have a backcountry MA that is non-motorized. Site-specific winter travel planning would be needed to close this area to over-snow vehicle use.

MA5: Category 782

Public Comment 529: (Letter Number(s): 146)

The Forest Service should change the desired condition in MA5-DC-AR-03 to state that motorized trail construction would be encouraged in these areas.

Response:

Motorized trail construction is neither encouraged nor discouraged in these areas. As backcountry, construction of facilities is limited. Construction of a motorized trail would be dependent on many variables, including site-specific NEPA, public involvement, and analysis of effects.

MA6: Category 794

Public Comment 196: (Letter Number(s): 164 and 273)

The Forest Service should consider adding more of the general forest MA (MA6) because it is the most flexible MA from a management prospective, and provides the widest range of both short- and long-term forest management options and recreational opportunities.

Response:

The alternatives presented different amounts of MA6. Alternative D contains the most MA6, at 63 percent of the Forest. This alternative was considered in selecting the preferred alternative for the FEIS. See the draft ROD for rationale as to why the decision-maker chose Alternative B Modified.

MA7: Category 797

Public Comment 198: (Letter Number(s): 159, 163, and 235)

The Forest Service should consider making the following changes to the primary recreation areas MA (MA7):

A) Retaining the MA7 designation for the Fourth of July Pass cross-country trail network. For the Lookout Pass Ski Area, the Forest designated an area larger than the proposed ski area expansion

as MA7. We object to this delineation because the NEPA process for the proposed ski area expansion has not been completed and there are problems with the proposed expansion that affect land in the IPNF and Lolo National Forest that have yet to be addressed. Although at first glance, the designation of MA7 to a portion of the Stevens Peak backcountry area may seem appropriate, the primary recreation category does not appear to provide sufficient management measures for maintaining opportunities for quiet human-powered snow sports;

B) Expanding the Canfield Mountain primary recreation area to cover the entire trail network on Canfield Mountain;

C) Disclosing the impacts of expanding the MA7 Lookout recreation area to a larger geographical area than for the no-action (1987 Plan) alternative because the draft Plan fails to explain the rationale behind this expansion; and

D) Allowing some level of timber production (scheduled on a rotation basis) in the Fourth of July area. This Park N' Ski area depends on timber harvest to create some open slopes. While we can understand why the Sam Owen Campground or English Point is not in the rotation basis, perhaps some of these areas could be included in the rotation basis (while protecting the recreation facilities).

Response:

A) We disagree that this allocation is inappropriate. The MA7 allocation across the Forest includes both motorized and non-motorized uses as well as highly developed areas and areas where there is little to no development. The Lookout Pass Ski Area analysis will determine, on a site-specific level, what and where improvements should or should not be developed. This is the appropriate level to determine if the ski area should be expanded and where, if any, improvements should be allowed. This analysis may include parts of the Lolo National Forest but our Forest Plan only covers the IPNF;

B) The Canfield Mountain MA7 area was mapped using experts from the Coeur d'Alene River Ranger District and the area allocated to MA7 was derived using their input. The primary use area was mapped as MA7. You are correct in stating that the entire trail network is not covered by the MA7 mapped area but the core area is included. Any management proposals in either MA7 or MA6 in this area would be analyzed through a site-specific NEPA process that would include public scoping and input;

C) The disclosure of effects from the management area allocations are described throughout the EIS where summaries of acres and the associated activities are described. The actual expansion of Lookout Pass Ski Area is NOT analyzed in the Plan as the proposed expansion is a site-specific analysis that will involve the public at several stages in the analysis process; and

D) Although not suitable for timber production, this area allows timber harvest to enhance recreational values. Areas that are suitable for timber production have timber production as an objective and they are managed on a rotation basis. The emphasis of MA7 on recreation facilities is not consistent with a timber production emphasis.

MAs General: Category 805

Public Comment 204: (Letter Number(s): 203, 214, 220, and 254)

The Forest Service should consider special designations for the following areas:

A) Creating a special management area in recommended wilderness or primitive areas within the Myrtle Creek watershed that will allow for management to reduce the effects of wildfire; and

B) Creating a special climbing recreation area for the Selkirk Crest, especially the area around Chimney Rock. This designation would be compatible with the proposed wilderness envisioned for much of the area and would provide recognition deserved of the special recreation opportunities it provides.

Response:

A) This area does not require a special management category. Under Alternative B Modified, the Myrtle Creek drainage is mostly MA6 or MA5. Only a small portion is MA1b, furthest away from the city. Management is already allowed in MA5 and MA6 to reduce fuel and limit wildfires. Planned ignitions are allowed in recommended wilderness as a tool to restore natural conditions in vegetation and reduce fuels. In addition, a full suite of fire suppression techniques are available in each of these MAs; and

B) Chimney Rock is allocated to MA1e (primitive lands) and would allow rock climbing. The Forest does not want to encourage concentrated recreation use in this primitive area through a special climbing management area. In addition, the Forest Plan does not make decisions on access or improvement of parking areas. The allocation to MA1e is consistent with the area and management for wilderness characteristics.

Minerals

DEIS Cumulative Effects: Category 853

Public Comment 900: (Letter Number(s): 178 and 248)

The Forest Service should consider the Coeur d'Alene Superfund cleanup and the role of forest damage in moving mine waste pollution downstream into population centers. Priority must be given to restoring cutover watersheds on the national forest, which are aggravating toxic floods.

Response:

The superfund team are only in the planning phase of Coeur d'Alene Superfund cleanup and do not currently have a mechanism for prioritizing areas. The superfund cleanup has been added to the cumulative effects in the FEIS.

Forest Plan Desired Conditions: Category 858

Public Comment 212: (Letter Number(s): 108 and 221)

The Forest Service should consider revising the desired condition for minerals to include direction for protecting other resources and reclaiming abandoned mine sites for more reasons than just human health risks. Suggest revising FW-DC-MIN-01 as follows: “The Forest continues to contribute to the economic strength and demands of the nation by supplying mineral and energy resources while assuring the land’s capability to sustain ecosystems. Mineral materials are made available based upon public interest, material availability, in-service needs, and protection of other resource values, including consistency with desired conditions for other resources. Geologic features are conserved for their intrinsic values and characteristics. Reclamation of abandoned mine sites to address human health and environmental degradation risks should occur, with reclamation priority given to mine sites with human health risks.”

Response:

We agree with your suggested edits. This has been changed in the revised Forest Plan.

Forest Plan Guidelines: Category 861

Public Comment 213: (Letter Number(s): 145 and 221)

The Forest Service should include guidelines in the Forest Plan for mineral development to ensure that other resources, particularly water quality and aquatic resources are protected. The following guidelines should be added:

A) FW-GDL-MIN-01: Minimize adverse effects of mineral operations on water quality and inland native fish and aquatic species of concern. If a Notice of Intent indicates that a mineral operation would be located in an RHCA, consider the effects of the activity on water quality and inland native fish and aquatic species of concern in the determination of significant surface disturbance pursuant to 36 CFR 228.4. For operations in a RHCA ensure operators take all practicable measures to maintain, protect, and rehabilitate fish and wildlife habitat which may be affected by the operations. Reclamation bonds are adequate to ensure long-term chemical and physical stability; successful reclamation of the area of operation; and necessary treatment and remediation of mine wastes over the long-term;

B) FW-GDL-MIN-02: Locate and design mine facilities and mine water management to minimize surface disturbances, control water runoff, minimize erosion and sedimentation, protect hydrologic function and integrity, and prevent the release of acid or toxic or hazardous materials to surface or ground waters;

C) FW-GDL-MIN-03: Locate structures, support facilities, and roads outside RHCAs. Where no alternative to locating mine facilities in RHCAs exists, locate and construct the facilities in ways that avoid impacts to RHCAs and streams and adverse effects on inland native fish and aquatic species of concern. Where no alternative to road construction exists, keep roads to the minimum necessary for the approved mineral activity. Close, obliterate, and revegetate roads no longer required for mineral or land management activities;

D) FW-GDL-MIN-04: Prohibit solid and sanitary waste facilities in RHCAs. If no alternative to locating mine waste (waste rock, spent ore, tailings) facilities in RHCAs exists, and releases can be prevented and stability can be ensured, then: Analyze the waste material using the best conventional sampling methods and analytic techniques to determine its chemical and physical stability characteristics. Locate and design the waste facilities using the best conventional techniques to ensure mass stability and prevent the release of acid or toxic materials. If the best conventional technology is not sufficient to prevent such releases and ensure stability over the long term, prohibit such facilities in RHCAs. Monitor waste and waste facilities to confirm predictions of chemical and physical stability, and make adjustments to operations as needed to avoid adverse effects on inland native fish and aquatic species of concern. Reclaim and monitor waste facilities to assure chemical and physical stability and revegetation to avoid adverse effects on inland native fish and aquatic species of concern. Require reclamation bonds adequate to ensure long-term chemical and physical stability, water treatment, and successful revegetation of mine waste facilities;

E) FW-GDL-MIN-05: Permit sand and gravel mining and extraction within RHCAs only if no alternatives exist, and if the action(s) would not retard or prevent attainment of watershed, riparian and aquatic habitat and aquatic species desired conditions, and would avoid adverse effects on inland native fish and aquatic species of concern;

F) FW-GDL-MIN-06: Develop inspection, monitoring, and reporting requirements for mineral activities. Evaluate and apply the results of inspection and monitoring to modify mineral plans, leases, or permits as needed to eliminate impacts that prevent attainment of watershed, riparian and aquatic habitat and aquatic species desired conditions, and avoid adverse effects on inland native fish and sensitive aquatic species; and

G) FW-GDL-MIN-07: Active and abandoned mines on the Forest that pose risks of environmental degradation, particularly acid mine drainage or mobilization and transport of toxic or hazardous materials shall be identified and prioritized for restoration. (Note that the Montana DEQ has mine site map resources that may assist with locating abandoned mine sites).

Response:

A – E) Suggested guidelines MIN-01 through MIN-05 are included in the retained direction from INFISH. Page 4 of the draft Forest Plan describes plan direction that is to remain in place as part of the revised Plan. The decision on the Inland Native Fish Strategy (July 1995) is included in the revised Plan and is found in appendix B of the draft Forest Plan.

The State and USACOE have a strict permitting process for in-stream mining operations;

F) The Forest Service already has regulation and manual direction for inspecting, monitoring, and reporting requirements for mineral activities (36 CFR 228.43 and FSM 2850). As indicated on page 2 of the KNF draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service is required to follow all existing laws, regulations, and policies relating to the management of NFS lands, and the forest plan direction is designed to supplement existing direction and not repeat them; and

G) The Forest already uses a program for prioritizing mines for restoration (the AML program).

Forest Plan Guidelines: Category 861

Public Comment 902: (Letter Number(s): 235)

Guidelines for MA1b, MA1c, and MA1e state that mineral leasing is available. The Idaho Roadless Rule prohibits mineral leasing in these areas. Does the IPNF consider this inconsistency allowable under the Idaho Roadless Rule?

Response:

The guidelines are consistent with the Idaho Roadless Rule. The Rule does not make these areas unavailable to leasing. As stated in 36 CFR 294.25 "...the Forest Service will not recommend, authorize, or consent to road construction, road reconstruction, or surface occupancy associated with mineral leases..." This language does not make these areas unavailable to mineral leasing. That use is available with no road construction or reconstruction and no surface occupancy.

Mines/Mining: Category 862

Public Comment 214: (Letter Number(s): 212)

The Forest Plan should encourage mining activity.

Response:

The desired condition for minerals, FW-DC-MIN-01, provides direction for the Forest to contribute to meeting the demand for mineral resources.

Miscellaneous

Incorporate by Reference: Category 901

Public Comment 219: (Letter Number(s): 194, 201 246, 247, 248, 252, and 286)

The Forest Service received several comment letters that contained support for or agreement with comments made by other organizations and/or individuals.

Response:

Thank you for your comment. See the responses to comments for the letters that you indicated support for.

Miscellaneous: Category 903

Public Comment 221: (Letter Number(s): 119)

The Forest Service should ensure all impact analyses in all resource areas compare the relative magnitude of man-caused impacts to the background level of naturally occurring impacts or management actions such as the “Let it burn” policy.

Response:

The effects analysis in the EIS is focused on the effects from Forest Service management actions. Natural disturbance events are unpredictable, with type, size, and timing of events unknown. However, the effects from natural disturbance are described in various resource sections, where applicable.

Monitoring

General: Category 952

Public Comment 225: (Letter Number(s): 131, 160, 171, 189, 195, 221, 222, 235, and 279)

The Forest Service should ensure that scientifically credible, site-specific monitoring is required to accurately determine effects from management. There are no monitoring measures to determine if the Forest is achieving increased ecological integrity and resiliency. There should be monitoring for effects of climate change to provide for adaptive management. Funding for monitoring must be ensured. Reports should be made available for public review. The IPNF should consider starting with the 1987 Forest Plan monitoring items.

Response:

The IPNF uses best available science in determining monitoring measures. Chapter 5 of the Forest Plan outlines monitoring questions, their link to forest plan direction, and measures for answering the questions. Changes have been made in the revised Forest Plan to improve the forest plan monitoring, with some revised questions, updated measures, incorporation of links to the forest plan direction, frequency of measurement, precision and reliability, and the time when evaluation will be reports. Funding the monitoring program is critical to understand the effectiveness of the Plan and movement towards desired conditions.

As has been the case with the 1987 Forest Plan, all forest plan monitoring and evaluation reports will be made available to the public. As stated in chapter 5 of the revised Forest Plan, the Forest will evaluate the monitoring information displayed in the evaluation reports biannually and determine if changes are needed in plan direction.

Much has been learned about forest plan monitoring since the 1987 Forest Plan was approved. Monitoring under the revised Forest Plan will take a systems approach, identifying measures to monitor movement towards Plan desired conditions and achievement of Plan objectives. For example, monitoring for wildlife under the revised Plan focuses on species that will monitor change in habitat and movement towards ecological desired conditions. The systems approach provides answers to movement towards desired condition, while the 1987 Forest Plan mostly answered questions about achieving objective levels.

Monitoring items in chapter 5 of the revised Forest Plan include measures to monitor movement towards desired condition. The monitoring questions under vegetation, wildlife, and watershed all measure movement towards the forest plan’s desired conditions. Desired conditions were developed to improve the forest’s resistance and resiliency to stresses under climate change. Movement towards desired condition will be an indication of the Forest’s ability to adapt to climate change.

General: Category 952

Public Comment 226: (Letter Number(s): 235 and 246)

The draft Forest Plan does not include those monitoring components required under 36 CFR 219(k)(4).

Response:

The Forest Plan monitoring program can be found in chapter 5 of the Forest Plan. The draft Plan did cite 36 CFR 219 (k) (see page 96). In keeping with this requirement, this chapter described the “action, effects, or resources to be measured,” as directed under item 4 (36 CFR 219 (k)(4)). Chapter 5 of the revised Forest Plan has been updated to include all the required components, including the frequency of measurement, precision, and reliability; and the time when evaluation will be reported.

Access & Recreation Questions: Category 953

Public Comment 227: (Letter Number(s): 119)

The Forest Service should develop a corrective action and over-arching mitigation plan that will undo the significant impact that all cumulative motorized access and motorized recreational closures has had on motorized recreationists over the past 35 years and a monitoring program provided by an unbiased third-party to assure that this correction occurs.

Response:

This is outside the scope of forest plan revision.

Access & Recreation Questions: Category 953

Public Comment 906: (Letter Number(s): 163)

The Forest Service should include the question of whether or not visitors are satisfied with their visits and what could be done to make their visits better in the Access and Recreation monitoring questions.

Response:

This has been included in the monitoring plan in the revised Forest Plan. See MON-AR-04.

Access & Recreation Measures: Category 954

Public Comment 908: (Letter Number(s): 190)

The Forest Service should describe the following in the annual monitoring report:

- A) The amount of road decommissioning that took place on the IPNF and the resource benefits that were realized as a result, including water quality improvements, habitat restoration, contributions toward access amendment standards, and reductions in long-term road maintenance costs; and
- B) How many trails were maintained and the amount of deferred trail maintenance.

Response:

A) The monitoring program in the revised Forest Plan does measure the miles of roads decommissioned. See MON-AR-02 and measure MON-AR-02-04. The condition of water quality and progress towards access amendment standards would be reported under those resource sections; and

B) The monitoring program in the revised Forest Plan does measure the miles of trails maintained. See MON-AR-03 and measure MON-AR-03-05.

American Indian Rights Questions: Category 955

Public Comment 229: (Letter Number(s): 209)

The Forest Service should consider the following regarding the American Indian Rights and Interests monitoring questions):

A) Monitoring compliance with the Forest Service’s Treaty and trust responsibilities is difficult, but should include more than number of contacts or policies. For example, monitoring increases in wildlife, plants, and fisheries to maintain and enhance Treaty harvest may be an appropriate metric; and

B) Including monitoring of special forest and botanical products in the monitoring program; doing so is an essential step in managing these resources and assuring Treaty harvest.

Response:

A) The monitoring program in the revised Forest Plan has been updated. While the monitoring measures under American Indian Rights and Interests remain focused on development of consultation protocols, agreements, and management plans, the monitoring measures under other resource areas address vegetation condition, aquatics, and wildlife habitat. All of these measures reflect condition of Treaty rights; and

B) This is an implementation issue and not a forest plan monitoring item. The Forest will continue to work with the tribes in managing special forest and botanical products.

Fire Measures: Category 960

Public Comment 909: (Letter Number(s): 190)

In the monitoring plan, the Forest Service should add items for reporting the amount of national forest land where prescribed fire treatments occur and also where unplanned ignitions are managed for the improvement of resource conditions.

Response:

The monitoring program in the draft Forest Plan was modified to include these items. Please see chapter 5 of the revised Forest Plan for the monitoring program.

Timber Measures: Category 966

Public Comment 910: (Letter Number(s): 190)

The Forest Service should consider including the following regarding timber in the monitoring plan:

A) Describing how much timber volume was offered annually, how much was sold, and provide breakdowns by ranger district; and

B) Reporting the net timber revenues returned to county governments.

Response:

A) The amount offered has been added to the monitoring program. Breakdowns by ranger district are not necessary, as the objective for timber volume sold is forestwide. The Forest Plan does not break down objectives or other direction by ranger district; and

B) Revenue returned to county governments is more complicated than just net timber revenues. Currently, returns to counties are still funded by the Secure Rural School and Community Self

Determination Act, which is independent of the timber program. If this act expires and funding returns to the Twenty-five Percent Returns, timber is just one part of the returns to counties. This is not an objective in the Forest Plan and will not be monitored.

Vegetation Measures: Category 968

Public Comment 232: (Letter Number(s): 190 and 235)

In addition to the monitoring items in the 1987 Forest Plan, the Forest Service should include the following items in the monitoring plan related to old growth and noxious weeds:

- A) An annual update of the OG inventory (including recruitment stands) indicating which stands were added or removed and the rationale, and an interactive map inventory with linked stand data on a website; and
- B) An annual reporting item that indicates the extent and changes to the noxious weed infestation areas.

Response:

- A) The existing 1987 Forest Plan does not require any monitoring or reporting of old growth related items. However, because the Forest recognized the importance of this resource and the need to demonstrate consistency with the old growth related standards and guidelines in the 1987 Plan, the IPNF began reporting on old growth approximately 20 years ago. Regarding the revised Forest Plan, as presented in chapter 5 the Forest would use three monitoring measures (MON-VEG-01-04, 05, and 06) for old growth. Old growth acres would be monitored using two techniques (FIA information and the Forests' stand inventory and mapping procedures) and potential recruitment old growth would be monitored using the Forests' stand inventory and mapping procedures. Lastly, the acres of old growth that was treated to improve resistance and resiliency of the old growth to disturbances would be monitored. The Forests' stand inventory and mapping information would be updated as needed, based on either changes being made at the project level, or if large scale disturbances (e.g., fires or insect/disease caused mortality events) occur on the Forest. The FIA plot based old growth analysis would be updated every 5 years. Due to budget limitations, the Forest does not plan on committing to the creation and maintenance of an interactive web based GIS system to display old growth information; and
- B) Annually reporting on the extent of weed infestations is not possible due to budget and staffing limitations. It would require a tremendous amount of money to survey 2.5 million acres of national forest for weeds each year. The IPNF has never been able to afford a complete survey of the entire Forest and could not fund that effort each year. The monitoring items related to non-native invasive plants that are included in the monitoring program in chapter 5 of the revised Forest Plan can probably be accomplished with the budget levels that we are likely to receive in the future.

Watershed/Aquatic Species Measures: Category 970

Public Comment 235: (Letter Number(s): 235)

In its monitoring measures, the Forest Service should consider requiring numerical disclosure of the acreage of detrimental soil conditions forestwide, as well as overall changes in forestwide soil productivity.

Response:

There is no requirement to disclose the acreage of detrimental soil conditions forestwide and there is no forestwide inventory for this type of information. This is very site-specific data that is not included in a programmatic Forest Plan. The revised Forest Plan does, however, include

requirements for monitoring soil. Soil monitoring question 1 evaluates the retention of coarse woody debris and soil monitoring question number 2 evaluates irreversible damage and compliance with regional soil quality standard. Both of these monitoring questions are used in evaluating maintenance of soil productivity.

Watershed/Aquatic Species Measures: Category 970

Public Comment 236: (Letter Number(s): 182, 221, 232, and 235)

Regarding the Watersheds and Aquatic Species Monitoring Measures, the revised Forest Plan should include the specific monitoring conditions of the INFISH amendment and the bull trout BO. The revised Forest Plan should require site-specific watershed/aquatic species monitoring at the project level, both in the short- and long-term, to ensure resource protection.

Response:

Numeric criteria for INFISH riparian management objectives (RMOs) are interim objectives not “standards.” INFISH validation and effectiveness monitoring is conducted by the PACFISH/INFISH Biological Opinion Effectiveness Monitoring (PIBO EM) team and is intended to cover the entire activity area for the INFISH biological opinion (see page 169 of the draft EIS). See also the following website, which contains all information associated with that effort: <http://www.fs.fed.us/biology/fishecology/emp>.

The desired condition provided in the revised Forest Plan (FW-DC-AQH-05) states that the habitat attributes and parameters “generally describe stream habitat conditions;” as aquatic ecosystems are complex, dynamic, and variable and will not meet all numeric criteria as prescribed at all times or throughout the entire length of a given stream channel network. Pages A-2 through A-3 of the INFISH decision notice (USFS 1995) describe the purpose and intent of the interim RMOs and explain that “all of the described features may not occur in a specific segment of stream within a watershed” (page A-2, USFS 1995).

The intent of the revised Forest Plan is to meet the objectives for these habitat features through the application of conservation and restoration concepts, along with INFISH direction, that will allow for natural recovery and attainment of RMOs. Current management of riparian areas, as described within INFISH direction is meant to provide protections necessary for stream ecosystems to reach their natural potential. Reach monitoring may be conducted at the project level to evaluate baseline conditions and to assess existing RMOs and, if appropriate, how a given project may affect those resources.

Effectiveness of the Forest Plan will be evaluated at the subwatershed scale. Reach monitoring may be conducted at the project level to identify compliance with the Forest Plan. The monitoring chapter has been updated to reflect the correct scale of monitoring. See chapter 5 of the revised Forest Plan for an updated description of monitoring activities.

Watershed/Aquatic Species Measures: Category 970

Public Comment 911: (Letter Number(s): 182)

The Forest Service should stop logging regeneration timber sales in 303(d) drainages without proposing or implementing any required validation and effectiveness monitoring to determine the validity of the predicted effects of the proposed and ongoing timber sales because there is no legal authority to enforce a violation of the TMDL.

Response:

The Forest is required to protect beneficial uses and consults with the appropriate water quality agencies when necessary and as required under the Clean Water Act. Guidance in the Forest Plan

indicates a commitment to protecting water quality (e.g., Watershed, Soil, Riparian, and Aquatic Resources Goal-01, FW-DC-WTR-02, 04, FW-DC-RIP-03, FW-OBJ-WTR-01, 02, FW-OBJ-AQH-02, FW-STD-WTR-01, FW-GDL-WTR-01).

Wilderness, Recommended Wilderness, & WSA Measures: Category 972

Public Comment 913: (Letter Number(s): 190)

The Forest Service should consider the following to annually assess whether or not the wilderness character of IRAs has changed:

- A) Reporting the number of incidents and closure violations;
- B) Assessing the overall amount of off-road vehicle use in IRAs; and
- C) Annually reporting trends in motor vehicle use in recommended wilderness (MA1b) and primitive lands (MA1e) (if applicable in the final Forest Plan).

Response:

A – C) These are not forest plan monitoring items. In general, the amount of violations and illegal use do not reflect the adequacy of forest plan direction. These are law enforcement activities.

Wildlife Questions: Category 973

Public Comment 237: (Letter Number(s): 189, 190, 207, 235, and 246)

What is the planned monitoring program for management indicator species, threatened, endangered, and sensitive species?

- A) Monitoring should be tied to Plan direction (e.g., standards);
- B) The Forest should monitor MIS, threatened, endangered, and sensitive species population trends; and
- C) Would the Forest identify focal species to monitor in addition to MIS?

Response:

A) Certain habitat parameters for MIS and T&E species would be monitored under the revised Forest Plan. Chapter 5 in the FEIS has been updated from what was in the DEIS. The monitoring questions and measures for wildlife have been changed to better tie to the Forest Plan direction. There is an objective for both of the terrestrial MIS (elk and the landbird assemblage). There is also a more general objective for the maintenance and restoration of wildlife habitat with an emphasis on TES species. The measures for the wildlife monitoring questions in chapter 5 also tie to the vegetation and fire monitoring questions/measures. This is due to the role the vegetation and fire direction in the Forest Plan plays in the maintenance or restoration of wildlife habitat. B) In order to provide for viability of species on the IPNF, the Forest Plan relies on a coarse and fine filter approach. The coarse filter is based on the idea that the species on the Forest evolved with the disturbance processes (e.g., fire, insects, and disease) that shaped the habitats that are found on the IPNF. The desired conditions for vegetation in the revised Forest Plan are based on those natural disturbance processes and the resulting habitat conditions. By maintaining or moving towards those desired conditions the species that evolved here with those conditions would continue to have habitat on the Forest. For those species that needed additional direction in the Plan to maintain/restore habitat, then additional desired conditions, standards, and guidelines were developed as part of a fine filter approach to viability. The fine filter approach narrows the focus to those species that require habitat that may be outside the natural range of variation and would not be covered by the coarse filter. In addition, there are species whose populations have been reduced to levels requiring special management considerations (e.g., species listed as

threatened, endangered, or sensitive). This coarse filter/fine filter approach to viability is also discussed in the introduction of the wildlife specialist's report and the introduction of the wildlife section in the DEIS/FEIS.

The Forest contracted with Ecosystem Resources Group (ERG) to analyze habitat changes over the next 50 years under different scenarios. These scenarios were based on the alternatives, the level of fire suppression, differences in climate (normal versus warmer), and budgets (with and without budget constraints). The species included in the analysis were those that could be tied to vegetative changes as the Forest trended towards the desired conditions for vegetation and fire. These included some of the TES and MIS analyzed in the wildlife specialist's report and DEIS/FEIS. ERG's analysis determined that sufficient habitat would be maintained for all the species they analyzed to support their viability. The IPNF would monitor the movement towards the desired conditions for vegetation and fire in the revised Forest Plan, and as the ERG report (ERG 2012) and the wildlife specialist's report determined, movement towards those desired conditions would provide sufficient habitat to support viability of TES species on the IPNF. The MIS were not selected for a viability concern. The introduction of the terrestrial MIS section in the wildlife specialist's report and the FEIS has been updated from what was in the DEIS. This includes rewording the table in that introduction displaying the terrestrial MIS. The landbird assemblage was selected to provide a tool to help measure our progress towards the desired conditions for vegetation and fire. This is based on the idea that the desired conditions for vegetation and fire would maintain or restore sufficient habitat for these landbird species on the IPNF. These species were chosen to represent different habitat components (e.g., large trees, mature stands, openings). Therefore the monitoring for the landbird assemblage is tied to the vegetation and fire monitoring questions/measures in chapter 5. As shown by ERG's analysis, we expect a trend towards the desired conditions for vegetation and fire to result in the maintenance/restoration of habitat for the landbird assemblage.

The focus on monitoring the movement towards the desired conditions for vegetation and fire is reflective of the Forest's systems approach to ecological sustainability.

Elk was selected as an MIS specifically for elk security areas and to measure progress towards the objective (FW-OBJ-WL-02) and guideline (FW-GDL-WL-13) in the Plan that provides direction for elk security. Population monitoring for the MIS elk is best done by the experts in that arena, the State agencies. The best population data for elk would come from the state and there is no value in the Forest attempting to collect the same data as that already collected by other agencies, agencies that have a long history of collecting that kind of data. The Forest could request the best available information from State agencies for those areas overlapping the IPNF rather than duplicating those monitoring efforts.

There is ongoing population monitoring efforts related to landbirds within Region 1 of the Forest Service. This includes transects on the IPNF. The five species within the Forest's landbird assemblage MIS are detected in that monitoring effort. That data and analysis is available to the Forest. Again, as with elk, there is no value in duplicating that monitoring effort. As budgets allow, the Forest could contribute towards the funding of this monitoring effort in order to boost sampling on the Forest and improve IPNF specific data.

Commenters stated that because wildlife populations are impacted not only by habitat availability and quality, but also by weather, predation, diseases, or hunting/trapping that monitoring habitat trends does not always reflect population trends. Commenters stated that populations should be monitored instead. Unfortunately, because of those factors mentioned previously, monitoring populations may not accurately reflect changes in habitat due to management actions. Populations may change due to factors outside the IPNF's control, and these factors may not be easily pinpointed. Therefore, to get the most utility out of our MIS, the IPNF has chosen them to be measurement tools to measure progress towards specific direction in the revised Forest Plan and

measure differences among the alternatives. The landbird assemblage was chosen to measure progress towards the desired conditions for vegetation and fire because habitat for those species is expected to be maintained/restored as we move towards those desired conditions. The ERG report (ERG 2012) shows that the IPNF does make progress towards those desired conditions and habitat for the landbird assemblage is maintained/restored. The IPNF has a guideline and objective for elk security habitat, so elk is a MIS and progress towards that objective, would be monitored.

One commenter requested information on monitoring of the 1987 Forest Plan MIS. Please see the Forest Plan monitoring reports at: <http://www.fs.usda.gov/main/ipnf/landmanagement/planning>. Commenters also are concerned that threatened and endangered species would not be monitored. Lynx habitat was analyzed in the ERG report (ERG 2012) as well and is expected to increase over time as we move towards the desired conditions for vegetation and fire. Threatened and endangered species habitat is monitored as per the Biological Opinions and RODs for the Northern Rockies Lynx Management Direction and the Access Amendment for grizzly bear (Forest Plan Amendments for Motorized Access Management within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones). See chapter 5 in the revised Forest Plan for the IPNF's monitoring plan regarding T&E monitoring.

Sensitive species are not specifically mentioned in the chapter 5 monitoring table of the revised Forest Plan. The IPNF does implement projects that benefit non-T&E species the Forest, potentially including sensitive species, and the acres of wildlife habitat maintained/restored would be monitored as shown in the chapter 5 monitoring table.

Commenters cited concerns over old growth and a lack of an old growth MIS in the draft Forest Plan. These commenters were concerned that old growth and the effects of management actions would not be monitored. See the vegetation section in the table in chapter 5 of the revised Forest Plan where it shows that old growth would indeed be monitored. Commenters specifically claimed that pileated woodpecker, northern goshawk, black-backed woodpecker, fisher, flammulated owl, and some lichen represented old growth habitat. While each of these wildlife species, except black-backed woodpecker, is associated with large and older forest conditions, none are considered old growth dependent species (See the science-based habitat descriptions for individual species in the wildlife specialist's report, FEIS, ERG 2012, KIPZ MIS selection paper and supporting documentation [i.e., USDA 2011 MIS Considerations for the IPNF], Samson 2006, McGrath et al. 2003, and USDI 1998). See the MIS selection paper that was prepared as part of the Forest Plan revision process, and the response to Public Comment 449, for a description of why the IPNF chose the MIS species we did. Regardless, the ERG (ERG 2012) report did analyze the effects of the draft Forest Plan on all these species. As with the other species analyzed, ERG determined that habitat would be maintained or improved for these species under the Proposed Action and viability would be retained as the IPNF trends toward the desired conditions in the revised Forest Plan. In regard to the idea of using lichen as an old growth MIS, the IPNF is not aware of any lichen species that research in the northern Rockies has shown to be an old growth obligate or solely dependent on old growth. Even if there were, the coarse filter approach to viability used by the IPNF in the revision process, the retention of old growth and increasing the amount old growth in the future as part of the revised Forest Plan, would suffice as a conservation measure to retain habitat for lichen species that can be found in old growth stands.

One commenter also cited the following passage from the Committee of Scientists Report (1999): "Habitat alone cannot be used to predict wildlife populations... The presence of suitable habitat does not ensure that any particular species will be present or will reproduce. Therefore, populations of species must also be assessed and continually monitored." The commenter appears to be making a case that the IPNF needs to go beyond the "coarse filter" approach and even

monitor a host of species on the Forest. This passage is found on pages 19-20 in chapter 3 of the Committee of Scientists Report (1999). The full paragraph is under the subheading of Composition which is under the broader topic of The Elements of Ecological Sustainability. The entire paragraph reads: “Habitat alone cannot be used to predict wildlife populations, however. The presence of suitable habitat does not ensure that any particular species will be present or will reproduce. Therefore, populations of species must also be assessed and continually monitored. Tools for assessing both habitat conditions and population dynamics must be developed and frequently validated. Because of limited time and funds, however, it may only be possible to assess the status of a relatively few ‘focal’ species. These species will provide information about the integrity of the larger ecosystem to which they belong. Focal species can include those that are threatened and endangered, occupy rare habitats, are of high management or public interest, are game species, or are indicator species. (The concepts of focus and indicator species are discussed more fully later in this section.)” Again, the point of this paragraph appears to be that a “fine filter” approach may be needed to supplement the “coarse filter” approach to viability and sustainability. The key part of the passage is, “...Because of limited time and funds, however, it may only be possible to assess the status of a relatively few ‘focal’ species...” Limited time and funds are a reality for the IPNF. Therefore, as the Committee of Scientists realized, it is unrealistic to expect all species or even all TES species on the IPNF, to have population monitoring. Please see Public Comment 449 for more information on the IPNF’s Plan for management indicator species. The MIS were selected to provide a measurement tool and to focus the assessment and monitoring to be undertaken. The landbird assemblage MIS were used to investigate whether managing for the desired conditions for vegetation/fire would provide adequate habitat for individual species.

Please see Public Comment 456 for more information on how the revised Forest Plan provides for viability of species.

One commenter suggested retaining all the 1987 Forest Plan monitoring requirements as a starting point and adding new monitoring requirements. As this is a newly revised Forest Plan, it was necessary to tailor the monitoring to fit the revised Plan and the direction contained therein rather than recycle all the monitoring for the 1987 Forest Plan, a Plan that is no longer in effect. One commenter requested that snow compacting activities be monitored as stated in the NRLMD. The NRLMD is a retained decision, including the monitoring requirements contained therein. A commenter requested that the IPNF monitor the availability of secure denning areas for wolverine that are free of motorized disturbance. Please see the wolverine analysis in the wildlife specialist’s report. It is explained that the USFWS proposal to list wolverine as threatened included a conclusion that over-snow motorized use does not pose a threat to wolverine populations. Therefore, there would be no reason for the IPNF to monitor over-snow motorized use in relation to wolverine denning habitat.

One commenter suggested including a monitoring question for caribou habitat suitability. This is not feasible at this time. Management plans for individual caribou management units have not been developed or implemented as described in the caribou recovery plan (page 34 in USDI 1994). Until then, there are no sideboards provided in the recovery plan for the monitoring suggested by the commenter; and

C) The IPNF is not identifying, analyzing, or monitoring focal species in this Forest Plan revision. This revision is being done under the 1982 Planning Rule, which includes the identification of MIS. The 2012 Planning Rule does not include MIS but instead uses focal species.

NEPA

Comprehensive Evaluation Report: Category 1000

Public Comment 919: (Letter Number(s): 235 and 164)

The Forest Service should allow public comment on the Comprehensive Evaluation Report before using it as “the principle document that supported the need to establish, amend, or revise a Forest Plan.”

Response:

The Comprehensive Evaluation Report was part of the documents available for review and comment during the comment period on the 2006 Proposed Forest Plan. The Comprehensive Evaluation Report may be a principle document, but it is not the only document supporting the need to establish, amend, or revise the Forest Plan. Other documents supporting the need to amend or revise the Forest Plan include the annual monitoring and evaluation reports for the 1987 Forest Plan, the Analysis of the Management Situation released in 2003, and the results from two public scoping periods (2002 and 2010) on revising the Plan. The CER was a principle document because it summarized this information up to 2006.

Cumulative Effects: Category 1001

Public Comment 240: (Letter Number(s): 145 and 180)

The Forest Service should consider the following regarding cumulative effects:

- A) Display the cumulative benefits from non-suitable acres, such as linkage zones connecting old growth, providing wildlife travel corridors as well as other wildlife habitat, and water quality benefits; all of the benefits from these lands should be portrayed visually and numerically;
- B) Cumulative impacts need to be fully considered at the project level, in order to ensure projects will meet the desired conditions at the landscape level as described in the Forest Plan.

Response:

A) The acres not suitable for timber production were considered in the effects analysis for other resources, such as wildlife and watershed. The acres not suitable for timber production have a different desired condition, depending on the management area, from those that are suitable. The acres not suitable for timber production are quantified in the EIS and appendix B to the EIS. They are not broken out by resource type (e.g., old growth, riparian areas, etc.) because of the overlap associated with these resources. Maps of lands suitable for timber production are included in appendix B of the FEIS.

B) Projects will analyze cumulative effects, as required under NEPA. Projects will strive to move the Forest towards Forest Plan desired conditions. Forest Plan monitoring will evaluate movement towards desired condition at the forest level.

Decision Making: Category 1002

Public Comment 241: (Letter Number(s): 119)

The Forest Service should make decisions that are balanced by the needs and opinions of the public for multiple use opportunities; decisions should not be based on pressure from environmental groups and other foundation-funded organizations and their litigation.

Response:

The decision maker considers all points of view in making his or her decision. The decision maker strives for balance and proper management of all resources. See the Record of Decision for documentation on the rationale for the decision.

Public Comment 242: (Letter Number(s): 119)

The Forest Service should recognize that the intent of NEPA is not to make decisions using comments as a voting process but to make decisions that address the needs of all citizens.

Response:

The IPNF does not regard comments on the Forest Plan as “a vote.” Direction regarding commenting that was distributed with the draft documents stated the following: “This is not a voting process. Comments are considered on basis of content not quantity.” See the response to Public Comment 241.

Public Comment 243: (Letter Number(s): 195 and 282)

The Forest Service should consider the draft Forest Plan alters the procedures for making decisions. Without specific and measurable standards in line with NEPA, the decision making is to the Forest Service’s discretion. It allows the Forest Service to make important decisions behind closed doors without public review and can easily favor special interests that have historical ties to the Forest Service.

Response:

The draft Forest Plan does nothing to alter project level decision-making. The standards in the draft Forest Plan are specific and measurable. Any discretion by the Forest Service in decision making on projects undergoes public scrutiny and comment through the NEPA process. The Forest Service strives to balance public input but is the ultimate decision maker. Nothing in the revised Forest Plan will change the NEPA process. The Forest Plan has had extensive public review and does not favor special interests.

Public Comment 921: (Letter Number(s): 179)

The Forest Service should ensure the Forest Plan is a framework for real action that sets out what the Forest Service will do instead of specifying constraints and limitations on activities that virtually assure the Forest Plan will not result in prudent and timely forest management.

Response:

The Forest Plan direction does describe what the Forest Service will do, including such things as improving wildlife habitat, restoring and enhancing watershed condition, increasing resiliency of vegetation, and providing wood fiber production.

Education: Category 1004**Public Comment 922:** (Letter Number(s): 248)

The Forest Service should create a timeline and/or other historical materials for the IPNF planning process to help the public understand the history of Forest/Forest Reserve Planning since the 1890s that is essential to understanding the controversies of the 1987 Forest Plan and the current proposed revisions.

Response:

Although interesting information, this is not required documentation to be included in our EIS.

Funding: Category 1005

Public Comment 245: (Letter Number(s): 163, 179, 248, 250, 259, and 262)

The Forest Service should consider the following regarding funding:

- A) The Forest Plan should address both cost and funding requirements to carry out the Forest Plan. The draft Forest Plan does neither. Budget projections in the Forest Plan are unrealistic. Lacking a budget to implement the federal plan as written, USFS staff will be implementing only parts of the Forest Plan or implementing the Forest Plan more slowly. The IPNF needs to make a commitment to achieve the objectives in the Forest Plan, even with variation in budgets;
- B) Forest management on the IPNF can, and should, be profitable. The Forest Plan should be designed to provide a net profit to federal government; the Forest Plan should provide for extracting and removing resources to provide funds to help maintain the Forest;
- C) A 1989 GAO study found that the Forest Service cannot maintain wilderness area trails, clean campsites, monitor conditions, or educate the public on proper wilderness behavior to the extent that it would like. Funding may not be adequate to address the increase in wilderness acreage in the draft Forest Plan.

Response:

- A) The revised Forest Plan was developed with the premise that budget levels would not increase over current levels. The objectives in the revised Forest Plan were developed to move towards a variety of Desired Future Conditions in the various resource areas. The quantity or amount of each objective was based largely on our current and recent past budget levels. We expect future budgets to stay relatively flat or decrease. The objectives are realistic projections of what we expect to accomplish annually or over the life of the Plan. The EIS describes the effects of implementing the alternatives under a constrained budget. If budgets decrease or increase in the future, the IPNF will still follow the direction in the Forest Plan, but movement towards desired conditions will be slowed (in the case of a budget decrease) or accelerated (in the case of a budget increase);
- B) Law, regulation, and policy direct the Forest Service to consider costs and financial efficiency in project level decisions. However, the decision-maker is not required to pick the most cost effective alternative. The decision maker takes many factors into account in making their decision, including such things as movement towards desired conditions, increased forest health, and local jobs and income. When feasible, the revenue from commercial timber sales may be used to provide other work on the ground, including road maintenance. These are site-specific project-level decisions that are not made in the Forest Plan; and
- C) The GAO study referenced is very dated. The IPNF is able to manage wilderness and recommended wilderness with current funding levels.

Plan Direction: Category 1006

Public Comment 246: (Letter Number(s): 189, 209, 235, and 279)

The Forest Service should consider the following regarding the Plan direction:

- A) Treating guidelines as guides and not requirements, a Forest Plan amendment should not be required if the guidelines are generally followed;
- B) The draft Forest Plan lacks specific and concrete standards and monitoring protocol for some important resources; the standards do not meet NEPA and the new planning rules' mandates for quality information and scientific accuracy;
- C) Recognizing that there will be no accountability for not meeting any of the stated conditions under desired conditions because they do not provide enough strong, binding direction as to compel managers to accomplish measurable outcomes in any specified timetable, nor could

managers be held accountable for not accomplishing the desired conditions. Direction on “Consistency with the Forest Plan” allows too much discretion by the Forest Service; in addition, the draft Forest Plan allows for adverse effects in the short-term: “Maintain or make progress toward one or more of the desired conditions over the long-term, even if the project or activity would adversely affect progress toward other desired conditions in a minor way over the long-term.” This invokes high levels of risk. Only in the long-term, after decades of implementation, might the results of such approaches compel managers to chart a more conservative or ecologically restorative course;

D) The meaning of consistency when guidelines are not followed leaves too much discretion by land managers: “When the project design varies from the exact wording of a guideline, project documentation must specifically explain how the project design is as effective in contributing to the maintenance or attainment of the guideline.” If the Forest must change guidelines within a project, it should use the Forest Plan Amendment process;

E) Moving all of the appendix B direction into chapter 2 of the revised Forest Plan, to add clarity and address ambiguities due to their location in appendix B; clarify the direction in appendix B that includes appendices from the 1987 Forest Plan; and

F) Ensuring the ecological integrity essential to long-term sustainability before promoting the economic and social sustainability of communities and economies; achieving sustainability requires a strong emphasis on restoration.

Response:

A) The IPNF disagrees. In order to provide protection of resources, projects must follow all guidelines. Guidelines are an important component of plan direction, allowing some flexibility (with proper documentation) while still providing guidance to protect resources;

B) The revised Forest Plan has concrete, measurable standards and a monitoring program. The revised Forest Plan has fewer standards than were found under the 1987 Forest Plan. Some of these standards are covered under law, regulation, Forest Service manual, Forest Service handbook, or other direction. The 1987 Plan reiterated much of this direction, resulting in redundancy in restating other direction. The revised Forest Plan removes this redundancy. As indicated on page 2 of the IPNF draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service is required to follow all existing laws, regulations, and policies relating to the management of NFS lands, and the Forest Plan direction is designed to supplement existing direction and not repeat them. In addition, the revised Forest Plan retains the following decisions: 1) Inland Native Fish Strategy; 2) Northern Rockies Lynx Management Direction, and 3) Grizzly Bear Access Amendment. As described on page 12 of the revised Forest Plan, this direction is retained and projects and activities must be consistent with the direction carried forward from these decisions. All project and activities must be in compliance with the Forest Plan. If a project or activity is not consistent with the Forest Plan (as described on pages 13 and 14 of the revised Forest Plan), an amendment must be made to the Forest Plan prior to implementation of the project/activity. Chapter 5 of the Forest Plan contains the monitoring program, which includes specific measures and linkages to Forest Plan direction. Additional information has been included in the monitoring chapter in the revised Forest Plan. The revised Forest Plan incorporates the latest best available science as describe in the FEIS and literature citations;

C) The Forest Plan is a strategic document (see page 2 of the draft Forest Plan). Desired conditions were written to be as specific as possible and provide direction at a strategic level. Projects may not be able to make progress towards all desired conditions in the Forest Plan. The project-level analysis will indicate how the project is meeting the Forest Plan consistency requirements as described on page 3 of the Forest Plan. Forest Plan monitoring will provide the

land managers and the public with information on how the Forest is progressing towards desired conditions and if any changes in plan direction is needed;

D) Guidelines are commitments that the Forest will follow during plan implementation. The project analysis will document how the project is meeting all applicable guidelines. As with the rest of our analysis that is required for NEPA, this documentation will be available for public scrutiny;

E) The revised Forest Plan has updated appendix B to provide more clarity and remove the reference to the 1987 Forest Plan appendices under the Grizzly Bear Access Amendment; and

F) There are many definitions for “sustainability.” The Forest recognizes that ecological, economic, and social sustainability are intertwined. The revised Forest Plan provides direction for the restoration of ecosystems and improving ecological integrity to contribute towards ecological, economic, and social sustainability.

Law Enforcement: Category 1007

Public Comment 924: (Letter Number(s): 145, 159, and 160)

The Forest Service should provide a clear discussion about the role of law enforcement actions to prevent resource damage, minimize conflicts between user groups, and help ensure management objectives are met.

Response:

The IPNF has a Law Enforcement Plan that provides this direction.

Laws, Regulations, and Policy: Category 1008

Public Comment 248: (Letter Number(s): 119, 124, 125, and 126)

The Forest Service should follow the intent of the 2001 OHV Record of Decision and Plan Amendment for Montana, North Dakota and portions of South Dakota, and the 2005 Travel Management Rule (36 CFR 212) and complete site-specific planning using comprehensive inventories of existing routes for motorized route designation. The Forest Service should honor the motorized recreation community’s cooperation and not use these rules inappropriately as to create wholesale motorized closures and a wholesale conversion of motorized to non-motorized routes.

Response:

The 2001 OHV Record of Decision and Plan Amendment for Montana, North Dakota, and Portions of South Dakota (also known as the Tri-state OHV Amendment) amended nine forest plans to prohibit cross-country motor-vehicle use. The IPNF was not included in this analysis and decision and its direction did not apply to the Forest. The 2005 Travel Management Rule (36 CFR 212 Subpart B) requires the designation of those roads, trails, and areas open to motor vehicle use on all NFS lands and (similar to the Tri-state OHV Amendment) prohibits the use of motor vehicles off the designated system (prohibits cross-country motor vehicle use with the exception of over-snow vehicle use).

Neither the Tri-state OHV Amendment nor the regulations at 36 CFR 212, require a comprehensive inventory of all existing routes, nor reconsideration of existing travel management decisions or designations. The inventory for site-specific planning is to be commensurate with the analysis needs, issues, desired resource conditions, and resource management objectives for the area and is dependent on the availability of funds and resources. The requirements for site-specific planning are met during the project level travel analyses, which have been occurring across the Forest. Travel analysis includes consolidating existing direction (past decisions that guide motor vehicle use) and an accurate inventory of NFS roads, trails, and areas managed for

motor vehicle use, but not a full inventory of unauthorized routes (FSM 7700/FSH 77709.55). If project-level travel analysis recommends additions or changes to route or area designations, those changes are subject to full public participation and involvement under the NEPA.

The IPNF have published motor vehicle use maps (MVUMs) which display those roads, trails, and areas designated for motor vehicle use in compliance with 36 CFR 212 Subpart B for the Coeur d'Alene River Ranger District and the Kaniksu Zone. Analysis for the St. Joe Travel Management Plan is in progress.

The revised Forest Plan will not close any roads, trails, or areas currently open to motorized recreation, with the exception of over-snow motorized vehicle use in recommended wilderness and research natural areas. Additional travel management designations or modifications are outside the scope of the revised Forest Plan. Any future site-specific travel management planning will comply with 36 CFR 212 and NEPA requirements for public involvement.

Public Comment 249: (Letter Number(s): 119, 182, 195, and 282)

The Forest Service should consider the following regarding laws, regulations, and policies:

A) The IPNF is creating de-facto wilderness. Wilderness study areas and non-motorized areas are managed as wilderness areas and are simply a mechanism to evade the measures set forth in the Wilderness Act. Only Congress can designate wilderness. The IPNF must follow the laws set for in the Wilderness Act in creating wilderness;

B) The Federal Land Policy and Management Act must be followed and any language in existing management plans for multiple-use areas that does not support multiple-use is inconsistent with directives from Congress, the needs of the public, and should be struck;

C) The draft Forest Plan does not have legally enforceable standards. There are no requirements or standards anywhere in the Watershed, Soil, Riparian, and Aquatic Resources section that show compliance with NFMA fisheries laws. There are no remedies proposed or language in the draft Forest Plan that would guarantee compliance with the Clean Water Act. The draft Forest Plan does not comply with the federal laws that protect our environment;

D) The claim that plans are 15-year documents is incorrect. NFMA requires a plan revision normally every ten years and not more than 15 years. The IPNF has failed in this regard;

E) NEPA requires that the best scientific information be used and evaluated. The agency has not done this with regard to some very specious and dubious assumptions regarding HRV/DFC and the use of the science behind ICBEMP; the ICBEMP did not go through NEPA and should not be used.

Response:

A) The IPNF followed all law, regulation, manual, and handbook direction in recommending areas as wilderness. Recommending lands as wilderness is required under the 1982 regulations (36 CFR 219) for forest planning. These areas are recommended to Congress for wilderness designation. Based on law, regulation, and policy, these areas are to be managed to protect wilderness characteristics until Congress determines whether to designate these areas as wilderness or not. Wilderness study areas are different from recommended wilderness; these areas are designated by Congress as areas to be studied for future wilderness designation. The IPNF has one wilderness study area, the Grandmother Mountain area, which was designated by Congress as a Wilderness Study Area;

B) Direction contained in the Forest Plan is compliant with the Federal Land Policy and Management Act (FLPMA). This act provides direction to management of public lands administered by the Bureau of Land Management (BLM), including provisions on federal land withdrawals, land acquisitions and exchanges, rights-of-way, advisory groups, range management, and the general organization and administration of BLM and the public lands. The FLPMA does have application to some activities under the Forest Service Lands Program,

including land acquisitions and exchanges and rights-of-ways. Direction for the Lands Program in the Forest Plan is consistent with this act;

C) Although not as many standards as was found in the 1987 Forest Plan, the draft Forest Plan does contain enforceable standards. As indicated on page 2 of the IPNF draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service is required to follow all existing laws, regulations, and policies relating to the management of NFS lands, and the Forest Plan direction is designed to supplement existing direction and not repeat them. The draft Forest Plan does provide direction for the protection of aquatic habitat and fish (in the draft Forest Plan, see pages 31 – 38 for forestwide direction and Appendix B for direction retained from the Inland Native Fish Strategy decision). The Forest Plan complies with all law, regulation, and policy that protect the environment;

D) The IPNF has followed all regulations in revising the Forest Plan. NFMA requires Forest Plans to be revised every 15 years. However, funds have not been sufficient to allow for this, and Congress has extended this requirement through its appropriations bills; and

E) The IPNF has used the best available science in developing desired conditions and other Forest Plan direction for the draft Forest Plan. Where appropriate, the science that was used as part of the ICBEMP assessment was incorporated in this analysis. The science associated with ICBEMP is independent of the NEPA process that was used or not used for this assessment. Science is independent of NEPA.

Public Comment 250: (Letter Number(s): 246)

The Forest Service should address the following:

A) In spite of federal laws that have been in existence for over 30 years that specifically address water quality and fisheries issues, the degraded aquatics conditions mentioned on page 138 continue to exist on the IPNF. The DEIS does not include high quality information with expert agency comments that address the specific reasons why the degraded fisheries and habitat continues to be degraded in spite of CWA, ESA, and NFMA regulations;

B) The DEIS does not assure compliance with federal and state laws with respect to aquatics issues. Page 181 of the DEIS states “Active restoration opportunities will be pursued whenever possible, and considered in the context of existing budget levels and other land management priorities.” Thus, the IPNF budgets and the timber program have a higher priority than being in compliance with federal laws. The final Forest Plan and FEIS need to address the NEPA deficiencies cited, in particular the requirements for accurate scientific analysis, high quality information and expert agency comments. The final NEPA documents also need to list each of the waterbodies on the IPNF that are in noncompliance with NFMA, CWA, and ESA fish passage regulations; and

C) The final EIS for the new Forest Plan needs to provide high quality information with expert agency comments indicating whether M&E requirements in a new Forest Plan would fully meet all M&E requirements as required by the 1982 planning regulations.

Response:

A) The introductory paragraph on page 138 of the DEIS was in error. The status of watershed conditions was more accurately described on page 159 of the DEIS. The introductory paragraph on page 138 has been updated in the FEIS to reflect more recent information on species’ status using the following reference: Idaho Department of Fish and Game, (2010), Fishery Management Annual Report, Panhandle Region 2010; and

B) The Forest Plan is in compliance with all NEPA and NFMA regulations. During project implementation, the Forest must comply with the all regulations. It is not clear why “proposal to see restoration opportunities whenever possible” infers that the Forest is not in “compliance with federal and state laws.” Budgets are a reality and the Forest cannot spend money it doesn’t have.

Where and when timber harvest occurs is determined through projects. Nothing in this document infers that timber harvest is a higher priority than watershed restoration. Commenter does not provide examples of what waterbodies are in noncompliance with existing regulations and for what specific reasons.

C) The IPNF uses best available science in determining monitoring measures. Chapter 5 of the Forest Plan outlines monitoring questions, their link to forest plan direction, and measures for answering the questions. Changes have been made in the revised Forest Plan to improve the forest plan monitoring, with some revised questions, updated measures, incorporation of links to the forest plan direction, frequency of measurement, precision and reliability, and the time when evaluation will be reports. The monitoring program described in Chapter 5 meets all M&E requirements under the 1982 planning regulations.

Management of National Forest Lands, Multiple Use: Category 1009

Public Comment 256: (Letter Number(s): 119, 204, 206, 208, 258, 262, 276, 301, 333, and 336)

The Forest Service should consider the following regarding Multiple-Use on National Forest System lands:

- A) There is support for multiple-use on the Forest because it is good for the land and the economy, there is no damage from access, there is room for all the uses and they should be given more allowance in the alternatives. The Forest should be managed timber, wildlife, minerals, and recreation. The IPNF needs to follow the law regarding multiple-use (such as the Multiple-Use Sustained Yield Act of 1960 and the Federal Land Policy and Management Act of 1976);
- B) Wilderness criteria and standards should not be applied to multiple-use lands, since wilderness is closed to motorized vehicles and equipment and multiple-use lands should be open to motorized vehicles and equipment;
- C) All of the remaining public lands, including roadless areas, must be managed for multiple-uses in order to avoid contributing further to the excessive allocation of resources and recreation opportunities for exclusive non-motorized use. The proposed Forest Plan does not meet the basic needs of the public for multiple-use opportunities, does not provide a proper allocation of multiple-use recreation opportunities, and does not meet the laws requiring multiple-use management of these lands;
- D) The IPNF should manage the Forest for balanced national priorities. This includes jobs, watershed, wildlife, and recreation; and
- E) Restoring the concept of managing national forest lands for the “greatest good for the greatest number of people”, the document should address restoration of this concept and take steps to restore reasonable multiple-use management and decision-making to public lands because the resources from the forest and the jobs that come with the management of them are needed.

Response:

A – E) All alternatives in this FEIS are consistent with the Multiple-use Sustained Yield Act. Multiple-use is provided across the Forest. However, multiple-use does not mean every acre allows timber harvest and motorized access. The act allows for broad discretion and there is a wide range of opinions about what mix of goods and services constitutes “multiple-use.” Wilderness management is multiple-use management. Many different uses are allowed in designated wilderness, and the framers of the Wilderness Act had to consider how the intent of wilderness could be interwoven with the intent of the Multiple-Use Sustained-Yield Act of 1960. Section 4 (a) (1) of the Wilderness Act of 1964 states “Nothing in the act shall be deemed to be in interference with the purpose for which national forests are established as set forth in the in the Act of June 4, 1897 (30 Stat. 11), and the Multiple-Use Sustained-Yield Act of June 12, 1960 (74

stat. 215).” The revised Forest Plan provides for balance in acres to be managed for wilderness and acres open to timber harvest and motorized use.

For an explanation of FLPMA and the revised Forest Plan, see the response to Public Comment 249 item B.

Maps: Category 1010

Public Comment 256: (Letter Number(s): 206 and 232)

The Forest Service should consider the following regarding maps:

- A) Creating more specific maps to be used for public comment;
- B) Realizing that not everyone has access to high speed internet to view or printing the maps; and
- C) Maps in the watershed section of the DEIS violate NEPA because they are too broad in scope and fail to delineate site-specific streams. It is impossible for the public to comment on, or properly understand this rating system and proposed management activities without providing the names of all the affected streams, including the names of all the 303(d) listed streams. These flaws and other shortcomings to the proposed Watershed Condition Ratings system violate NEPA and NFMA.

Response:

- A) The IPNF provided as much information as possible on the alternative maps. It is not possible to produce readable maps with additional details, such as roads and section lines. Townships and ranges were included, as well as streams and mountain peaks. Detailed maps were provided upon request for publics interested in specific areas;
- B) Hard copy maps were also available. See the response to item A; and
- C) It is not possible to provide the detail you request on an 8 ½ by 11 inch map. Appendix D of the FEIS describes the analysis process used in determining watershed condition. More detailed information is available upon request.

Planning Rule: Category 1013

Public Comment 262: (Letter Number(s): 235)

The Forest Service should consider the following regarding the Planning Rule:

- A) There is a relative absence of explicit reference to the 1982 36 CFR 219 planning rule—the guiding NFMA implementing regulations – in the draft Forest Plan. This makes it difficult to see how the draft Forest Plan is prepared and meant to be consistent with and grounded in regulations written to fundamentally guide planning under NFMA; and
- B) Realizing that a 30-day objection period is not long enough to allow meaningful review of this document.

Response:

- A) The Notice of Intent to revise the Forest Plan published March 10, 2010 stated the Forest was using the 1982 planning regulations as provided under the 2000 Planning Rule. The draft Forest Plan, page 1, states the IPNF elected to revise the Forest Plan using the provisions of the 1982 planning rule, as provided under the 2000 Planning Rule. Page 1 of the Draft Forest Plan also states “References in this plan to sections of 36 CFR are to the 1982 planning rule.” There are numerous citations to the 1982 planning rule in the draft Forest Plan and DEIS. Citations to the rule have been increased in the revised Forest Plan and FEIS; and
- B) The 30-day objection period referred to by the commenter was that defined under the 2000 Planning Rule (at 36 CFR 219.32). On March 23, the agency established a new planning rule (the 2012 Rule). Information provided on the IPNF website and in a mailing to the public during the

comment period on the draft Forest Plan and DEIS explained the Forest would be following the objection process as outlined in the new 2012 Planning Rule at 36 CFR 219 Part B. The 2012 Planning Rule at 36 CFR 219.17 states “If the responsible official chooses to complete an ongoing planning process of the prior planning regulations, but chooses to allow for an objection rather than an administrative appeal, the objection process in Subpart B shall apply.” The responsible official decided to follow the objection process rather than the appeal process because she would like to continue the collaborative process to resolve any lingering public concerns, prior to issuance of the decisions. The objection process is more of a collaborative approach to address concerns than is the traditional appeal process because the process is prior to the issuance of a decision, instead of after the issuance of a decision. The requirements for the objection process in Subpart B provide for a 60-day objection period, allowing more time for review of the documents and submission of any objection than had been the case under the 2000 Rule.

Process (Significant Issues): Category 1014

Public Comment 263: (Letter Number(s): 9, 96, 119, 163, and 198)

The Forest Service should consider the following regarding the NEPA process:

- A) Implementing a NEPA public involvement program that adequately identifies the significant issues and needs of motorized recreationists. Most motorized recreationists have given up on the public involvement process. The draft documents are overwhelming to review. It is difficult for the average citizen to participate, review the documents, and comment. Given this, the needs of the overall public must be carefully determined. The most equitable alternative to meet the public’s needs would be a reasonable multiple-use alternative. Meeting the unanswered needs and frustrations of over 50 million motorized recreationists is the most significant issue at hand for this proposed action;
- B) Developing a starting benchmark alternative that identifies all of the existing roads and trails available to motorized recreationists and those additional routes required to meet the needs of the public to comply with the NEPA requirement for adequate disclosure of the potential impacts of a proposed action as stated in CEQ Sec. 1500.1;
- C) Considering all significant issues involving the human environment for motorized recreationists during the evaluation and decision-making process;
- D) Realizing that lacking a sufficiently reasoned explanation for why wilderness quality lands were suggested and then not better protected will make it hard to garner broad public support the final Forest Plan, these questions of due process and validity of the decision making process result in people criticizing the agency and challenging projects;
- E) Realizing that the GAs are too large to present a detailed desired condition;
- F) Recognizing that the draft Forest Plan was developed using fraudulent and flawed information provided by the Intergovernmental Panel on Climate Change (IPCC), an United Nations body having no jurisdiction on US public lands;
- G) Reviewing the attachment to these comments and include (and also reference) the source documents for the opposing views in the SDEIS, and discussing opposing views that it believes are reasonable in context with this project and if resource damage could occur as a result of this project; and
- H) The Forest has failed to consider alternatives and information presented by the public and river-specific organizations regarding eligibility for Wild and Scenic Rivers. Both Forest Service policy and NEPA require forests to take a fresh and “hard look” at the eligibility of a forest’s streams during the planning process.

Response:

A) The public was invited to participate in the Forest Plan revision process. Many of the public who participated are motorized recreationists and those desiring multiple-use. Their views have been heard and incorporated into the decision making process and Plan. The major revision topics of “access and recreation” and “timber” were built around their concerns. The range of alternatives included an alternative with more motorized access and more timber harvest and less recommended wilderness (Alternative D). This alternative was considered in selecting the preferred alternative. The Forest agrees the documents for the draft Forest Plan and draft EIS are large and complex. Forest staff has been available to assist the public in understanding the documents and the process;

B) The revised Forest Plan will not close any roads, trails, or areas currently open to motorized use, with the exception of over-snow motorized vehicle use in recommended wilderness and research natural areas. This revised Forest Plan is not a travel planning document and does not make decisions on individual roads or trails. Thus, this type of assessment is not needed for the IPNF revision;

C) Motorized recreationists were included as part of the human environment. See the social and economic environment under chapter 3 of the EIS.

D) The IPNF presented a range of alternatives for recommended wilderness. Alternative C included the most recommended wilderness. This alternative was considered in selecting the preferred alternative. The Forest Plan revision process has followed NEPA and given full consideration to recommended wilderness, wildlife habitat, and other resource concerns. Under Alternatives B and C, timber harvest is a result of the desire to move vegetation towards desired condition. Only under Alternative D was timber harvest considered first and movement towards desired condition considered second;

E) The Geographic Areas were developed to follow watershed lines and provide landscapes that communities related to. These broad landscape areas provided an opportunity for the public to meet, discuss, and agree on desired conditions. In addition to Geographic Areas, the Forest Plan includes desired conditions forestwide and by management area;

F) The Forest used the best available science in developing the Climate Change report. The jurisdiction of the UN has nothing to do with the Climate Change report or the draft Forest Plan;

G) The attachment to the commenter’s letter was not specific to the Forest Plan revision process or this project. No resource damage will occur as a result of the Forest Plan decision; and

H) The IPNF completed an inventory of all named rivers and streams to determine additional segments that may be eligible as wild and scenic rivers. This is documented in appendix F of the EIS. Additional information has been included in the final EIS to better describe the inventory process and results. The IPNF went through two scoping periods and a comment period on a Proposed Plan (released in 2006). This scoping and the comment period on the Proposed Plan did not bring forward wild and scenic rivers as a public issue, nor did they result in any additional streams or rivers to consider for eligibility. The final EIS contains an alternative not analyzed in detail addressing the concern for additional eligible rivers and streams.

Purpose and Need: Category 1015

Public Comment 265 (Letter Number(s): 119)

The Purpose and Need did not adequately address the needs for motorized recreation. The population is aging and desires adequate motorized access. There is a need for increased motorized opportunities and recognition of the positive impact on the quality of the human environment. The Purpose and Need must follow through on the final OHV Rule as a route designation process.

Response:

One of the Forest Plan revision topics is “Access and Recreation.” The Forest Plan revision topics are the major issues that identify where resource conditions, technical knowledge, or public perceptions of resource management have created a potential “need for change.” These topics are included in the Purpose and Need for revising the Forest Plan (see chapter 1 of the FEIS). This access and recreation issue is reflected in the range of alternatives, with more motorized access under Alternative D and less motorized access under Alternative C. This revised Forest Plan does not make any decisions on route designations. The Forest Plan revision is not a travel management planning document. See the response to Public Comment 248.

Relationship to Other Entities: Category 1016**Public Comment 266** (Letter Number(s): 209)

The Forest Service should coordinate and cooperate with the tribes regarding wildlife, fisheries and plants in the same manner as the USFWS, IDFG and WDFW (page 7 of the draft Forest Plan). Coordinating with Canadian and British Columbia agencies is also essential to ecosystem-based management the plans promote. Tribal plans must be used and incorporated into supporting analysis of the plans. (36 C.F.R. § 219.7© and (d) 1982 Planning Rule requiring review and consideration of planning and land use policies of Indian tribes and consultation with Indian tribes).

Response:

The IPNF has consulted with the Tribes in developing the revised Forest Plan. The Forest Plan has been updated to include the Tribes when referring to coordination and consultation on page 7 of the revised Forest Plan. The Forest’s relationship with Canada and the potential resource effects are described in the FEIS.

Public Comment 267 (Letter Number(s): 214)

The Forest Service should allow Homeland Security and local law enforcement to have unrestricted access to lands and exempt their actions from any ESA or any other requirements.

Response:

The Forest Service is required to follow all laws, such as the Endangered Species Act. The IPNF is working with the Border Patrol and law enforcement at the project level regarding access. The Forest Plan does not make any decisions to close or open any routes or areas to motorized use, with the exception of closing recommended wilderness to over-snow motorized vehicle and mechanized use. The recommended wilderness included in the draft Forest Plan along the northern border (the Salmo Priest area) has not changed since the 1987 Forest Plan. The draft Forest Plan includes direction to coordinate with the U.S. Border Patrol on issues relating to national security along the northern international boundary with Canada.

Relationship to Other Assessments or National Policy: Category 1017**Public Comment 270** (Letter Number(s): 119)

The Forest Service should ensure that this project includes proper interpretation of the 2001 Roadless Area Conservation Rule. The roadless rule should not be used to close existing motorized routes in IRAs. The cumulative negative impacts from the Roadless Rule on motorized recreationists needs to be included in the effects analysis for this project.

Response:

The revised Forest Plan will not close any roads, trails, or areas currently open to motorized use, with the exception of over-snow motorized vehicle use in recommended wilderness and research natural areas. The IPNF have published motor vehicle use maps (MVUMs) which display those roads, trails, and areas designated for motor vehicle use in compliance with 36 CFR 212 Subpart B for the Coeur d'Alene River Ranger District and the Kaniksu Zone. Analysis for the St. Joe Travel Management Plan is in progress. Additional travel management designations or modifications are outside the scope of the revised Forest Plan. The affects from the 2001 Roadless Rule has been included in as part of the current condition in the affected environment and in cumulative effects discussions where applicable in the FEIS.

**Retained Existing Forest Plan Direction Grizzly Bear Access
Amendment: Category 1018****Public Comment 273** (Letter Number(s): 235 and 255)

The Forest Service should not incorporate the 2011 Forest Plan Amendments for Motorized Access Management within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones - Record of Decision (USDA Forest Service) ("Motorized Access Amendments") because the ROD and FEIS for the 2011 Motorized Access Amendments have been administratively appealed and incorporating the amendments before the judicial review is complete is premature, nor should the Grizzly Bear Management language be incorporated into the draft Forest Plan until the judicial review is complete.

Response:

The 2011 Motorized Access Amendment is under litigation. However, the amendment is still in effect until the courts decide differently. We have a signed decision that we are adhering to.

**Retained Existing Forest Plan Direction INFISH and Bull Trout
Biological Opinion: Category 1019****Public Comment 274** (Letter Number(s): 182, 232, and 235)

The Forest Service should consider the following regarding the retained decisions:

A) The Forest needs to explain why they are retaining the INFISH direction, when it was developed as an interim strategy. INFISH has not been revised to reflect new information. The interim direction does not provide adequate assurance that future actions will not result in adverse effects to listed bull trout DPSs. DLMP at p. 282;

B) According to the August 1998 Bull Trout Biological Opinion regarding INFISH (BO) high water yield events are an important factor and need to be considered. The Forest Service needs to explain how this deficiency in INFISH is addressed in the draft Forest Plan;

C) The Interim Riparian Management Objectives from INFISH include numeric standards for Pool Frequency, Water Temperature, Large Woody Debris, Bank Stability, Bank Angle and Width-Depth Ratio. The draft Forest Plan contains a desired condition (FW-DC-AQH-05) for these items. The draft Forest Plan lacks non-discretionary numeric standards that would result in movement towards the desired condition;

D) Draft Forest Plan standard FW-STD-RIP-02 is not consistent with INFISH direction because it allows actions that may reduce habitat quality;

E) The draft Forest Plan should include direction to require monitoring of timber sale activities to determine if the INFISH direction is meeting the intent of the 1998 INFISH Biological Opinion;

F) INFISH standards presented in the draft Forest Plan fail to provide sufficient protection to watersheds and aquatic biota and bull trout for several reasons. It deals primarily with riparian

zone protection, and does not consider instream and stream bank erosion and sediment deposition during high water yield events, such as spring runoff and rain-on-snow;

G) The 1998 Bull Trout Biological Opinion expressed many concerns with RHCAs, Key and Priority Watersheds, Watershed Analysis, Watershed Restoration, and Monitoring. The Forest needs to explain how the revised Forest Plan addresses each of the concerns; and

H) The Forest needs to explain if the definitions of standards, guidelines, and objectives in chapter 1 of the draft Forest Plan apply to those same terms for the retained decisions listed in appendix B.

Response:

A) PACFISH and INFISH were intended to be interim strategies because permanent strategies were expected to be brought forward in the Interior Columbia River Basin Ecosystem Management Project decision, which was being developed at the time. That project eventually evolved into the Interior Columbia Basin Strategy but did not produce a Record of Decision. The decision was eventually made to keep PACFISH, INFISH, and the associated Biological Opinions in place until Forest Plans were revised. Memorandums such as the Coordination and Accountability of PACFISH and INFISH, 1998 NMFS and USFWS Opinions, and 2003 USFWS Opinion (Jarbidge) (BLM/FS/FWS/EPA/NOAA Fisheries Memorandum, November 16, 2004) acted to ensure the PACFISH, INFISH and the Biological Opinions “remain durable until replaced by local Forest Plan revisions.”

The associated Biological Opinions recognized the lack of formal restoration strategies for both PACFISH and INFISH. The Analysis of the Management Situation Technical Report reiterated this (see KIPZ AMS Technical Report, p. 81), noting that INFISH is a protection strategy and that, “although INFISH allows for and even encourages that watershed restoration be done, it lacks any specific direction or priority to do so.” The Need for Change recognized opportunity to build on past efforts (such as INFISH) by developing restoration strategies in the revised Forest Plan.

INFISH was reviewed several times during the revision process to ensure that it still complied with best available science, most recently in 2009 while preparing to determine whether the decision and biological opinion should be brought forward as a retained decision (see 03_23_09 INFISH and the KIPZ Planning Effort). The reviews have shown that the direction in INFISH is still relevant and there has not been new information or new science that contradicts that direction. Therefore, INFISH was brought forward as a retained decision. In addition to retaining INFISH, the Forest Plan contains direction that builds on INFISH protections by providing restoration strategies, thereby addressing the concerns in the biological opinion and answering the Need for Change in the AMS.

The Forest recognizes that INFISH is lacking for some protective and restoration measures and has included additional guidance and direction in the Forest Plan to address this (see page 178-181 of the DEIS). The revised Forest Plan does not rely solely on INFISH direction to protect or recover bull trout and has other handbook and manual direction (i.e., Soil and Water Conservation Practices Handbook FSH 2509), state laws, and other federal laws and regulations;

B) The Biological Opinion (BO) does not prescribe a need for consideration of water yield events. Water yield is discussed in three places in the BO, providing generalities in terms of effects to the aquatic environment. See pages 35, 36, and 72 of the BO. The revised Forest Plan direction provides direction regarding stream channels and their function. See FW-DC-WTR-03, FW-DC-WTR-05, and FW-DC-AR-07. Also see response to item A above.

C) The objectives, standards, and guidelines in the revised Forest Plan will be effective in trending the landscape towards the desired conditions as described;

D) The revised Forest Plan is not inconsistent with INFISH. The Forest Plan standard FW-STD-RIP-02 refers to compensatory components in the watershed context, which is the scale of analysis, and promotes additional restoration, where RHCAs are not intact and not functioning, i.e., an improved condition overall. INFISH direction describes compensatory restoration components in terms of off-setting degradation, i.e., no net change in condition;

E) The restoration measures outlined in the Forest Plan, including other agency regulation and policy, along with existing state and federal laws and regulations, will continue to improve aquatic habitat conditions for native aquatic species. Monitoring the implementation and effectiveness of the Forest Plan is considered in chapter 5 of the Forest Plan and provides a monitoring strategy intended to evaluate this concern. The agency also will continue to use the PACFISH/INFISH Biological Opinion (PIBO) Implementation and Effectiveness Monitoring Team to evaluate the effectiveness of implementing the BO. Some monitoring may occur at the project level for timber sales, depending on development of site-specific analyses;

F) The Forest recognizes that INFISH is lacking for some protective and restoration measures and has included additional guidance and direction in the Forest Plan to address this (see page 178-181 of the DEIS). The Forest Plan does not rely solely on INFISH direction to protect or recover bull trout and has other handbook and manual direction (i.e., Soil and Water Conservation Practices Handbook FSH 2509), state laws, and other federal laws and regulations. Movement towards desired conditions for watershed, riparian, and aquatic species will improve watershed resiliency during high water yield events (see response to item B above). Cumulative effects were considered on pages 190-191 of the DEIS. The Forest used a reasonable elevation range to predict rain-on-snow events across a landscape;

G) The INFISH is a retained decision that has already gone through the public comment process and has been vetted with regulatory agencies such as EPA and USFWS. The direction has been in place for more than 15 years and the Forest believes that the direction in INFISH does provide effective protection for aquatic systems. The concerns noted in the BO were not described as inadequacies. The Forest implements INFISH at the project level and those protective measures go through consultation with the USFWS and there has not been feedback that these protections are inadequate. In addition, the revised Forest Plan does not rely solely on INFISH direction to protect or recover bull trout and has other handbook and manual direction (i.e., Soil and Water Conservation Practices Handbook FSH 2509), state laws, and other federal laws and regulations. Although there is no requirement, the Forest has addressed many of these issues. For example, there is additional direction for improvement to RMOs. The RHCAs, as designed, are very effective in protecting riparian areas and associated aquatic habitats. Key and priority watersheds have been modified with the concept of conservation and restoration subwatersheds, as displayed in the EIS. A watershed characterization was also included in the analysis and is also described in the EIS. The Forest Plan has a heavy emphasis on restoration and the need for this restoration component was also describe in the EIS. Furthermore, the PIBO Effectiveness Monitoring team was adopted by the agency to specifically monitor the effectiveness of implementing the BO; and H) Direction for retained decisions has been clarified in the revised Forest Plan. See chapter 1, pages 14 and 15 of the revised Forest Plan for definitions of the direction from the retained decisions.

Scope of Analysis/Decision: Category 1021

Public Comment 276 (Letter Number(s): 119, 200, and 206)

The Forest Service has not completed the site-specific analysis as required by NEPA. Site-specific analysis is required at the point when an irrevocable commitment of resources is made (40 CFR § 1502.24). The application of the various management area directions, standards, and guidelines mandate the closing of routes and/or areas to snowmobiling and bicycling,

representing site-specific decisions. The effects and rationale for that decision must be disclosed and cannot be deferred.

Response:

The revised Forest Plan will not close any roads, trails, or areas currently open to motorized vehicle use, with the exception of over-snow motorized vehicle and bicycle use in recommended wilderness and research natural areas. The closing of these areas to over-snow motorized vehicles and bicycles is site-specific and effects have been disclosed in the EIS. No other routes or areas on the Forest will be closed to motorized access or bicycle use because of Forest Plan management area direction, standards, or guidelines. The IPNF have published motor vehicle use maps (MVUMs) which display those roads, trails, and areas designated for motor vehicle use in compliance with the Travel Management Rule (36 CFR 212) for the Coeur d'Alene River Ranger District and the Kaniksu Zone. Analysis for the St. Joe Travel Management Plan is in progress. Additional travel management designations or modifications are outside the scope of the revised Forest Plan. Any future site-specific travel management planning will comply with the Travel Management Rule and NEPA and public involvement. Public Comment(s) for Public Comment 276:

Non-native Invasive Plants

DEIS General: Category 1050

Public Comment 278 (Letter Number(s): 119 and 201)

The Forest Service should, in the DEIS, consider all sources and uses that contribute to the noxious weed problem, including hikers, mountain bikers, equestrians (non-use of weed-free hay), natural processes, and wildlife.

Response:

Pages 117-126 of the IPNF DEIS provides an effects analysis for noxious weeds (and other non-native invasive plants) and in that discussion there is an acknowledgement of the numerous sources of potential weed introduction and spread, including those associated with non-motorized recreational uses and natural (e.g., wildlife, wind, water) vectors.

DEIS General: Category 1050

Public Comment 931 (Letter Number(s): 235)

The Forest Service should disclose the long-term efficacy and costs associated with weed treatments as well as the environmental impacts of weeds.

Response:

The non-native invasive plants section of the IPNF DEIS (pages 117-126) presented the affected environment as well as the environmental consequences for noxious weeds and other invasive non-native plants. The programmatic level impacts that the various alternatives would have on the risk of new weed introductions and the spread of existing weeds was presented on pages 123-126 of the DEIS. As indicated on page 118, the general impacts that the alternatives would have on the risk of new weed introductions or existing weed spread was primarily based on what level of ground disturbing activities would likely occur under the various alternatives.

The Forest does not believe that a detailed discussion of the long-term efficacy and economics of weed treatments would be helpful in understanding how the alternatives would affect weeds at the programmatic level. Each of the action alternatives have the same forest plan components related to non-native invasive plants; and therefore, the primary factor regarding differences in impacts

between the alternatives involves how much, and what kind of ground disturbance may occur under the alternatives and how that would influence weeds. To the degree that it is reasonable to do so at the programmatic level, the impacts were evaluated and presented in the DEIS.

DEIS Environmental Consequences: Category 1054

Public Comment 281 (Letter Number(s): 235)

The Forest Service should consider how the productivity of the land has been affected by noxious weeds.

Response:

The IPNF DEIS contains an acknowledgement that non-native invasive plants can affect soil productivity as well as other resources (last paragraph on page 118). For the programmatic Forest Plan, the Forest does not feel that it would be appropriate or helpful to conduct a more thorough analysis of the potential impacts of weeds on soil productivity. Depending upon the nature of the proposed projects, site-specific NEPA documents that are developed for individual projects on the Forest may consider this issue in more depth.

Forest Plan Standards: Category 1060

Public Comment 284 (Letter Number(s): 189)

The Forest Service should include additional standards for noxious weed prevention.

Response:

The IPNF recognizes the importance that prevention measures have in an integrated weed management strategy and program. The IPNF, as well as the other forests and grasslands in Region One, has already adopted prevention and control measures (R1 Supplement to FSM 2080) that are used to help prevent and mitigate the spread and introduction of non-native invasive plants. The Forest does not feel it is necessary to reiterate those requirements in this Forest Plan as they already exist elsewhere. As indicated on page 2 of the IPNF draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service will follow all existing laws, regulations, and policies relating to the management of the NFS lands, and the forest plan components are generally designed to supplement, not replace, existing direction.

Forest Plan Guidelines: Category 1061

Public Comment 285 (Letter Number(s): 221)

The Forest Service should develop guidelines that prioritize non-native invasive plant management techniques that focus on non-chemical treatments first, with reliance of chemicals being the last resort, and add the following:

FW-GDL-VEG-09 as follows: Integrated weed management techniques shall be favored to treat and reduce noxious weed infestations, and new noxious weed invasions shall be contained after discovery within the discovered site; and

FW-GDL-VEG-10 as follows: Herbicides, pesticides, and other toxicants and chemicals shall be used in a safe manner in accordance with federal label instructions and appropriate restrictions that avoid public health and safety problems, and allow protection and maintenance of water quality standards and avoid adverse effects to inland native fish and aquatic species of concern from weed control chemicals.

Response:

Direction already exists for the additional guidelines that are suggested. It is already required that the Forest Service use integrated pest management practices (e.g., USDA Department Regulation 9500-4, FSM 2902) and the draft Forest Plan (see pg 15) already contains a component that both requires the use of integrated pest management approaches as well as indicates that infestations of new species would be contained or eradicated (FW-DC-VEG-10). The safe use of herbicides, pesticides, and other toxicants is already required by federal law and the protection of water quality and other aquatic resources from chemicals is addressed in the retained existing decision for the INFISH (see FW-STD-RIP-03 on page 35 of draft Forest Plan and the standard # RA-3 on page 252 of appendix B in the draft Forest Plan).

Possible Actions (Plan – Appendix A)**American Indian Rights: Category 1101****Public Comment 288:** (Letter Number(s): 209)

The Forest Service should consider Possible Actions for Tribal relations that include ongoing government-to-government and staff consultation for each federally recognized tribe with historical or treaty interests in forest land regarding cultural resource and sacred site protection and access to the Forests for cultural and religious practices, through a cooperatively established communications policy.

Response:

This possible action is already included in appendix A, but with less detail regarding what would be consulted on. The Forest prefers to leave this possible action more general, not just confined to “regarding cultural resource and sacred site protection and access to the Forests for cultural and religious practices.” The tribes may wish to consult on more than just cultural resources, sacred sites, and access for cultural and religious practices.

Rare Plants**DEIS Affected Environment: Category 1151****Public Comment 295:** (Letter Number(s): 209 and 235)

The Forest Service should conduct an analysis to determine how the proposal would impact plants of cultural importance to the Kootenai Tribe. In addition, the Forest Service should consider protecting the sensitive plant species that occur in peatlands by placing the peatlands into MA3 (botanical areas).

Response:

The analysis that was conducted for rare plants included all threatened, endangered, and sensitive plants (TES); and therefore, any of the plant species on the Kootenai Tribe list that are TES were evaluated in the DEIS. The coarse-filter analysis of forest vegetation that was conducted focused on tree species. Of the 12 tree species on the Kootenai Tribes list, 11 were considered in the DEIS. White spruce was not analyzed as we are not aware of any locations of it on the Forest where it is pure. That spruce often hybridizes with Englemann spruce. On the KNF, it is believed that most of the spruce trees are hybrids between the two species (Pfister et al. 1977). Although the same situation is not documented to occur on the IPNF, it would be reasonable to assume that the two species hybridize on the IPNF as well. Regarding the other plant species on the Kootenai Tribe of Idaho list, they evolved under the Historic Range of Variability (HRV) and as discussed on pages 49-51 of the IPNF DEIS, the broad approach that the IPNF is taking in the Forest Plan is

to trend the vegetation towards the HRV (while considering potential climate change). Therefore, compared to the 1987 Forest Plan the effects to the other native plants on the Tribes list should generally be beneficial.

Peatlands are already protected from management activities by several forest plan components (e.g., FW-DC-VEG-12, FW-GDL-VEG-09, FW-DC-WTR-01, and FW-DC-RIP-06). The IPNF does not believe designating all of the peatlands as botanical areas (MA3) would offer those areas any additional protections.

Social & Economic

Economic General: Category 1250

Public Comment 296: (Letter Number(s): 3, 4, 6, 10, 12, 28, 60, 80, 85, 97, 101, 119, 122, 157, 159, 162, 165, 179, 180, 193, 204, 205, 208, 209, 212, 249, 273, 277, and 287)

The Forest Service should consider the following regarding economics:

A) There currently isn't enough forest products infrastructure to accomplish the restoration activities needed to meet the Forest Plan desired conditions. The Plan needs to provide for strong functioning infrastructure to complete the restoration work needed to achieve desired conditions. The annual predicted timber volume sold should support the existing infrastructure. Furthermore, the forest products infrastructure provides for jobs with livable wages and supports local economies. The importance of the forest products industry and its impact on local economies needs to be analyzed in the EIS.

B) The local economies rely on sustainable natural resource extraction, recreation (including snowmobiling), mining, and tourism. More restrictions on access, through increased amounts of recommended wilderness and wild and scenic rivers, reduces these opportunities. Restricting access and utilization of the Forest will increase the economic hardship to the local area.

C) OHV recreation has a large positive economic benefit to the local economies. Developing ATV trails will increase motorized recreation and jobs and income. The Forest needs to recognize this positive economic benefit and conduct a benefit-cost analysis of non-motorized versus motorized trail use.

D) Wilderness, watchable wildlife, and fishing have a large positive economic benefit to the local economies.

E) The new forest management plan needs to include a major effort at significantly decreasing fire fuel by increasing logging activity, which will also generate jobs and federal forest land payments generated by the harvest.

Response:

A) There continues to be local demand for stumpage from the Forest, as evidenced by the amount of timber sales sold on the Idaho Panhandle National Forests in recent years. Most sales offered have been sold with strong competition. The Forest works to ensure sale feasibility of all commercial timber sales. The amount of restoration work and vegetation treatment proposed under the Forest Plan is feasible, given current budget levels. Sale of stumpage will continue to contribute to the viability of the forest products infrastructure. The social and economic section of the FEIS highlights the importance of Forest outputs on local economies and communities within the analysis area.

B) The value of activities, outputs, and uses of the Forest is recognized in the social and economic section of the FEIS. This section describes the social and economic environment and provides an analysis of the jobs and income generated by alternative.

C) The value of OHV recreation is recognized in the social and economic section of the FEIS. See the response to B. This type of recreation is a subset of the activities, outputs, and uses that

generate jobs and income. The Forest Plan does not make any decisions on development of ATV trails. This would be decided through a site-specific project following NEPA. An analysis of economic efficiency was completed for each alternative. The Forest Plan does not make decisions on non-motorized versus motorized roads; thus, a benefit cost analysis of non-motorized versus motorized trails is outside the scope of the Forest Plan revision.

D) The value of these activities is included in the social and economic section of the FEIS. The jobs and income analysis section includes these types of activities, as well as other activities, uses, and outputs of the Forest.

E) The sustainable level of timber harvest has been displayed in the FEIS. See the timber section of chapter 3 of the FEIS. The value of jobs and income associated with timber harvest has been included in the social and economic section of chapter 3 of the FEIS.

Environmental Justice: Category 1251

Public Comment 298: (Letter Number(s): 119)

The Forest Service should consider that motorized recreationists have been affected in a disproportionately high and adverse manner by the significant impact that has occurred from all cumulative closures of motorized access and motorized recreational closures resulting in an environmental justice issue. A social impact analysis needs to be completed.

Response:

As required by Executive Order 12898, all federal actions must consider potentially disproportionate effects on minority or low-income communities. Environmental Justice is defined as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies” (EPA website). The Council on Environmental Quality (CEQ) (1997) provides the following definitions regarding Environmental Justice requirements:

Minority population: Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis...

Low-income population: Low-income populations in an affected area should be identified with the annual statistical poverty thresholds from the Bureau of the Census' Current Population Reports, Series P-60 on Income and Poverty. In identifying low-income populations, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions of environmental exposure or effect.

Road closures do not cause disproportionate impacts – the road is closed equally to all people. Throughout the Plan revision process, all people were afforded fair treatment, provided opportunities for meaningful involvement, and given access to the process of transportation and road management. The comprehensive collaborative process undertaken for the Forest Plan did not identify any concerns regarding disproportionate impacts to low-income or minority populations (IPNF DEIS p. 481). Additionally, activities such as firewood cutting, huckleberry picking, hunting, and fishing are not limited to a specific area – they can be conducted in a variety of places. Thus road closures do not cause a disproportionate impact to people utilizing these resources.

A social analysis was included as part of the effects analysis for the Economic and Social Environment. The DEIS references social assessments (Parker, Wulforth, and Kamm 2002; Russell and Downs 1995; Russell and Adams-Russell 2003) as well as an analysis on conditions and trends (Russell et al. 2006). These references were used in developing the social impact analysis for the DEIS.

Jobs: Category 1253

Public Comment 300: (Letter Number(s): 179, 180, 197, 205, and 208)

The Forest Service should consider the following regarding jobs:

- A) Changes in land management have resulted in job losses with a decline in the logging industry. Extractive industries had higher paying jobs and these are being replaced by low-paying service industry jobs;
- B) Recognizing that more restrictions result in less recreation and fewer jobs;
- C) The impact on local economies and businesses has not been accurately analyzed in the draft Forest Plan and that under any of the alternatives the local economies will suffer;
- D) Recognizing that jobs would be created with restorative forestry, thinning, planting and the removal of roads; and
- E) Recognizing that the quality of life provided by the surrounding natural areas attracts people who want to live in the area who bring their personal assets and incomes with them and that their buying power creates new jobs in the area.

Response:

The impacts of forest management on jobs and income are described in the Social and Economic Environment section of the FEIS. This section includes an analysis of the change to jobs and labor income based on expected outputs and activities for each alternative. This includes timber production and other uses as well as restoration activities. See the tables entitled “Employment by Program for Current Management and by Alternative (average annual, decade 1)” and “Labor Income by Program for Current Management and by Alternative (average annual, decade 1; Thousands of Dollars)” in the environmental consequences section of the Social and Economic Environment section of Chapter 3 of the FEIS. These tables display jobs and income by resource area for each alternative. The expected activities, uses, and outputs are described under the individual resource areas in the FEIS.

Quality of life factors are described in the Social and Economic Environment section of the FEIS. The natural areas and outdoor recreation opportunities provide a draw to the area and are also highly valued by local residents. The social assessments conducted to support forest plan revision recognized the in-migration that has been occurring in this area. This in-migration is a source of change to the communities. This influx of new residents is described under the “Communities and Change” section of the Social and Economics in the FEIS. This section of the FEIS has been updated to recognize the potential for new jobs associated with in-migration.

Payments to Counties: Category 1254

Public Comment 301: (Letter Number(s): 209, 249, and 251)

The Forest Service should consider the following regarding payments to counties:

- A) Completing additional analysis of the effects changes to the payments (The Secure Rural Schools and Community Self-Determination Act) may have on local governments;
- B) Recognizing that changes in land management has greatly reduced revenue from Secure Schools and from the tax revenue generated by a healthy timber-base economy; and

F) The federal government provides a small amount of funding to the county for roads and schools, but we would be economically far better off with the economic benefits of real forest management. Detailed localized impacts must be factored into any decisions of the Plan.

Response:

A return to the 25 Percent Payments would result in a large reduction in federal payments to the counties within the analysis area. The effects of this change in returns to counties was described in the DEIS. The FEIS describes the change to payments to counties by alternative, as well as the reduction in jobs and income from a return to the 25 Percent Payments (see the “Employment and Income” and the “Payments to Counties” sections within the Environmental Consequences of the Social and Economic Environment of Chapter 3). The impacts to local economies are considered in the decision on the Forest Plan. The draft Record of Decision documents the rationale for the decision and includes the consideration of effects to the social and economic environment.

Social General: Category 1256

Public Comment 303: (Letter Number(s): 17 and 208)

The Forest Service should protect and preserve the Forest and its resources for future generations. Social values must be considered in recommending wilderness, demonstrating public support, and prompting Congress to take action on Agency recommendations.

Response:

The mission of the Forest Service is to sustain the health, diversity, and productivity of the forests to meet the needs of present and future generations. The revised Forest Plan provides for restoration of vegetation and aquatic resources while generating sustainable outputs and uses. The revised Forest Plan also provides for protection and conservation of resources. The Forest Plan desired conditions, standards, and guidelines provide protection for resources and chapter 3 of the FEIS describes the effects by resource.

In addition to resource restoration and protection, the Forest Plan recommends areas to Congress as wilderness. Social values were considered in recommending wilderness. The wilderness evaluation, documented in appendix C of the FEIS, contains an assessment of the capability, availability, and need for each inventoried roadless area. As described in appendix C, once the assessment is complete, factors such as size and shape, manageability, and comments from the public were used in determining areas to be recommended to Congress as wilderness.

Social General: Category 1256

Public Comment 304: (Letter Number(s): 119)

The Forest Service should include a socio-economic analysis that includes the following:

- A) Impacts on the public owning OHVs and looking for opportunities to use them and landowners who purchased property with the intent of being able to access and recreate using motor vehicles and clarify to the public; and
- B) An evaluation of conditions contributing to learned helplessness including the lack of recognition and attention to the needs of motorized recreationists and the significant social problems that result from these conditions.

Response:

Both of these comments are outside the scope of our analysis.

Social General: Category 1256

Public Comment 306: (Letter Number(s): 179)

The Forest Service should provide opportunities to involve logging contractors in small sales programs, road-side salvage, and small scale stewardship contracts.

Response:

The Forest Plan has direction to provide different sized sales and to use different contract methods. The timber forestwide desired condition (FW-DC-TBR-01) states “a sustainable mix of timber products ... is offered under a variety of harvest and contract methods...” This gives direction to provide different sized sales, which would include small sales and road-side salvage, utilizing different contract methods, which would include stewardship sales. Actual types of products and sale size will be determined at the project level.

DEIS Affected Environment: Category 1258

Public Comment 307: (Letter Number(s): 209)

The Forest Service should consider the following in describing the affected environment for the socio-economic analysis:

- A) Clarifying whether the Kootenai Tribe is included as part of the Government Sector or another category; and
- B) Clarifying what is included in the various categories in table 119 and table 122 and defining the “Government” sector, what is included in the categories in table 119 and the definition of “Intergovernmental Revenue” as used in table 122.

Response:

The information on employment by industry was obtained from the Bureau of Economic Analysis. Both of these sources classify all government-owned enterprises into one or more government sectors. This includes all tribal enterprises.

The “% Wildland Government” values found in table 119 of the DEIS reflect the percent of total county labor income that is associated with the labor income paid to employees (and the multiplier effect of the spending of those employees in the economy) of federal land management agencies, such as the USDA Forest Service and Soil Conservation Service, USDI Bureau of Land Management, Fish and Wildlife Service, National Park Service, Bureau of Indian Affairs and a portion of the Army Corps of Engineers.

For the other categories in table 119 of the DEIS, grazing is the labor income connected to the IMPLAN sectors of ranch and range fed cattle, and sheep, goats, and lambs. The category of “timber” includes the labor income associated with all of the primary timber processing sectors of the economy, such as logging, sawmills, pulp mills, etc. It does not include secondary processing, such as wood furniture manufacturing, windows, and doors, etc. Mining includes the primary processing of minerals and ores, such as copper, silver, gold, coal, sand, and gravel, etc. Finally, the recreation category includes the labor income associated with recreation visits on federally managed lands. Given these definitions, tribal enterprises connected with any of these activities would be included. Recreation on tribal lands would not be included.

The definition of intergovernmental revenue, as used in table 122 of the DEIS, is unclear. According to the US Census Bureau, there is ongoing dialogue surrounding where to include revenues coming into a county from tribal lands. Some of this revenue shows up as intergovernmental revenue and some under miscellaneous revenue. For the definitions of the

categories used in table 122 of the DEIS, see Section 4.3, Chapter 4 of the US Census Bureau publication, Government Finance and Employment Classification Manual, and (http://www2.census.gov/govs/pubs/classification/2006_classification_manual.pdf).

DEIS Alternatives: Category 1259

Public Comment 308: (Letter Number(s): 119)

Economic and social analyses should be given equal consideration as ecological analyses.

Response:

The projected consequences to the economic and social environment, along with the ecological consequences, are given consideration by the decision maker in making her decision. The Record of Decision documents the rationale for the decision and includes the consideration of effects to the social and economic environment.

DEIS Environmental Consequences: Category 1261

Public Comment 309: (Letter Number(s): 255)

The effects on private property rights and values are inadequately addressed in the DLMP and EIS. For example, landowners with property inside the "buffer zones" along proposed Wild & Scenic Rivers designations were not contacted and should have been.

Response:

The Forest Plan will not affect private property rights and values. The Forest Plan does not make any decisions regarding use of private property. Information has been provided the public, including landowners adjacent to Forest boundaries, regarding the forest plan revision, with invitations to attend open houses and submit comments on the draft Plan and DEIS.

DEIS Cumulative Effects: Category 1260

Public Comment 310: (Letter Number(s): 119 and 250)

The effects on local economies are not adequately addressed. The Forest Service must consider the cumulative negative impacts to the local social and economic environment from past and present actions.

Response:

The FEIS did consider the cumulative negative impacts to the social and economic environment. The FEIS has included historic data for most items used to describe the local social and economic environment. For example, local employment and income was described as far back as 2001. Unemployment figures were shown back to 1999. This shows how conditions have changed over the last decade or so. To understand the projected change from current condition to jobs and income, a recent three-year average was used to define "current" in order to smooth some fluctuations that occur from year to year. This "current" condition was then used to compare to projected effects under the alternatives.

DEIS Environmental Consequences: Category 1261

Public Comment 311: (Letter Number(s): 119)

Economic models such as IMPLAN should not be used when the input data is estimated and not factual or actual. We request that the economic analysis use actual local data to determine the true economic and social impact of proposed motorized access and closures on the public.

Response:

The IMPLAN data are highly accurate. There are few data sets that have undergone the intensity of scrutiny that the IMPLAN data have experienced since the 1980s. The IMPLAN data and software are in wide use by rural development agencies, consultants, universities, state and local governments, and federal agencies, and numerous studies using IMPLAN have been peer reviewed. The IMPLAN data come from highly regarded sources (see table below) and have the great benefit of consistent methodology over time as well as consistency across the country. As the national datasets are put together each year, the data are controlled to the state level and checked against the Bureau of Economic Analysis' Regional Economic Information System (REIS) data. As the data are estimated down to the county level, a consistent method is used to fill in non-disclosed data. Using nationally consistent datasets that use scientifically defensible data collection methods allow for consistent analysis and procedures to be used for forest planning efforts across the county. More information on the IMPLAN data set can be found at www.implan.com.

Data Type	Source Data	Comments
Industry sales	U.S. Bureau of Census (Census) economic censuses, U.S. Bureau of Economic Analysis (BEA) output estimates U.S. Bureau of Labor Statistics (BLS) employment projections.	Total Industry Output equals the value of all sales to intermediate (business to business) and final (consumers, exports) demand.
Employment (jobs)	BEA: Regional Economic Information System (REIS) BLS: ES202 employment security data Census: County Business Patterns	Employment (jobs) is defined as average annual employment. It includes full and part time, temporary, and seasonal jobs as well as multiple jobs held by a single person.
Labor Income	Employee compensation: BLS ES202 BEA REIS data. Proprietor's Income: Federal tax forms.	Labor Income includes: Employee compensation: the value of wages <u>and</u> benefits Proprietor's income: Any income received for payment of self-employed work.

Primary field data was not used for this analysis. For forest plan revisions, the starting point for developing the economic area of influence is generally the national forest as a whole, encompassing one or more counties. It is normally not necessary, or even desirable, to model down to the community level. Forest Service data (recreation visits, head-months, timber harvest, etc.) are available at a similar scale. When estimating the economic contribution of natural resource management on the forest, county level IMPLAN data are used, matching the scale of the economic analysis area.

Analysis at a sub-forest level often requires collection of primary data, a time consuming and expensive process. Additionally, small communities often have little infrastructure to capture direct expenditures; therefore, much of the economic activity “leaks” out of these smaller areas. For example, results from a study in Priest Lake, ID suggest that the majority of economic stimulus introduced to the community is lost to other areas. This makes sense due to the relative size of the economy in comparison to nearby cities and towns. In order to capture the whole economic contribution of natural resource management on the national forests, larger analysis areas must be selected.

DEIS Environmental Consequences: Category 1261**Public Comment 312:** (Letter Number(s): 124)

The DEIS contains an analysis of the economic impacts of national forest activities on the surrounding communities (pages 476 – 477). The analysis lists direct Forest Service programs such as logging but it makes no mention of the economic impact of the part time residents, the recreational residence permittees. This group has a significant economic impact on local businesses and should be included.

Response:

The analysis includes many uses of the forest, including recreation, timber, grazing, and minerals. The IMPLAN analysis includes the economic impact of recreational residence permittees. The annual datasets for IMPLAN capture all production, sales and consumer spending for a year in a specified area. Any spending in the area associated with second home owners is also captured as they purchase goods and services, pay for utilities, etc. in the area. The IMPLAN dataset contains information on sales (Total Industry Output (TIO)) and purchases (Personal Consumption Expenditures (PCE)) down to the county level. It is not possible, however, to discern what percentage of local TIO and PCEs are contributed by second home owners as their activity is rolled up into the total.

FP Desired Condition: Category 1265**Public Comment 313:** (Letter Number(s): 124)

The Forest Plan Goal for Social and Economic Systems should include activities of part-time residents.

Response:

Permitted recreation residences have been added to this goal in the revised Forest Plan.

FP Desired Condition: Category 1265**Public Comment 935:** (Letter Number(s): 222)

The Forest Service should display the staffing and budget required to meet the desired condition and should portray how this public asset can help provide jobs as well as contribute to local rural communities, schools, and roads.

Response:

The Allowable Sale Quantity (ASQ) is the highest level of timber harvest that is sustainable, meets standards and guidelines, and moves the forest towards desired condition. The budget necessary to sell timber at the ASQ level was disclosed in the DEIS (see page 367, under the Effects from Budget section). The Forest analyzed timber harvest under current budget levels and developed the predicted volume sold in order to show anticipated effects. These are the most likely production figures. The Forest wanted to disclose to timber industry and other publics the output levels given current budgets. There is no expectation for increased budgets in the future. However, if funds did become available, the Forest would then be able to increase timber harvest above predicted sell levels and less than or equal to the ASQ. The timber and the vegetation sections display the consequences at each level of production. The social and economic section displays effects for the most likely level and worst case, which is that with current budgets.

Special Forest Products & Botanical Products

Forest Plan Goals: Category 1357

Public Comment 316: (Letter Number(s): 209)

The Forest Service should consider adding Special Forest and Botanical Products Goal-01 (see DEIS p. 449): The KNF considers ‘treaty rights, customary and traditional uses (including subsistence and other historical uses of plant material by Tribes), the federal trust responsibility to Tribes, and competitive market demands in determining which products would be excluded from or allowed for sale to commercial harvesters. When there is a shortage of any particular special forest product for tribal use, commercial permits will be issued only to the extent that the tribal use can be accommodated (the page cited is from the IPNF DEIS).

Response:

The IPNF considers this proposed plan component more of an implementation type item than something that would be appropriate to add to the revised Forest Plan. The Forest will continue to discuss and consult on this issue to provide treaty rights but does not believe an additional plan component is necessary.

Timber

Demand: Category 1400

Public Comment 319: (Letter Number(s): 9, 179, 222, and 269)

The Forest Service should consider the following regarding the demand for timber:

- A) Unused processing capacity at sawmills in the Idaho Panhandle region includes at least three locations where current operations are constrained due to a limited and insufficient log supply;
- B) Structural timber species such as DF/L and GF/H should be given a high priority. WP/PP should be considered but only in relation to market demand;
- C) There is little need to schedule entries in IPNF roadless areas due to projected demand for various resources such as timber and minerals;
- D) Currently private industrial tree farms and trees from other private sources are being exported; therefore the need to harvest to meet demand does not exist; and
- E) The Forest Plan and DEIS need to include a careful discussion of the status of US softwood lumber markets which are currently being served by more than 28 percent of imported lumber. Wood products produced in the local IPNF market area will serve both national and international markets.

Response:

- A) The demand analysis shows a mill capacity that is above current supply levels;
- B) There are other considerations besides just market demand that result in commercial timber sales. The Forest has a desired condition to restore western white pine and Ponderosa pine to improve ecological function and provide increased resistance and resiliency to climate change. Given the desired condition, the Forest will look for opportunities to increase the amount of western white pine and Ponderosa pine. As described in the vegetation section of the DEIS, the grand fir and western hemlock stands are prone to disease. In moving towards desired condition, the Forest will emphasize timber harvest in grand fir/western hemlock and Douglas-fir to increase the amount of western white pine, Ponderosa pine, and larch;
- C and D) Very little harvest is scheduled in roadless areas and this only occurs at the ASQ level (see the “Timber” section of Chapter 3 of the FEIS, Effects from Inventoried Roadless Areas).

The demand for timber remains higher than the amount produced at either the predicted timber volume offer or the ASQ levels. See the timber section of the EIS; and

E) The demand analysis that was completed for the Forest Plan revision analyzes the flow of timber harvest and identifies the location of mills receiving that timber harvest. It then describes the kinds of mills receiving timber, their capacity to process timber, as well as their capability to use timber of various sizes. Excerpts of the report are provided in the EIS (see the Timber section). This analysis provides a good indication of the demand for timber from the IPNF. An analysis of lumber markets and imported lumber is not required in determining the demand for timber from the IPNF.

Long-term Sustained Yield Capacity: Category 1401

Public Comment 321: (Letter Number(s): 189)

There was a comment based on the 2006 Proposed Plan that the Forest Plan did not address logging in areas that have yet to reach CMAI. NFMA generally prohibits logging of trees that have not reached CMAI. Furthermore, size of openings was inadequately addressed.

Response:

The requirement to generally reach CMAI prior to harvest is included in the revised Forest Plan. See FW-STD-TBR-04.

Spectrum Model: Category 1402

Public Comment 322: (Letter Number(s): 180, 222, 235, and 246)

The Forest should include a projected sale schedule in the final Forest Plan. The Forest should also include more information regarding the Spectrum model. Please explain why the model used different size classes than those in the draft Forest Plan. Also explain why the model allows more logging in degraded watersheds.

Response:

An appendix on proposed and possible actions is included in the Forest Plan (see appendix A). In addition, the Forest annually develops a 3 to 5 year timber sale action plan to look at sale opportunities and manage the timber program. This information is available to timber industry and the public.

The Spectrum modeling parameters and model outputs were documented in the draft EIS. See appendix B of the DEIS, pages 19 – 39. This appendix was referenced under the “Timber” section of chapter 3 of the DEIS (page 363).

The Spectrum model uses different size classes than those in the draft Forest Plan because of the desired condition limiting timber harvest in old growth. The model broke the large size class into two classes: large (15” – 20”) and very large (20”+). The Plan refers to just one class: large (greater than 15”). For the vegetation environmental consequences, the Forest wanted to be able to determine the amount of old growth present over time. The very large size class was used as a proxy for old growth. For the DEIS, the Spectrum model was used to analyze the change in the amount of old growth. For the final EIS, a different model was used to determine the changes to vegetation over time. See the documentation in the FEIS for a description of this modeling. The modeling in the DEIS did allow a greater amount of harvest to occur in watersheds that were already degraded. This has been changed in the FEIS and replaced with a limitation on openings created in all watersheds, not based on watershed condition class. This change was made to better address forest plan standards and guidelines.

Spectrum Model: Category 1402**Public Comment 322A:** (Letter Number(s): 209)

The Spectrum modeling was constrained by operational and logistical limitations showing only 5,000 acres per year could be feasibly thinned. We are concerned that this limitation will only provide failure to meet the desired conditions and objectives for forest resilience and hope that this numerical constraint will not be used as a production gate on the Forest. The Plan states the objective to treat 250,000 acres over the life of the Plan. Given the current backlog of thinning acres, this would indicate the need for greater thinning to achieve protection and restoration than the 5,000 acres modeled.

Response:

The constraint on thinning in the Spectrum model was based on operational feasibility. Given current budget and workforce, it isn't possible to provide for a higher level of thinning on the Forest. However, this modeling constraint is not a limitation on the actual amount of acres the Forest may thin. This is just a modeling assumption, to improve the ability of the model to provide realistic results regarding effects to vegetation. The Forest Plan objective to treat 250,000 acres over the life of the Plan includes all vegetation treatments, including prescribed burning, commercial timber harvest, and treatment of noxious weeds, as well as precommercial thinning. All of these treatments will provide for forest restoration.

Suitability: Category 1403**Public Comment 323:** (Letter Number(s): 179, 180, 190, 207, 222, and 246)

The Forest Service should consider the following regarding timber suitability:

- A) More than 60 percent of the tentatively suitable forestland is precluded from timber management by the proposed plan and the vast majority is in a state of diminished forest health. So the Forest Service should describe the forest health problems and evaluate options and consequences for management alternatives;
- B) If an area is not roaded or accessible, it should be removed from the suitable timber base;
- C) Lands in the northern Selkirk Mountains should not be classified as suitable for timber production because of the presence of numerous old-growth dependent and listed species in the area, such as woodland caribou. Certain lands identified as suitable for timber harvest conflict with plans for the recovery of threatened and endangered species;
- D) The amount of lands suitable for timber production is not sustainable. The amount of land considered suitable for timber production should be reduced to provide a sustainable level of harvest and to reduce lawsuits; and
- E) Increase active management by scheduling harvest on all lands suitable for timber production in the Spectrum model.

Response:

- A) The EIS does describe the effects on forest health and vegetation composition from management under current budget levels and the ASQ level (see the discussion under the Environmental Consequences section of Vegetation in chapter 3 of the EIS). The unconstrained budget level describes the vegetation treatment that could occur with unlimited budget;
- B) The process to determine suitable timber lands is described under NFMA and the 1982 Rule procedures. There is no law or regulation to remove inaccessible areas from suitable timber lands. However, most of the suitable timber base on the Forest is roaded;
- C) Lands identified as old growth or grizzly bear core are not suitable for timber production. Forest plan direction provides protection for sensitive species habitat and timber harvest will not

adversely affect that habitat or the recovery of threatened and endangered species. In some cases, timber harvest is needed to improve habitat. This will be determined on a site-specific, project basis;

D) Analysis was conducted to determine the amount of timber production that would be sustainable from the lands suitable for timber production. See appendix B of the EIS for documentation on the process used to determine lands suitable for timber production and the modeling used to determine sustainable harvest levels; and

E) To meet other resource requirements, such as lynx management direction, water quality, and non-declining sustainable yields, the model cannot schedule all acres suitable for timber production. In addition, the model schedules timber harvest in response to the model objective function, which was either a goal to move towards desired condition (Alternatives B and C), an objective to maximize present net value (Alternative A), or an objective to maximize timber (Alternative D). Because of these other management requirements and the objective function, only a portion of the suitable base is available to schedule. See appendix B of the EIS for documentation on the Spectrum model.

Supply - ASQ & Predicted Sale Volume: Category 1404

Public Comment 324: (Letter Number(s): 147, 179, 180, 205, 207, 208, 212, 214, 251, 267, and 281)

The Forest Service should increase timber harvest to improve forest health, reduce fuel risk, and achieve desired condition. The Forest grows much more than is being harvested. The ASQ should be increased. The objective for timber harvest in the Forest Plan should reflect the ASQ and not the predicted volume sold. Budget should not be a consideration in the objective for timber.

Timber harvest levels need to be sustainable and reliable. The FEIS needs to display the adverse effects on forest health and wildfires from managing at the minimum sale level. The Forest should consider a new management area where timber harvest would be to achieve the goal stated under Timber on page 23 of the draft Forest Plan.

Response:

An analysis was completed to determine the sustainable level of timber harvest in response to desired conditions and management requirements. The results are outlined in the EIS and Plan as the ASQ (unlimited budget) and the predicted volume sold (constrained to current levels of budgets). This analysis process is outlined in appendix B of the EIS. If budgets increase, the Forest has the ability to increase timber volumes above the predicted timber volume sold up to the ASQ level. The ASQ level is the maximum that would be sustainable, given constraints and management requirements for other resources. The Forest cannot harvest what is grown because of limitations from other resources, such as grizzly bear, water quality, and old growth. The EIS does describe the effects on forest health and vegetation composition from management under current budget levels (see the discussion under the Environmental Consequences section of Vegetation in chapter 3 of the EIS).

Our objectives in the Forest Plan were developed to move towards a variety of desired future conditions in the various resource areas. The quantity or amount of each objective was based largely on our current and recent past budget levels. We expect future budgets to stay relatively flat or decrease. It would be disingenuous to portray unrealistic objectives based on unconstrained or much higher budget levels. The objectives are realistic projections of what we expect to accomplish annually or over the life of the Plan. An explanation of the role of budget in developing objectives has been included in the revised Forest Plan.

The lands suitable for timber production within MA6 already provide for this type of direction. These are the lands where timber production is emphasized. These are the lands that are most responsive to the timber goal. There is no need for an additional management area.

DEIS General: Category 1405

Public Comment 327: (Letter Number(s): 9, 205, and 248)

The allowable sale quantity (ASQ) appears to be arbitrary and unsupported, not derived from actual forest inventory data. Provide an explanation of how ASQ was determined. In addition, ASQ is no longer required under the planning rule; the Forest should remove all reference to ASQ and replace with sustainable harvest level.

Response:

The ASQ was developed using the latest information on species and size class distribution. Timber growth and yields tables were built using data from the latest forestwide inventory (from the Forest Inventory and Analysis). The Spectrum model determined timber harvest levels based on management requirements, the land base, and yield tables. The modeling process is documented in appendix B of the EIS.

The IPNF is revising their Forest Plan following the 1982 Rule procedures as allowed under the 2000 Rule (see page 1 of the Forest Plan and the Notice of Intent to revise the IPNF Forest Plan published March, 2010). Calculation of ASQ is required under the 1982 procedures and, thus, used throughout the EIS and Forest Plan.

DEIS Alternatives: Category 1407

Public Comment 937: (Letter Number(s): 207 and 222)

The Forest Service should include direction in the Forest Plan to develop the 5-Year Action Plan in a collaborative manner and meet the following criteria:

- 1) That active management takes priority on lands designated as suitable for timber production;
- 2) Desired future condition, not the budget, should be the goal. The Forest Plan should show the staffing and budget needed to meet the desired future condition for the Forest;
- 3) Analyzing the economic and resource impact for falling short of meeting goals for each desired future condition;
- 4) That there should be a market focus on structural timber, and other products based on market demand;
- 5) That access to isolated suitable timber areas should be allowed; where new roads are necessary they should be designed so that they will not fragment old growth;
- 6) Providing a projected harvest schedule for the suitable timber acres so the public can see how the desired future condition of the Forest will be met over a rotation period;
- 7) Evaluating all the suitable timber production acres within a project area and provide reasonable details on harvest schedules and volume;
- 8) Identifying all old growth stands within any project area. If they do not meet scientific principles for size or distribution, they will be expanded. To compensate for any loss of suitable timber base acres, an equal number of acres will be found to put in the suitable category;
- 9) Across the suitable acres, apply the following:
 - a) Determine which acres contain mature forest and immature forest. On the immature acres use commercial thinning so that a healthy resilient forest is in place;
 - b) Give strong consideration to uneven-aged management and variable retention practices on mature acres. This lighter touch on the land will result in more acres being treated, reduce impacts on water quality, improve wildlife habitat, and allow more restoration efforts to occur all

to the benefit of healthy forests, healthy communities and a healthy infrastructure. This will help accomplish the desired future condition goals over time;

c) Use clear cuts as a prescription of last resort after consideration of alternative ways to accomplish the goals;

d) Analyze the non-suitable acres; INFS buffers and other no-harvest acres as linkage zones connecting old growth, providing wildlife travel corridors as well as other wildlife habitat and water quality benefits. This should be portrayed visually as well as quantifiably; and

e) Reporting data yearly so it can be made readily available to the public in an easily accessible format including interactive maps.

Response:

The Forest annually creates a 3 to 5 year timber sale action plan. There is no requirement to include direction on how to develop the timber sale action plan in the Forest Plan. The Forest Plan does not include direction on how to develop plans that are required in various resource areas. This is an implementation issue.

1) Lands suitable for timber production are where most of the timber harvest will occur on the Forest. These lands do emphasize active management, while meeting other management requirements and within allocated budgets;

2) See response to Public Comment 324;

3) Some desired conditions in the Forest Plan will not be achieved over the life of the Plan and can only be achieved over a longer timeframe. The affects analysis in the EIS describes the effects of implementing the alternatives;

4) See response to Public Comment 319B;

5) See response to Public Comment 323B. There is direction in the Forest Plan for road construction to avoid old growth (see FW-GDL-VEG-02);

6) An appendix on proposed and possible actions is included in the Forest Plan (see appendix A). In addition, the Forest annually develops a 3 to 5 year timber sale action plan to look at sale opportunities and manage the timber program. This information is available to timber industry and the public;

7) This occurs during project planning;

8) Old growth is evaluated during project planning and will have to meet direction in the Forest Plan (see FW-DC-VEG-03, FW-STD-VEG-01 and FW-STD-VEG-02);

9a – 9c) The harvest system for individual stands and areas is determined at the project level, with site-specific analysis;

9d) This analysis occurs at the project level; and

9e) It is unclear what is to be reported annually. The Forest Plan will be monitored and an evaluation report produced annually.

DEIS Cumulative Effects: Category 1408

Public Comment 938: (Letter Number(s): 248)

The Forest Service should address the cumulative impacts on checkerboard lands. The draft Forest Plan is silent on cumulative impacts of existing logging and road-building in adjoining ownerships. This impact should be analyzed and used to refine management options available and the resultant ASQ.

Response:

In calculating the ASQ, the model included requirements for wildlife, water quality, and the goal to move towards vegetation desired conditions. Based on these requirements, only a portion of the lands suitable for timber production were scheduled to produce the resultant ASQ. Not all details

about the land base can be modeled strategically. The cumulative impacts from adjacent private lands will be addressed at the project scale. If the cumulative impacts are too high, harvest will not occur on the adjacent forest lands until the private lands have recovered.

Forest Plan General: Category 1411

Public Comment 330: (Letter Number(s): 145)

The Forest Service should use mosaic cutting, which has beneficial impacts to both wildlife habitats and on the aesthetic quality of forest landscapes. Balancing the amount of edge from each harvest over the landscape with the amount of contiguous forest remaining and the cumulative effects of different harvest practices over time is necessary to provide the best quality wildlife habitat while meeting harvest objectives.

Response:

The type of harvest will be determined at the project level. Wildlife, watershed, and other resource requirements will be considered during project analysis.

Forest Plan General: Category 1411

Public Comment 333: (Letter Number(s): 9 and 102)

The Forest Service should not harvest any timber or build any new roads.

Response:

The Forest Service manages forest resources to meet many needs and comply with legal mandates, including laws that direct the Forest Service to manage for the production of timber products (Organic Administration Act, Sustained Yield Management Act, Multiple Use-Sustained Yield Act), and laws that mandate protection of resources (Organic Act, Sustained Yield Management Act, Clean Water Act, Multiple Use-Sustained Yield Act, National Environmental Policy Act, Endangered Species Act). Timber management remains a viable part of the mission of the Forest Service, as does the protection of soil, water, and all other resources

Forest Plan Desired Condition: Category 1413

Public Comment 334: (Letter Number(s): 198)

The Forest Service should consider the following suggestions to mitigate the restraints that budgets place on timber production and achieving the ASQ:

- A) Modify the Plan to realign the suitable timber base so that there are fewer conflicts with sensitive species and old growth;
- B) Include some form of community collaboration which would reduce the potential for project level conflict and legal challenges;
- C) Make the 5 year plan process a part of the Forest Plan and make it collaborative which would help reduce conflict if a broader scale vision was agreed upon by diverse interests;
- D) Include a human resources evaluation as part of the Plan which addresses two main questions - is the agency operating as efficiently as it can, and are planning resources receiving the priority they need to complete the projects that are envisioned as necessary to achieving desired conditions; and
- E) Focus on projects that involve stewardship contracting, or other mechanisms that return the project dollars to the local forest because if projects pay for themselves, or if the needed subsidies are reduced, then constrained budgets should have less of an impact on goals.

Response:

A) Sensitive species and old growth were considered in determining lands suitable for timber production. Old growth, grizzly bear core areas, and riparian areas are not suitable for timber production. See appendix B of the EIS for a description of the analysis in determining lands suitable for timber production; and

B – E) These suggestions are outside the scope of the Forest Plan revision. The 3 to 5 year timber sale action plan is updated annually and will not be included in the Forest Plan. The Forest shares the 3 to 5 year timber sale action plan with the public and communicates with the stakeholder group on planned sales. The Forest continues to collaborate and work with various stakeholders in developing timber sales. Stewardship contracting is a mechanism that is used when appropriate, based on sale attributes.

Forest Plan Desired Condition: Category 1413**Public Comment 336:** (Letter Number(s):190 and 235)

The Forest Service should eliminate language in FW-DC-TBR-01, FW-DC-TBR-03, and FW-GDL-01 regarding salvage sales. There is no ecological justification for salvage logging trees killed by fire (Beschta et al. 1995). In fact, salvage logging trees killed by fire has been shown to slow recovery of post-fire ecosystems. Snags, coarse woody debris, and other structural features of post-fire stands create the microclimatic conditions necessary for recovery. Also, including salvage logging in these two desired conditions removes the distinction between suitable and unsuitable lands, allowing logging on virtually all IPNF land.

Response:

The silvicultural practice of salvage cutting (or salvage logging) is defined as the removal of dead trees or trees being damaged or dying due to injurious agents other than competition, to recover value that would otherwise be lost (see the glossary in the Forest Plan). Neither the definition of salvage cutting nor the verbiage used in the three Plan components that are noted in the public comments (FW-DC-TBR-01, FW-DC-TBR-03, FW-GDL-TBR-01, pgs 23-24 of the draft IPNF Forest Plan) claims that salvage cutting is justified due to ecological benefits that it may have. Rather, both the plan components and the definition of the practice indicate that the purpose of salvage cutting is generally to recover timber value.

Salvage cutting is typically used on the Forest in situations where trees have been blown down or broken by storms, killed or injured by insects or diseases, or have died as a result of fire. In addition to the objective of recovering some of the economic value of the trees, there are certainly other reasons for that this practice may be used. For example, removing damaged or blown down trees in a campground or other administrative site could help to reduce safety hazards. In certain situations, by removing blown down trees the salvage activity could reduce the chance that bark beetles would breed and multiply in the damaged timber and populations subsequently attack adjacent, otherwise healthy trees. Lastly, by capturing some of the economic value of the dead or dying timber, it is sometimes possible to utilize those funds for other needed restoration activities. Regarding the removal and utilization of trees that are killed by wildland fires, the impacts would be evaluated on a site-specific, project basis. As required by NEPA, the ecological as well as the economic and social impacts would be considered prior to using this or other silvicultural practices to respond to fire killed timber. At the programmatic level of this Forest Plan, the IPNF does not believe it would be appropriate to place a restriction or prohibition on the use of salvage cutting in general, or more specifically the use of salvage cutting following fires. The authors of the Beschta Report (Beschta et al. 1995) provide their opinions on the issue of salvaging cutting after fires in the form of general policy principles and land management recommendations. While their recommendations are generally applicable to federal lands throughout the western United

States (or at least the interior Columbia and upper Missouri basins), they are not focused on the specific ecological, social, and economic characteristics of post-fire conditions of the IPNF. In addition, in making their broad recommendations and policy suggestions, the authors did not consider the multiple-use goals and objectives of the Forest. After a fire occurs on the Forest where the use of salvage cutting is being proposed, the IPNF will consider the authors' suggested principles and recommendations (as well as other relevant ecological information) in the context of the specific post-fire conditions and the overall multiple-use Forest Plan direction.

As far as allowing the practice of salvage cutting on unsuitable timber land, that practice is specifically allowed in the 1982 Forest Plan, planning regulations. Those regulations say: "No timber harvesting shall occur on lands classified as not suited for timber production pursuant to Sec. 219.14 except for salvage sales (emphasis added), sales necessary to protect other multiple-use values or activities that meet other objectives..." (36 CFR 219.27). The distinction between suitable and unsuitable timber lands is described at length on pages 416-417 of the IPNF DEIS, as well as in appendix B (pgs 16-17) to the IPNF DEIS. Lastly, some quantitative information was added to the FEIS regarding how many acres on the Forest are suitable for timber production, how many acres are not suitable for timber production but where some timber harvest could occur for other reasons, and how many acres could not have any form of timber harvest on them for any reason (see the Timber section of the DEIS).

Forest Plan Standards: Category 1415

Public Comment 942: (Letter Number(s): 235)

The Forest Service should strengthen the timber standard, MA5-STD-TBR-01. It contains exceptions that negate the meaning of limited timber harvest. Timber harvest should not be allowed in MA5. There is extensive scientific consensus that undisturbed areas such as the roadless areas in MA5 represent areas of high ecological integrity. This science is found in the federal government's National Roadless Rule EIS and ICBEMP EISs, and in a vast body of scientific literature. The science indicates that there is no need to "maintain or restore ecosystem composition and structure; to reduce the risk of uncharacteristic wildfires; or to address insect and disease or other forest health concerns" in the IPNF's roadless areas.

Response:

The language found in MA5-STD-TBR-01 is consistent with the Idaho Roadless Rule (36 CFR 294.24) and the 2001 Roadless Rule (36 CFR 294.13). The Forest wants to retain options for management in these areas if the need arises. Management activities would only occur following site-specific project NEPA, with analysis that would consider the effect of proposed activities on other resources.

Forest Plan Standards: Category 1415

Public Comment 943: (Letter Number(s): 235)

The Forest Service should clarify the timber standard, FW-STD-TBR-02, because there is an undefined category of natural processes the Forest Service calls "catastrophe," which defines an economic loss of opportunity as the catastrophe rather than something being ecologically harmful. Also, it seems redundant for a standard to explicitly state that the law would be followed.

Response:

This wording is consistent with Forest Service manual direction (FSM 1920.12(e)). The word "catastrophe" does not imply an economic loss but rather large natural disturbance events.

Forest Plan Standards: Category 1415

Public Comment 944: (Letter Number(s): 246)

The Forest Service should include better guidelines for soil protection, tree selection, and other silvicultural concerns in the Forest Plan. Uneven-age management, variable retention, and other techniques for a more resilient forest should be mandated in modern timber management. The desired future conditions for the Forest should not be left to the broad discretion of land managers but should be enforceable from clear standards in the Plan.

Response:

The draft Forest Plan does provide adequate direction for soil protection and vegetation management. As indicated on page 2 of the draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service is required to follow all existing laws, regulations, and policies relating to the management of NFS lands, and the Forest Plan direction is designed to supplement existing direction and not repeat them. The Soil and Water Conservation Practices (SWCP) Handbook for the Northern Region directs the Forest to implement Best Management Practices for all management activities, providing additional protection to soils and watersheds. Analysis on harvest techniques, such as uneven-aged management, occurs at the project scale, using site-specific analysis.

Forest Plan Guidelines: Category 1416

Public Comment 342: (Letter Number(s):221)

The Forest Service should consider adding the following guidelines to provide additional aquatic resource protection for timber management as follows (although these could as easily be incorporated into Watershed, Water Quality and Aquatics guidelines):

A) FW-GDL-TBR-02 as follows: Vegetation and/or fuel management prescriptions in RCAs will be for the purpose of restoring, enhancing, or protecting the physical and biological characteristics of the RCA including riparian management objectives. Vegetation and/or fuel treatments, for the purpose of protecting urban interface, private property and other investment, and public safety in RCAs shall be designed so as not to prevent the attainment of desired stream function. Fuelwood cutting and salvage in RCAs is allowed where it will not prevent or retard attainment of watershed, riparian and aquatic habitat and aquatic species desired conditions; and B) FW-GDL-TBR-03 as follows: Minimize erosion and sediment production and adverse impacts to soils during timber harvest by consideration of measures such as use of existing skid trails wherever possible; restrictions on skidding with tracked machinery in sensitive areas; using slash mats to protect soils; constructing water bars; creating brush sediment traps; adding slash to skid trail surfaces after recontouring and ripping; seeding/planting of forbs, grasses or shrubs to reduce soil erosion and hasten recovery; as well as recontouring, slashing and seeding of temporary roads and log landing areas following use.

Response:

A) The retained INFISH decision includes this direction. Under INFISH, vegetation treatment in riparian areas is not allowed unless there is a defined riparian management objective. This is also discussed in the riparian habitat standards in the Plan, FW-STD-RIP-01, 02, and 03; and B) The Soil and Water Conservation Practices (SWCP) handbook for the Northern Region directs the Forest to implement best management practices for all management activities such as those described by the commenter (Ref: Region 1 SCWP Handbook FSH 2509.22).

Vegetation

Carbon Sequestration: Category 1450

Public Comment 947: (Letter Number(s): 121 and 235)

The Forest Service should consider the following regarding carbon sequestration:

A) That there is an emerging scientific consensus that removing wood or any biomass from the forest has a negative impact on carbon sequestration, and that the IPNF analysis is skewed to support the business-as-usual management of the Forest;

B) That all old growth and unlogged areas should be preserved for carbon storage and that all logged areas should be allowed to develop into old growth. This management strategy could double carbon storage (Harmon et al. 2002, Harmon 2001, Harmon et al. 1990, Homan et al. 2005, Solomon et al. 2007, Turner et al. 1995, Turner et al. 1997, Woodbury et al. 2007);

C) That soil carbon is very important in the global carbon balance (Kutsch et al. 2010);

D) The Van der Werf et al. (2009) publication that concluded the following: “(T)he maximum reduction in CO₂ emissions from avoiding deforestation and forest degradation is probably about 12 percent of current total anthropogenic emissions (or 15 percent if peat degradation is included); and that is assuming, unrealistically, that emissions from deforestation, forest degradation and peat degradation can be completely eliminated.”

...reducing fossil fuel emissions remain the key element for stabilizing atmospheric CO₂ concentrations.

(E)fforts to mitigate emissions from tropical forests and peatlands, and maintain existing terrestrial carbon stocks, remain critical for the negotiation of a post-Kyoto agreement.

Even our revised estimates represent substantial emissions...

E) The publication of Keith et al. (2009) which shows that forest ecosystems do not necessarily reach an equilibrium between assimilation and respiration of carbon, but can continue to accumulate carbon in living biomass, coarse woody debris, and soils; and therefore, may act as net carbon sinks for long periods. Conserving forests with large stocks of biomass from deforestation and degradation avoids significant carbon emissions to the atmosphere;

F) The publication of Harmon (2009) that notes the issues that should be addressed when assessing proposed actions and common misconceptions; and

G) The publications of Hanson (2010), Campbell et al. (2011) and Mitchell et al. (2009) refute the notion that fuel-reduction treatments increase forest carbon storage in the western U.S.

Response:

A) The Forest does not agree with the sweeping contention that there is an emerging scientific consensus that removing wood or any biomass from forests reduces net carbon sequestration. The impact that forest ecosystems have on carbon sequestration and the question of how forest management actions (or in actions) influence carbon storage and flux is entirely too complex of an issue to generalize as the respondent did. As described in our responses to the other subconcerns, the Forest took a hard look at the science of carbon sequestration and forest management during the Plan revision process. The publications cited by the respondent simply do not support the argument that removing wood or any biomass from forests on the IPNF would reduce net carbon sequestration of those forests, nor do the publications suggest that the analysis conducted by the IPNF was “skewed” to support “business-as-usual” (which we assume means logging).

The management of the National Forest System does not emphasize “logging.” Rather, management of all national forests, including the IPNF, emphasizes multiple-use as prescribed by the Multiple-Use Sustained-Yield Act of 1960 and the National Forest Management Act.

Accomplishment of these statutory objectives is defined in the Forest Plan. Neither the principal statutes nor the Forest Plan suggest that carbon storage supersede the statutorily defined purposes of national forest management. The policy prescription suggested by the respondent (i.e., allow all stands to develop into old growth) ignores many of the purposes and values of the national forest system established by federal laws and regulations, as well as the purpose and need for revising the IPNF Forest Plan. Lastly, the suggestion that areas be “preserved indefinitely” is ecologically unrealistic, even assuming no further active forest management. Natural disturbance regimes will continue and likely increase in intensity with climate change and this will prevent the development or “preservation” of old growth conditions in many areas of the Forest;

B) Regarding the need to preserve undisturbed forests in order to sequester more carbon and mitigate global warming, the KIPZ Climate Change Report contains an entire chapter on the subject of carbon sequestration and forest productivity (see pgs 57-70). In addition, the IPNF DEIS contains a discussion of carbon sequestration in the affected environment section (pgs 76 and 77) and the environmental consequences (pgs 98 and 99). As discussed in the KIPZ Climate Change Report, the rate of carbon sequestration and net ecosystem productivity generally peaks in a forest stand at an intermediate stage of stand development, and then declines as they get older. As discussed in detail on pages 64 and 65 of the KIPZ Climate Change Report, the idea of allowing the stands to get older (either by continued or increased fire suppression or by not harvesting them) in order to sequester more carbon can be problematic for a number of reasons. For example, that strategy could increase the risk of carbon loss from wildfires, bark beetle outbreaks or even root disease pathogens (pgs 64-65, 73-84 and 85-90 of the KIPZ Climate Change Report). As discussed in the DEIS (pgs 75, 76, and 94-98) as well as the KIPZ Climate Change Report, one of the more substantial climate change adaptation options is to promote the resistance and resiliency of the forests to disturbance and stress agents. For example, the KIPZ Climate Change Report (page vi) states the following: Increase the resilience of forest vegetation by reducing the potential severity of wildfire and insect outbreaks. Managing the density of trees can improve forest resiliency by reducing water stress, decreasing susceptibility to insect and disease mortality, and decreasing the likelihood of stand-replacing wildfires. Management actions that increase the diversity of stand ages, size classes, and tree species in currently homogenous landscapes can reduce the extent and severity of bark beetle outbreaks and wildland fires. Mechanical treatments, prescribed fire, and managing wildland fires for resource benefits are all potential tools for increasing the resiliency of forest vegetation to climate and other stressors. In addition, existing programs to reduce the vulnerability of whitebark pine and western white pine to white pine blister rust will also improve the resistance of these species to the added stresses associated with climate change.

Numerous Forest Plan components were developed to respond to this issue (e.g., Vegetation Goal-01, FW-DC-VEG-01, 02, 03, 04, 05, 06, 11; FW-OBJ-VEG-01, FW-STD-VEG-01, 02; and FW-GDL-VEG-01).

Concerning the eight references that were cited in the comment associated with subconcern B, the following is a response as to their applicability in supporting the commenters argument that the best policy prescription to sequester carbon in the forests on the IPNF is to “preserve” the stands in order to allow them to develop into old growth.

Turner et al. (1997) is a brief letter to the editor commenting that another paper overestimates the potential benefits of carbon storage in harvested wood products and afforestation. Two of the papers referenced (Turner et al. 1995, Woodbury et al. 2007) report estimates of existing carbon stocks and flux in U.S. forests. Neither paper recommends conversion of all forests to old growth conditions, or suggests a land management policy similar to that proposed by the commenters. Harmon et al. (1990) and Harmon (2001) provide general descriptions of the carbon cycle for forests in western Oregon and Washington. These papers make the point that old forests generally

store more carbon than younger forests. While we agree with that fact, it is also true that the forests of western Oregon and Washington have disturbance and succession dynamics, and thus carbon dynamics that differ substantially from the more disturbance prone forests of the IPNF and the rest of the northern Rocky Mountains. The forests of the IPNF are much more prone to large scale disturbances (fire and insect/diseases) and an analysis that ignores the potential impacts of management practices on those disturbances is largely irrelevant to the IPNF. The analysis and discussion presented in the KIPZ Climate Change Report and the DEIS for the IPNF revised Forest Plan, used research and scientific papers that are much more applicable for the northern Rocky Mountains.

Similarly, Harmon and Marks (2002) focus primarily on the aspects of dynamics of Douglas-fir/western hemlock forests in western Oregon and Washington. This study uses a computer model to examine the carbon implications of several silvicultural practices. This study found that: forests protected from fire stored the greatest amount of landscape level carbon; carbon stores increased with rotation length (assuming no natural disturbance); and carbon stores decreased as the fraction of trees harvested and detritus removed increased. Pertinent to the commenters suggested policy prescription, the authors concluded that in the case of high wood products utilization and severe slash-burning, increasing rotation length from 40 to 120 years increased landscape-level carbon stores more than 2.5 fold. The authors concluded that partial timber harvest with minimum use of slash-burning may increase carbon stores to two-fold compared to silvicultural practices that authors describe as traditional for the study area. In addition, based on their model simulations, the authors concluded that if carbon storage was the only land management consideration conversion to an old growth dominated landscape would be the best option because the model suggests such a landscape would store close to 90 percent of the potential maximum. Again, we note that these conclusions for forests of western Oregon and Washington are unlikely to apply to forests of south central Montana, which have very different natural disturbance regimes.

Homann et al. (2005) measured total ecosystem organic carbon in 35 old growth forest stands in Oregon and Washington. All but 4 stands were in relatively warm and wet forests in coastal forests or on the west-side of the Cascade Mountains. The authors extrapolated the carbon measurements from these stands to estimate the theoretical potential carbon stores for the entire region (western Oregon and Washington). Comparing the results of this extrapolation to estimates of existing carbon stocks from other studies (using different methods), the authors concluded that current carbon storage in western Oregon and Washington is less than half the theoretical potential. The authors acknowledged that converting to a “theoretical landscape without catastrophic natural or human disturbance” is unrealistic. This paper, and a very similar paper by many of the same authors (Smithwick et al. 2002), explain that natural disturbance regimes and other factors will result in regional carbon sequestration capacities that may be much different from the theoretical potential reported in Homann et al. (2005).

In regards to the Solomon et al. (2007) publication that was cited by the commenter, we failed to find any relevant discussions in that 74 page document that supported the policy prescription that the IPNF should manage the Forest to allow all of the forested areas to develop into old growth in order to maximize carbon sequestration;

C) Regarding the function that forest soils play in carbon sequestration, the KIPZ Climate Change Report does include information on that topic (see pages 58 and 66). Kutsch et al. (2010) developed a book titled: *Soil Carbon Dynamics: An Integrated Methodology*. The book provides an integrated view on measuring and modeling soil carbon dynamics. However, the IPNF fails to understand how this reference supports the argument by the commenter that all the forest stands on the IPNF should be preserved so that they develop into old growth in order to sequester the maximum carbon possible;

D) The Van der Werf, et al. (2009) citation is a two page commentary that is summarized on the first page with the following statement: “Deforestation is the second largest anthropogenic source of carbon dioxide to the atmosphere, after fossil fuel combustion. Following a budget reanalysis, the contribution from deforestation is revised downwards, but tropical peatlands emerge as a notable carbon dioxide source.” The IPNF fails to see how a study of worldwide deforestation and its influence on CO₂ emissions is relevant to the Forest and its effort at plan revision. The IPNF is not proposing deforestation and we do not manage tropical forests or tropical peatlands. The temperate peatlands that occur on the IPNF are well protected with various forest plan components, two of which are FW-DC-VEG-12 and FW-GDL-VEG-09;

E) The Keith et al. (2009) publication is titled “Re-evaluation of forest biomass carbon stocks and lessons from the world’s most carbon-dense forests.” The closest forest area to the IPNF that this publication discusses is the Pacific Northwest region of western Oregon, western Washington and Victoria, BC. Most of the discussion focuses around Australian eucalyptus forests and the wet Pacific Northwest forests. For similar reasons to those provided for subconcern B, the Forest does not believe this publication is very relevant to the IPNF. The forests of the IPNF are much more prone to large scale disturbances (fire and insect/diseases) and an analysis that ignores the potential impacts of management practices on those disturbances is not very germane to the IPNF. The analysis and discussion presented in the KIPZ Climate Change Report and the DEIS for the IPNF revised Forest Plan, used research and scientific papers that are much more applicable to forests within the northern Rocky Mountains;

F) Harmon (2009) is a 10 page document of Congressional testimony that he provided before the Subcommittee on National Parks, Forests, and Public Lands of the Committee of Natural resources for an oversight hearing on “The role of Federal Lands in Combating Climate Change.” Regarding the Harmon (2009) document the commenter states: “Harmon, 2009 reviews, in terms as simple as possible, how the forest system stores carbon, the issues that need to be addressed when assessing any proposed action, and some common misconceptions that need to be avoided. He also reviews and assesses some of the more common proposals as well as his general scientific concerns about the forest system as a place to store carbon.” There is nothing in that document that the IPNF believes conflicts with the analysis and discussion on carbon sequestration that is provided in the KIPZ Climate Change Report and the EIS for the revised Forest Plan. Due to the lack of specificity from the commenter as to what the Harmon (2009) said in his testimony that the IPNF did not consider or inappropriately considered, we are not able to respond to this in more detail; and

G) Hanson (2010), Campbell et al. (2011) and Mitchell et al. (2009) are cited by the commenter as evidence that fuel reduction activities decrease carbon storage, rather than increase them. However, nowhere in the DEIS for the revised Forest Plan or in the KIPZ Climate Change Report did the Forest Service state that fuel reduction activities on the IPNF would increase carbon storage. The cause and effect relationship between specific management activities such as fuel reduction treatments and long-term carbon flux and stores is too complex to generalize. The KIPZ Climate Change Report presents the current trends in forest carbon in the U.S., Northern Rockies and the two Forests (IPNF and KNF) in the KIPZ zone. Ecological, social, and economic aspects of the topic of carbon stocks and flux, and forest management are discussed. Potential mitigation options are presented. The summary to the Mitigation Option section of that report states the following:

At the global scale, prevention of large-scale conversion of forests to other land uses (deforestation), primarily in the tropics, provides the greatest opportunity to mitigate the trend of increasing atmospheric concentrations of CO₂ (Nabuurs et al. 2007). In the U.S., the largest and most effective mitigation opportunity has already been taken - the creation

of state and federal public forests that share the common objective of "keeping forests as forests" in perpetuity.

Within the context of public forests, individual land management actions are unlikely to have significant long-term effects on the atmospheric concentrations of CO₂ and other greenhouse gases. Without a substantial reduction in fossil fuel emissions, the impacts of projected climate change on disturbance regimes and species composition will likely overwhelm the short-term effects of land management actions. From this perspective, the primary forest management action to mitigate increasing atmospheric CO₂

concentrations is the sustainable use of woody biomass to generate energy and biofuels, and displace more fossil-fuel intensive construction materials (Nabuurs et al. 2007). As the IPCC concluded; "In the long-term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit" (Nabuurs et al. 2007, page 543).

As discussed in more detail above in the response to subconcern B, one of the more substantial climate change adaptation options that the IPNF can implement is to promote the resistance and resiliency of the forests to disturbance and stress agents, and the Forest has included components in the revised Forest Plan to that end.

Forest Composition: Category 1451

Public Comment 949: (Letter Number(s): 283)

The Forest Service should provide information on how attainable the goals are regarding the desire to increase western white pine and western larch, and decrease grand fir.

Response:

The desired condition that is expressed in the revised Forest Plan for the composition of the tree species on the IPNF (e.g., FW-DC-VEG-01) is a long-term goal that is probably not achievable during the life of this revised Forest Plan (i.e., next 15 years). The analysis that was done in the EIS to determine how the various alternatives would affect the composition of the Forest was done under two budget assumptions- one assuming the future budget levels would be similar to the recent past (called the constrained budget), and one assuming that there was an unlimited budget (called the unconstrained budget) in which to implement treatments that could affect the forest composition. The effects of these two scenarios on forest composition was presented in the DEIS (pages 87 and 88). Since the DEIS was released, that analysis was updated with information from more detailed modeling efforts and the results show that compared to the initial analysis, more progress can be made towards the desired conditions of increasing white pine and larch, and decreasing the grand fir mix dominance group. However, under the constrained budget assumption, the progress is still fairly small relative to the desired conditions. If the IPNF receives substantial more funding in the future, the progress could be much greater. Additional information on this topic can be found in the FEIS within the Environmental Consequences section for the Forest Composition and Structure topic.

Forest Size Class: Category 1453

Public Comment 951: (Letter Number(s): 235)

The Forest Service should consider that the utilization of size classes as a major driving component of the Forest Plan is not adequately grounded in science because they are vaguely defined. In addition, the highly important features found in old growth are not recognized.

Response:

As explained on page 65 of the IPNF DEIS, the four size classes were used to broadly describe and quantify the structure of the forest stands that currently exist (as well as historical amounts) on the IPNF. Obviously, classification systems such as size classes are human constructs designed to simplify complex elements such as forest structure. As explained in O'Hara et al. (1996), one of the first efforts to characterize forest structure in the Inland Northwest was Thomas's (1979) description of structural development for forest stands in the Blue Mountains of Oregon and Washington. Thomas used categories for tree sizes such as seedlings, saplings, poles, small sawtimber, large sawtimber, and old growth. Other than some rather subtle terminology differences (e.g., using a "small" size class rather than a "pole" size class, or using a "medium" size class rather than a "small sawtimber class"), the classification used in the forest plan revision process was not too different from the system used by Thomas. In describing various systems to classify forest structure, O'Hara points out the following:

"A feature common to all vegetation classification systems is their inability to satisfy all potential users. All three types of Inland Northwest vegetation classifications described have shortcomings that make on classification system more appropriate for some uses than another. As ecological classifications are ultimately interpretive, it is essential that a scheme be chosen that clarifies the ecological attributes, processes, and dynamics appropriate to the objectives and values for which landscapes are managed."

The size classes used in the revised Forest Plan to describe forest structure, are not "vaguely defined." Rather, they are defined very quantitative. For example, on page 13 of the draft Forest Plan (and on page 66 of the DEIS), the seed/sap size class is defined as being dominated by trees 0-5" DBH (diameter at breast height), while the small size class is defined as having trees dominated by 5-10 DBH trees. The medium and large size classes are defined in a similar fashion.

Regarding old growth, the features are described on page 67 and 68 of the DEIS, and the very detailed description of the various types of old growth is cited in the Green et al. 1992 (errata corrected 10/08) publication. That document defines old growth forest types for the Northern Region of the Forest Service (including the IPNF) and is approximately 68 pages long. This includes four appendices as well as lengthy errata corrections. The document and definitions for the various old growth types are too lengthy to include in the revised Forest Plan or FEIS. The entire document is contained in the project record. In the DEIS for the draft Forest Plan there is a brief description of the most common old growth forest types and the associated characteristics.

Historic Range of Variability (HRV): Category 1454

Public Comment 347: (Letter Number(s): 209)

The Forest Service should consider Traditional Ecological Knowledge (TEK) along with Western science (also known as Scientific Ecological Knowledge or SEK) when assessing forest health and productivity.

Response:

The IPNF understands that Traditional Ecological Knowledge (TEK) and Scientific Ecological Knowledge (SEK) can be complementary to one another in efforts to understand ecological relationships and connections between humans, other living things, and their physical environment. As discussed at length in Mason et al. (2012) and other papers, the idea that these two methods might be combined to produce a stronger resource management approach than either could provide alone is gaining more acceptance (e.g., Pierotti and Wildcat 2000, Michel and Gayton 2002, and Kimmerer 2002). The IPNF looks forward to opportunities that may arise in

the future to learn about TEK that is held by the Kootenai Tribe of Idaho that could be used to improve the management of the Forest.

Historic Range of Variability (HRV): Category 1454

Public Comment 952: (Letter Number(s): 179, 189, and 235)

The Forest Service should consider the following regarding HRV:

- A) Providing a simple description of the amount of forest that is outside of the natural range of variability and shows forest health problems;
- B) That the vegetative model (i.e., the assumption that the historic fire regime was one of a high frequency, low intensity fire regime) that was used in the analysis does not fit this region and that there is scientific information that contrasts with the fire history and ecology information presented in the EIS. For example, McDaniel (2006) indicates that fire severity is a function of climate, not fuels. Baker (2009) and Yaussy (2010) indicate that the historically effects to vegetation from frequent, low-intensity wildfires are small compared to infrequent, high-severity fires. Lastly, Williams and Baker (2012) show that forests were structurally variable due to varying fire severities; and
- C) The following publications and the potential limitations of using the HRV approach: Walder 1995, Johnson et al. 1994, Webb and Bartlein 1992, Tiedemann et al. 2000 and Frissell and Bayles 1996.

Response:

A) A simplistic answer to the question of how much of the forest vegetation is outside of the natural range of variability (HRV) would require a much more specific question as to what aspect of forest vegetation is under consideration (e.g., composition, structure, pattern, function) and what one's definition of "forest health" is. As described on pages 48 and 49 of the DEIS, the HRV analysis focused on forest composition, structure, landscape pattern, and processes (disturbance and succession). For each of those forest vegetation components, the analysis provides a description of the existing and historic range of conditions and provides some conclusions as to what departures might mean in terms of effects to resistance and resiliency of the forest vegetation towards disturbances and stressors (e.g., fire risk, insect/disease susceptibility, drought stress, carbon sequestration). As depicted in figure 7 of the DEIS (pg 63), the current tree species composition of the Forest has a lot less ponderosa pine, western larch and western white pine than it did historically, and much more grand fir mix, lodgepole pine, and subalpine fir mix. As depicted in figure 8 of the DEIS (pg 66), the current distribution of size classes on the Forest is such that there is a lot more acres in the small and medium size classes, and fewer acres in the seed/sap size class than the HRV. If one's definition of forest health mainly involves dead/dying trees or forest stands at risk for wildfire, then there is an analysis on pages 94-98 that describes how much of the Forest is at risk to various disturbances (fire, insect/diseases) and stressors (e.g., weather, moisture stress, forest density);

B) As discussed at length on pages 56-58 of the IPNF DEIS, the dominant fire regime on the IPNF is a variable or mixed-severity fire regime. As indicated in that section of the DEIS titled "Wildfire", that type of a fire regime commonly had a moderately short fire return interval for nonlethal or mixed severity fires, with lethal crown fires occurring less often. Nowhere in the DEIS or draft Forest Plan, did the IPNF infer that the dominant natural fire regime on the Forest was one of frequent, low severity fires.

McDaniel (2006) is an internet article written by a reporter that is titled "What climate scientists have learned from Western wildfires." Two fire and climate researchers, Westerling and Swetnam, were interviewed for the article and concluded that the western U.S. was experiencing hotter and drier conditions with longer fire seasons. The DEIS and supporting documentation for the revised

Forest Plan (e.g., the KIPZ Climate Change Report) certainly recognize this and the literature used in the analysis in the EIS is consistent with that internet article. For example, on page 55 of the DEIS, we say: “Recent research has found evidence that decadal scale fluctuations in climate, such as those caused by the pacific decadal oscillation, can have a large influence on forest disturbance processes such as wildfire and insect outbreaks (Bollenbacher 2010, Hessl et al. 2004, McKenzie et al. 2009, Morgan et al. 2008, Westerling et al. 2006).”

Yaussey’s (2010) review of Baker’s (2009) book essentially highlights some of the key points of the book. In regards to these two citations, the commenter seems to be arguing that large, infrequent high-severity wildfires had a much larger influence historically on forest ecology than did low-severity fires. Nowhere in the DEIS or draft Forest Plan, did the IPNF infer that low-severity fires had a more important role in shaping the composition, structure, or function of the forests of the IPNF. On certain sites (e.g., the warm/dry biophysical setting), low-severity fires probably had a greater role in shaping the forest vegetation than stand-replacing fires, while on other sites (e.g., the warm/moist biophysical setting), stand-replacing wildfires likely had a greater influence than did low-severity fires. However, as presented in the DEIS (pgs 56-58 of the DEIS and elsewhere), all three categories of wildfires (i.e., stand-replacing, mixed-severity and low-severity) played important roles in the overall ecology of the forests on the IPNF.

Regarding Williams and Baker (2012), the commenter did not list a citation for this publication so we are uncertain what article it is. However a search of those authors and the year 2012 led us to believe that the article being referred to may be the following: “Williams, M.A. and W.L. Baker (2012). Spatially extensive reconstructions show variable-severity fire and heterogeneous structure in historical western United States dry forests. *Global Ecology and Biogeography* 21:1042-1052. If that is indeed the article that the commenter is referring to, then here is a response. As indicated by that article’s title, the authors studied dry forests in the western U.S. Forests of the IPNF are not characterized as dry forests so the applicability of that study to the IPNF is very limited. In addition, even for the relatively small amount of the IPNF that would be considered to having fairly dry sites, the conclusions of that study generally do not conflict with information in the DEIS or associated documents for the revised Forest Plan. Nowhere in the DEIS or other documents associated with the revised Forest Plan, did we characterize the structure or composition of the forests on the drier sites as being homogenous due to frequent low-severity wildfires;

C) The rationale for using the HRV of forest vegetation conditions as a coarse filter ecosystem management approach to sustaining biological diversity is explained in the following locations: pages 43-44 and 49-51 of the DEIS, pages 11-14 of appendix B to the DEIS, the Forest Vegetation specialist report, and the Technical Report for the AMS for the KIPZ Forest Plan Revisions (March 2003). The following discussion focuses on the citations listed in the comments and which were used by the commenter to argue against using the HRV approach.

Walder 1995-: This document is an unpublished master’s thesis titled” Silviculture vs. nature: an ecological assessment of forest health alternatives. Univ. of Montana, Missoula MT. Due to the unpublished nature of this document, we were unable to review it in order to specifically respond to it.

Regarding Frissell and Bayles (1996), this is an opinion paper written by authors who propose watershed reserves/refugia for the maintenance of aquatic diversity and sustainability. For example, in the abstract for their paper, they state: “To provide for rational, adaptive progress in ecosystem management and to reduce the risk of irreversible and unanticipated consequences, managers and scientists must identify catchments and aquatic networks where ecological integrity has been least damaged by prior management, and jointly develop means to ensure their protection as reservoirs of natural biodiversity...”. The authors present cautionary arguments in their paper regarding the use of the natural range of variability approach for ecosystem

management, and we believe we have considered their points along with the more recent, and numerous papers on the general topic of using HRV.

Tiedemann et al. (2000): The commenter did not provide the citation for this publication so we are unable to respond to it.

Johnson et al. (1994): As the authors of this publication state in the abstract, paleo-vegetation studies have shown that vegetation has changed in composition and extent in the intermountain Pacific Northwest over the past 20,000 years. The context in which this publication was cited by the commenter was in what seemed to be an argument that the IPNF developed the HRV based on one single point in time. However, as explained on page 49 of the DEIS, the IPNF used a period of time from approximately 2,500 years ago until the 1880s. The substantial sources of information and methods to determine the HRV are summarized on page 50 of the DEIS. If one were to read that list and the associated documentation of the methodology that was used to develop the HRV, we do not believe one would conclude that the IPNF used only one point in time to develop the HRV. In addition, as the authors of Johnson et al. (1994) indicate, “Passive management is not the best choice after the long tenure of human management of the land. To improve degraded ecosystems and landscapes requires active use of tools and techniques still being developed. The key is to shift from functionalism to multifunctional projects performed on a large scale. Degraded landscapes and vegetation on the eastside cannot be improved without planning, conducting, and monitoring restoration projects at a landscape scale.” In many ways, the revised Forest Plan and philosophy embodied within it attempt to do this very thing.

Webb and Bartlein (1992): This publication, titled “GLOBAL CHANGES DURING THE LAST 3 MILLION YEARS: Climatic Controls and Biotic Responses”, seems to be cited by the commenter for the same purpose as Johnson et al. (1994), to argue that climate has always varied and organisms had to adapt to those changes. Therefore, one could not use one point in time to determine what the HRV may have been. The IPNF agrees. However, as articulated above, and as explained in more detail within the DEIS itself, the IPNF did not use one point in time to determine what the historical vegetation looked like.

Landscape Pattern: Category 1455

Public Comment 953: (Letter Number(s): 235)

A) Cite the document that explains the landscape pattern assessment that was described in the DEIS, and address the contention that the IPNF does not use any scientifically-validated or peer reviewed metrics, in order to describe the “complex (landscape) pattern” created predominantly by fire and therefore reflective of the vegetative HRV; and

B) Consider that the Committee of Scientists (1999) indicated that focusing only on composition, structure, and processes may miss some components of biological diversity.

Response:

A) In addition to the landscape pattern information that was presented in the DEIS on pages 74-75 and 93-94 of the DEIS, and on pages 13-16 of appendix B to the DEIS, even more detailed information on the spatial pattern analysis that was conducted using the model FRAGSTATS can be found in the project record. The spatial pattern metrics used in the detailed analysis are well described and scientifically supported in the literature for FRAGSTATS (see: <http://www.umass.edu/landeco/research/fragstats/fragstats.html>). The analysis done for the IPNF included the following type of spatial pattern metrics: patch density, size and variability, edge metrics (4 different kinds), shape metrics (6 different kinds), core area metrics (6 different kinds), and an interspersions metric. Approximately 20 different metrics were calculated. The developer of FRAGSTATS, Dr. McGarigal, is a professor in the Department of Environmental Conservation

at the University of Massachusetts, as well as the Director of the Landscape Ecology Lab. His Curriculum Vitae can be found at: <http://www.umass.edu/landeco/people/km.cv.pdf>;

B) The passages from the Committee of Scientists Report (1999) cited by the commenter was taken out of context. For instance, the commenter wrote that the Committee of Scientists “take issue with wildlife management that emphasizes manipulation of habitat as the primary management methodology for insuring wildlife viability” and then cited the following passage from the Committee of Scientists report: “...in recognition that focusing only on composition, structure, and processes may miss some components of biological diversity.” In this case, the entire passage from the Committee of Scientist’s report is found on page 39 in chapter 3 under the Focal Species section. The full paragraph reads: “An emphasis on focal species, including their functional importance or their role in the conservation of other species, combines aspects of single-species and ecosystem management. It also leads to considering species directly, in recognition that focusing only on composition, structure, and processes may miss some components of biological diversity.” The IPNF not only is taking a “coarse filter” or ecosystem approach to management, but also a “fine filter” approach to maintaining viability. The fine filter approach includes providing direction in the revised Forest Plan for specific habitat components or to address the potential for certain effects to specific species or groups of species. This approach is apparent in many of the desired conditions, objectives, standards, and guidelines in the revised Forest Plan.

The “coarse filter” approach is discussed in the Committee of Scientists Report (1999) on pages 32 and 35. On page 35 is this paragraph: “Because ecosystems are inherently variable, managers need some guidance about the amount of environmental variation that is acceptable and is within the biota’s ability to respond adaptively to it. Estimates of an acceptable range of variability in compositions, structures, and processes provide reference distributions or conditions against which competing management scenarios are compared and ecological integrity is assessed. These reference conditions may be, in fact, the ‘coarse filter’ within which the current physical landscape and biota evolved. To the degree that future management scenarios can achieve these conditions, the more likely it is that the ‘coarse filter’ will achieve the objectives for ecological sustainability and the less likely that ‘fine-filter’ strategies will be needed for individual species.” The commenter also cited the following passage from the Committee of Scientists Report (1999): “Habitat alone cannot be used to predict wildlife populations... The presence of suitable habitat do not ensure that any particular species will be present or will reproduce. Therefore, populations of species must also be assessed and continually monitored.” The commenter appears to be making a case that the IPNF needs to go beyond the “coarse filter” approach and even monitor a host of species on the Forest. This passage is found on pp. 19-20 in chapter 3 of the Committee of Scientists Report (1999). The full paragraph is under the subheading of Composition which is under the broader topic of The Elements of Ecological Sustainability. The entire paragraph reads: “Habitat alone cannot be used to predict wildlife populations, however. The presence of suitable habitat does not ensure that any particular species will be present or will reproduce. Therefore, populations of species must also be assessed and continually monitored. Tools for assessing both habitat conditions and population dynamics must be developed and frequently validated. Because of limited time and funds, however, it may only be possible to assess the status of a relatively few ‘focal’ species. These species will provide information about the integrity of the larger ecosystem to which they belong. Focal species can include those that are threatened and endangered, occupy rare habitats, are of high management or public interest, are game species, or are indicator species. (The concepts of focus and indicator species are discussed more fully later in this section.)” Again, the point of this paragraph appears to be that a “fine filter” approach may be needed to supplement the “coarse filter” approach to viability and sustainability. The key part of the passage omitted by the commenter is, “...Because of limited time and funds, however, it may

only be possible to assess the status of a relatively few ‘focal’ species...” Limited time and funds are a reality for the IPNF. Therefore, as the Committee of Scientists realized, it is unrealistic to expect all species or even all TES species on the IPNF, to have population monitoring. The management indicator species (MIS) were selected to provide a measurement tool and to focus the assessment and monitoring to be undertaken. The landbird assemblage MIS were used to investigate whether managing for the desired conditions for vegetation/fire would provide adequate habitat for individual species.

Also, please see the introduction of the wildlife specialist’s report for a discussion on the “coarse filter/fine filter” approach to providing viability. See the individual species’ sections for how the “coarse filter” and “fine filter” components of the revised Forest Plan impact viability for the species analyzed. Additionally, see the ERG Report (ERG 2012) for more analysis related to viability of individual species under the revised Forest Plan.

Old Growth General: Category 1456

Public Comment 351: (Letter Number(s): 66, 68, 69, 70, 73, 84, 85, 128, 136, 151, 171, 184, 185, 189, 190, 195, 197, 209, 222, and 235)

The Forest Service should consider the following regarding old growth:

- A) The need to increase protections for old growth stands and/or protects more old growth;
- B) Only allowing treatments within dry old growth stands;
- C) Establishing a robust monitoring plan for old growth stands that are treated;
- D) Prohibiting all logging (or other manipulation) in old growth stands. The following publications support that position: Lindenmayer et al. 2009, Williams and Baker 2012, Bull et al. 1995, Bull et al. 2005, Bull et al. 2007;
- E) Prohibiting road construction in old growth stands;
- F) Provide information on what the HRV was for old growth on the IPNF;
- G) Designating a specific MA for old growth;
- H) Improving the old growth section of the DEIS, specifically related to old growth definitions;
- I) Constructing motorized trails into old growth to enhance the opportunity for the public to enjoy and appreciate those interesting ecological features;
- J) Designating recruitment old growth;
- K) Establishing requirements for minimum old growth stands or patch sizes;
- L) A requirement that old growth inventories continue;
- M) Maintaining the standards in the 1987 Forest Plan for minimum old growth amounts, distribution, etc.;
- N) Establishing a requirement regarding the distribution of old growth on the Forest;
- O) The need for an independent peer review of Green et al. (1992) and consideration of the following publications that support the need for that review: Yanishevsky 1990, Shultz 1992, Pfister 1987, Franklin and Spies 1991;
- P) Providing information regarding how many acres of old growth on the IPNF occur in MA6 (general forest);
- Q) Prohibiting firewood cutting in old growth stands; and
- R) Portray the non-suitable acres, INFISH buffers, as well as other non-harvest acres as linkage zones connecting old growth and providing wildlife travel corridors/habitat.

Response:

To address the numerous comments that the IPNF received regarding old growth, a substantial amount of additional information was included in the FEIS and some changes made to the revised Forest Plan. Please see the old growth subsection of the vegetation section in the FEIS for additional details on many of the responses that are provided below.

- A) Please see the response to item M in this Public Comment 351;
- B and D) The IPNF disagrees with the idea of including a component into the revised Forest Plan that would prohibit logging in all old growth stands under any circumstances, or limit treatments in old growth stands to just stands that occur on dry sites. Please see the discussion of this issue in the “Vegetation” section of the FEIS for more information;
- C) See the response to item D in Public Comment 371;
- E) Please see the response to item E in Public Comment 371;
- F) A discussion was added to the FEIS regarding what the historic range of variability may have been for forest stands having conditions similar to old growth structures. See the “Affected Environment” section of the forest vegetation topic in the FEIS for this information;
- G) The IPNF does not believe assigning old growth stands to a specific MA is necessary nor would doing so be helpful in the management of the old growth resource. The revised Forest Plan contains direction for old growth stands in a number of plan components and the Forest does not believe assigning these stands to a specific MA would provide any additional value;
- H) The old growth definitions and descriptions are provided in Green et al. 1992 (errata corrected 12/11). That document defines old growth forest types for the Northern Region of the Forest Service (including the IPNF) and is approximately 68 pages long. This includes four appendices as well as lengthy errata corrections. The document and definitions for the various old growth types are too lengthy to include in the revised Forest Plan or FEIS. The entire document is contained in the project record. In the DEIS for the draft Forest Plan (page 67) there is a brief description of the most common old growth forest types and the associated characteristics. In response to public comments received on the general topic of old growth, the discussions in the “Affected Environment and Environmental Consequence” sections of the FEIS were expanded;
- I) The IPNF does not believe that constructing new motorized trails into old growth stands in order to provide the public with additional or easier access to these stands is necessary or would be appropriate. A recent analysis that was conducted indicates that approximately 27,000 acres (approximately 9 percent of the total acres of old growth on the IPNF -FACTS codes 2, 9, 10, 11 and 12) of old growth stands occur within 200’ of open roads. Therefore, we feel that the public already has an ample amount of easy motorized access to old growth stands;
- J) The designation of stands to manage for recruitment potential old growth is discussed in the “Vegetation” section of the FEIS;
- K) The 1987 Forest Plan standard for old growth had one element (item F) relating to the minimum size that old growth stands (or patches) should be in order to allocate them. That standard indicated that stands should be at least 25 acres in size. However, that direction was purposely left out of the revised Forest Plan. While large stands or blocks of old growth are certainly more valuable for wildlife species that prefer or require interior habitat, smaller stands can have other important ecological and social values. For example, some of the ancient cedar groves, which are a subset of old growth stands, are much smaller than 25 acres in size but represent truly unique stands and are irreplaceable within our life spans. The Region One definitions of old growth (i.e., Green et al. 1992) do not specify criteria for minimum patch or stand size. For many situations, it might be reasonable to use five acres as the lower limit as suggested by Bollenbacher and Hahn (2008). However, as previously illustrated with the ancient cedar grove example, we did not desire a standard or guideline in the revised Forest Plan for this item:
- L) Please see the response to item D in Public Comment 371;
- M) The standard (and the associated components of it) in the 1987 Forest Plan concerning old growth was largely developed as a mechanism to identify and manage 10 percent of the forested area of the IPNF as old growth, and then to allow harvesting of the rest under certain circumstances. The new direction in the revised Forest Plan is very different. For example, in

contrast to the 1987 Forest Plan, the revised Forest Plan would not allow the removal of old growth stands through timber harvesting (see FW-STD-VEG-01). Rather, as opposed to the 1987 Forest Plan, the revised Plan includes direction (see FW-DC-VEG-03) to increase the amount of old growth on the Forest and to emphasize the development of the types of old growth that would be most resistant and resilient towards forest insects and diseases, wildfires, drought and other potential stressors such as climate change (e.g., ponderosa pine, western larch, western white pine and whitebark pine). Another difference between the 1987 Forest Plan and the revised Plan is that the revised Plan acknowledges that some management activities such as thinning and/or use of prescribed fire, could be used in certain old growth stands under certain circumstances to increase the resistance and/or resiliency of the stands to undesirable disturbances, such as stand replacing wildfire events or insect epidemics (see FW-GDL-VEG-01). The revised Plan recognizes the tremendous ecological and social importance of ancient cedar groves (which are a special category of old growth). Unlike the 1987 Forest Plan, the revised Plan would not allow reducing these ancient cedar groves through harvesting or conducting other vegetation management activities in them (see FW-STD-VEG-02);

N) Please see the response to item C in Public Comment 371;

O) The IPNF is unaware of any NFMA, NEPA, or other law that requires the Forest Service to have publications such as Green et al. (1992) peer reviewed. NEPA requires “a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences...in decision making” (Sec. 102 (A)). There are no requirements that interdisciplinary teams be made up of research scientists; nor that only peer reviewed literature or methodologies are considered. NEPA (40 CFR 1502.24) does require “... that agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. The IPNF believes Green et al. (1992) exceeds that requirement. As described in much more detail within the document, Green et al. 1992 was developed by an interdisciplinary team of Forest Service employees from throughout Region One. Many of the team members have advanced degrees in their field of science and years of practical experience in the region’s different forested ecosystems. During the preparation of that publication, the team used dozens of publications (many of which were peer reviewed) to inform the process that they used to develop the old growth type descriptions for each of the zones in the Region. . In 2000, Pfister et al. (2000) conducted a peer review of documents that provide old-growth descriptions and attributes. The review concluded that Green et. al. (1992) provides the best available source for initial screening and making determinations of old growth. Since that time, additional publications have been developed on old growth and many of those are referenced in Bollenbacher and Hann (2008). That publication cites over 80 papers or reports and serves to synthesize the relevant information on the management of old growth forests and the current practices used to create, maintain, and restore resilient old growth stands.

In the letter that the commenter submitted, both Yanishevsky 1994, as well as Yanishevsky 1990 were cited in the body of the letter in support of their position. However, neither of those citations was included in the list at the end of the letter. Rather, Yanishevsky 1987 was included in that list yet it was not cited in the body of the comments. Without knowing the actual document and the complete citation that the commenter meant to reference, we are unable to locate the correct documents and respond as to its relevancy to the argument in question. In regards to the citations of both Pfister 1987 as well as Schultz 1992b that the commenter referenced in the body of the letter, neither one of those citations were included in the list at the end of the letter either.

Therefore, for the same reasons that are noted above, we are unable to respond to the relevancy of those publications as well. Lastly, the commenter also cites Franklin and Spies (1991) in their argument. However, once again, the complete citation is not included in the list at the end of their letter and thus that document cannot be evaluated;

P) Approximately 181,212 acres of the IPNF occurs in MA6 and is occupied by old growth (FACTS special use codes 2, 9, 10, 11 and 12);

Q) Please see the response to item F in Public Comment 371; and

R) When the draft Forest Plan and DEIS was released to the public for review, the IPNF received requests to provide a timber suitability map for the Forest. In response, a GIS map was produced and provided on the following internet site:

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5351202.pdf. That map shows the suitable and unsuitable timber lands on the Forest and we believe, illustrates what the commenter is asking for. A lot more information is available regarding wildlife travel corridors and connectivity in the following locations: the response to Public Comment 439, individual species' sections in the wildlife specialist's report and in the FIES, and there is a separate connectivity section in the specialist's report and FEIS that gives an overview of KIPZ's approach to connectivity.

Resistance and Resiliency: Category 1457

Public Comment 354: (Letter Number(s): 179 and 189)

The Forest Service should consider the following:

A) That the proposed plan does not harvest timber over enough acres to adequately respond to the forestwide forest health problem;

B) Providing evidence that suggests that insect and disease are worse now than at any other point;

C) The scientific evidence (from Hutto 1995) that contradicts the assumption in the DEIS that wildfires in the Northern Rockies were dominated by a regime of high frequency and low intensity fires;

D) The Beschta et al. (1995) report that states "Land managers should be managing for naturally evolving ecosystems, rather than perpetuating artificial ones we have attempted to create;"

E) The scientific evidence (from Rieman and Clayton 1999 and Pacific Biodiversity Project 2000) that indicates that logging does not replicate natural fires;

F) Providing the historical information that was used to determine the HRV. In addition, is the Forest Service trying to foster the processes that shaped the ecosystem or merely recreating structural conditions at a single point in time? How were fire, insects, tree diseases, and other natural disturbances factored in determining the structural conditions for the HRV? Lastly, consider Harvey et al. (1994) and Gast and others (1991) who indicate that forest insects and diseases perform essential roles in functioning ecosystem;

G) The publications of DellaSala et al. (1995 and 1995a) and Henjum et al. (1994) that provide scientific evidence that logging and thinning forests do not minimize the effects of fire;

H) The following publications that provide evidence that within fire groups 3-5 (defined in Smith and Fischer 1997), that fire exclusion has not measurably altered those forests or that the effects are difficult to quantify: Smith and Fischer (1997), Barrett et al. (1991), Weir et al. (1995).

I) Publications (Turner et al. 1994 and Turner et al. 1994a) that support the argument that climate, not fuel is the driver of fire intensity;

J) That the Forest Plan is based on unsupported assumptions regarding fire ecology. For example, Skovlin and Thomas' report shows that dense stands existed historically and that contradicts the prevailing "ponderosa-pine poster child" mentality of the agency. In addition, Baker and Ehle (2001), and Pierce et al. (2004) suggest that fire-history data has uncertainties and biases when used to estimate mean fire interval and that Ament (1997) has a completely different view of desired future conditions;

K) The following publications that support the argument that insects and diseases are important to forests and that timber harvesting can lead to increases in insect and disease impacts: Smith 1989, Goheen and Goheen 1989, Edmonds et al. 1989, Chavez et al. 1980, Wargo and Shaw 1985, Roth

et al. 1980, Filip 1979, McDonald et al. 1987, Morrison and Mallett 1996, Hansen et al. 1988, Hansen 1978, Goheen et al. 1985, Aho et al. 1987 and Goheen and Hansen 1993; and
L) The argument that white pine restoration should not be conducted by using a genetic resistance breeding and planting program. Fins et al. (2001) supports this position.

Response:

A) See the response for Public Comments 56 and 949. As those responses indicate, the amount of active vegetative treatments that can be accomplished during the life of this revised Forest Plan will depend on budget levels. The estimates of the number of acres that could be treated was developed two ways: one with the assumption that future budget levels would be similar to the recent past (this was called the constrained budget); and one analysis assuming that we would receive an “unconstrained” budget. However, even the analysis that was done assuming an unconstrained budget had other resource constraints built into it order that other resource limitations would be considered regarding how much could be treated, and where and when it could be treated. That process was discussed at length in pages 29-39 of appendix B to the DEIS.

B) The IPNF did not make the broad claim that all or even most of the forest insects and diseases are worse now than historically. However, certain insects and diseases, especially non-native organisms such as the fungus that causes white pine blister rust (*Cronartium ribicola*) or the defoliating insect called the larch casebearer (*Coleophora laricella*), could obviously be considered to be “worse” than they were historically. Other insects and diseases, such as some of the native root diseases (e.g., *Armillaria sp.*, *Phellinus sulphurascens*) are likely to be causing more tree mortality than historically due primarily to the shift in the composition of the Forest towards being more dominated by the tree species that are more susceptible to those root disease causing fungi. Forest insect and disease conditions are summarized in the DEIS on pages 59-62 and 95-97;

C) As previously noted in the response to Public Comment 952 (B), the IPNF never generalized that the dominating historical fire regime was one of frequent, low-severity fires. Please see the response to that Public Comment for more information. Regarding Hutto (1995), that publication is titled “Composition of Bird Communities Following Stand-Replacement Fires in Northern Rocky Mountain (U.S.A.) Conifer Forests.” The commenter seemed to cite that publication as evidence that many bird communities depend upon fire as a disturbance agent that creates habitat for those species, and that the IPNF should allow wildfires to burn and that even stand-replacing wildfires are necessary for those bird species. Nothing in the publication or the commenter’s argument seems to conflict with the plan components involving the use of fire or the management of wildlife habitat. To the contrary, to the extent that it is possible and prudent to do so, the revised forest plan components emphasize the need for the use of more fire (both the use of unplanned, natural ignitions as well as planned prescribe fires) and the creation of more early seral forests for biological diversity and other purposes;

D) Regarding Beschta et al. (1995), that report is titled “WILDFIRE AND SALVAGE LOGGING- Recommendations for Ecologically Sound Post-Fire Salvage Management and Other Post-Fire Treatments on Federal Lands in the West.” The commenter quoted one sentence from the report and used it to support their argument that seemed to suggest that the Forest Service should never harvest trees. However, the sentence that is quoted is part of a larger paragraph in the Beschta report that is titled “Fire suppression throughout forest ecosystems should not automatically be a management goal of the highest priority. The overall management goal must be to preserve (and reestablish) the fire and other disturbance regimes that maintain ecological systems and processes, while protecting human life and property”. To the extent possible, the plan components in the revised Forest Plan were designed to encourage this very goal. For example, the plan components encourage a greater use of natural, unplanned ignitions for achieving

resource objectives, as well as using prescribed fire. Fire suppression (with the exception of the initial response to human caused wildfires, which is required to be suppressed) is not automatically the management goal of highest priority and there are many plan components in the revised Plan that are designed to preserve and/or reestablish fire as a more prominent process compared to the past few decades;

E) Rieman and Clayton (1999) and Pacific Biodiversity Project (2000) are cited by the commenter while arguing that logging does not replicate natural fires and indicating that the Forest Plan does not provide any evidence to the contrary. First, nowhere in the DEIS nor the draft Forest Plan did the IPNF state that logging replicates natural fires, and second, to the small extent that the publications cited may be applicable to that argument, the publications do not conflict with the management approach taken in the revised Forest Plan or information in the DEIS.

Rieman and Clayton (1999) is a publication titled “Wildfire and Native Fish: Issues of Forest Health and Conservation of Sensitive Species.” In the abstract to the publication, the author’s state: “Large fires can produce dramatic changes in aquatic systems, including altered sediment and flow regimes, fish mortality, and even local extinctions.” They also state: “Although timber harvest and fire can precipitate similar changes in watershed processes, we do not necessarily expect the physical and ecological consequences of large fires and timber harvest to be the same.” In their conclusions they say: “The tradeoffs between vegetation management and wildfire are not simple. In some cases short-term rates of erosion and sediment delivery after a fire may be larger than the effects of roads and timber harvest.” The IPNF realizes that timber harvesting and/or road construction can harm aquatic resources under certain circumstances, and we also realize wildfires can also do the same. Lastly, we do not believe that restoration of the forest vegetation can be accomplished by simply manipulating structure and composition. We are acutely aware that processes such as those that fire fosters or soil and watershed processes are critical for ecological function and that structure and function are often a result of underlying processes. Pacific Biodiversity Project (2000) citation is a report titled “Assessment of Summer 2000 Wildfires: Landscape History, Current Condition and Ownership”. The authors of the report do not seem to be addressing differences in environmental impacts of timber harvesting versus fire. Rather, as noted in their conclusions, they seem to be arguing that the wildfires in 2000 were not “disasters” as was depicted by the media, at least not ecological disasters. Rather than increasing logging to decrease fuels, they argue for an increase in the use of prescribed fire as well as the use of natural, unplanned ignitions in order to reduce hazard to human communities. The plan components in the revised Forest Plan also emphasize the need to increase the use of fire. Therefore, the IPNF does not see a conflict with what the authors are suggesting versus what the IPNF has proposed in the revised Forest Plan;

F) The historical data used to develop the HRV for forest vegetation was described on pages 49-51 of the DEIS and pages 11-16 of appendix B of the DEIS. In addition, the Forest Vegetation Specialist Report for the revised Forest Plan contains some additional information on the topic. In considering HRV and ecosystem management, the IPNF not only considered historical structure and composition, but also processes important in ecosystem function. For example, on page 49 of the DEIS, we state: “The HRV analysis focuses on forest composition, structure, landscape pattern, and processes (disturbance and succession).” We also indicate on that same page that “The broad vegetative management approach that is being used in the draft Forest Plan is one of providing ecological components, patterns and processes at multiple scales on the landscape, and thereby, providing the full spectrum of habitats and conditions needed for all of the biological organisms associated with the various ecosystems.” Fire, insects, tree diseases, and other natural disturbances obviously heavily influenced the historic forest composition and structure (including pattern). Therefore, those disturbance agents were instrumental in shaping the historic forest

conditions. The commenter cites Harvey et al. (1995) and Gast and others (1991) as evidence that forest insects and diseases are a natural part of the forest ecosystem and serve essential roles. The IPNF is aware of this. As indicated in the DEIS (pages 59-62), most of the native forest insects and diseases on the IPNF are likely functioning within their historic roles. However, due to changes in the historic forest composition, structure, and processes, some are likely outside of their normal roles.” Some of the more significant ones are discussed in the DEIS;

G) The DellaSala et al. (1995) publication discusses forest health restoration policy on federally owned lands and reviews a broad set of scientific considerations of forest health and forest health treatments. The authors of this paper recommend that the discussion of forest health be expanded beyond tree health to include inland forest ecosystems and their capacity to: 1) maintain viable populations of native species across their geographic range, as mandated by the National Forest Management Act of 1976(16 U.S.C. 1600); 2) sustain critical ecosystem processes such as nutrient cycling, epizootics, natural fires, and species interactions that support and maintain diverse communities of species and ecosystems; and 3) retain characteristic biodiversity and dynamic properties in the face of short- and long-term disturbance. The revised Forest Plan and EIS for the IPNF are consistent with the authors’ publication. We do not agree with the commenter that this publication serves as evidence that logging and thinning do not minimize the effects of fire. In fact, on page 354 of that publication, in a discussion section titled “Reducing fire risks at urban-wildlands interface”, the authors state: “Fuel reductions within this buffer should include; 1) thinning to increase tree spacing and remove fuel ladders; 2) salvage of downed trees; and 3) prescribed fire (according to guidelines above).

The DellaSala et al. (1995a) publication as well as the Henjum et al. (1994) is similar to the DellaSala et al. (1995) publication discussed above. That is, they are papers suggesting broad policy prescriptions regarding old growth and wildlife reserves, corridors and matrix areas. As with the DellaSala et al. (1995) publication, we do not agree with the commenter that the other two papers serve as evidence that logging and thinning cannot reduce wildfire effects;

H) The Smith and Fischer (1997) publication that was cited by the commenter was also cited in the DEIS for the revised Forest Plan. That document provides information on fire ecology in forest habitat and community types occurring in northern Idaho. It identifies fire groups based on pre-settlement fire regimes and patterns of succession and stand development after fire, describes forest fuels and suggests considerations for fire management. That document is very relevant to general topics of fire and forest ecology for the IPNF. However, relative to the context in which the commenter cited that reference, we disagree with their conclusion. While it may be somewhat difficult to quantify how much fire exclusion has increased forest fuels on sites considered to be in the fire groups 3-5, there is little doubt that there have been impacts. Even the authors of that 1997 publication acknowledge this. For example, on page 64, they state: “The effects of fire exclusion are difficult to quantify in long-interval fire regimes, including those typical of Fire Group Three.” However, the authors continue by citing a publication (Romme 1982) where researchers looked at forests in Yellowstone National Park that had these Fire Group Three type forests, and they concluded: “In the extensive lodgepole pine forests of Yellowstone National Park, large or severe fire may be more common now than in pre-settlement times because low-severity fires have not maintained variation in stand structure and a fuel discontinuity over the landscape...”. Regarding Fire Group Four, Smith and Fischer (1997) state the following on page 71: “Where fire has been excluded successfully over large areas, more area is in mature stands than prior to settlement by European Americans (unless harvesting has intervened).

Discontinuities in stand structure and fuel arrays, created historically by low-severity fire, have largely been eliminated, so structural homogeneity has increased across the landscape. Mountain pine beetle irruptions have been extensive in mature lodgepole pine forests, locally increasing downed woody fuels. Understory trees and mistletoe have increased the vertical continuity of

fuels. Because of these changes, modern-day fires may be more likely to crown or burn severely over large areas than those in pre-settlement times.” Regarding forests in Fire Group 5, on page 78 of Smith and Fischer (1997), the authors’ state: “...variety in stand structure and fuels, created historically by mixed-severity fire and occasional severe fire, has probably decreased.” Regarding the possible effects of the changes, the authors continue and say: “Effects may include increased dominance by climax species, expansion of root disease centers, and increased vertical continuity of fuels.”

The last two publications that the commenter cites in this comment are Barrett et al. (1991) and Weir et al. (1995). The authors of the Weir et al. (1995) paper studied how fire suppression activities may have affected forests in three national parks and a forest reserve in Canada. They concluded that there was not much evidence to support the idea that fire suppression activities reduced the natural fire frequency in those forests. The authors of Barrett et al. (1991) studied fires in the Glacier National Park in Montana and one of their conclusions was that in one of their two study areas that there was strong circumstantial evidence of interrupted fire occurrence post-1935 due to the fact that there was a 10-fold reduction in fire frequency (pg 1718). They continue by stating that “In the northern Rocky Mountains, mosaic homogeneity might have serious implications for productive lodgepole pine ecosystems because stands often become susceptible to mountain pine beetle epidemics after about 80 years.” While these two papers were not cited in the forest plan revision documents, they are both consistent with the other science that was used; I) The 1994 Turner and Romme (cited as Turner et al. (1994) by the commenter) paper that is titled “Landscape dynamics in crown fire ecosystems”, was cited by the commenter in an argument that climate, not fuels, was a driver of fire intensity. First, as discussed in the DEIS (pgs 55-58), the IPNF recognizes that climate and weather patterns have a large influence over wildfires and other forest disturbances. While Turner and Romme (1994), was not cited in the DEIS, other more recent papers were cited that support that same point. Secondly, the Turner and Romme (1994) paper acknowledges that in addition to climatic conditions influencing wildfire behavior and spread, topographic and physiographic features in the landscape as well as the spatial arrangement and types of fuels also have a strong influence on fire spread (see page 59). The Turner et al. (1994a) paper that is cited by the commenter focuses on studying how the pattern of burn severities differed across the landscapes in the 1998 Yellowstone National Park wildfires. This specific paper was not cited in the DEIS for the revised Forest Plan, but other research papers were cited that discuss how wildfires and other disturbances affect landscape patterns of forest vegetation (see pgs 74-75 of the DEIS);

J) Regarding the Skovlin and Thomas’ report cited by the commenter, because a complete citation was not provided, we are unsure of exactly what report the commenter is referring to. However, we suspect it may be a 1995 report titled “Interpreting Long-Term Trends in Blue Mountain Ecosystems from Repeat Photography” and published by as Gen. Tech. Rep. PNW-GTR-315. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 114 p. Assuming that the commenter was indeed referring to that publication, then here is our response. That publication is a collection of early photos (before 1925) compared to more recent photos (as recent as 1992) of the same locations, within the Blue Mountains of Oregon. The purpose of the photo comparisons was to infer what changes have occurred to the vegetation from human activities. In the forest plan revision documents, that report was not cited. First, the ecosystems in the Blue Mountains tend to be much drier than those on the IPNF; and therefore, the applicability is very limited. Second, when citing this report, the commenter is arguing that the historical forest conditions that are described in the forest plan revision documents are not correct and the commenter infers that the IPNF is assuming that the historical stands on the IPNF were all fairly open stands similar to the park-like ponderosa pine stands that occur drier locations. However, we never made that claim in the forest plan revision documents.

The Pierce et al. (2004) and Baker and Ehle (2001) publications, that are cited by the commenter in their argument that the IPNF assumptions on historical fire regimes were incorrect. The Pierce et al. (2004) publication is a study about how millennial-scale climate fluctuations affect fire regimes in the dry forests of southern Idaho. Although the study takes place in a much drier ecosystem than the IPNF, there is nothing in that study that conflict with information that is presented in the forest plan revision documents. As noted above in the response to comment C, the IPNF never generalized that the dominate historical fire regime was one of frequent, low-severity fires. The Baker and Ehle (2001) publication is an in-depth paper about the uncertainty of trying to estimate mean fire return intervals and fire rotations in the ponderosa pine forests in the western U.S. While there are stands of ponderosa pine on the IPNF on fairly dry sites, most of the forested areas on the IPNF are much wetter thus the relevancy of that study to the IPNF is minimal. However, in the DEIS (see pages 56-58), we acknowledge that there is a wide range around the mean fire return interval for stand replacing wildfires (mean is 200 years plus or minus 80 years), for mixed-severity fires (55-85 years) and for low-severity fires (10-30 years). Lastly, as discussed above in the response to subconcern I, we also acknowledge that climate variation has a large influence over fire regimes. The publication of Zack and Morgan (1994) that is cited in the DEIS contains more information on how the historical fire regime was predicted for the IPNF and the uncertainties about those estimates. Regarding the Ament (1997) paper, cited by the commenter, the author is advocating a change to the policies regarding the use of prescribed fire and wildfire and those policy changes are outside the scope of this Forest Plan revision process; K) Regarding the important ecological functions that insect and diseases play in forest ecosystems, please see our response above for comment F. Rather than providing an encyclopedic level of information in the DEIS on all the insects and diseases, the IPNF chose to focus on the specific species of insects/diseases that may be functioning outside of their historic role (see page 59 of the DEIS) and disclosing what the general effects may be to those species from implementing the various management alternatives discussed in the EIS.

The following response focuses on the commenters' argument that timber harvesting can actually increase the incidence or severity of insects or diseases. First, we are very aware that some types of silvicultural practices may increase some insect and/or disease pathogens in certain circumstances. In general, most of the publications that are cited by the commenter to support this argument focus on the impacts that outdated silvicultural practices such as "high grading" can have on insect and disease agents. High grading is defined as the removal of the most commercially valuable trees, often leaving a residual stand composed of trees of poor condition or species composition. High grading can have genetic implications (i.e., dysgenic effects) and long-term economic or stand health implications.

As discussed on page 58 of the DEIS, silvicultural prescriptions in the Northern Region of the Forest Service (which the IPNF occurs within) for over the last 15 years have largely been designed to emulate composition and structures created by historic fire regimes. Among other requirements, employees on the IPNF (as well as elsewhere in the region) who are considering harvest cutting treatments are required to select methods, patterns and resulting structure that keep tree damage and mortality from pest organism, animals, and wind at acceptable levels and that are compatible with the natural forces that are responsible for the constitution of forests in the Northern Rockies (FSH 2409.17 R1 supplement 2409.17-94-1). As described on pages 22 and 23 of the draft IPNF Forest Plan, there is a vegetation guideline (FW-GDL-VEG-08) that states "Silvicultural practices should generally trend the forest vegetation towards conditions that are more resistant and resilient towards disturbances and stressors, including climate change."

Impacts from insects or diseases that are functioning outside of their historic role or are otherwise undesirable are considered as one category or disturbance and stressors. FW-DC-VEG-06 (page 14 of the IPNF Forest Plan) was developed to articulate the desire that the forest composition and

structure trend back towards more historical conditions and as a result, to have impacts from some of the insects and diseases agents decrease.

Regarding annosus root disease and the Smith (1989) and Goheen and Goheen (1989) citations, it is important to distinguish among the three species now known to constitute the former *Heterobasidion annosum* (Niemela and Korhonen 1998). These species have differing abilities to cause disease in western conifers. *H. annosum* is a pathogen of *Pinus* spp. and has not been documented to occur in northern Idaho. *H. abietinum* is a pathogen of *Abies* spp. and, in northern Idaho, Douglas-fir. *H. parviporum* is a pathogen of *Picea abies* and may not occur in North America. This may account for reports such as Kliejunas (1986) in which annosus-infected fir stumps were found not to result in infection of planted pines.

There is reasonably good evidence that *H. annosum* will not only establish long-term infections in large pine stumps (at least 17”), but will cause significant subsequent mortality in residual and regenerated pines. However, this pathogen is not known in north Idaho and we have looked for it consistently for at least 20 years. The nearest known *H. annosum* is in western Montana, on the Flathead Indian Reservation near Hot Springs. It occurs on very dry habitat types, mostly ponderosa pine HT’s, and possibly the very driest Douglas-fir (pinegrass). This may account for the apparent absence of this pathogen on the IPNF, Clearwater NF and Nez Perce NF.

Most studies using permanent plots, rather than retrospective surveys, have shown that harvests that leave (or result in regeneration of) susceptible hosts neither increase nor decrease survival of residuals. Others have been inconclusive, showing increased mortality in about half of the locations while growth also increased. Although infected stumps do act as inoculum sources for subsequent stands on a site, so do root systems of trees killed by root disease. This is likely the reason there is no clear response to stump creation. However, in nearly all published reports, there was clearly no benefit to the residuals except where species composition was shifted toward root disease resistant or tolerant species. In other words, cutting trees whether partial or clearcut harvests may not hurt but it almost certainly won’t help the disease situation without species conversion.

The retrospective study reported in Goheen and Goheen (1989) concludes that stands with multiple logging entries had more evidence of annosus root disease in grand fir than stands with a single entry. This conclusion is generally accepted but it should be noted that, as a retrospective study, it is possible, even probable that repeated harvest entries were in response to higher initial mortality rates due to root disease. Therefore, it is not possible to determine whether the harvests were the cause, or the result, of elevated levels of root disease.

Also, in a more recent publication, Filip and others (1992) reported high levels (89%) of true fir stump infection in shelterwood and seedtree harvest units but considered this due to pre-existing root infections (present before harvest.) They also reported that up to 9 years after harvest, only .2% of regenerated trees had died of annosus root disease, despite the high inoculum levels in stumps. At 15-19 years, the mortality rates from annosus root disease were even lower (>.001%). Lockman (1993) found that tree infection rates in several sites on the Nez Perce NF in northern Idaho were low in both clearcut and paired uncut units. Although stump infection rates were higher in clearcut units, the rate of associated tree infection was not different between cut and uncut units. Based on our current knowledge of annosus root disease in Douglas-fir and true fir stands, infection of cut stump surfaces by spores probably has little or no influence upon disease development in residual trees or regeneration. However, infected stumps are very likely to play a role in perpetuation of the fungus and development of disease as trees reach maturity.

In regards to the citations of Edmonds et al. (1989), Chavez et al. (1980), Wargo and Shaw (1985), and Roth et al. (1980). These references to the very unique *Armillaria* infection centers in ponderosa pine in the (much studied) Glenwood area of Washington are not appropriate in

assessing the behavior of *Armillaria ostoyae* in north Idaho. However, that *Armillaria* spp will utilize stumps for longterm food sources and spread from stumps to live trees is accepted as fact. *Armillaria ostoyae*, *Heterobasidion abietinum*, and *Phellinus weirii* (now, more appropriately *Inonotus heinrichii*) are all considered to be capable of maintaining significant biomass for long periods in large stumps. *Armillaria ostoyae* is known to be capable of developing very large, presumably very old, clones that survive from one generation to the next on a site (Dettman and van der Kamp 2001a and b). Whether a stand is uncut, clearcut, partially cut or burned these fungi will survive in root systems of dead trees and eventually spread to whatever live hosts are available.

The relative “vigor” of Douglas-fir does not affect the likelihood of mortality caused by *A. ostoyae* (Rosso and Hansen 1998). In the case of *I. heinrichii*, the more vigorous Douglas-fir may be more likely to be killed because their larger root systems contact more inoculum, sooner (Bloomberg and Reynolds 1985). However, some conifer species are significantly resistant to both *Armillaria ostoyae* and the non-cedar form *P. weirii* (*I. heinrichii*). Western larch (Robinson and Morrison 2001), ponderosa pine, western white pine, western redcedar and lodgepole pine are all resistant to *A. ostoyae* after the age of about 20-30 years (Filip and Schmitt 1990, Hagle and others 2003, Morrison 1981). These species are also tolerant or resistant to the non-cedar form of *P. weirii* (Filip and Schmitt 1990, Hadfield 1995, Hagle and others 2003, Nelson and Sturrock 1993). They are also resistant to fir-type annosus root disease (Hagle and others 2003). Regarding the Filip (1979), McDonald et al. (1987), and Morrison and Mallett (1996) citations, the authors of McDonald et al. (1987) state: “The incidence of pathogenicity was high (59 percent) on disturbed plots in the ABGR, THPL and TSHE series and incidence of pathogenicity was low (18 percent) on undisturbed plots in the ABGR, THPL and TSHE series; incidence of pathogenicity was high (65 percent) on undisturbed plots in the PSME and ABLA series and the incidence of pathogenicity was low (25 percent) on disturbed plots in the PSMA and ABLA series.” The authors have essentially concluded that disturbance can either increase or decrease “pathogenicity” of *Armillaria*, depending on the habitat type. In reality, the combination of relatively few plots and failure to account for differences in tree species (potential host) composition makes these results hard to credit. The primary author has stated regarding this study “Since a limited number of plots were included in this study, these results must be considered as preliminary.” (G.I. McDonald; Relationships among site quality, stand structure, and *Armillaria* root rot in Douglas-fir forests.) Since Byler and others (1990) and Morrison and others (2000), and Cruikshank and others (1997) found dry sites to have the least incidence of mortality from *Armillaria* root disease, it is likely Dr. McDonald is correct in considering his 1987 results preliminary.

Regarding Hansen et al. (1988), Hansen (1978), and Witcosky et al. (1986), Blackstain root disease is rare in north Idaho and does not play a significant role in forests in north Idaho so these reports have no bearing on this Plan.

Regarding Aho et al. (1987), Goheen and Hansen (1993) and Goheen et al. (1985), any natural stresses (such as competition, drought, wind or snow damage, fire) or man caused stresses placed on trees may make them more susceptible to insect attack. The effects of silvicultural treatments using proper logging techniques as a tool can reduce the susceptibility of trees to natural damaging agents. By reducing the competition between trees, the redistribution of light, water, nutrients and growing space improves the health of remaining trees.

L) Due to the fairly lengthy nature of the response to this comment, the information for this response was placed in the affected environment section for the Forest Vegetation topic (insect and disease subsection) of the FEIS. Please see that section of the FEIS for a response.

Snags: Category 1458

Public Comment 355: (Letter Number(s): 145)

The Forest Service should consider adding a plan component that would require that forest debris be raked away from the base of snags in areas proposed for prescribed burns to order to protect the snags.

Response:

We concur that snags and down logs (and other forms of large woody material) are important features of healthy forests and wildlife habitat. We have multiple forest plan components that serve to protect and/or create these snags/down logs. During the design of site-specific project proposals, we have and will continue to evaluate the need and benefit of conducting activities such as raking forest debris away from snags to protect them. However, at the programmatic scale of this Forest Plan, we do not believe it would be appropriate to develop a specific forest plan component requiring this specific practice.

Forest Plan General: Category 1465

Public Comment 357: (Letter Number(s): 131)

The Forest Service should consider adding some language into the Priest GA description that acknowledges that this GA is unique in regards to the number of rare plant communities it contains as well as the number of peatlands. That information was present in the 2006 draft Forest Plan.

Response:

The General Location, Description, and Unique Features section of the Priest Geographic Area description in the FEIS was modified to include the language that the commenter suggested.

Forest Plan Desired Condition: Category 1467

Public Comment 359: (Letter Number(s): 131 and 232)

The Forest Service should revise FW-DC-VEG-03 to include a stated desired condition for managing areas with an emphasis on old growth recruitment in order for old growth stands to be resilient to disturbances and climate change. In addition, when trying to increase the amount of whitebark pine old growth at the expense of the subalpine-fir and Englemann spruce forests, the Forest Service should take care to recognize that caribou habitat is not affected.

Response:

FW-DC-VEG-03 was revised and a number of edits were made. In the draft Forest Plan in FW-DC-VEG-03 we used the phrase “other lands managed for old growth” to represent what is called “Old Growth Recruitment” in this comment. However, after considering this and other comments, reference to recruitment old growth or other lands managed for old growth was removed from this desired condition for the following reasons. The desire is to increase the amount of old growth on the IPNF relative to existing levels. Managing for recruitment old growth is a potential strategy that could be considered to develop more old growth; it is not a desired condition. However, in the FEIS, additional information was provided to discuss ways that could be used to try and encourage the development of more old growth stands on the IPNF. Please see the old growth subsection on the vegetation section in the FEIS for additional details.

Regarding caribou habitat, when proposing projects in that species habitat the IPNF will adhere to all of the plan components (e.g., FW-DC-WL-07, FW-GDL-WL-02, 03, 04, and 19) associated with caribou and any relevant recovery direction from the USFWS.

Forest Plan Desired Condition: Category 1467

Public Comment 360: (Letter Number(s): 131)

The Forest Service should revise FW-DC-VEG-10 by eliminating “where feasible and appropriate.” Those words imply that the use of non-native plants might be appropriate, and there are no circumstances where native plants would not be appropriate.

Response:

FW-DC-VEG-10 was revised to eliminate any reference to revegetation and native plants. After considering this comment and existing Forest Service direction regarding the use of native plants for revegetation, restoration, and rehabilitation activities, it was decided that additional direction in this desired condition was not needed. National direction in FSM 2070 establishes policy regarding the use of native plants for these purposes and it reiterating that direction in the Forest Plan is not necessary. At the national level of the Forest Service, a strategic framework has been established for the use of native plant materials. Information on that strategy can be found on the following internet site:

http://www.fs.fed.us/wildflowers/nativeplantmaterials/documents/NativePlantMaterialsPolicy_Sept2012.pdf. Lastly, for examples of what kind of activities have been going on within Region One of the Forest Service, and on the IPNF, please go to the following internet site:

<http://www.fs.fed.us/wildflowers/nativeplantmaterials/documents/npmreports/fy2011/R1/2011NPMAnnualReportRegionOne.pdf>.

Forest Plan Desired Condition: Category 1467

Public Comment 361: (Letter Number(s): 131 and 235)

The Forest Service should include a more complete description of the desired conditions for alpine (not just sub-alpine) settings in FW-DC-VEG-11 and should identify the source data that is relied upon to define the desired condition of the various biophysical settings.

Response:

The biophysical settings and the vegetation response units (VRUs) that they include were designed as ecological classification systems for forested areas. The DEIS (pgs 52-54) provide more information on biophysical settings and USDA (1999) provides detailed information on VRUs. The scope of those classification systems does not include non-forested plant communities such as those that occur in alpine environments. As described in the DEIS (pg 6) and in the AMS, the focus of the vegetation forest plan revision topic was forested areas. While the IPNF certainly recognizes the ecological importance of non-forested plant communities, they were not emphasized to the degree that a detailed classification system nor a discussion of them was warranted in the Forest Plan or EIS. However, in some situations, rare plants listed on the regional sensitive species list or USFW Threatened and Endangered list occupy non-forested areas. In that situation, those specific plants are discussed in the rare plant section of the EIS and some forest plan components include direction for them.

The data and analysis that was conducted to determine what the historic range of variability was for forest conditions for each of the biophysical settings was described in the DEIS (appendix B, pgs 11-16).

Forest Plan Desired Condition: Category 1467

Public Comment 362: (Letter Number(s): 209)

The Forest Service should provide additional information on western white pine blister rust resistant planting stock and anticipated mortality levels in the future.

Response:

We are highly confident that blister rust resistant western white pine (WWP) seedling stock will be available for the IPNF to use in WWP restoration efforts during the life of the Plan. Regarding potential mortality levels from blister rust on rust resistant stock, a fairly recent and comprehensive report was written on this topic (Kearns et al. 2012). After monitoring 22 tree plantations in northern Idaho for 11 years, Kearns et al. found that 22.4 percent of the planted F2 Stock (which is the type of stock being planted today) had been killed by blister rust, versus between 46.9 and 94.7 percent for natural white pine seedlings. However, as the authors of that report note, it is not known what level of mortality may be expected through the life of the plantations.

Forest Plan Desired Condition: Category 1467

Public Comment 363: (Letter Number(s): 189 and 235)

The Forest Service should allow natural ecological processes to shape the forest conditions rather than using desired future conditions. In addition, the Forest Service should provide the scientific basis for the snag numbers presented in the Plan, as well as provide an explanation for not using the snags in the Upper Columbia River Basin draft EIS.

Response:

Please see the responses for Public Comment 952 (C) and Public Comment 354 (D and F) for an explanation regarding the use of desired future conditions. Regarding snags, the desired condition for snags is articulated in FW-DC-VEG-07 (page 14 of the draft Forest Plan). In addition to a narrative, the desired condition includes a table (table 2 of the draft Forest Plan) that was developed as a result of an analysis done by Bollenbacher et al. (2009). As indicated on page 70 of the DEIS, “To determine historic snag densities, the snag analysis separated the forest inventory data into two categories; areas that occurred in wilderness or roadless areas, and the rest of the Forest. The assumption was that snag levels and distribution patterns in the wilderness/roadless areas provide a better “picture” of historic snag conditions, and represent the best available information as to the historic range and distribution of snags.” The snag per acre information by diameter class in table 2 of the draft Forest Plan represents the lower and upper bounds of the 90 percent confidence intervals of the existing snags in the roadless/wilderness areas of the IPNF. While snag information in the Upper Columbia River Basin draft EIS may be somewhat relevant to the IPNF, we believe the information specifically developed on the IPNF provides a better, more site-specific estimate of the historic and desired snag conditions. The snag information presented in FW-GDL-VEG-04 in table 4 was developed in a similar fashion as was the information in table 2 of FW-DC-VEG-07, but the information in table 4 was more separated by seral stage. The snag and live tree numbers in table 4 of the draft Forest Plan came from those presented in table 11 of the DEIS (pg 71), with the only difference being that the numbers provided in table 4 were rounded off to the nearest 0.5 snags per acre as compared to those provided in table 11. A much more detailed description of the snag information is presented in the DEIS on pages 65-68, and in Bollenbacher et al. (2009).

Forest Plan Desired Condition: Category 1467**Public Comment 364:** (Letter Number(s): 232 and 235)

The Forest Service should consider FW-DC-VEG-04 and whether or not it is appropriate, given that it could conflict with management direction for lynx and having decreased tree densities and canopy layers might be scientifically questionable.

Response:

When conducting a vegetation treatment project in lynx habitat, the IPNF will adhere to the Northern Rockies Lynx Management Direction (NRLMD), Record of Decision. The NRLMD is one of the retained decisions in the revised Forest Plan (see pg 4 of the draft IPNF Forest Plan), there is also a forestwide standard (FW-STD-WL-01) in the revised Plan that requires the same direction.

Fire suppression efforts, and to a much lesser degree, the old logging practice of “high-grading,” have generally increased the canopy layers and “understories” in forest stands on the IPNF. This, along with a general increase in tree densities, has predisposed more of the forest stands to disturbances such as wildfires, insect/diseases and moisture stress. The general intent of FW-DC-VEG-04 is to express the desire to reverse this trend. We acknowledge that some wildlife species (and other organisms) require dense, multi-canopied forests and the intent of this desired condition is not to suggest that all stands should be manipulated to decrease density and canopy layers. Rather, the intent is to trend the forests towards having a structure (density, vertical and horizontal structure, age classes) that more closely approximates historical conditions and is also more resistant and resilient towards potential climate change stressors and other disturbances. This is discussed in the DEIS for the IPNF on pages 72-73. While it is difficult to quantify how much stand density and the number of multi-canopied stands has increased relative to historical conditions on the IPNF, there is overwhelming evidence to substantiate that it has occurred and that for multiple reasons it would be irresponsible not to try and reverse this trend. In the DEIS (page 73), Keane et al. (2002) was cited as general evidence that fire suppression has led to denser stands and to more canopy layers. The title of that publication is - “Cascading effects of fire exclusion in the Rocky Mountain ecosystems: a literature review”. After considering over two-hundred publications (see pages 17-24), the authors of Keane et al. (2002) come to the following conclusions:

“Perhaps the most documented and studied effect of fire exclusion is the change in stand composition and structure. In general, forest composition has gone from early seral, shade-intolerant tree species to late seral, shade tolerant species, while stand structure has gone from single-layer canopies to multiple-layer canopies with fire exclusion (Mutch and others 1993, Quigley and Arbelbilde 1997, Steele 1994, Veblen and Lorenz 1991). This phenomenon is repeated over and over again for most fire dominated ecosystems of the United States and Canada (Chang 1996, Ferry and others 1995, Frost 1998, Kolb and others 1998, Quigley and Arbelbide 1997, Taylor 1998). “It is this fundamental change in vegetation composition and structure that cascades downward to impact a myriad of other ecosystem characteristics.” “The increase in density, biomass, and number of woody species also seems to be a common theme in most fire-altered ecosystems.”

In addition to the Keane et al. (2002) publication and the two-hundred plus references cited in that paper, the IPNF could provide more evidence that forests have generally become denser, developed more canopy layers, and at the stand and landscape scales have become more homogeneous than historically. The need to address this situation was discussed in multiple places in the DEIS (e.g., pages 72-76, 94-98) as well as the Forest Vegetation Specialist Report. Lastly, as discussed in both the DEIS and in the KIPZ Climate Change Report, given what is currently predicted to occur as a result of climate change there seems to be a consensus that

reducing tree densities and fuel loadings is a rationale and prudent approach to increase the resistance and resiliency of forests to multiple stressors.

Forest Plan Desired Condition: Category 1467

Public Comment 958: (Letter Number(s): 232)

The Forest Service should consider revising FW-DC-VEG-01 because the mid-point of the desired range might not be an appropriate goal for everywhere in the Forest.

Response:

At the forestwide scale, the desire is that the composition (as measured by the dominance groups) would be within the desired ranges indicated by figure 2 of the DEIS. We realize that in some locations, wildlife habitat needs or other resource issues may be such that the desired composition is different, possibly even above or below the ranges illustrated in figure 2. However, in general, at the scale of the Forest level, the goal is to eventually have the composition be within the desired ranges. We made a small change to the language in FW-DC-VEG-01 to remove the reference to the “mid-point” of the desired range. Given this comment and further consideration by the IDT, we felt that a “target” of the mid-point was probably too detailed given the large natural variation in the range of forest composition.

Forest Plan Desired Condition: Category 1467

Public Comment 959: (Letter Number(s): 232)

The Forest Service should consider revising FW-DC-VEG-02 because the mid-point of the desired range might not be an appropriate goal for everywhere in the Forest.

Response:

At the forestwide scale, the desire is that the structure (as measured by size classes) would be within the desired ranges indicated by figure 3 of the DEIS. We realize that in some locations, wildlife habitat needs or other resource issues may be such that the desired structure is different, possibly even above or below the ranges illustrated in figure 3. However, in general, at the scale of the Forest level, the goal is that eventually have the structure be within the desired ranges. We made a small change to the language in FW-DC-VEG-02 to remove the reference to the “mid-point” of the desired range. Given this comment and further consideration by the IDT, we felt that a “target” of the mid-point was probably too detailed given the large natural variation in the range of forest structure.

Forest Plan Objectives: Category 1468

Public Comment 365: (Letter Number(s): 190, 207, and 209)

The Forest Service should edit FW-OBJ-VEG-01 to include a caveat that these species are susceptible to insect and disease mortality, rather than “insect/disease resistant species dominant types” (pg 20). In addition, the Forest Service should include more direction and objectives for the restoration of whitebark pine.

Response:

Western white pine and whitebark pine can certainly be killed by the mountain pine beetle or the non-native white pine blister rust fungus. However, in general, compared to the other species such as grand fir, Douglas-fir, western hemlock, the western white pine and whitebark pine are fairly resistant to insects and diseases such as root rots and defoliating insects.

Regarding forest plan components that address WBP, there were numerous ones created for the draft Forest Plan to emphasize the desire and need to conduct management activities for this species. For example, FW-DC-VEG-01 articulates the desire to increase the amount of WBP (along with some other tree species) on the Forest. FW-DC-VEG-03 indicates a desire to increase the amount of old growth stands that contain WBP. FW-DC-VEG-09 expresses the desire that for all sensitive plant species, including WBP, that ecological conditions and processes be retained or restored; and that geographic distributions are maintained. The forestwide objective FW-OBJ-VEG-01 includes the goal of increasing the amount of certain tree species, including WBP by 120,000 to 150,000 acres during the life of the Plan. In addition to the forestwide plan components associated with WBP that are noted above, most of the individual geographic areas (GAs) that are discussed in chapter 4 of the Forest Plan also contain desired condition plan components to increase the amount of WBP where the habitat exist for it in the GAs. The vegetation section in the FEIS also contains a summary of the type of activities that the IPNF (and other forests in the region) have been conducting in the past to restore this species. However, as described in that section, both the Canada lynx and grizzly bear have habitat that overlaps the whitebark pine sites. The presence of habitat for those species makes it difficult to aggressively implement restoration activities that are needed for the whitebark pine. Other challenges have been the limited funds that have historically been available as well as the difficult access to many of these remote, high elevation sites. Despite these challenges, the IPNF has been and will continue to conduct restoration projects for this tree. The Forest does not believe additional direction in the Forest Plan would further serve to help the restoration of this species. Please see the whitebark pine discussion in the vegetation section of the FEIS for additional information on the restoration efforts that have been, and continue to occur on the IPNF and elsewhere in the region.

Forest Plan Standards: Category 1469

Public Comment 368: (Letter Number(s): 131, 190, and 209)

The Forest Service should include details in the Vegetation Standards and Guidelines related to the management of the landscape in ways which will benefit whitebark pine because whitebark pine was added to the Region 1 list of sensitive species in 2011 and is a candidate for listing under the Endangered Species Act, further underscoring the need to emphasize the specific goals and actions that the Plan will undertake to assure recovery of this species. Whitebark pine was not included in the list of sensitive plants in the EIS, the final Plan should take note of the fact that it is now on the Region 1 sensitive species list.

Response:

Updates were made to the FEIS in recognition that the status of whitebark pine (WBP) has changed and now that tree species is on the regional sensitive species list and has been classified as a “Candidate” species by the U.S. Fish and Wildlife Service for potential listing on the Threatened and Endangered species list. See the vegetation section of the FEIS for more details. Regarding the forest plan components that address WBP, there were numerous ones created for the draft Forest Plan to emphasize the desire and need to conduct management activities for this species. For example, FW-DC-VEG-01 articulates the desire to increase the amount of WBP (along with some other tree species) on the Forest. FW-DC-VEG-03 indicates a desire to increase the amount of old growth stands that contain WBP. FW-DC-VEG-09 expresses the desire that for all sensitive plant species, including WBP, that ecological conditions and processes be retained or restored, and that geographic distributions are maintained. The forestwide objective FW-OBJ-VEG-01 includes the goal of increasing the amount of certain tree species, including WBP by 85,000 to 90,000 acres during the life of the Plan. In addition to the forestwide plan components

associated with WBP that are noted above, most of the individual geographic areas (GAs) that are discussed in chapter 4 of the Forest Plan also contain desired condition plan components to increase the amount of WBP where the habitat exist for it in the GAs. The vegetation section in the FEIS also contains a summary of the type of activities that the IPNF (and other forests in the region) have been conducting in the past to restore this species. However, as described in that section, both the Canada lynx and grizzly bear have habitat that overlaps the whitebark pine sites. The presence of habitat for those species makes it difficult to aggressively implement restoration activities that are needed for the whitebark pine. Other challenges have been the limited funds that have historically been available as well as the difficult access to many of these remote, high elevation sites. Despite these challenges, the IPNF has been and will continue to conduct restoration projects for this tree. The Forest does not believe additional direction in the Forest Plan would further serve to help the restoration of this species. Please see the whitebark pine discussion in the vegetation section of the FEIS for additional information on the restoration efforts that have been, and continue to occur on the IPNF and elsewhere in the region.

Forest Plan Standards: Category 1469

Public Comment 369: (Letter Number(s): 131)

The Forest Service should add standards and/or guidelines for vegetation that would direct activities to limit construction of new roads because they are vectors for the introduction of noxious weeds, include a statement of intent for guidelines for complete pre-project botanical surveys, and include a set of guidelines for implementing post project monitoring for invasive species.

Response:

Regarding the comment concerning pre-project botanical surveys, the existing guideline in the draft Forest Plan was made a guideline rather than a standard due to the second sentence that reads: “If needed, conduct field review and provide mitigation or protection to maintain high-quality occurrences (those intact, sustainable habitats) over time.” Not all proposed management activities or projects require that field reviews be conducted for TES plant species or that mitigation/protection measures are identified. Therefore, this portion of the plan component is discretionary in nature and relies on conclusions that are reached when the first part of the plan component is fulfilled, that is: “Evaluate proposed management activities and project areas for the presence of occupied or suitable habitat for any plant species listed under the Endangered Species Act or on the regional sensitive species list.” For this reason, the IPNF believes this plan component fits the description of a guideline better than it does a standard. The general nature of a standard versus a guideline was presented on pages 3 and 4 of the draft Forest Plan.

For the monitoring portion of the concern, the monitoring of non-native invasive species is described in chapter 5 (pgs 99-102) of the draft Forest Plan. In addition, there is an existing requirement that at least 50 percent of treatments involving the use of herbicides are monitored and that all management activities be monitored for the “....potential spread or establishment of invasive species in aquatic and terrestrial areas of the National Forest System.” (FSM 2903 – item 9 on page 12). For these reasons, the IPNF does not feel it is necessary to add or reiterate existing monitoring items in the forest plan components.

Regarding road activities and their influence on weed spread, there is already substantial direction regarding required prevention and control measures for road related activities. Specifically, pages 3-5 of FSM 2081.2. The IPNF does not feel it is necessary to reiterate or add additional requirements to this programmatic plan for this issue.

Forest Plan Old Growth Standards and Guidelines: Category 1470

Public Comment 371: (Letter Number(s): 67, 83, 84, 121, 131, 136, 189, 190, 207, 214, 235, and 248)

The Forest Service should strengthen the standards and other forest plan components to protect remaining old growth and provide for recruitment of future old growth. The following items should be considered:

- A) Including a standard that at least 30 percent of the forested area is managed for existing or future old growth;
- B) Prohibiting all logging in old growth;
- C) Establishing plan direction regarding the distribution of old growth on the Forest;
- D) Including a requirement that old growth inventories continue as they have been done in the past;
- E) Prohibiting road construction in old growth stands;
- F) Prohibiting firewood cutting in old growth;
- G) Designating recruitment old growth and identifying most of it in the unsuitable timber base;
- H) Establishing direction for the maintenance of a certain minimum amount of old growth;
- I) Creating direction that indicates that if an old growth stand has a natural disturbance in it and no longer meets the definition of old growth, that it continues to be managed as if it were old growth;
- J) Adopting a draft report written by Zack et al. (1997) for old growth management in the Coeur d'Alene basin;
- K) Identifying desired future conditions for old growth by old growth type;
- L) Articulating the desired condition for how much old growth should occur on the IPNF; and
- M) Not increasing the amount of old growth that is currently identified and managed as such.

Response:

To address the numerous comments that the IPNF received regarding old growth, a substantial amount of additional information was included in the FEIS and some changes made to the components in the revised Forest Plan. Please see the old growth subsection of the “Vegetation” section in the FEIS for details on responses to many of the comments listed above. A few of the comments are addressed below:

- A) See the old growth discussion in the forest vegetation section of the FEIS for a response to this item;
 - B) The IPNF disagrees with the idea of including a component in the revised Forest Plan that would prohibit logging in all old growth stands under any circumstances. Please see the discussion of this issue in the “Vegetation” section of the FEIS for more information;
 - C) Old growth stands are currently well distributed across the three administrative zones of the IPNF, the five GAs on the Forest, and over the fifteen different landscape areas (see the DEIS on page 68 and Bush and Reyes 2013). Old growth is also well distributed across the various habitat types on the Forest (USDA Forest Service 2013). Lastly, approximately 62 percent of the existing old growth (data base special use codes 2, 9, 10, 11 and 12) occurs within MA6 (general forest), and approximately 60 percent of the IPNF is occupied by MA6. Therefore, the amount of old growth in MA6 is reflective of the amount of area occupied by that MA.
- Regarding direction in the revised Forest Plan, additions were made to the forestwide component FW-DC-VEG-03 that was presented in the draft Forest Plan. That component now expresses the desire to have old growth stands well distributed across the various GAs on the Forest. The IPNF has decided that the scale of the GAs is a better scale at which to manage the old growth resource compared to the Old Growth Management Units (OGMUs) that were used in the 1987 Forest

Plan. This item is discussed at more length in the body of the FEIS in the sections concerning old growth;

D) Chapter 5 (page 100) of the draft Forest Plan included inventory and monitoring components associated with old growth. Those components are essentially representing a summary of how the Forest has been monitoring and reporting on old growth for many years. After releasing the draft Plan, edits and modifications were made to the old growth related monitoring components.

However, the basic intent remained the same. In chapter 5 of the revised Forest Plan, there are three monitoring components (MON-VEG-01-04, MON-VEG-01-05, and MON-VEG-01-06) that address old growth management. Those components indicate that both the FIA data as well as the Forests' stand inventory information would be used to monitor old growth, and the Forests' stand inventory information would also be used to monitor recruitment potential old growth.

Lastly, MON-VEG-01-06 indicates that old growth that is treated would be monitored as well. In addition to this response, please see the response to Public Comment 232 (item A) for more information on this topic;

E) The draft Forest Plan (page 21) contained direction in FW-GDL-VEG-02 that relates to road construction or other developments in old growth. That direction remains the same in the revised Forest Plan. The 1987 Forest Plan contains direction (Standard 10, item i) indicating that road construction should be avoided in old growth stands if doing so would be in conflict with the direction regarding the size of old growth stands. The revised Forest Plan contains more limiting direction (see FW-GDL-VEG-02) indicating that both road construction (either temporary or permanent) as well as other developments should generally be avoided in old growth stands unless the road construction was needed to implement activities that were designed to increase the resistance and/or resilience of the stands to disturbances;

F) Regarding the suggestion that firewood cutting be prohibited within old growth stands, the Forest does not believe this is necessary. A recent (see project record) analysis that was done across the Forest indicates that only approximately 9 percent of the old growth stands (this includes recruitment potential old growth as well as stands that currently are old growth) occur within 200' of open Forest Service roads. Therefore, the vast majority of old growth stands are not subject to firewood cutting. While a prohibition on firewood cutting in old growth stands could potentially help to protect snags on 9 percent of the total old growth acres, the administrative and law enforcement activities that would be required to implement that prohibition would be substantial. All old growth stands would have to be signed along roads and maps would have to be developed and provided to the public. Limited law enforcement resources would have to be dedicated to this effort to enforce the prohibition and it would impact the time spent on other issues. Lastly, from the standpoint of snags and their function as wildlife habitat, a recent broad scale wildlife analysis indicates that wildlife species that tend to require or use snags during their lifecycles will likely have ample habitat in the future on the Forest. The analysis considered natural disturbance events and processes as well as management activities;

G) The designation of stands to manage for recruitment potential old growth is discussed in the "Vegetation" section of the FEIS;

H) Please see the response for item A in this Public Comment 371;

I) As articulated in plan component FW-DC-VEG-03, the desire is to increase the amount of old growth on the IPNF. The reasons for that desired condition are discussed in the "Vegetation," "Wildlife" and other sections of the FEIS. One of the reasons is to try and provide habitat for wildlife species as well as other organisms that utilize old growth type stands. When old growth stands burn up from wildfires or are severely affected by other disturbances (e.g., insects, diseases, blowdown events), it does not make sense to keep them in the old growth inventory any longer as they are no longer providing that type of habitat;

J) The document being referenced is a 16-year old draft paper developed by several IPNF employees (Zack et al. 1997). The 1997 draft paper presented management strategies for mature and old forest stands in the Coeur d'Alene (CDA) GA that were consistent with the objectives and standards that were associated with the Interior Columbia Basin Ecosystem Management Project (ICBEMP) and the associated Upper Columbia River Basin (UCRB) draft Environmental Impact Statement (DEIS). The UCRB DEIS was released in May of 1997 and at that time the IPNF was working on developing a mid-scale ecosystem assessment for the Coeur d'Alene River Basin (including parts of the Rathdrum Prairie) and one of the objectives was to make that Coeur d'Alene GA assessment consistent with UCRB standards and other direction. Although a FEIS and a proposed decision for the ICBEMP project were published in 2000, the state directors and regional foresters elected not to prepare a Record of Decision and amend the Forest Service and BLM land management plans. Instead, the various participants adopted a broad strategy (titled “The Interior Columbia Basin Strategy”) (USDA FS & USDI BLM, 1997) that was to be used as a guidance document during the revision of land and resource management plans. The IPNF never finalized the 1997 draft paper on mature and old forest strategies and that document never became a part of the final Coeur d'Alene GA. However, despite never finalizing those strategies, many of the principles contained in that 1997 paper have been incorporated into plan components in the revised Forest Plan;

K) As described in table 1 located on page 8 of the Green et al. 1992 (errata corrected 12/11) old growth document, there are 10 different types of old growth that are described for northern Idaho. Old growth types are based on what the cover type is for the stand as well as what the habitat type group is. We do not have the level of historical information that would be needed to determine how much of the 10 old growth types would have occurred on the IPNF historically. Therefore, even if we believed it would be helpful to express a desired amount of old growth for each of the old growth types, it would not be possible to base those desired amounts on historical conditions. So, rather than develop desired condition numbers for 10 old growth types, we more generally expressed the desire (see FW-DC-VEG-03) in the revised Forest Plan to increase the amount of old growth stands dominated by ponderosa pine, western larch, western white pine and whitebark pine, more so than the other species. We believe it is those species that are much less common in old growth stands today than they were historically;

L) As discussed in more detail in the affected environment section of the Forest Vegetation topic in the FEIS, the desire is to increase the amount of old growth on the Forest; and

M) As expressed in the forestwide plan component FW-DC-VEG-03, the desire is to increase the amount of old growth over the long-term. The rationale for that desired condition is articulated in numerous locations in both the “Vegetation” and “Wildlife” sections of the FEIS.

Forest Plan Guidelines: Category 1471

Public Comment 375: (Letter Number(s): 131)

The Forest Service should consider making FW-GDL-VEG-07 a standard rather than a guideline.

Response:

This plan component was made a guideline rather than a standard due to the second sentence that reads: “If needed, conduct field review and provide mitigation or protection to maintain high-quality occurrences (those intact, sustainable habitats) over time.” Not all proposed management activities or projects require that field reviews be conducted for TES plant species or that mitigation/protection measures are identified. Therefore, this portion of the plan component is discretionary in nature and relies on conclusions that are reached when the first part of the plan component is fulfilled, that is: “Evaluate proposed management activities and project areas for the presence of occupied or suitable habitat for any plant species listed under the Endangered Species

Act or on the regional sensitive species list.” For this reason, the IPNF believes this plan component fits the description of a guideline better than it does a standard. The general nature of a standard versus a guideline was presented on pages 3 and 4 of the draft Forest Plan.

Forest Plan Guidelines: Category 1471

Public Comment 380: (Letter Number(s): 235)

The Forest Service should consider revising Vegetation guideline GDL-VEG-05 because retaining snags and live trees “calculated as an average for the total treatment unit acreage in a project area” (FW-GDL-VEG-05) would make it extremely difficult to do meaningful monitoring of snag and live tree retention, because the entire set of timber sale units would have to be monitored.

Response:

After considering this comment and reviewing the verbiage that was included in the draft Forest Plan for FW-GDL-VEG-05 (page 21 and 22 of the draft Forest Plan), we concur with the commenter. Therefore, for the revised Forest Plan we removed the bullet item that previously said: “Retain the number of snags and live trees as identified in table 4 and calculated as an average for the total treatment unit acreage in a project area. (This calculation allows for variability among treatment units, which produces a more natural clumpy distribution).”

Coeur d’Alene GA: Category 1472

Public Comment 960: (Letter Number(s): 190)

The Forest Service should improve the desired condition for this GA by including an illustration of the area where the increase in old growth patch size is being emphasized. Furthermore, the geographic area direction for the Coeur d’Alene GA should include a figure, illustrating the desired amount of old growth in the GA by type.

Response:

To address the numerous comments that the IPNF received regarding old growth, a substantial amount of additional information was included in the FEIS. Please see the old growth subsection of the Vegetation section in the FEIS for details.

Lower Kootenai GA: Category 1473

Public Comment 961: (Letter Number(s): 190)

The Forest Service should include GA direction to include a desired condition for old growth. As with other GAs, we recommend that the Forest Service describe and illustrate the spatial locations of the GA where old growth is desirable. The geographic direction should also include a figure, illustrating the current and desired distribution of old growth in the GA by type.

Response:

To address the numerous comments that the IPNF received regarding old growth, a substantial amount of additional information was included in the FEIS. Please see the old growth subsection of the Vegetation section in the FEIS for details.

Pend Oreille GA: Category 1474

Public Comment 962: (Letter Number(s): 190)

The Forest Service should include GA direction to include a desired condition for old growth. As with other GAs, we recommend that the Forest Service describe and illustrate the spatial locations of the GA where old growth is desirable. The geographic direction should also include a figure, illustrating the current and desired distribution of old growth in the GA by type.

Response:

To address the numerous comments that the IPNF received regarding old growth, a substantial amount of additional information was included in the FEIS. Please see the old growth subsection of the vegetation section in the FEIS for details.

Priest GA: Category 1475

Public Comment 963: (Letter Number(s): 131)

The Forest Service should consider adding information to the desired condition statements for this GA to include:

- Preservation of all native plant habitats likely to harbor rare, sensitive, and disjunctive species;
- Preservation of all peat lands in their native state; and
- A thorough botanical assessment of the Priest Lake Basin to guide management activities.

Response:

Regarding the protection of peatlands, the IPNF already has several forestwide plan components designed to help protect these environments and the unique species associated with them (e.g., FW-DC-VEG-12, FW-GDL-VEG-09, FW-DC-WTR-01, FW-DC-RIP-06). The Forest does not believe it would be helpful to reiterate them or include additional measures for this specific GA. Concerning the suggestion that we have a desired condition of having a thorough botanical assessment of the Priest Lake Basin, that goal is probably not achievable. First, approximately half of the basin is not managed by the Forest Service and the IPNF does not have authority over the management of that area. Second, even just considering the portion of the basin that is under Forest Service administration, there is simply too much area to conduct extensive surveys and assessments over the entire area given our limited budgets. Rather, the IPNF conducts surveys and assessments based on specific project proposals and the likelihood for impacts, as well as doing assessments of areas that are known or suspected of having a relatively high potential for rare plants and/or communities. The 2010/2011 IPNF Forest Plan Monitoring Report (USDA Forest Service, 2012) and available at: <http://www.fs.usda.gov/main/ipnf/landmanagement/planning>) as well as the Rare Plant Specialist Report for this revised Forest Plan, contain fairly detailed information on the number of acres on the Forest that have been surveyed for rare plants in the field, as well as the monitoring that has gone on regarding existing known locations. As described in more detail in those reports, approximately 23 percent (or approximately 160,000 acres), of the estimated suitable habitat for rare plants on the IPNF have been surveyed to date. In 2010 and 2011 alone, approximately 20,000 acres were surveyed and 82 rare plant locations found. The Idaho Conservation Data Center (ICDC 2010) and the Forest Service have prepared numerous reports and assessments over the years regarding rare plants and plant communities on and near the IPNF. The past survey information and assessments for rare plants have, and will continue to inform management decisions on the Forest.

Priest GA: Category 1475

Public Comment 964: (Letter Number(s): 190)

The Forest Service should modify desired condition GA-DC-VEG-PR-01 to include an illustration, which visually displays the spatial locations where old growth and old growth recruitment is desirable. A figure illustrating the current and desired distribution of old growth by type should also be included.

Response:

To address the numerous comments that the IPNF received regarding old growth, a substantial amount of additional information was included in the FEIS. Please see the old growth subsection of the Vegetation section in the FEIS for details.

St. Joe GA: Category 1476

Public Comment 965: (Letter Number(s): 190)

The Forest Service should modify desired condition GA-DC-VEG-SJ-01 to include an illustration, which visually displays the spatial locations where old growth and old growth recruitment is desirable. A figure illustrating the current and desired distribution of old growth by type should also be included.

Response:

To address the numerous comments that the IPNF received regarding old growth, a substantial amount of additional information was included in the FEIS. Please see the old growth subsection of the Vegetation section in the FEIS for details.

Watersheds, Soils, Riparian & Aquatic Habitat/Species

Aquatics General: Category 1500

Public Comment 381: (Letter Number(s): 145, 246, and 279)

The Forest Service should protect aquatic resources from improper mining practices that could diminish riparian habitat and water quality. Analysis of the draft Forest Plan should include effects on aquatic species, including burbot, from degraded habitats in the Kootenai River and should recommend solutions for mitigating current, partial, and indiscriminate barriers for fish passage. The Forest Plan needs to include guidance towards reversing the trend towards increasingly degraded watersheds, riparian habitat, and non-viability of native aquatic species. Discussion needs to be added about how watersheds were impacted by the 1987 Forest Plan.

Response:

Protective measures for mining operations are provided for in the INFISH direction, which is a retained decision. Also site-specific operations can be tailored at the time that Notices of Intent or Plans of Operations are received by the public. Some recreational mining activities also require a permit by the state of Idaho, which has stipulations for operations in the aquatic environment. Additional information has been included in the FEIS regarding the burbot population in the Kootenai River.

The Forest addresses fish passage issues where appropriate. Guidance under INFISH provides this management approach, as does the direction in the Forest Plan (e.g., FW-DC-AQH-02, FW-DC-AQS-01, FW-OBJ-AQH-01, and FW-OBJ-AQH-03).

The DEIS provides a scientific analysis of the effects from management direction for Forest Plan goals, desired conditions, objectives, standards, and guidelines. The forest plan direction was developed using professional judgment and the latest Best Available Science to provide for improved soil and aquatic resources.

The effects from the 1987 Forest Plan are described in the EIS, under the No Action Alternative, Alternative A. The intent of the 1987 Forest Plan was not to eliminate degraded aquatic systems. However, conditions are improving on the IPNF. For examples of improved systems, please reference the World Wide Web: EPA success stories for Idaho – most of which are on the IPNFs - <http://water.epa.gov/polwaste/nps/success319>.

Bull Trout: Category 1501

Public Comment 382: (Letter Number(s): 235)

The Forest Service needs to indicate in the draft Forest Plan how critical habitat designation for bull trout affects the forestwide direction.

Response:

Critical habitat does not affect the forestwide elements, but rather activities that occur within the management areas have the potential to affect designated critical habitat. Direction in the revised Forest Plan was developed to provide required protection to critical habitat. The Forest consulted with U.S. Fish and Wildlife Service on the effects of the proposed action on bull trout designated critical habitat, as required under the Endangered Species Act (ESA). Projects that have the potential to affect designated critical habitat for bull trout will also be consulted on individually, and is also required under ESA.

Bull Trout: Category 1501

Public Comment 839: (Letter Number(s): 235)

The draft Forest Plan should identify core areas for bull trout and develop mechanisms to protect bull trout populations and the habitat they rely on to ensure persistence of the fish throughout their range. In addition to core areas for bull trout, the draft Forest Plan should identify and protect core habitat areas and other high value watersheds for other native fish species on the IPNF.

Response:

The Forest Service does not designate core areas. Core area designation, bull trout recovery, and conservation are directed by the U.S. Fish and Wildlife Service. Defining core areas for other fish species is not necessary and the revised Forest Plan direction provides for the protection of other native fish species. The analysis for the development of conservation and restoration subwatersheds included other native salmonids (i.e., westslope cutthroat and interior redband trout).

Interior Redband Trout: Category 1503

Public Comment 800: (Letter Number(s): 145)

The EIS should reflect that the Little North Fork Clearwater supports a native redband trout fishery in its discussion of existing conditions.

Response:

Updated information is provided in the final EIS.

Kootenai River Sturgeon: Category 1504

Public Comment 801: (Letter Number(s): 209)

An inconsistency in the draft EIS should be addressed to correctly reflect that the Kootenai River White Sturgeon inhabits 168 miles of the Kootenai River.

Response:

This has been corrected in the final EIS.

Soil Compaction: Category 1511

Public Comment 802: (Letter Number(s): 207 and 235)

The ASQ and sustained yield calculations in the EIS should account for potential loss of soil productivity from compaction.

Response:

The revised Forest Plan and regional direction (FSM R1 Supplement No. 2500-99-1) require the maintenance of long-term soil productivity and limit soil compaction. This is monitored at the project level. The Forest does not anticipate soil compaction problems that would reduce soil productivity. Long-term soil productivity will be maintained on the Forest and ASQ and long-term sustained-yield capacity were modeled correctly. See response to Public Comment 387 (C) for more information on soil productivity protection measures in the Forest Plan.

Soils General: Category 1512

Public Comment 387: (Letter Number(s): 119, 207, and 235)

The Forest Service should consider the following:

- A) The sediment analysis conducted for this project assumed that all of the increased sediment produced by public access and recreational use can be transported or moved. The sediment analysis should include the transport capacity of the project;
- B) The revised Forest Plan should include the Regional Soil Quality Standards (FSM 2500-99-1) to protect soils by preventing actions that adversely impact productivity above 15 percent of each logging unit;
- C) There is a lack of currently existing reasonable regulatory mechanisms for protecting soil productivity on the IPNF. NFMA requires no irreversible damage to soils; and
- D) The revised Forest Plan needs to direct the monitoring of soil productivity and not just soil disturbance, and says nothing in regards to the monitoring the soil productivity. There is no correlation of detrimental soil disturbance in activity areas to metrics of long-term reductions in soil productivity areas.

Response:

- A) The DEIS did not include a sediment analysis for public access and recreational use. Analysis of watersheds was conducted at a strategic level, using watershed characterization and evaluation of watershed condition using forestwide data sources. See appendix D of the DEIS for an explanation of the analysis process;
- B) As indicated on page 2 of the draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service is required to follow all existing laws, regulations, and policies relating to the management of NFS lands. Forest Plan direction is designed to supplement existing direction and not repeat them. The regional supplemental manual direction is required as part of project implementation;
- C) The draft Forest Plan provides direction to maintain soil productivity through the retention of coarse and fine woody debris (FW-DC-SOIL-01, FW-DC-VEG-08, FW-GDL-SOIL-02, and 03). Other forestwide direction (FW-DC-SOIL-02, 03, FW-GDL-SOIL-01, and 04) provide for

reduced detrimental soil disturbance and maintenance of soil stability. In addition, regional supplemental manual direction (FSM 2500-99-1) is applied at the project level to limit detrimental disturbance. The direction not to exceed 15 percent detrimental disturbance has resulted in less compaction and improved conditions for the soil resources. See the soils affected environment in the draft EIS pages 153 to 155 for a discussion of the current condition of soils on the IPNF; and

D) Detrimental soil disturbance is used as an indicator of potentially affected productivity. The revised Forest Plan will monitor the retention of coarse woody debris and the extent of detrimental disturbance from vegetation management activities.

Watershed Condition: Category 1514

Public Comment 390: (Letter Number(s): 128, 182, 184, 185, 209, 235, and 279)

The Forest Service should consider the following to protect watersheds:

- A) Assist as a stakeholder in restoration projects to improve the Kootenai Tribe's fisheries since the majority of the fisheries are endangered, threatened, or have been extirpated from Kootenai Territory;
- B) Protecting watersheds that have been overcut;
- C) Watershed Condition Ratings referenced in the draft EIS need to include aquatic standards or thresholds to limit timber sale activities. The maps of watershed condition are too broad in scope and fail to delineate site-specific streams; and
- D) The draft EIS should include discussion of restoration efforts in the Coeur d'Alene Basin because those efforts protect Lake Coeur d'Alene and the Spokane River. Objectives in the Forest Plan for sustainable timber harvests need to be compatible with goals for the Clean Up.

Response:

- A) The Forest Plan describes the intent to cooperate with all stakeholders, including tribes, in FW-DC-WTR-06;
- B) The Forest Plan has a restoration emphasis, in terms of watersheds. In the Watershed, Soil, Riparian and Aquatic Resources section of the Plan, there are numerous desired conditions, goals, objectives, standards, and guidelines that provide this emphasis;
- C) The watershed condition analysis was not intended to determine precise thresholds. The watershed condition is intended to be used to "provide a framework to assist specialists and decision makers in ensuring that management actions will not limit or prevent attainment of desired conditions for aquatic resources." (DEIS at p. 144) The draft Forest Plan provides direction to protect watersheds through its desired conditions, standards, guidelines, and objectives. The draft EIS maps display final Watershed Condition Rating by major drainage basin and are not designed to display information on specific streams. Although the scale at which the maps are displayed in the EIS is not conducive to displaying the names of individual streams, the major drainage basin names are included. Please contact the Forest for individual stream names for the 6th level drainages. The methodology for the analysis of watershed condition is disclosed in appendix E of the draft EIS. The draft Forest Plan does not propose any site-specific management activities; therefore there are no direct effects as defined under Section 1508.8 Effects under the CEQ Regulations for Implementing NEPA. This is a programmatic document and any site-specific proposals will be analyzed at the project level, with the appropriate level of additional NEPA. See also response to Public Comment 911, for the Forest's intent to comply with existing laws and regulations for protecting water quality; and
- D) Cleanup efforts in the Coeur d'Alene basin are included in the discussion of effects in the final EIS.

Best management practices are applied to timber sale projects at the project level and are intended to protect soil and aquatic resources. If appropriate for a given project, effects from water yield would be considered at the project level. Timber harvest levels presented in the revised Forest Plan are consistent with Clean Up efforts in the Coeur d'Alene basin.

Watershed General: Category 1515

Public Comment 803: (Letter Number(s): 5, 111, 113, 116, 145, 203, 246, and 279)

The Forest Service should consider the following to protect watersheds:

- A) The draft Forest Plan should designate the government property that serves as the recharge area for the Oldtown water source a municipal watershed;
- B) The Forest Plan should make it a priority to maintain Myrtle Creek Road to reduce the incidence of slides and erosion;
- C) The draft Forest Plan doesn't do enough to emphasize restoration of watersheds. The Forest needs to develop realistic recovery plans to restore damaged watersheds. In addition, when using models in a given area, evidence needs to be shown for current years and recent calibrations for the ECA subset on each zone on the Forest to establish accurate changes in runoff; and
- D) Reduce sedimentation to streams from roads by decommissioning or relocating adjacent to streams. If this is not possible, the fill in areas should be armored to help reduce erosion.

Response:

- A) The Forest Plan does not designate municipal watersheds, although protective measures for domestic water supplies are considered during project level analyses;
- B) The Forest Plan does not make priorities or direct specific road maintenance projects;
- C) The Forest Plan provides direction to maintain and restore watersheds. See forestwide desired conditions, standards, guidelines, and objectives. The draft EIS identified watersheds for conservation and restoration. The Forest evaluated watershed condition and included an ECA calculation that included recent harvest. See appendix D of the FEIS for a description of the analysis process used in completing the ECA percent used in watershed characterization. Furthermore, the WATSED discussion on page 138 of appendix D is only provided for context on where the ECA tool was derived. WATSED in and of itself was not used for the analysis of watershed condition; and
- D) The Forest recognizes the need to reduce unnecessary roads and considers travel management needs during site-specific travel management decisions. As part of the road evaluation done during a project's development, the Forest considers opportunities to reduce road impacts in riparian areas. Many opportunities on the IPNF have already been realized. Also reference EPA success stories at: <http://water.epa.gov/polwaste/nps/success319>, which includes water quality improvements as a result of addressing road issues in the North Fork of the Coeur d'Alene Basin.

Water Quality/Quantity: Category 1516

Public Comment 392: (Letter Number(s): 181, 182, and 208)

The Forest Service should consider the following to protect water quality and quantity:

- A) Preserving the water quality of the Scotchman Peak region through an allocation of recommended wilderness because five different streams in this area: the East Fork Lightning Creek, Lower and Upper Spar Creek, Char Creek, West Fork Blue Creek and Ross Creek have very high biotic integrity according to the protocol found in Burkantis (1998);
- B) Water quality standards and monitoring are greatly diluted compared to the current Forest Plan; and

C) The Forest Plan must comply with all facets of the Clean Water Act, including the provisions dealing with road-generated pollution.

Response:

A) Water quality was one of the criteria used in evaluating Scotchman Peaks as recommended wilderness;

B) The revised Forest Plan does have fewer standards than were found under the 1987 Forest Plan. Some of these standards are covered under law, regulation, Forest Service manual, Forest Service handbook, or other direction. The 1987 Forest Plan reiterated much of this direction, resulting in redundancy in restating other direction. The revised Forest Plan removes this redundancy. As indicated on page 2 of the draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service is required to follow all existing laws, regulations, and policies relating to the management of NFS lands, and the Forest Plan direction is designed to supplement existing direction and not repeat them. In addition, the revised Forest Plan retains the Inland Native Fish Strategy. As described on page 12 of the revised Forest Plan, this direction is retained and projects and activities must be consistent with the direction carried forward from these decisions; and

C) Sediment delivery from roads is addressed at the project level, through the application of best management practices and road maintenance activities. The revised Forest Plan is strategic and programmatic in nature, providing guidance and direction to future site-specific projects and activities. The revised Forest Plan does not create, authorize, or execute any ground-disturbing activity, although it does provide for the consideration of certain types of activities. The revised Forest Plan contains direction to ensure all site-specific projects meet or exceed state Best Management Practices prepared under guidance of the Clean Water Act. Implementation of the revised Forest Plan is expected to contribute to protecting or restoring the physical, chemical, and biological integrity of waters of the United States in accordance with the Clean Water Act.

DEIS General: Category 1517

Public Comment 393: (Letter Number(s):9, 209, and 235)

The Forest Service should consider the following in the DEIS to protect watersheds:

A) Including the following sentence in the DEIS: “All temporary roads will be obliterated back to the natural angle of repose and seeded with native grass when the timber has been removed for the sale that constructed the temp road;”

B) Providing more specifics to the statement concerning hatchery fish on pages 138 and 159 of the DEIS to include the particular hatchery or hatchery fish it is directed toward. Remove blanket statements that hatchery fish are causing declines in aquatic species unless there is specific science to support these statements. References to the viability and trend of native aquatic species need to be made consistent throughout the DEIS; and

C) The data, monitoring protocol, and analysis that support statements in the DEIS that claim land management strategies implemented for the protection of aquatic habitats are meeting the intent of the 1998 Biological Opinion for bull trout (page 178) need to be included in the document.

Response:

A) Forest Service Manual direction requires the closure of all temporary roads following completion of a timber sale. Standard Forest Service timber sale contract provisions then specify how to do the closure, usually through obliteration. As indicated on page 2 of the draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service is required to follow all existing laws, regulations, and policies relating to the management of NFS lands, and the

Forest Plan direction is designed to supplement existing direction and not repeat them. Thus, this direction will not be repeated in the revised Forest Plan;

B) These statements were revised in the final EIS. References to aquatic species' viability in the DEIS have been clarified in the final EIS to address consistency; and

C) This information is found in the PIBO summary data that is available on the World Wide Web. Please see last sentence of paragraph on page 178 of the DEIS that states: "For complete PIBO summary information, visit the Forest Service Fish and Aquatic Ecology website." This is found at <http://www.fs.fed.us/biology/fishecology/>.

DEIS Affected Environment: Category 1518

Public Comment 394: (Letter Number(s): 209 and 235)

The Forest Service should consider the following in regards to the Watershed Affected Environment:

A) Clarify misleading information in the DEIS about kokanee;

B) Provide specific, sufficient population numbers in the various subwatersheds to adequately and accurately reveal current native trout populations; and

C) The DEIS should correlate the Sensitivity Rating and/or the Watershed Disturbance Rating with measures of the condition or status of aquatic habitat, such as attainment of INFISH RMOs, measures of hydrological equilibrium/streambank stability in assessed subwatersheds, or with data gathered for the 1987 Forest Plan monitoring items to better indicate the condition of aquatic habitat.

D) Including the specific reference to the Treaty of Hellgate of 1855, Executive Order 13175 and USDA and USFS regulation and policies to recognize the importance of the watersheds and riparian and aquatic species to Tribal hunting, fishing, and gathering and as a domestic water source to the Legal and Administrative Framework for this section of DEIS chapter 3 (Affected Environment and Environmental Consequences) (DEIS pages 138-139).

Response:

A) The information about kokanee was removed from the final EIS;

B) Please see the Region 1 Salmonid Multi-Scale Assessment analysis in appendix D of the FEIS that describes how population status was integrated into the native trout distribution. At this scale of analysis, population numbers across the entire landscape would be difficult to accurately describe. Furthermore, population status and trends are managed by the state of Idaho and data for the Panhandle region is available on their website at:

<https://collaboration.idfg.idaho.gov/FisheriesTechnicalReports/Forms/AllItems.aspx>; and

C) Watershed condition was taken into account by looking at relative cumulative effects of watershed sensitivity and past land management activities, such as road densities and past vegetation management activities. See appendix D of the FEIS, which provides documentation of what was considered in the overall assessment of watershed condition and the Forest's best attempt to qualify the effects of different land management effects to watersheds, soils, and fisheries resources at the landscape scale. The watershed characterization spreadsheet is part of the project record and available upon request. The spreadsheet was not included in the EIS, because of its large size. Please see the analysis methodology in appendix D for a description of the Forest's categorization of the conditions of the subwatersheds at a larger landscape scale, for the purposes of defining objectives for improving subwatershed conditions. Vegetative cover is a component of the Equivalent Clearcut Acres analysis as described in that appendix. The kind of information that the commenter is requesting is better described at the project scale and will be analyzed at that time.

The Forest has not conducted a correlation between sensitivity rating and watershed disturbance rating to aquatic habitat, streambank stability, or attainment of RMOs at this scale, or related that to monitoring data from the 1987 Forest Plan. An analysis of specific habitat conditions or status, or hydrologic equilibrium for the entire landscape would be complex.

D) The Hellgate Treaty and Executive Order 13175 were not added, as they are not directly related to the Watershed and Aquatics topic. It was not clear what USDA and USFS regulations were requested to be added regarding fishing. All legal requirements will be followed by management activities on the Forest.

DEIS Alternatives: Category 1519

Public Comment 805: (Letter Number(s): 221)

The DEIS appeared to have the inconsistent conclusions regarding the overall effects of the alternatives on water quality, soil productivity, riparian, and aquatic habitats.

Response:

The conclusions related to Watersheds, Soils, Riparian, and Aquatic Habitat/Species have been clarified in the final EIS.

DEIS Cumulative Effects: Category 1520

Public Comment 253: (Letter Number(s): 279)

The Forest Service should integrate watershed management with global warming.

Response:

Climate change was considered in the cumulative effects discussion and is integrated into various resource area discussions. For effects specific to watersheds and aquatic species, see page 191 of the final EIS. For more detail on how climate change was considered see, USDA Forest Service (2010) KIPZ Climate Change Report. Missoula, MT: USDA Forest Service, Region 1. 236 p.

DEIS Environmental Consequences: Category 1521

Public Comment 396: (Letter Number(s): 9, 195, 209, and 235)

The Forest Service should consider the following in regards to the watershed environmental consequences:

A) Analyze dams and diversions in more detail (DEIS p. 188) to better understand their effects to watershed health;

B) Editing the statement on DEIS page 179 (“Any miles of road construction will be greatly offset through miles of road decommissioning.”) to read: “The sediment predicted using sediment models for all new road construction must be offset with the sediment reduction that will occur by decommissioning existing roads in the same subdrainage” because decommissioning a mile of road for every mile of road constructed is no guarantee that the net sediment delivered to streams that drain the areas where the new road is built and old road is decommissioned will be reduced;

C) Developing a comprehensive management strategy for bull trout habitat;

D) Additional effects analysis (DEIS pp. 401-403) of impacts to Tribal drinking water supplies should be conducted as the Kootenai Tribe’s drinking water comes from the forests and protection of the watershed is important to Tribal member health and safety; and

E) Explaining how the revised Forest Plan will remedy the six features that harm native fish that are identified in the 1998 BT BiOp (draft Plan on pages 281 and 282).

Response:

A) Dams and diversions were not considered to be a major management activity affecting NFS lands on the IPNF in the near future and we did not feel that it was necessary to conduct a detailed analysis of those effects, beyond what was acknowledged on page 188 of the DEIS;

B) The discussion in the DEIS provides an assessment of environmental effects for each alternative. Road decommissioning is conducted to improve watershed and other resource conditions, offsetting affects from new road construction. The suggested wording is additional direction that is not included in the revised Forest Plan;

C) The Forest Plan provides direction that will enhance restoration of bull trout. See FW-DC-AQS-04 and FW-DC-AQS-05. The conservation and restoration watersheds will assist in recovery of the species. In addition, recovery planning by USFWS will provide a comprehensive management strategy for the species;

D) Watershed Goal-01, FW-DC-WTR-02, FW-STD-WTR-01, and FW-GDL-WTR-01 provide for restoration, maintenance, and protection of water quality. The water quality protection measures outlined in the Plan would not violate water quality standards under any existing regulations. The agency is required to meet the intent of the Clean Water Act, which includes compliance with state water quality regulations in accordance with EPA direction. In addition to language on page 401-403, the DEIS states FW-STD-WTR-01 ensures that source water areas for public water supplies are protected (DEIS p. 186). Furthermore, any land management activities that affect KTOI ceded lands are consulted on with the tribe and effects analyses as are commended by the commenter will be conducted during project level analyses. If TMDLs are developed in coordination with tribes and water quality limitations can be addressed by neighboring USFS lands, the agency would have to comply with those TMDL requirements; and

E) INFISH direction (i.e., the 1998 BT BiOp) is a retained decision under the Forest Plan and the Forest will comply with that decision. This decision has already been consulted on. The information provided in the Biological Opinion was an assessment of existing LRMPs (i.e., the 1987 Forest Plan) and the purpose of that assessment was to provide the foundation for INFISH direction to improve baseline conditions. The Forest Plan provides guidance in the Watershed, Soil, Riparian, and Aquatic Resources section to restore, improve, and maintain aquatic habitat in addition to the retained INFISH decision. See also rationale provided in the draft EIS: Effects of Forestwide Direction beginning (p. 177) on the Forest's intent to supplement the retained decision. The Biological Assessment for bull trout and associated Biological Opinion (please see KIPZ project record) also include extensive information on bull trout protection measures.

Forest Plan General: Category 1523**Public Comment 397:** (Letter Number(s): 235, 246, and 279)

The Forest Service should consider the following in regards to Watersheds in the Forest Plan:

A) Include requirements of 36 CFR 219.19 for maintaining viable populations of native fish and wildlife species;

B) Consider the legal mandates and policy guidance that requires the Forest Service to address fish passage at road-stream crossings; and

C) Adjust the increased flood activity noted on record to include the updated USGS data since the 1987 Forest Plan was developed.

Response:

A) The revised Forest Plan does meet the direction of 36 CFR 219.19, as evidenced by the effects analysis and the biological assessment for bull trout. The Forest Plan direction provides the protections necessary to provide habitat for aquatic species. Additionally, the Region 1 Salmonid

Multi-Scale Assessment (V6.5) was used to evaluate the status of salmonids within the planning area (appendix E, DEIS);

B) It is not apparent in the laws, policies, and regulations stated, that the Forest is out of compliance and fish passage issues and viability of species are considered wherever feasible. Fish passages issues are site-specific issues addressed at the project level. The Forest Plan does provide goals, desired conditions, and objectives for programmatically improving fish passage and addressing fish passage issues (e.g., Goal-05, FW-DC-AQH-02, FW-DC-AQS-01, FW-OBJ-AQH-01, 03, and FW-STD-RIP-03). Addressing all passage barriers may also not be desirable in some cases as they provide a barrier to keep non-native species from encroachment into native species habitats; and

C) The Forest is unaware of any “increased flood activity” since the 1987 Plan was implemented. A review of the stream gage data for the Coeur d’Alene River shows that most of the highest flows on record were prior to 1976.

(http://nwis.waterdata.usgs.gov/id/nwis/peak/?site_no=12413500&agency_cd=USGS)

Forest Plan Goals: Category 1524

Public Comment 806: (Letter Number(s): 166 and 207)

The Forest Service needs to consider the following that will further develop the Watershed Goals:

- A) Clarifying the goals of the uplands as well as riparian conservation areas; and
- B) Developing a priority list of watersheds that need restoration and updating it annually.

Response:

A) Appropriate management of RHCAs will protect water resources, including the upland portion of watersheds, and trend them towards the desired conditions stated in the Forest Plan.

Implementing BMPs on the uplands will also improve or protect overall watershed health. This concept is addressed throughout both the Plan language and EIS and there is no need to consider additional language that is already inherent throughout the document. Refer to discussion of Watersheds, Soils, Riparian, and Aquatic Habitat/Species in chapter 3 of the draft EIS, as well as Forest Plan direction for the same resources in chapter 2 of the draft Forest Plan; and

B) The Forest Plan does not prioritize watersheds for restoration. Rather, the Forest considers watershed condition on a periodic basis. For evaluation of the effectiveness of the Forest Plan an assessment will be conducted periodically, to update the watershed characterization spreadsheet to determine if there is an overall trend in subwatershed conditions across the landscape. That assessment will not be conducted annually, but will be conducted every 5 years. See chapter 5 of the revised Forest Plan for monitoring direction.

Forest Plan Desired Condition: Category 1525

Public Comment 400: (Letter Number(s): 209)

The Forest Service should amend standard FW-DC-AQS-04 to recognize the Kootenai Tribe’s co-management authority as was done with standard FW-DC-AQS-06 as a good example of government to government relationships.

Response:

The term “tribes” has been added to FW-DC-AQS-04 in the revised Forest Plan as follows “Coordination with stakeholders, such as tribes, state, and other federal agencies, and adjacent land owners, is emphasized.”

Forest Plan Desired Condition: Category 1525

Public Comment 402: (Letter Number(s): 166, 235, and 236)

The Forest Service should consider the following in regards to the watershed desired condition:

- A) Creating a monitoring plan to test stream temperature by subwatershed to meet state water quality standards as required by state law;
- B) Watersheds desired condition section begins by defining “watershed” as meaning streams, lakes, wetland and riparian areas. This is confusing since the definition of watershed in the glossary contradicts this as does the conventional use of this term;
- C) Coordinating with entities, such as the Bonner County Aquatic Invasive Species Task Force, to achieve goals with respect to aquatic invasive species; and
- D) Quantifying the general language in the Watersheds and Water Quality, Soils, Aquatic Habitat, Aquatic Species to prevent different interpretations throughout the life of the Plan.

Response:

- A) The Forest Service is required to protect water quality and abate or mitigate adverse water quality impacts while meeting other resource goals and objectives (FSH 2509.22). The agency has direction in place that provides extensive protection to RHCAs (see retained decision – INFISH), thereby preventing further degradation to stream temperatures. Shade and groundwater influence are typically the limiting factors for regulating water temperatures. A temperature-specific monitoring network to evaluate Forest Plan implementation is not required as stream temperatures would not deviate from current conditions or may actually improve as vegetation continues to grow in RHCAs, with limited management effects;
- B) The desired condition does not define watersheds as meaning streams, lakes, wetlands and riparian areas. The desired condition statement actually reads as follows: “Watersheds, riparian areas, and hydrologic systems, such as streams, lakes, and wetlands, including peatlands...”
- C) The state of Idaho is the lead agency in the management of non-native species and the USFS coordinates with the appropriate agencies as necessary for them to accomplish their mission. Additionally, the Forest Plan describes the intent to cooperate with all stakeholders under FW-DC-WTR-06. An example of this coordination is the aquatic invasive species awareness trainings hosted by the Forest Service, in conjunction with the Idaho State Department of Agriculture; and
- D) The Forest has clarified objectives to be measurable and time-specific. The objective FW-OBJ-WTR-01 is referring to a change in watershed condition rating. The process for developing the condition ratings is described in appendix D of the FEIS. The measure is the trending towards a better watershed condition, as defined in appendix D.

Forest Plan Desired Condition: Category 1525

Public Comment 948: (Letter Number(s): 235)

The Forest Service should include standards in the elements for implementation and require monitoring in the form of stream surveys to determine if desired parameters for habitat features are being met for FW-DC-AQH-05.

Response:

The Forest will rely heavily on the PIBO implementation and effectiveness monitoring. See page 178 of the DEIS for a discussion about current findings by the PIBO team, noting that riparian function appears to be improving and meeting the intent of these desired conditions.

Forest Plan Objectives: Category 1526

Public Comment 807: (Letter Number(s): 221)

The Forest Service should consider developing a metric for the following Watershed objectives:

- A) FW-OBJ-WTR-03 to work cooperatively with the state, EPA, and local watershed groups to support development of TMDLs and water quality restoration plans; and
- B) FW-OBJ-WTR-04 to assess and validate listings of impaired waters and prioritize impaired waters on the IPNF for restoration.

Response:

- A) The Forest is already required, under the Clean Water Act, to work cooperatively with other agencies to support development of TMDLs and does also work closely with those agencies regarding water quality restoration plans. See Idaho success stories for examples of coordination efforts on the IPNFs, between EPA and state of Idaho DEQ in restoring local waters under Section 319 of the Clean Water Act (<http://water.epa.gov/polwaste/nps/success319/>); and
- B) The Forest did not feel that a specific objective is necessary, given that these efforts are required under existing law, policy, and agency direction. See also A above.

Forest Plan Objectives: Category 1526

Public Comment 808: (Letter Number(s): 221 and 235)

The Forest Service should consider revising the following Watershed Objectives:

- A) FW-OBJ-AQH-02 to state: Over the life of the Plan, the structural and functional diversity of aquatic macroinvertebrate communities of all streams within a planning area is not substantially different than would be expected at sites that remain non-impaired by anthropogenic pollution and/or pollutants. The indication that this objective is being met is that the O/E model scores at all sites monitored on individual water bodies are between 0.80 and 1.20; and
- B) Explain why FW-OBJ-SOIL-01 is only 75 to 150 acres. The IPNF can easily accomplish this with one timber sale.

Response:

- A) The direction as stated does not allow for degradation, but simply provides an indicator of relative water quality across the landscape. It is not the Forest's intent to manage towards a minimum standard for projects, but to meet or exceed those criteria wherever possible so that an assessment of overall landscape water quality is being promoted; and
- B) Restoration of soil productivity requires activities to improve soil nutrients or de-compaction. The 75 to 150 acres is what is anticipated to be accomplished given current budgets. This work is not accomplished with a timber sale.

Forest Plan Standards: Category 1527

Public Comment 413: (Letter Number(s): 9, 182, 195, 221, 232, 235, and 246)

The Forest Service should consider the following in regards to the Forest Plan direction:

- A) Defining the terms short-term effects, long-term effects, and benefits when describing the water quality standards;
- B) Consider other expert agency opinions in support of the Plan direction for water quality standards;
- C) Strengthen standards and guidelines so they are more enforceable and increasing the objective outputs in order to meet desired conditions more rapidly as well as ensuring standards are measurable and describing the frequency that they will be monitored in the monitoring plan;

- D) Not relying on restoration efforts as a substitute for preventing habitat degradation. This is in conflict with retained INFISH decision WR-3;
- E) In the Forest Plan, summarize or identify the relevant law, regulation, or policy which helps to achieve the desired conditions;
- F) Add a standard to ensure no further degradation of water quality in 303(d)-listed watersheds and waterbodies, unless such degradation is short-term and necessary to promote long-term water quality improvement and attainment of support for beneficial uses;
- G) Including Soil Quality Standards limiting subwatershed-level detrimental disturbance or explaining why Region 1 Soil Standards are not part of the Forest Plan;
- H) Including standards that would result in meeting the habitat needs of bull trout and other native fish described in the 1998 BT BiOp; and
- I) Including the Watershed Disturbance Rating in the Forest Plan to help attain watershed restoration.

Response:

- A) Short- and long-term effects vary by project and resource area and it is not appropriate to define a specific standard for all activities at this scale. The use of these terms has been clarified and reworded in FW-STD-WTR-01 and FW-STD-RIP-01 in the revised Forest Plan. There is no need to define “benefits,” as this is a common term. Specific benefits from planned activities are described at the project level;
- B) In addition to the Forest Plan direction on water quality, the Forest must meet the Clean Water Act and regulations developed by the EPA or the State of Idaho. Expert agency comments were considered throughout the planning process and during the public comment period. That documentation is available in the project record. See also pages ii and pages 9-11 in the DEIS;
- C) All projects must be in compliance with the Forest Plan and a project has to validate compliance with the Forest Plan direction, including applicable standards and guidelines. Forest Plan direction is not discretionary. Standards and guidelines provide direction on how to conduct management activities and are not always intended to be measurable, nor do they always define thresholds. Numeric requirements depend on the individual standard or guideline. Forest Plan standards, guidelines, and objectives are intended to move resources towards desired conditions, given current and future constraints. There is no requirement to fully achieve desired conditions although it is the Forest’s intent to attempt to reach them in a reasonable manner, given operational constraints. Objectives were developed based on current, historic, and projected budgets and target accomplishment scenarios to provide realistic expectations to the public. Objectives provide a measure of Forest Plan implementation and effectiveness. The monitoring plan in the revised Forest Plan further refines measurable monitoring items to evaluate Forest Plan implementation. Please see definitions of Forest Plan direction and discussion on consistency with the Forest Plan, beginning on page 2 of the draft Forest Plan;
- D) The commenter has confused the direction in FW-STD-WTR-02, by not considering the entire statement, which starts with, “When RHCAs are not intact and not functioning at desired condition...” The standard does not promote restoration as a means to mitigate effects from proposed activities, but rather requires restoration when RHCAs are not functioning towards desired conditions and projects cannot further degrade RHCAs. This direction does not conflict with INFISH WR-3;
- E) The final Environmental Impact Statement (EIS) lists applicable laws, policy, and regulations (pages 132-134 of the draft EIS) but does not try to restate them in the Forest Plan content. The IPNF is required to follow laws, regulations, and policies that relate to managing NFS land. The Forest Plan is designed to supplement, not replace, direction from these sources. Restating this

information in the revised Forest Plan would not be consistent with the format of the Forest Plan and the display of direction specific to the Forest Plan;

F) The standard is not necessary, as the proposed activities must comply with the all sections of the Clean Water Act, including 303(d);

G) That requirement is not included in the Forest Plan because it is contained in other direction that the Forest must follow. As indicated on page 2 of the draft Forest Plan (under the heading of Implementing the Forest Plan), the Forest Service is required to follow all existing laws, regulations, and policies relating to the management of NFS lands, and the Forest Plan direction is designed to supplement existing direction and not repeat them;

H) The Biological Opinion does not require Forest Plans to adopt such standards and only provides some context in evaluating the relative impacts of roads on bull trout populations. The Forest Plan is not intended to be a recovery plan for endangered species, although the Forest makes every attempt to comply with the ESA and consults on all proposed actions that could affect listed species;

J) There is no science regarding “thresholds” for the factors used in the assessment of disturbance that could be used as standards. The watershed condition ratings in the EIS, which used disturbance as one factor, are used to evaluate baseline watershed conditions across the Forest. The revised Forest Plan contains direction to improve watershed condition. The Forest Plan monitoring requires watershed condition to be evaluated every 5 years; and

K) Language in the DEIS, beginning on page 12, describes coordination efforts with other entities in order to comply with other laws or regulatory requirements. Pages 138-140 of the DEIS describe the legal and administrative framework that the Forest is required to follow. Expert agency comments were considered throughout the planning process and during the public comment period. That documentation is available in the project record. See also pages ii and pages 9-11 in the DEIS.

Regarding a request to require that fish passage barriers would not be appropriate, given current management strategies that might consider leaving a barrier in place, if it protects a genetic stronghold for native species from invasion by non-native species.

Forest Plan Standards: Category 1527

Public Comment 418: (Letter Number(s): 221)

In order to better achieve desired conditions, the Forest Service should consider revising FW-STD-WTR-01 as follows: Ground-disturbing activities in source water areas (designated special or public water supply watersheds) shall prevent risks and threats to public uses of the water, and be consistent with state source water protection program requirements. Limited short-term effects from activities in source water areas may be acceptable when they support long-term benefits to the RCAs and aquatic resources.

Response:

The standard will be reworded to state: Ground-disturbing activities in source water areas (designated special or public water supply watersheds) shall prevent risks and threats to public uses of water. Limited short-term effects from activities in source water areas may be acceptable when they support long-term benefits to Riparian Habitat Conservation Areas (RHCAs), soils, and aquatic resources.

Forest Plan Standards: Category 1527

Public Comment 419: (Letter Number(s): 221)

In order to better achieve desired conditions, the Forest Service should consider adding FW-STD-AQH-01 as follows: Ground-disturbing activities in Conservation and Restoration Watersheds shall protect aquatic habitat for westslope cutthroat trout, bull trout, or interior redband trout. Short-term negative effects are acceptable if outweighed by long-term benefits because it will achieve the desired condition better.

Response:

That direction is inherent throughout the Watershed, Soils, Riparian, and Aquatic Habitat/Species section of the Forest Plan as well as the direction carried forward with the retained decision, INFISH.

Forest Plan Standards: Category 1527

Public Comment 811: (Letter Number(s): 235)

The Forest Service should consider revising guideline“FW-GDL-AQS-01 to include strict limits on the amount of sediment delivered to fish bearing streams from ground disturbing activities.

Response:

It would not be reasonable to set generic sediment limitations across the entire planning area, as the process for sedimentation and the effects of those processes is extremely complex. Effects of sediment delivery are described or evaluated during project level analysis and implementation. Potential for sediment delivery is also regulated through permits from the lead state water quality agencies and other regulatory mechanisms such as permits through Section 404 of the Clean Water Act and negotiations with US Fish and Wildlife Service, in the event that threatened or endangered species or their habitats may be affected by a project.

Forest Plan Guidelines: Category 1528

Public Comment 422: (Letter Number(s): 182)

The Forest Service should revise the following Watershed guideline FW-GDL-WTR-01 by adding: The IPNF shall work cooperatively with the state, EPA, Tribes, and local watershed groups to support development of TMDLs and water quality restoration plans, and assess and validate listings of impaired waters and prioritize impaired waters on the IPNF for restoration because it will achieve the desired condition better.

Response:

The agency is already required to coordinate with the entities listed above under the direction of the Clean Water Act. These coordination efforts are also described in the DEIS (see page 12-13).

Forest Plan Guidelines: Category 1528

Public Comment 423: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-WTR-03: Ground-disturbing activities in watersheds without water quality impaired waterbodies shall be planned, designed, and implemented to protect and maintain project area watershed conditions and water quality to maintain continued support of beneficial uses.

Response:

This direction is inherent throughout the language in Watersheds, Soils, Riparian, and Aquatic Habitat/Species section of the Plan, as well as regulatory requirements to comply with the Clean Water Act.

Forest Plan Guidelines: Category 1528

Public Comment 425: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-WTR-04: The IPNF shall consider state listings of 303(d) water quality impaired waters along with fisheries needs as watershed and water quality restoration needs and monitoring activities are prioritized, and restoration activities planned and conducted in restoration watersheds.

Response:

The Forest must comply with state water quality direction and there is no need to add additional language in the Forest Plan to direct the Forest when there is already regulatory authority to do so.

Forest Plan Guidelines: Category 1528

Public Comment 426: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-RIP-07: Wetlands should be flagged and marked on the ground and on maps to facilitate avoidance of disturbance to wetlands.

Response:

Wetlands are identified prior to or during project implementation and identification of those resources may be required under standard contract provisions for timber sales, where applicable.

Forest Plan Guidelines: Category 1528

Public Comment 427: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-RIP-08: Consider including fisheries biologist and/or hydrologist when laying out treatment units and marking trees within riparian areas along streams to ensure adequate riparian and stream protection.

Response:

Treatment units and streamside management zones are considered during project level planning and specialists contribute to project development in interdisciplinary settings during the NEPA process. Fisheries biologists and hydrologists are generally included in an interdisciplinary team.

Forest Plan Guidelines: Category 1528

Public Comment 428: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-RIP-09: Prohibit storage of fuels and other toxicants within RHCAs. Prohibit refueling within RHCAs unless there are no other alternatives. Refueling sites within an RHCA must be approved by the Forest Service and have an approved spill containment plan.

Response:

This is INFISH direction RA-4. This direction has been retained in the revised Forest Plan and is listed as direction in appendix B. See page 13 of the revised Forest Plan for an explanation of the retained direction in INFISH.

Forest Plan Guidelines: Category 1528

Public Comment 429: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-AQH-01: Plan, design, and implement new projects and activities wherever possible to maintain or restore structure, composition, and function of habitat for fisheries and other aquatic species, including overwintering, spawning, cover, rearing, and feeding habitat.

Response:

This direction is inherent throughout much of the Forest Plan direction and with the retained decision, INFISH.

Forest Plan Guidelines: Category 1528

Public Comment 430: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-AQH-02: Require instream flows and habitat conditions for hydroelectric and other surface water development proposals to maintain or restore riparian resources, favorable channel conditions, fish passage, reproduction, and growth. Coordination will occur with the USFWS, MDFWP, and other federal, state, and local agencies. During re-licensing of hydroelectric projects, provide written and timely license conditions to the Federal Energy Regulatory Commission (FERC), that require fish passage and flows and habitat conditions that maintain/restore riparian resources and channel integrity. Coordinate re-licensing projects with the appropriate state agencies.

Response:

This is INFISH direction, LH-1. This direction has been retained in the revised Forest Plan and is listed as direction in appendix B. See page 13 of the revised Forest Plan for an explanation of the retained direction in INFISH.

Forest Plan Guidelines: Category 1528

Public Comment 431: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-AQS-03: The IPNF shall evaluate the risks of aquatic nuisance/exotic species introduction as part of project analysis.

Response:

As part of moving towards desired conditions, the Forest may consider aquatic nuisance species for project analysis as appropriate. There is currently no need to require that consideration for all projects.

Forest Plan Guidelines: Category 1528

Public Comment 432: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-AQS-04: Provide and maintain fish passage at new, replacement, and reconstructed road crossings of existing and potential fish-bearing streams, unless barriers are determined beneficial for native fish and/or sensitive aquatic species conservation.

Response:

The recommended direction is inherent in the INFISH standards and guidelines for roads management. This direction has been retained in the revised Forest Plan and is listed as direction in appendix B. See page 13 of the revised Forest Plan for an explanation of the retained direction in INFISH.

Forest Plan Guidelines: Category 1528

Public Comment 812: (Letter Number(s): 190)

The Forest Service should consider revising guideline“FW-GDL-SOIL-01 so that ground-based equipment only operates on slopes less than 30 percent.

Response:

Based on local observations, the Forest has determined that it may be appropriate for ground based equipment to operate on slopes <40 percent in some cases. That value is evaluated during project level analyses to identify sensitive soil types or landslide hazards that would have a lower tolerance for effects from ground based harvest or would be completely avoided.

Forest Plan Guidelines: Category 1528

Public Comment 813: (Letter Number(s): 190)

The Forest Service should change guideline FW-GDL-SOIL-04 to a standard and reword as follows: Ground-disturbing management activities on landslide prone areas shall be avoided and buffered according to Inland Native Fish Strategy requirements. Landslide-prone areas are the most sensitive land types on the landscape.

Response:

The proposed wording does not differ much from the existing language and landslide prone areas are not subject to INFISH buffer direction, which applies to stream courses and wetlands.

Forest Plan Guidelines: Category 1528

Public Comment 814: (Letter Number(s): 221)

The Forest Service should consider adding the following Watershed guideline FW-GDL-WTR-05: Projects and activities are planned, designed, and implemented in a manner that protects and maintains project area watershed conditions and water quality for continued support of beneficial uses where such uses are currently supported.

Response:

The proposed language is inherent through much of the Forest Plan direction described in the Watersheds, Soils, Riparian, and Aquatic Resources section.

Forest Plan Guidelines: Category 1528

Public Comment 816: (Letter Number(s): 166)

The Forest Service should develop a strategy for the legacy road issues to reduce the road system to that which can be maintained by the Forest on a biannual basis, rather than the proposed once every four to ten years. In addition, consider including inspection criteria in the strategy that states all roads are to be inspected that have urgent problems (such as plugged culverts, washouts, and slides) and corrected on an annual basis.

Response:

The Forest recognizes the need to manage its road network, which is reflected throughout the Access and Recreation section of the Forest Plan. Furthermore, transportation analyses are conducted during project level planning in many cases, where the transportation network is a large component of the project.

Wildlife**Linkage Zones/Corridors: Category 1600****Public Comment 439:** (Letter Number(s): 119, 160, 171, 209, 210, and 235)

Wildlife connectivity should be a high priority in the revised Forest Plan by:

- A) Creating a new linkage area MA and considering the importance of wilderness and non-motorized areas for connectivity; and
- B) Adding additional direction in the Forest Plan for connectivity.

Response:

A) Some commenters suggested that a separate MA be created specifically for connectivity, and that the IPNF should consider the importance of wilderness and non-motorized areas for connectivity. There is no need to have a separate MA designation because of the direction already present in the revised Forest Plan. The IPNF has a commitment to providing connectivity, which is evidenced by the fact that the connectivity direction found in the forestwide and GA sections apply regardless of MA. Additionally, there is already MA direction in the revised Forest Plan that specifically states that certain MAs contribute to wildlife movement and security. This MA direction includes MA1a-DC-WL-01, MA1b-DC-WL-01, MA1c-DC-WL-01, MA1e-DC-WL-01, MA3-DC-WL-01, and MA5 -DC-WL-01. This includes wilderness, recommended wilderness, wilderness study areas, and primitive lands. The MA5 backcountry also contributes to connectivity. Most IRAs are located within these MAs; and therefore, would contribute to connectivity and security. See the connectivity section and individual species' sections in the wildlife specialist's report and the FEIS for more discussion and analysis regarding the connectivity direction in the revised Forest Plan.

In addition to the GA direction there is forestwide desired conditions and guidelines that maintain or improve connectivity (FW-DC-WL-18, FW-GDL-WL-15, FW-GDL-WL-16, and FW-GDL-WL-17). Please see the wildlife specialist's report and FEIS.

The IPNF connectivity direction is flexible in that it is suited for the dynamic nature of the habitats on the IPNF and is more consistent with natural disturbance processes rather than being static, permanent, inflexible, mapped polygons. As shown in the example in the ERG report which used marten habitat (ERG 2012), static, permanent, inflexible, mapped polygons are not well suited for our natural disturbance processes found here on the IPNF.

An analysis of wilderness areas, Inventoried Roadless Areas (the roadless nature of which would be maintained in the revised Forest Plan), and motorized versus non-motorized areas played a role in the development of the connectivity analyses in the wildlife specialist's report and the FEIS (see the connectivity section and individual species sections).

One commenter questioned the need to provide connectivity at all. Please see the wildlife specialist's report sections on connectivity and the individual species sections; and

B) The GA direction related to connectivity has been updated in the revised Forest Plan. These GA desired conditions provide connectivity within the IPNF and to adjacent NFS lands as well as the border with Canada. Combined with the forestwide and MA direction, the Forest Plan contains adequate direction to maintain/improve connectivity for wildlife. Please see the wildlife specialist's report and FEIS.

American Peregrine Falcon: Category 1602

Public Comment 442: (Letter Number(s): 253)

The Forest Service should consider the following regarding seasonal restrictions and buffers around American Peregrine Falcon nests:

- A) Climbing can be a low impact activity;
- B) Seasonal restrictions could be reduced if monitoring shows nests are not active or after the peregrine young have fledged; and
- C) There should be flexibility in the sizing of seasonal buffers.

Response:

FW-GDL-WL-01 and the ½ mile distance buffer around peregrine falcon nests have been revised. Direction to protect raptor nests is now covered under FW-GDL-WL-20 and says to use the best available information in setting distance and timing restrictions.

A) FW-DC-WL-01, FW-DC-WL-08, and FW-GDL-WL-20 all provide direction to limit disturbance near peregrine falcon nests on the Forest. USFWS (USDI 1999) concluded that rock climbing does indeed have the potential to disturb and displace nesting peregrine falcons.

Hamann et al. (1999) recommended a ½ mile buffer around nests and restricting rock climbing. Please see the peregrine falcon section in the wildlife specialist's report and the FEIS;

B) FW-DC-WL-08 applies “during periods of use.” Additionally, FW-GDL-WL-20 applies to known active nests. This would allow seasonal restrictions to be lifted on nests that are inactive; however, monitoring of the nest would be needed to determine that the nest is in fact inactive.

Monitoring to determine inactivity may not be feasible if funding is not available; and

C) The size of distance buffers and timeframe for restrictions implemented under FW-GDL-WL-20 could be tailored based on the best available science and local site-specific information (e.g., topography). See chapter 1 in the revised Forest Plan for the section on “Consistency with the Forest Plan.”

Black-Backed Woodpecker: Category 1605

Public Comment 445: (Letter Number(s): 235)

The Forest should provide habitat for black-backed woodpeckers.

Response:

One commenter questioned whether FW-GDL-WL-08 was consistent with FW-DC-FIRE-02.

They were concerned that FW-DC-FIRE-02 and the statement that “fire behavior is characterized by low-intensity surface fires with limited crown potential” meant that blacked-backed woodpecker habitat would be outside of historic conditions. FW-DC-FIRE-02 is a desired condition for WUI, not the entire Forest. Please see the black-backed woodpecker section in the wildlife specialist's report, FEIS, and ERG report (ERG 2012) for more information on how the revised Forest Plan maintains black-backed woodpecker viability.

Canada Lynx: Category 1606

Public Comment 446: (Letter Number(s): 119 and 190)

The public submitted varied, often conflicting, comments regarding lynx and lynx habitat.

Concerns included:

- A) The Forest Service should not use lynx as a reason for winter over-snow motorized use closures;
- B) The Forest Service should limit over-snow motorized use because it impacts lynx;

- C) MA1e conflicts with the Northern Lynx Management Direction; and
 D) Add a desired condition to minimize disturbance to lynx in the upper St. Joe River and Mallard Larkins areas.

Response:

A) There are several reasons why over-snow motorized use may be limited in specific areas, and not all of them are wildlife related. Please see the lynx section in the wildlife specialist's report and FEIS for more information pertaining to the impacts of over-snow motorized use on lynx. Also, please see other individual species sections, such as those for grizzly bear, elk, and big game for more discussion on the impacts of over-snow motorized use on wildlife;

B) Please see the wildlife specialist's report, FEIS, BA, and BO for more information on the effects of over-snow motorized use and the revised Forest Plan on lynx.

One commenter listed several older documents when stating their concerns over over-snow motorized use and the impacts on lynx. Several of these were cited in the analysis, however there were others that were not relevant or were not easily obtained but were not necessary due to the use of other similar citations:

Cordell and Bergstrom (1991) was not easily obtainable, but was redundant given the use of Cordell et al. 1990 to discuss the same concept. Cordell et al. (1990) was cited in the analysis. Knight and Gutzwiller (1995) and Idaho Department of Parks and Recreation (1997) were not easily obtainable but were not necessary because the same concept was covered by Cordell et al. (1990).

Bider (1962) as well as Ozoga and Harger (1966) were not cited directly, but were cited in Buskirk et al. (2000). Buskirk et al. (2000) was included in the analysis and covers the concepts that the commenter was using Bider (1962) and Ozoga and Harger (1996) as citations.

Lewis and Wenger (1998) were not cited. This is not an experimental study but rather a report of interviews with people who had encountered lynx in Idaho. The paper set out to document where in Idaho lynx had been observed historically. It did not contribute to the analysis of over-snow motorized use and the impacts on lynx and was therefore not used;

C) Please see the wildlife specialist's report, FEIS, BA, and BO for more information on the effects of over-snow motorized use and the revised Forest Plan on lynx. FW-STD-WL-01 states that the NRLMD will be applied. Because this is a forestwide standard, this means it applies regardless of MA designation. The revised Forest Plan is consistent with the NRLMD. The MA1e in the Salmo-Priest area has been dropped in Alternative B Modified and has been replaced with MA1b. The MA1e in the southern Selkirks remains the same in Alternative B Modified. That alternative does not change the existing condition for snowmobile use in that area. The northern portion of that MA1e is within the snowmobile closure area for caribou and does not change that closure. The northern portion was allocated to MA1e to preserve the opportunity to allow snowmobiling, after site-specific NEPA and ESA consultation, if the closure was lifted. The southern portion of that MA1e has existing (allowed) snowmobile use and that wouldn't change under the allocation of the area to MA1e; and

D) Please see the wildlife specialist's report, FEIS, BA, and BO for more information on the effects of over-snow motorized use, disturbance, and the revised Forest Plan on lynx. This addition to the Forest Plan direction was not necessary.

Common Loon: Category 1607

Public Comment 850: (Letter Number(s): 209)

The Forest Service should update the information concerning the common loon on page 236 of the DEIS.

Response:

The common loon sections in the wildlife specialist's report and FEIS have been updated.

Gray Wolf: Category 1611

Public Comment 447: (Letter Number(s): 209)

The Forest Service should provide more analysis on wolves than what was in the DEIS.

Response:

Additional analysis on the gray wolf can be found in the wildlife specialist's report and FEIS.

Grizzly Bear: Category 1612

Public Comment 448: (Letter Number(s): 119, 151, 163, 190, 209, 232, and 245)

Numerous comments were received regarding grizzly bear habitat management. These included the following, sometimes conflicting, concerns:

- A) Grizzly bear populations can coexist with motorized use, so the Forest should not close roads to motorized use;
- B) The Forest should analyze increased vegetation management to improve grizzly bear habitat;
- C) There needs to be more detail in the grizzly bear analysis than what was in the DEIS;
- D) Over-snow motorized use impacts grizzly bears;
- E) MA1e potentially impacts grizzly bears by allowing over-snow motorized use during spring emergence;
- F) Exploring opportunities to reduce open road densities within and outside of BMUs whenever possible; and
- E) Changing the date of the beginning of the bear year from April 1.

Response:

A) Please see the grizzly bear section of the wildlife specialist's report, FEIS, BA and BO for information and analysis of motorized use and security habitat for grizzly bears. Also see the Access Amendment FEIS, BA, and BO for additional information of the effects of motor vehicle use on grizzly bears.

One commenter listed several websites containing information they hoped would support their idea that grizzly bear habitat is fully occupied in areas with lots of human visitors (Glacier National Park and the Northern Continental Divide Ecosystem, and Yellowstone National Park); and therefore, grizzlies can coexist with motorized use. Unfortunately, the links the commenter provided to these newspaper articles and other documents were invalid. However, it is clear in the comment which grizzly bear ecosystems they were referring to (the Greater Yellowstone and Northern Continental Divide). Those ecosystems do have healthy grizzly bear populations and both have been or will soon be proposed for delisting. The Selkirk and Cabinet-Yaak grizzly bear populations are not yet at recovery goals. Again, please see the wildlife specialist's report, FEIS, BA, and BO for information relevant to the Selkirk and Cabinet-Yaak grizzly bear populations. One commenter stated that, "A recent Grizzly Bear study in the Swan Valley of Montana found that 99 percent of the bears spent 99 percent of their time on Plum Creek property. This property has been heavily logged resulting in undergrowth plant species that support bears. Thick and overgrown timber does not allow for adequate undergrowth. As we now see by this study, critical bear habitat is quite different than what was once assumed and this new information must be incorporated into this evaluation. The Forest Service should discard the original 'road density guidelines' and develop new guidelines that reflect the habitat most critical for bears as one that is

timber harvested and roaded. Old outdated science formulated by assumptions should not be used when true science and actual data is now available.”

The conclusions from the study in the Swan Valley apply only to the multi-ownership Swan Valley, as stated by the study monitoring team themselves (Hicks et al. 2010, Baty et al., No Date), so this study was not used in the development or analysis of the revised Forest Plan. Also, the percent of radio collar locations on Plum Creek land was only 34 percent (page 28 in Baty et al., No Date), not 99 percent Forest Service lands accounted for 49 percent of the locations (page 28 in Baty et al., No Date). The results of the study provided a preliminary snap-shot of valley use during summer and fall, and no cause/effect relationships could be gleaned from the data because the study was not an experimental design (page 21 in Baty et al., No Date, and page 27 in Hicks et al. 2010). The information from this study in the Swan Valley was not used in the development or analysis of the revised Forest Plan;

B) Please see the grizzly bear section of the wildlife specialist’s report, FEIS, BA, and BO for information and analysis regarding grizzly bear habitat, vegetation management, fire, and the direction in the revised Forest Plan;

C) Please see the grizzly bear section in the wildlife specialist’s report and FEIS for more information than that found in the DEIS;

D) Please see the grizzly bear section of the wildlife specialist’s report, FEIS, BA, and BO for information and analysis regarding grizzly bear denning, spring emergence, and disturbance associated with over-snow motorized use;

E) Please see the grizzly bear section of the wildlife specialist’s report, FEIS, BA, and BO for information and analysis regarding grizzly bear denning, spring emergence, and disturbance associated with over-snow motorized use. The MA1e in the Salmo-Priest area has been dropped in Alternative B Modified and has been replaced with MA1b. The MA1e in the southern Selkirk remains the same in Alternative B Modified compared to Alternative B from the DEIS.

Alternative B Modified does not change the existing condition for snowmobile use in that area. The northern portion of MA1e is within the snowmobile closure area for caribou and does not change that closure. The northern portion was allocated to MA1e to preserve the opportunity to allow snowmobiling, after site-specific NEPA and ESA consultation, if the closure was lifted. The southern portion of MA1e has existing (allowed) snowmobile use and that wouldn’t change under the allocation of the area to MA1e;

F) Please see the grizzly bear section of the wildlife specialist’s report, FEIS, BA, and BO for information and analysis of open roads and the impacts on grizzly bears. The revised Forest Plan retains the Access Amendment, which set core area, open motorized route density, and total motorized route density standards for the BMUs in the Selkirk and Cabinet-Yaak Recovery Zones. Additionally, areas outside of the recovery zones that had recurring grizzly bear use (Bears Outside of Recovery Zone, or BORZ, areas) had limits placed on the linear miles of total and open motorized routes in those areas; and

E) Several commenters suggested changing the date of the beginning of the bear year. Some suggested moving it earlier to mid-March because some bears emerge from the den before April 1. Others suggested moving the date in FW-GDL-WL-01 or FW-STD-WL-04 to mid-April to accommodate more snowmobiling grooming opportunities associated with that guideline and standard. The Forest Plan revision will use April 1 as the start of the bear year as described in Johnson et al. (2008).

Management Indicator Species (MIS): Category 1614

Public Comment 449: (Letter Number(s): 89, 136, 190, 195, 207, and 235)

The public wanted a multitude of species identified as MIS:

A) The Forest should identify and monitor focal species and keystone species rather than MIS; and

B) The public thinks the Forest should add TES species, old growth species, and a host of other species for a variety of other habitats as MIS.

Response:

A) Focal species are a component of the 2012 Planning Rule. This Forest Plan revision is being done under the 1982 Planning Rule which includes the identification of MIS, not focal species. Therefore focal species will not be identified as part of this revision process. The IPNF is also not required to identify “keystone species” and monitor their populations, an idea requested by commenters.

Under the 2012 Planning Rule, focal species, which could include keystone species, would be selected because they are believed to be responsive to ecological conditions that can inform future plan decisions and would not be selected to make inferences about other species. The IPNF’s MIS, chosen under the 1982 Planning Rule for this revision, were selected because they were believed to be responsive to management actions to trend towards the desired conditions for vegetation and fire and could inform plan decisions and compare alternatives. See the response to B below for more information on why the IPNF chose the MIS we did; and

B) There is no requirement to select MIS for every activity, vegetation type, or management issue. The IPNF selected MIS species that provided a means to measure the difference between the Forest Plan alternatives, could be tied to forestwide objectives, and were species whose habitat was likely to be influenced by the management activities on the Forest done to move towards the desired conditions for vegetation in the revised Forest Plan. The IPNF has opted for a landbird assemblage and elk as MIS after considering where, and what kind of, management activities are likely to occur under the revised Forest Plan. Knowing that selecting MIS is a requirement, despite the scientific criticisms of the concept, the IPNF selected species that would be the most useful in measuring progress towards the desired conditions in the revised Forest Plan.

The species in the landbird assemblage were selected to represent a variety of habitat conditions that could be tied to the desired conditions for vegetation. Elk were selected because of a concern over elk security habitat. Please see the wildlife specialist’s report, FEIS, and KIPZ MIS Selection documentation (USDA 2013).

Commenters suggested several other species as MIS, including some species that were MIS in the 1987 Forest Plan. This included pileated woodpecker, northern goshawk, and TES species. Please see the KIPZ MIS Selection documentation (USDA 2013) for a discussion on why these species were not selected. The main reason they were not selected is that the landbird assemblage provided a better measurement tool to analyze the difference between the Forest Plan alternatives and to measure progress towards the desired conditions for vegetation. Flammulated owl was also suggested. The landbird assemblage already covers a variety of habitat types (e.g., snags, open habitats, mature stands) used by flammulated owls. Additionally, the landbird assemblage can take advantage of a pre-existing monitoring effort (Regional landbird monitoring program) that monitors multiple species at once. Monitoring flammulated owls would not be as efficient or practical as monitoring the landbird assemblage. Please see the wildlife specialist’s report, wildlife section in the FEIS, and ERG report (ERG 2012) for more information on how the revised Forest Plan provides for flammulated owl habitat.

Commenters specifically mentioned a desire to select an “old growth” MIS. Unfortunately, the IPNF does not have a species that is an obligate of old growth habitat or relies solely on old growth habitat. Pileated woodpeckers and northern goshawks are not good candidates because they are not solely dependent on old growth for their habitat needs. The IPNF has species that

will use old growth habitat, even if they are not old growth obligates. For example, the Hammond's flycatcher, which is a member of the landbird assemblage MIS, uses mature coniferous forests. Hairy woodpecker uses large snags and is also a member of the landbird assemblage. Please see the ERG report (ERG 2012) for an analysis of how the revised Forest Plan provides habitat for the species in the landbird assemblage, how the large tree size class changes over time, and also analysis for pileated woodpecker and northern goshawk. Neither the pileated woodpecker nor the northern goshawk is at a viability risk under the revised Forest Plan (ERG 2012). The landbird assemblage is also analyzed in the wildlife specialist's report and FEIS.

The direction in the revised Forest Plan is designed to retain existing old growth and promote the development of future old growth. This includes FW-DC-VEG-03, FW-DC-VEG-05, FW-STD-VEG-01, FW-VEG-GDL-01, FW-VEG-GDL-02, FW-DC-WL-12, GA-DC-VEG-CDA-01, GA-DC-VEG-PR-01, and GA-DC-VEG-SJ-01. See the vegetation section of the FEIS and the vegetation specialist's report for more information on how the revised Forest Plan maintains or improves old growth on the IPNF. By maintaining/improving the amount of old growth on the IPNF, this habitat component would be available for species that use old growth.

Please see the wildlife and vegetation specialist's reports, and the wildlife and vegetation sections in the FEIS for more information on old growth and effects of the Plan.

One commenter cited Palladini et al. (2007) and suggested adding several more species to the landbird assemblage and using all of them as focal species rather than MIS (see A in this response for a discussion of focal species versus MIS). Additionally, as with several of the species mentioned by the commenter, the hairy woodpecker, a member of the landbird assemblage, was one of 19 species identified in Palladini et al. (2007) as being more likely to occur in old growth versus mature stands (although present in both).

Pileated woodpecker was specifically mentioned as a keystone species that should be included as a focal species (see A in this response for a discussion of focal species versus MIS). ERG (2012) also analyzed the effects of the revised Forest Plan on pileated woodpecker and determined that pileated woodpecker habitat is above HRV on the IPNF and would stay that way over the next 50 years. Therefore pileated woodpecker would continue to have adequate habitat on the IPNF.

Pileated woodpecker would therefore have more than adequate habitat to continue its function as a "keystone" species that creates cavities that other secondary cavity nesters utilize.

One commenter cited several articles to support their request to retain the pileated woodpecker as a MIS. They did not provide full literature citations and the IPNF was not able to find the literature that may have been what the commenter was citing. These include Power et al. (1996), Simberloff (1998), Aubry and Raley (2002), and Lindenmayer et al. (2000). The commenter appeared to be using these citations to define terms (e.g., keystone species) and describe different types of "indicator species" to show how the pileated woodpecker fit these definitions and should be included as a MIS or focal species. The commenter also cited a document from the Flathead National Forest, which contains several literature citations, regarding pileated woodpecker and its role in providing cavities that other species utilize. The commenter wishes the IPNF to identify the pileated as a "keystone species." The IPNF agrees that the pileated plays an important role in the ecosystem, a "keystone", however this does not mean the pileated makes a good MIS. Please see the KIPZ MIS Selection documentation (USDA 2013) for information on why the IPNF selected certain species as MIS and why pileated was not retained. Please see the ERG report and wildlife specialist's report for more information on the revised Forest Plan's effects on pileated woodpeckers.

Fisher was also specifically mentioned by commenters as a potential MIS. FW-DC-VEG-08, FW-GDL-VEG-03, and FW-DC-WL-14 in the revised Forest Plan provide direction to retain coarse woody debris on the IPNF. Fisher was analyzed in the ERG report (ERG 2012) and viability was

maintained on the IPNF under the revised Forest Plan. Fisher is also analyzed in the wildlife specialist's report and FEIS.

One commenter cited a passage out of a document from the Boise National Forest which contained numerous literature citations regarding black-backed woodpecker. The commenter was making an argument that black-backed woodpecker should be a MIS. The literature cited, which described that black-backed woodpeckers are tied to burned forests, was consistent with the literature already cited in the wildlife specialist's report. Some of the citations are already cited in the wildlife specialist's report. The IPNF agrees that black-backed woodpeckers are tied to burned forests, and this is why there is a desired condition and guideline in the revised Forest Plan to provide this habitat for not only black-backed woodpeckers, but also other species tied to burned forests. Additionally, members of the landbird assemblage MIS use openings created after fires (e.g., olive-sided flycatcher). There would be adequate habitat provided for black-backed woodpeckers under the revised Forest Plan. Please see the wildlife specialist's report, FEIS, and ERG report (ERG 2012) for more information. As stated previously, there is no requirement to select MIS for every activity, vegetation type, or management issue. The IPNF selected the landbird assemblage to measure progress towards the desired conditions for vegetation and fire. A collection of five species were selected because they represented a range of habitats and were being monitored in the ongoing regional landbird monitoring program.

The same commenter suggested identifying all TES as MIS. This is unrealistic for a variety of reasons. The IPNF opted to select species (landbird assemblage) that allowed the measurement of progress towards the desired conditions for vegetation, and those desired conditions are important as they're tied to the "coarse filter" for viability. There was a pre-existing monitoring program for landbirds so there was efficiency in monitoring.

Macroinvertebrates were chosen as an indicator of overall water quality and the RIVPACS methodology is assumed to be an appropriate mechanism to do so (see page 177 of the DEIS). There is no requirement for the Forest Service to monitor population trends of the species listed by the commenter, although the Forest relies heavily on efforts by the Idaho Department of Fish and Wildlife and US Fish and Wildlife Service to monitor population trends of some of these species. The agency is also required to evaluate effects of proposed actions on threatened and endangered species, as well as sensitive species and those effects are disclosed in the Biological Assessment for bull trout and within the aquatic species section of chapter 3 of the EIS, for revision of the Forest Plan and will also be considered during site-specific project implementation.

As stated above, there is no requirement to select a MIS for every habitat, management issue, or activity. The IPNF chose to focus on the overarching desired conditions for vegetation/fire that influenced stand composition and size class when selecting MIS to represent vegetative change on the IPNF. Again, please see the KIPZ MIS Selection documentation (USDA 2013), wildlife specialist's report, and FEIS for more information and analysis regarding MIS for the revised Forest Plan.

One commenter requested that the IPNF "identify, map, and conserve areas of high biodiversity on the IPNF." Please see the wildlife specialist's report, particularly the introduction, for a discussion on the coarse filter/fine filter approach to providing ecosystem diversity. Also see the response to Public Comment 456 for more on how the Plan maintains viability. This same commenter requested that the IPNF "recognize old growth as a community of plant, animal, lichen, and fungi species that would have occurred historically in the stand, and where some common bird species reach their greatest abundance." As mentioned previously, the revised Forest Plan does indeed recognize the need to maintain/improve old growth and therefore contains direction related to old growth, and an analysis of old growth is contained in the vegetation and wildlife specialists' reports and FEIS.

One commenter mentioned whitebark pine as a focal species. For specific information on the plan components that are already present in the revised Forest Plan for this tree, as well as a discussion on the restoration activities that the Forest has undertaken for this species and would continue in the future, see the responses to Public Comment 365 and 368.

North American Wolverine: Category 1615

Public Comment 450: (Letter Number(s): 106, 163, 171, and 190)

The Forest Service should protect wolverine habitat:

A) Over-snow motorized use impacts wolverine denning.

Response:

In February of 2013 the USFWS proposed the wolverine as a threatened species under the Endangered Species Act. In addition to the proposed listing, USFWS included a section 4(d) rule that listed specific activities that are not a significant threat to the species and incidental take occurring from these activities would not be a violation of section 9 of the ESA. These activities include: dispersed recreation such as snowmobiling, backpacking, and hunting for other species; timber harvest, wildland firefighting, prescribed fire, and silviculture; transportation corridor and urban development; mining; and transportation and trade of legally possessed wolverine skins and skins from captive-bred wolverines within the US” (page 7890 in USDI 2013a). In the proposed listing, USFWS identified climate change and the loss of persistent spring snow as the primary factor impacting wolverine populations. Trapping mortality can also be a factor impacting wolverine populations. Neither of those two factors is under the control of the IPNF.

Activities allowed under the revised Forest Plan would fit under the section 4(d) rule proposed by USFWS (USDI 2013a) and therefore the revised Forest Plan would not jeopardize the continued existence of the wolverine as described in the proposed 4(d) rule. Please see the wildlife specialist’s report and FEIS for more information on the effects of the revised Forest Plan on wolverine.

A) As cited in the wildlife specialist’s report and as explained by the USFWS (USDI 2013a pages 7877-7878), wolverine populations don’t appear to be negatively impacted by human disturbance, including over-snow motorized recreation.

One commenter specifically mentioned the MA1e allocation in the Selkirks and a concern over the impacts of snowmobiling on wolverine. As described above and in the wildlife specialist’s report, wolverine populations don’t appear to be negatively impacted by human disturbance, including over-snow motorized recreation. The commenter cited several documents to describe the habitat used by the wolverine, several of which are cited in the wildlife specialist’s report. Some of the literature was cited by the commenter to make their argument that snowmobiling impacts wolverines. The USFWS reviewed the potential threats to wolverine in issuing their proposed listing and section 4(d) rule. The IPNF will use the latest information on wolverine, the proposed listing and section 4(d) rule by USFWS, in our analysis. Please see the wolverine section in the wildlife specialist’s report and FEIS. As described by USFWS, over-snow motorized use doesn’t appear to negatively impact wolverine populations, so the MA1e allocation, or any of the other MA allocations that may allow over-snow motorized use, are not expected to negatively impact wolverine populations.

All the direction in the draft Forest Plan that mentioned wolverine has been edited for the revised Forest Plan.

Townsend’s Big-eared Bat: Category 1617

Public Comment 817: (Letter Number(s): 89)

The Forest Service should survey for potential roost habitat and gate some unoccupied, but suitable, mines to be available as habitat.

Response:

One commenter requested that a desired condition be crafted to include surveys for possible roost habitat forestwide. Desired conditions are not the appropriate place to describe surveys or monitoring to be done under the revised Forest Plan. Site-specific surveys for evidence of bat roosts in old buildings, adits, and caves already commonly occur where those potential sites may be impacted by a site-specific project.

Please see the wildlife specialist's report and FEIS for information/analysis on bats and the impacts of the direction in the revised Forest Plan. Direction in the Plan that addresses bat roost sites includes FW-GDL-WL-09 and FW-GDL-WL-10. The Plan would maintain adequate roosting habitat for bats and there isn't a need to gate mines that are currently unoccupied by bats in the hopes that they will someday use those artificial habitats.

DEIS Environmental Consequences: Category 1623

Public Comment 455: (Letter Number(s): 119 and 209)

The Forest Service should consider the following regarding the wildlife analysis:

- A) The analysis should describe wildlife mortality due to OHV as minor and therefore roads should be kept open;
- B) Providing more information regarding the amounts of habitat available for wildlife than was discussed in the DEIS;
- C) Including a specific reference to the Treaty of Hellgate of 1855, Executive Order 13175, and USDA and USFS regulation and policies to recognize the importance of wildlife to Tribal hunting and fishing.

Response:

A) Direct mortality due to collisions with ATVs or OHVs was not considered an issue in the wildlife analysis. Collisions with wildlife are more likely to occur with larger vehicles travelling at higher speeds than ATVs or OHVs do on low-speed NFS roads or trails. However, disturbance and displacement of wildlife due to ATVs or OHVs is likely similar to that caused by other motorized vehicles. Generally, the wildlife analysis discusses the effects from "motor vehicle use" and focuses on the disturbance/displacement potential rather than direct mortality that may result from a much less likely collision on a low-speed NFS road;

B) The wildlife specialist's report contains more information on the amounts of wildlife habitat available than that found in the DEIS. Also, the ERG report (ERG 2012) contains analysis of the amounts of habitat for several species on the IPNF. The FEIS was updated with more information from the wildlife specialist's report, but due to the size of the wildlife specialist's report not all of it can be included in the FEIS. Please see the wildlife specialist's report, FEIS, and ERG report (ERG 2012) for additional information than that found in the DEIS. Also, the Analysis of Management Situation (AMS) is included in the project record; and

C) Both the draft and revised Forest Plans contain a section on forestwide direction related to American Indian Rights and Interests. In that section is a desired condition, FW-DC-AI-02, which states, "The Forest recognizes and maintains culturally significant species and the habitat necessary to support healthy, sustainable, and harvestable plant and animal populations to ensure that rights reserved by Tribes in treaties are not significantly impacted or diminished."

The DEIS also analyzed the impacts of the Forest Plan on treaty rights. Please see the section titled Tribal Interest and Treaty Rights in the DEIS beginning on page 390. Please see pages 390-394 for a description of the Legal and Administrative Framework for Tribal Interests and Treaty

Rights related to the IPNF Forest Plan revision. The Treaty of Hellgate of 1855 was specifically referenced and analyzed in the DEIS. Please see pages 390, 395, 399, and 400 in the DEIS. Executive Order 13175 was referenced on page 394 of the DEIS.

Forest Plan General: Category 1625

Public Comment 456: (Letter Number(s): 117, 145, 214, 235 and 246)

The Forest Service should consider the following regarding wildlife in the Forest Plan:

- A) The revised Forest Plan should maintain viable populations of wildlife as per 36 CFR 219.19;
- B) The Forest Plan should protect endangered and threatened species from further decline;
- C) The Forest should consider and protect important wildlife habitats such as old growth, large snags, ponderosa pine forests, and provide security habitats in the form of wilderness areas.

Response:

A) It was determined that the revised Forest Plan does indeed maintain viable populations of wildlife as per 36 CFR 219.19. Please see the wildlife specialist's report, wildlife section in the FEIS, and ERG (2012) for more information on how the revised Forest Plan maintains species viability. 36 CFR 219.19 is mentioned several times in the wildlife specialist's report.

One commenter wanted "wildlife desired conditions in objective, measurable terms of habitat amount, habitat distribution, and habitat connectivity based on the biology of the various animals..." and felt that the Plan "...under-values the natural processes that created these habitat conditions for population viability for the very wildlife it purports to sustain."

The desired conditions in the vegetation section of the revised Forest Plan form the basis of the "coarse filter" for viability. This is based on the idea that by providing the range of habitats and amounts of habitats that were present historically under natural disturbance processes that the species that evolved on the IPNF under those disturbance processes would continue to have adequate habitat. In other words, the desired conditions for vegetation describe the amounts, types, and pattern of wildlife habitat present under natural disturbance processes and toward which the revised Forest Plan would trend the Forest or maintain. Please see the wildlife specialist's report and FEIS for more discussion on the "coarse filter/fine filter" approach to providing viability, along with the individual species' sections and connectivity section for more information on how the vegetation desired conditions provide wildlife habitat;

B) Please see the BA, BO, wildlife specialist's report, FEIS, and ERG report (ERG 2012) for more information on how the revised Forest Plan contributes to T&E species recovery and maintains critical habitat where it has been designated; and

C) The revised Forest Plan provides a variety of wildlife habitats, including old growth, large snags, ponderosa pine forests, and security habitat. Please see the wildlife specialist's report, FEIS, and ERG report (ERG 2012) for more information and analysis regarding these habitats and others that are provided by the revised Forest Plan. For more information on stand composition, stand structure, and old growth please see the vegetation specialist's report and section in the FEIS.

One commenter specifically mentioned the Sawtooth Creek vicinity of Mallard Larkins and its contribution to wildlife habitat if it was recommended as wilderness. This area has changed from MA3 (special area) in Alternative B to MA1b (recommended wilderness) in Alternative B Modified.

One commenter cited concerns over large snags and retaining enough on the IPNF to provide habitat for pileated woodpeckers. They cited several documents to show pileated woodpeckers use large snags and that maintaining only "minimum" amounts of snags would be inadequate. They cited USDA (1990), McClelland and McClelland (1999) and Yanishevsky (1994).

Unfortunately they did not provide adequate information for the IPNF to locate the Yanishevsky (1994) document.

The revised Forest Plan does indeed maintain adequate habitat for pileated woodpeckers, including large snag habitat. FW-GDL-VEG-04 begins by stating “vegetation management activities should generally retain snags greater than 20 inches DBH and at least the minimum number of snags and live trees (for future snags) that are displayed in table 4.” This doesn’t mean that only the minimum number of snags needed to meet the needs of wildlife would be retained, only that at least the number of snags in table 4 would be retained. Greater than 20 inches DBH includes the large snags that pileated woodpeckers use as cited by the commenter in USDA (1990) and McClelland and McClelland (1999). It should be noted that FW-GDL-VEG-04 and FW-GDL-VEG-05 apply to vegetation management activities and the retention of snags. This is just a small part of the Forest, and on the rest of the Forest natural disturbance processes largely determine the number of snags on the landscape. FW-DC-WL-13 also provides direction to maintain large trees and snags. For more information on how the revised Forest Plan maintains adequate habitat for pileated woodpeckers, please see the ERG report (ERG 2012).

Forest Plan General: Category 1625

Public Comment 837: (Letter Number(s): 163)

The Forest Service should consider changing the wildlife desired conditions for the Coeur d’Alene Geographic Area:

- A) The Forest should change the desired condition that states “Motorized use occurs on managed routes that avoid important wildlife habitat;” and
- B) Eliminate the desired condition that states “The Idaho/Montana divide provides habitat (with minimal human-caused disturbance and development) for wildlife movement between the Salmon and Selway-Bitterroot wilderness areas and Canada’s potential source populations.”

Response:

A) This comment refers to an older, outdated version of the Forest Plan and not the draft Forest Plan that was sent out in December 2011. This statement does not occur anywhere in the 2011 draft Forest Plan; and

B) Again, this comment refers to an older, outdated version of the Forest Plan and not the draft Forest Plan that was sent out in December 2011. This desired condition has been updated for the revised Forest Plan.

This desired condition does not mean the Forest is looking to get rid of the Lookout Divide Ski Area, the Route of the Hiawatha Rail-Trail, or eliminate all snowmobiling in this area. It simply means that the desired condition is that wildlife connectivity in this area is maintained.

Forest Plan Goals: Category 1626

Public Comment 457: (Letter Number(s): 131 and 209)

The Forest Service should reword wildlife Goal 1:

- A) The Kootenai Tribe of Idaho would like direction added to the Plan in the form of goals and desired conditions stating that the IPNF will provide sustainable wildlife populations capable of supporting the exercise of Treaty rights.

Response:

This goal was re-worded in the revised version of the Forest Plan. Both internal and external commenters felt that the words “desired non-native” in the draft version were unclear and should

even be removed from this goal. The revised version does not contain the words “desired non-native.”

A) Both the draft and revised Forest Plans contain a section on forestwide direction related to American Indian Rights and Interests. In that section is a desired condition, FW-DC-AI-02, which states, “The Forest recognizes and maintains culturally significant species and the habitat necessary to support healthy, sustainable, and harvestable plant and animal populations to ensure that rights reserved by Tribes in treaties are not significantly impacted or diminished.”

The DEIS also analyzed the impacts of the Forest Plan on treaty rights. Please see the section titled Tribal Interest and Treaty Rights in the DEIS beginning on page 390. Please see pages 390-394 for a description of the Legal and Administrative Framework for Tribal Interests and Treaty Rights related to the IPNF Forest Plan revision. The Treaty of Hellgate of 1855 was specifically referenced and analyzed in the DEIS. Please see pages 390, 395, 399, and 400 in the DEIS.

Forest Plan Goals: Category 1626

Public Comment 818: (Letter Number(s): 89, 119, 145, 163, 189, 209, 218, 232 and 235)

The Forest Service should consider:

- A) Improving big game habitat;
- B) Replacing FW-GDL-WL-13;
- C) Explaining the basis for the 30 percent threshold in FW-GDL-WL-13 and explain at what scale elk security will be measured;
- D) There should be additional description of habitat for elk than what was in the DEIS; and
- E) Some commenters stated that restrictions on motorized use in order to benefit big game is unnecessary, instead non-motorized use should be restricted because it has more impact on wildlife.

Response:

A) Please see the sections in the wildlife specialist’s report and FEIS for big game and elk for analysis and information on how the revised Forest Plan maintains or improves habitat for big game. This includes the use of fire as a tool under the revised Forest Plan. The wolf section also contains information on big game and effects from the revised Forest Plan.

One commenter requested that FW-GDL-WL-12 include a statement about snow-intercept cover. As mentioned previously, cover/forage is managed according to the desired conditions for vegetation and fire, which are based on natural disturbance processes. Those same natural disturbance processes are the ones under which our native ungulates evolved with on the IPNF. Therefore, the amounts and pattern of cover/forage would trend towards conditions similar to what our native ungulates evolved with. Please see the elk and big game sections in the wildlife specialist’s report and FEIS.

One commenter asked for a specific objective for elk forage. Another asked that FW-OBJ-WL-01 be edited to include providing a mosaic of habitats for native ungulates. Cover/forage are managed based on the desired conditions for vegetation and fire in the revised Forest Plan; and therefore, do not require an objective of its own. Additionally, even though FW-OBJ-WL-01 mentions TES species, FW-OBJ-WL-01 is general enough that elk habitat maintenance/restoration would count;

B) Some commenters felt that FW-GDL-WL-13 should be changed or replaced. This guideline was developed over many years of working on revising the Forest Plan. Coordination with the state agencies over the years lead to the development and inclusion of this guideline in the revised Forest Plan. Based upon both external and internal comments on the draft Plan, FW-GDL-WL-13, FW-OBJ-WL-02, and the definition of elk security in the Plan glossary were updated (please see the elk section in the wildlife specialist’s report for more information). Elk security was

identified as a concern both internally, among the agencies, and by the public. Although there are several methods to examining the effects of motorized routes on elk, this specific guideline was developed initially due to concerns about providing secure habitat during the hunting season. Other direction in the revised Forest Plan were developed due to concerns over disturbance during the spring (e.g., calving season) and winter.

One commenter suggested using alternative literature to craft FW-GDL-WL-13 rather than using Hillis et al. (1991) as a starting point to develop that guideline. The commenter specifically referred to the “Gaines report” but did not provide any further information or literature citation. They were likely referring to Gaines et al. (2003). The authors of that document set out to conduct a literature review on the effects of linear recreation routes on their selected focal species. They used the available science to develop GIS based models to assess the cumulative effects of recreation routes on those focal species. Their models ranked the results for the big game models, for example, as low, moderate, or high influence of routes on focal species habitat. Although the document provides a means to assess the cumulative effects of linear routes, it doesn’t set recommendations like the Hillis et al. (1991) document does. The intent of Hillis et al. (1991) was very clearly stated in their introduction where they posed the questions, “How large must a cover block be to provide effective security, how far must a security area be from a road, and how much of the area should provide security to meet elk vulnerability objectives?” Their recommendations are what formed the foundation from which FW-GDL-WL-13, FW-OBJ-WL-02, and the definition of elk security in the Plan glossary were developed. The definition of elk security in the glossary deviates somewhat from the original Hillis et al. (1991) recommendations in that Hillis et al. (1991) only looked at “open roads,” whereas the definition in the Plan was expanded to “open motorized routes” to account for the influence of motorized trails as well. Hillis et al. (1991) defined security areas as blocks of hiding cover greater than 250 acres in size and more than one half mile from an open road. The definition in the Plan glossary uses the term “timbered stand” because many regenerated stands on the Forest contain enough horizontal cover to provide cover for elk, and at larger scales the available data is not fine enough to tease out small patches of hiding cover. The calculations in the wildlife specialist’s report excluded areas as security habitat if they were identified as non-forest or in the seedling/sapling stage (i.e., recently harvested and not likely to provide cover at this stage because the regeneration isn’t tall enough). There would be overlap between the security areas defined in FW-GDL-WL-13, FW-OBJ-WL-02, and the Plan glossary and areas outside the zone of influence of the routes in the GIS models from the Gaines et al. (2003) document, but by basing the Plan definition on Hillis et al. (1991) there’s a minimum size for those blocks;

C) FW-GDL-WL-13, FW-OBJ-WL-02, and the definition of elk security in the glossary have been updated for the FEIS and revised Forest Plan. Please see the elk section in the wildlife specialist’s report for information regarding these updates. The 30 percent threshold for elk security in FW-OBJ-WL-02 was derived from the recommendations in Hillis et al. (1991). The scale at which elk security will be measured is the individual elk management units on the south and central zones of the IPNF. The scale of analysis and the elk management units were agreed upon during coordination with IDFG during the Forest Plan revision process;

D) The FEIS includes more information on elk and other big game than what was found in the DEIS. The wildlife specialist’s report contains the full analysis for elk and big game; and

E) One commenter states that elk security and disturbance is not a problem, and even if it was, non-motorized uses pose more of a problem than motorized users and therefore management should be directed at restricting non-motorized uses rather than motorized uses.

Please see the elk and big game sections in the wildlife specialist’s report and FEIS for more discussion on big game security. It should be noted that elk security areas also provide security habitat for other wildlife, including other big game during the fall.

The commenter provided citations to several webpages and provided links, unfortunately many of those links were broken and those webpages can no longer be found. The commenter appears to have been trying to make a case that there are many factors that determine the size of big game populations, and that it is not only about access management. Please see the big game and elk section in the wildlife specialist's report and FEIS. Factors, called "stressors" in the analysis, that influence big game populations are disclosed. Those that are within the control of the Forest are discussed in more depth in the analysis.

The commenter did also rely on several scientific publications which could be located, so this response focuses on those citations, which have also been cited in the wildlife specialist's report. The commenter used Schultz and Bailey (1978) to support their claim that non-motorized users were more disturbing to big game than motorized users. This study was conducted on an unhunted population of elk in the Rocky Mountain National Park. The Forest concludes that Ciuti et al. (2012) is more representative of the impacts of recreation on big game on NFS lands. In Ciuti et al. (2012) they found that the "highest levels of vigilance were recorded on public lands where hunting and motorized recreation activities were cumulative compared to the national park during summer, which had the lowest levels of vigilance." Elk, and other big game, are hunted on the IPNF, so the findings in Ciuti et al. (2012) are more relevant. Ciuti et al. (2012) found that elk decreased their feeding time when closer to roads and became more vigilant as traffic volume increased.

Ward and Cupal (1979) was also cited by the commenter. That paper again found that elk responded more to people afoot than to motorized vehicles. The Forest acknowledges that all types of recreation, whether motorized or non-motorized, can have disturbance impacts on wildlife, including big game. However, most non-motorized users arrive on the IPNF and navigate to their chosen non-motorized recreation spot by driving a motorized vehicle on the IPNF's road system. Additionally, the number of non-motorized users diminishes with increasing distance from a road. Thus road access influences the distribution of non-motorized use on the IPNF.

The revised Forest Plan includes direction to minimize disturbance to big game from management activities, with the definition of management activity being "[a]ny activity that is carried out or authorized by the Forest that would result in impacts on natural resources or change human use of the Forest." Access management, both motorized and non-motorized, would classify as a management activity because it would have an impact on natural resources (e.g., big game) and change human use on the Forest (the distribution of motorized or non-motorized recreation). Therefore, the revised Forest Plan does include and acknowledge that both non-motorized and motorized uses may have an impact on wildlife, including big game. Examples of applicable direction in the revised Forest Plan include FW-GDL-WL-11, FW-GDL-WL-12, and FW-GDL-WL-14 which limit disturbance to big game on winter range and during birthing/parturition.

Again, please see the elk section of the wildlife specialist's report and FEIS for more information on elk security and disturbance. Elk security areas also provide security for other wildlife species; including other big game (see the big game section of the wildlife specialist's report and FEIS) during the fall. As noted earlier in this response, the wolf section of the wildlife specialist's report and FEIS also contain analysis related to big game habitat.

Black Swift: Category 1627

Public Comment 458: (Letter Number(s): 209)

The DEIS contained outdated information regarding the occurrence of black swift on the Forest and the FEIS should be updated with more recent information.

Response:

The black swift section in the wildlife specialist's report and FEIS has been updated between draft and revised.

Objectives: Category 1628

Public Comment 462: (Letter Number(s): 89 and 235)

The Forest Service should clarify wildlife objective FW-OBJ-WL-03.

Response:

FW-OBJ-WL-03 has been updated between the draft and revised Forest Plan to provide annual acreage figures in addition to the percentage figure for the life of the Plan. For more information about how natural disturbance (e.g., fire) and vegetation management trends the Forest towards the desired conditions for vegetation, and how that impacts habitat for the landbird assemblage, please see the wildlife specialist's report, FEIS, and ERG report (ERG 2012).

Standards: Category 1629

Public Comment 465: (Letter Number(s): 189, 232 and 235)

The Forest Plan should have more standards for wildlife:

- A) The Forest should protect old growth for wildlife;
- B) Recovery of T&E species should be a standard in the final Plan;
- C) "Low disturbance" for grizzly bears and wolverine should be quantified in a standard;
- D) FW-STD-WL-03 should be extended to include public use of NFS lands;
- E) There should be science-based standards for sensitive species, including western toad; and
- F) FW-GDL-WL-08 should be re-written as a standard.

Response:

A) The Forest does indeed protect old growth. There are several standards, guidelines, and desired conditions that pertain to old growth. These are primarily found in the vegetation section of the forestwide direction in the revised Forest Plan. There is also FW-DC-WL-12 in the wildlife section of the revised Forest Plan as well. Please see the vegetation and wildlife specialist's reports, as well as the FEIS, for more information regarding the effects of the revised Forest Plan on old growth;

B) One commenter wanted FW-DC-WL-03 converted to a standard. The recovery of threatened and endangered species is not the sole responsibility of the IPNF. Many factors influencing progress towards recovery are outside the control of the IPNF. This fact is captured in the last sentence of FW-DC-WL-03, "Populations trend toward recovery through cooperation and coordination with USFWS, state agencies, other federal agencies, tribes, and interested groups." FW-DC-WL-03 is better suited as a desired condition rather than a standard;

C) One commenter stated, "For rare species, like grizzly and wolverine, low disturbance is not quantified in any standards." It is unclear from this statement what the commenter wanted to see in the form of a standard. The revised Forest Plan already contains a standard for grizzly bear, FW-STD-WL-02, which states the Access Amendment, shall be applied. The Access Amendment set standards for core area; open motorized route density, total motorized route density, and capped linear miles of total and open road in the BORZ (Bears Outside Recovery Zone polygons). For wolverine, activities under the revised Forest Plan would not pose a threat to wolverine populations. Please see the wolverine and grizzly bear sections of the wildlife specialist's report and FEIS. Also, please see the BA and BO for more information on the effects of the revised Forest Plan on grizzly bear;

D) The IPNF already has a food/attractant storage order in place that applies to the public;
 E) There are several guidelines and desired conditions that mention individual sensitive species. These were included as part of the “fine filter” component of providing viability if the “coarse filter” did not cover the key habitat components for an individual species. Specific species include common loon, harlequin duck, wolf, Townsend’s big-eared bat, and fringed myotis. There are other guidelines or desired conditions that are more generally written but would contribute to maintaining/improving habitat for sensitive species or minimizing disturbance. Many of the guidelines were re-written between the draft and revised Forest Plan. Please see chapter 1 of the revised Forest Plan for definitions of Plan elements (e.g., guidelines) and how projects would be consistent with the Plan. Please see the individual species’ sections in the wildlife specialist’s report, FEIS, and ERG report (2012) for more information on how the revised Forest Plan maintains viability for sensitive species.

The revised Forest Plan has direction that specifically mentions amphibians, as well as other direction that would maintain western toad habitat. Please see the western toad portion of the Watersheds, Soils, Riparian, and Aquatic Habitat/Species sections of the DEIS, FEIS, and associated specialist’s report; and

F) One commenter requested that FW-GDL-WL-08 be converted to a standard. Please see chapter 1 of the revised Forest Plan for information regarding the definitions of guidelines and standards as well as how projects would be consistent with the direction in the Plan. Projects that are not designed to comply with the intent or purpose of a guideline would require a Forest Plan amendment. It is not necessary for FW-GDL-WL-08 to become a standard. It, along with other direction in the Plan, is more than adequate to maintain black-backed woodpecker habitat. Please see the black-backed woodpecker section of the wildlife specialist’s report, FEIS, and ERG report (ERG 2012) for information on how this guideline, and other Forest Plan direction, maintains habitat for black-backed woodpeckers.

Coeur d'Alene GA: Category 1631

Public Comment 827: (Letter Number(s): 190)

The Forest Service should allocate the backcountry MA into motorized and non-motorized zones in order to facilitate easier achievement of desired conditions in the Geographic Areas.

Response:

One commenter was concerned about the consistency of MA5 with specific GA direction that provides for either area with low levels of human disturbance or provides connectivity (GA-DC-WL-CDA-02, GA-DC-WL-CDA-03, GA-DC-WL-SJ-01, and GA-DC-WL-SJ-02). The GA desired conditions apply throughout the GA, regardless of MA. The commenter wanted MA5 allocated into motorized and non-motorized areas. Regardless of whether the MA allows motorized use, the GA desired conditions would still apply. Please see chapter 1 in the revised Forest Plan for information on how projects would be consistent with the Plan. Additionally, MA5 already has a DC (MA5-DC-WL-01) that states, “Large remote areas with little human disturbance such as those found in this MA (in conjunction with MAs 1a, 1b, 1c, and 1e) are retained and contribute habitats for species with large home ranges. Habitat conditions within these management areas contribute to wildlife movement within and across the Forest. These areas also provide foraging, security, denning, and nesting habitat for wildlife.” This MA5 desired condition is consistent with the GA desired conditions mentioned in the comment letter (GA-DC-WL-CDA-02, GA-DC-WL-CDA-03, GA-DC-WL-SJ-01, and GA-DC-WL-SJ-02).

Woodland Caribou: Category 1638

Public Comment 453: (Letter Number(s): 10, 12, 106, 115, 151, 190, 209, 228, 232, 235 and 245)

The public submitted varied, sometimes conflicting, comments regarding woodland caribou:

- A) Increase protections for caribou by rewording guidelines and desired conditions and creating new standards, including a new standard to preserve non-old growth cedar-hemlock and spruce-fir forests;
- B) Over-snow motorized use should be limited in order to minimize disturbance to caribou;
- C) Consider wolves and other predators as the primary threat to caribou rather than over-snow motorized use;
- D) Recommend the south end of the Selkirks as wilderness in order to provide protections for caribou;
- E) Consider the use of fire and vegetation management to improve the long-term sustainability of caribou habitat;
- F) Retain the fire management direction from the 1987 Forest Plan in caribou habitat in order to preserve caribou habitat;
- G) Provide more information regarding the caribou analysis than was displayed in the DEIS; and
- H) Clarify the statements on pages 100, 223 and 226-227 of the DEIS.

Response:

A) The revised Forest Plan contains adequate direction to maintain or improve habitat conditions and habitat connectivity for caribou on the IPNF. Please see the BA, BO, wildlife specialist's report, and FEIS for more information and analysis. This includes direction in the revised Forest Plan to maintain/increase old growth, as well as maintain/trend habitat conditions towards the desired conditions for vegetation which are based on natural disturbance processes and historic conditions. Those conditions and natural disturbance processes are what caribou evolved with on the IPNF. Caribou habitat is not a limiting factor. At this time, more than 60 percent of the potential forested caribou habitat is in a mature or old growth condition.

One commenter requested a standard be added that would protect non-old growth cedar-hemlock and spruce-fir forests so that they could become old growth. There is already direction in the revised Forest Plan that would lead to the development of future old growth. Please see the BA, BO, wildlife specialist's report, and FEIS for more information on how the revised Forest Plan affects the vegetative components of caribou habitat. This commenter wanted the word "should" in FW-GDL-WL-02 replaced with "shall." FW-GDL-WL-02 was determined to be adequate as a guideline. As per the BA, habitat is not a limiting factor for caribou on the IPNF. Please see chapter 1 in the revised Forest Plan for information on how projects need to be consistent with the Plan. The intent of a guideline has to be met or a Forest Plan amendment developed.

One commenter requested standards to address connectivity as well as identifying specific connectivity/linkage areas. There are already forestwide desired conditions and guidelines that address connectivity specifically for caribou or for wildlife in general. Additionally, there are GA desired conditions that specifically mention connectivity for caribou. Habitat connectivity was evaluated in the BA, BO, wildlife specialist's report and FEIS and the direction in the revised Forest Plan was determined to be adequate to maintain/improve connectivity for caribou. As discussed in the BA, much of the recovery zone has been recovering from wildfires that occurred over a century ago. Suitable seasonal caribou habitat is becoming less fragmented as the areas burned in these large wildfires have recovered over time.

One commenter suggested re-wording FW-DC-WL-07. The wording of this desired condition was not changed as it was determined to be worded appropriately for a desired condition and is more consistent with the tone of the other forestwide desired conditions in the wildlife section.

One commenter cited Vors et al. (2007) stating that the decline of woodland caribou is primarily the result of anthropogenic landscape disturbance. Vors et al. (2007) looked at woodland caribou extirpation and anthropogenic landscape disturbance in Ontario, not in the Selkirks. The BA and BO cite other literature that explains the Selkirk caribou decline can be attributed to access, hunting, habitat change, and alteration of predator numbers;

B) The court-ordered snowmobile closure area is not lifted by the finalization of the revised Forest Plan. For more information regarding over-snow motorized use and caribou, please see the BA, BO, wildlife specialist's report, and FEIS.

One commenter was concerned about the consistency of the revised Forest Plan with regard to the direction related to caribou and allowing over-snow motorized use in portions of the IPNF. Again, please see the BA, BO, wildlife specialist's report, and FEIS for more information regarding over-snow motorized use and the effects of the revised Forest Plan on caribou.

Commenters specifically mentioned concerns over the MA1e allocation in the Salmo-Priest area and southern portion of the Selkirks. The MA1e allocation in the Salmo-Priest area has been changed to MA1b in Alternative B Modified. The MA1e allocation in the Selkirks remains the same as that from the original Alternative B. This allocation does not change what is currently happening on the ground with regard to snowmobiling. In the portion of the MA1e within the snowmobiling closure area for caribou that closure would remain in place unless future site-specific analysis is done to open that area to snowmobiling following removal of the court-ordered closure. The MA1e designation is to retain the opportunities to allow snowmobiling if the court-ordered closure is removed and site-specific analysis is completed to allow snowmobiling in the future. The southern portion of the MA1e in the Selkirks currently allows snowmobiling. This would not change under allocation of MA1e. The current status of snowmobiling within and outside of the court-ordered closure area was considered as part of the baseline condition during consultation with USFWS over the revised Forest Plan. Again, please see the BA, BO, wildlife specialist's report, and FEIS for more information regarding the effects of the revised Forest Plan on due to motorized use, including over-snow motorized use.

One commenter compared the MA locations to Kinley and Apps (2007). Kinley and Apps (2007) stated that their priority habitat approach was intended to be used at the ecosystem scale, not at smaller scales;

C) Predation on caribou was discussed in the caribou analysis in the wildlife specialist's report and BA. Please see those documents for more information;

D) Commenters requested that the MA1e (primitive lands) in the southern portion of the Selkirks be changed to MA1b (recommended wilderness). The MA1e allocation does not change the court-ordered snowmobile closure area. The southern end of MA1e currently allows snowmobiling, so there is no change in that regard with Alternative B Modified. The allocation of MA1e allows the IPNF to do site-specific analysis in the future to allow over-snow motorized use if the court-ordered snowmobile closure area is lifted. This does not mean that snowmobiling would necessarily be allowed, only that the possibility of allowing that use at some point in the future is retained.

Commenters expressed concern that there would be conflict between the MA direction for MA1e and the GA direction regarding caribou. The GA direction applies across all MA allocations, just as the forestwide direction applies across all MAs.

Please see the BA, BO, wildlife specialist's report, and FEIS for more information/analysis regarding over-snow motorized use and caribou, as well as the effects of the MA allocations on caribou;

E) Fire and vegetation management under the revised Forest Plan were analyzed in the BA, BO, wildlife specialist's report, and FEIS. Please see those documents for more information on the effects of the vegetation and fire direction in the revised Forest Plan.

One commenter did not want any caribou habitat identified as suitable for timber production. As displayed in table 36 of the BA, no caribou habitat was identified under the Proposed Action as suitable for timber production.

One commenter stated concerns over management activities that would increase habitat for big game and therefore impact caribou mortality. It's not clear from the comment what specific cause of mortality they were concerned about (e.g., increase of predation rates due to increases in alternate prey sources, or mistaken identity mortality during big game hunting seasons). Again, please see the BA, BO, wildlife specialist's report, and FEIS for more information on caribou mortality and the effects of the revised Forest Plan on caribou. The desired conditions for vegetation and fire are based on natural disturbance processes, and those are the same conditions and processes that caribou evolved with on the IPNF. This includes coexisting with big game and predators;

F) One commenter was concerned over the use of fire in caribou habitat. Caribou evolved with fire as a natural disturbance process on the IPNF and therefore would have similar amounts and pattern of habitat as the Forest trends towards the desired conditions for vegetation and fire. The caribou recovery zone overlaps with grizzly bear, Canada lynx, and whitebark pine habitat. These three species need early seral and/or burned areas as a component of their habitat. Please see the BA, BO, wildlife specialist's report, and FEIS for more information on the effects of the vegetation and fire direction in the revised Forest Plan on caribou and their habitat;

G) The FEIS contains an updated analysis from what appeared in the DEIS. Also, please see the BA, BO, and wildlife specialist's report for additional information; and

H) The FEIS contains a revised and updated caribou section than what was found in the DEIS. Also, please see the BA, BO, and wildlife specialist's report for additional information.

Commenters questioned some of the statements on page 100 of the DEIS. Fire is a natural disturbance process that played a large role in determining the amount and pattern of caribou habitat on the IPNF, historically. Caribou evolved with fire as a natural disturbance process on the IPNF and had adequate habitat, otherwise caribou would likely not have persisted on the IPNF and been present when the era of fire suppression began. FW-GDL-WL-02 has been rewritten and acknowledges the role fire played historically on the IPNF in caribou habitat and this guideline provides the flexibility to allow the use of fire in caribou habitat under the revised Forest Plan. The use of fire and vegetation management under the revised Forest Plan, and the effects for caribou and critical habitat, were analyzed in the BA, BO, wildlife specialist's report, and FEIS. The FEIS has been updated to reflect the role of fire in caribou habitat.

One commenter was concerned over the consistency of statements on pages 223 and 226. On page 223 of the DEIS is a paragraph that contains a general discussion of the factors that may have led to the decline in the woodland caribou population across its range. This discussion was not specific to the IPNF. On page 226 of the DEIS is a statement that habitat on the IPNF is within HRV. This statement was specific to the IPNF rather than being a general statement for the entire range of the woodland caribou. The two statements are not contradictory. One is from a broad discussion on factors affecting woodland caribou in the past across its entire range, and one is a specific statement regarding current habitat on the IPNF. The FEIS has been updated to be consistent with the BA. The evaluation now focuses on the current condition of caribou habitat and that the vegetative components of caribou habitat are not currently limiting, rather than using the term "HRV." In general, at a coarse scale, the subalpine fir dominance group is within HRV. However, there has been a shift in species composition as larch, white pine, and Engelmann spruce have declined and subalpine fir has increased. Wildfires historically shaped the composition, structure, and pattern of vegetation within the caribou habitat. The historical fire regime and the pattern that it created on the landscape allowed for the development of enough suitable habitat for caribou that populations persisted. Fire suppression has been one of the factors

that have led to an existing landscape pattern that may be more homogenous, and less diverse than historical conditions in regards to the sizes of forest patches on the landscape and diversity within those patches. With a more homogenous landscape, the risk of unusually large and/or intense disturbances (e.g., fire, insects, and disease) may be elevated and with it, the potential for the loss of key habitat components such as mature or old growth forest stands that provide winter habitat.

Wild & Scenic Rivers

Eligibility: Category 1700

Public Comment 475: (Letter Number(s): 96)

The Forest Service should consider the following regarding the eligibility of Wild and Scenic Rivers (W&SRs):

- A) The FEIS needs to describe the process used for the inventory and provide documentation regarding the individual potential ORVs that were considered on inventoried streams. The ORVs for the resulting eligible streams need to be described narratively. In addition, the inventory should have had a broader scope, including national significance of streams on the Forest;
- B) The DEIS failed to recognize the recreational ORV of whitewater paddling for the following streams: Boulder Creek, Boundary Creek, Cow Creek, Lion Creek, Upper Smith Creek, Marble Creek, and Slate Creek. Each of these streams unequivocally possess outstanding remarkable recreational values relating to whitewater paddling, are unique and rare within the region and nation, attract visitors from throughout the region and the nation, and attract people for a type of place-based experiential learning (challenging high-quality whitewater paddling) that few other regional rivers offer. These rivers should be considered eligible wild and scenic rivers;
- C) The DEIS failed to recognize the biological ORV of Boundary Creek. This creek offers critical habitat for many rare, threatened, and endangered species, including mountain caribou, grizzly bears, lynx, harlequin ducks, and bald eagles and an array of aquatic species. Boundary Creek should be determined eligible; and
- D) The DEIS failed to recognize the recreational ORV of whitewater paddling for the North Fork Coeur d'Alene River, Pack River, and Little North Fork of the Clearwater.

Response:

- A) Appendix E and chapter 3 of the FEIS have been updated to include additional information on the inventory process and a description of the resulting ORVs for eligible rivers. As described in appendix E, direction regarding the area, region, or scale of comparison is not fixed, and is defined as that which serves as a basis for meaningful comparative analysis. Given the preponderance of rivers and creeks throughout the Northern Region and the northwest portion of the U.S., the IPNF chose the individual forest as the basis for comparison;
- B) Although whitewater paddling occurs on these creeks, they are not rare, unique, or exemplary. Only the unique, rare, or exemplary values are noted as ORVs;
- C) This habitat is found throughout the northern portion of the Forest and is not an outstandingly remarkable value for Boundary Creek; and
- D) See response to item B above. Use on these rivers is not rare, unique, or exemplary on the IPNF and was not identified as an outstandingly remarkable value for these rivers.

Inventory: Category 1701

Public Comment 476: (Letter Number(s): 96)

The Forest Service should include the June 28, 2011 (updated November 28, 2011) American Whitewater proposal for Wild and Scenic Eligible Rivers Inventory in the FEIS. The draft Forest Plan and its supporting documents make no mention of this resource, fail to analyze the proposed streams in the DEIS, and ultimately fail to find the proposed streams eligible for Wild and Scenic designation.

Response:

The report issued by American Rivers was not available in time to be included in the DEIS. Management area allocations had been finalized and most of the DEIS analysis completed when the first report was submitted in June of 2011. The FEIS has addressed this report, including it as an alternative considered but eliminated from detailed study. See chapter 2 of the FEIS for a description of this alternative (titled “Additional Eligible Wild and Scenic River Designation”) and why it was eliminated from detailed study.