

APPENDIX K

Public Comments and Forest Service Responses

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Note: All comments appearing in this appendix have been given a code number that corresponds to one of the coded subjects in the following list, and are assigned numeric order within the coded subject area. For example, the first comment addressing planning is identified as Comment 100-1, the second one is Comment 100-2, etc.

Code Area of Concern

100 - Planning
101 - Alternatives
102 - New or Changed Information
103 - Disclosure of Effects
104 - Regulatory Issues
110 - Public Information/Involvement
111 - Public Involvement
112 - Environmental/Conservation Education
300 - Scenery
401 - Recreational Experience
402 - Use Levels (Private and Commercial)
403 - Fair and Equitable Use
404 - Limitation on Hours of Operation
405 - Encounters and Congestion
406 - Salmon River Use
407 - Party Size
408 - Campsite Management (Social)
409 - Boat Size
410 - Length of High Use Season
411 - Hunting/Fishing
412 - Hiking/Horseback Riding
413 - Personal Motorized Watercraft
415 - Regional Versus National Use
416 - Access for Handicapped/Elderly
417 - Conflicts Between User Groups
419 - Noise
450 - Aviation
460 - Cultural/Historical
500 - Resources (General Comments)
510 - Wildlife
520 - Fisheries/Riparian
530 - Domestic Grazing
540 - Soils
560 - Ecosystem Management
570 - Pest/Vegetation, Noxious Weeds
600 - Economics/Social
630 - Safety
631 - Navigation Markers
633 - Powerboat Safety
635 - Campsites (Physical)
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700 - Wilderness
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APPENDIX K

Public Comments and Forest Service Responses

Introduction

Purpose

This appendix displays the substantive comments received in response to the draft environmental impact statement, and the Forest Service response to the comments. Included in the appendix are: background information on how comments were obtained; information about those who commented; explanation of how comments were used; comments on responses; letters from government agencies and elected officials; and a list of those who commented.

How Comments Were Obtained

Release of the DEIS Document

A Notice of Availability of the Draft Environmental Impact Statement (DEIS) for the Wild and Scenic Snake River Recreation Management Plan was published in the Federal Register, Vol. 57, No. 236, on December 8, 1992. The documents were filed with the Environmental Protection Agency and mailed to individuals, groups, and organizations on August 13, 1993. Three hundred copies of the draft EIS and approximately 1,500 summaries were distributed in the initial mailing and another 345 copies of the draft EIS were distributed during the 90-day comment period which ended November 22, 1993. Summaries were made available at public meetings, upon request, and at major portals during the comment period.

Meetings

Public meetings were held at Enterprise, La Grande, Halfway, and Portland, OR; Boise and Riggins, ID; and Clarkston, WA between September 7 and September 16, 1993 to explain the DEIS preferred alternative and the commenting process. Approximately 430 interested people attended the meetings.

A number of people stopped by or called Forest Service offices to offer comments, discuss options, or to learn more about the plan.

Publicity by Others

Several special interest groups, outfitters, and guides issued newsletters, published brochures, hosted meetings, and otherwise stimulated interest in river management and generated support for their organizations' concerns. The Hells Canyon Alliance and the Hells Canyon Preservation Council were very successful in their campaigns to get people to submit comments.

Information About Those Who Commented

Where Respondents Live More than 2,100 letters and form letters from over 3,200 individuals, agencies and organizations were received. Sixty-four percent of the letters came from residents of Idaho, Oregon, and Washington. Nearly 1,300 letters or forms were received from the rim communities near the river. A breakdown of where the respondents live follows:

Location	Number of Letters
Rim Communities	1,271
Rest of the Pacific Northwest	585
Outside the Pacific Northwest	271
Foreign Countries	8

Rim communities included are: Lewiston, Caldwell, Meridian, Boise, Coeur d'Alene, Baker City, Enterprise, La Grande, Halfway, Pendleton, Pullman, Spokane, Tri-Cities, and Clarkston.

Who Responded Sixty-three percent of the responses were from people associated with an organization. The next highest percentage, 31%, were responses sent in by individuals. The major categories are as follows:

Category	Number of Responses
Individuals	658
Organizations	1,355
Agencies	15
Companies	75
Elected Officials	11
Permittees/Outfitters	21

Form of Response Individual letters, form letters generated by special interest groups, and petitions were used to express views and present comments.

Category	Number of Responses
Individual	1,052
Form Letter	1,046
Petition	3

Explanation of How Comments Were Used

In accordance with 40 CFR 1503.4, Response to Comments, comments were assessed collectively and individually and have resulted in a variety of actions including:

1. Modifying the alternatives.
2. Developing new alternatives.
3. Modifying and supplementing the analysis.

4. Adding information.
5. Making factual corrections.
6. Making format changes.
7. Explaining why comments did not result in changes.
8. Simple acknowledgment of a comment.

Comments and Responses

As expected with the large number of comments received, many were similar. Representative comments from those expressing similar views were selected and answered. Comments were not reviewed and judged before selection, but were randomly chosen as a representative expression of what people said. Although some reviewers may not find their exact comment, they should be able to find one that represents their point of view. Because of the random selection, the number of comments favoring or opposing a position or opinion are not necessarily proportional to the number of comments appearing in this appendix. All substantive comments which were pertinent to the Snake River plan and were received during the comment period have been addressed. Comments received following the close of the comment period were reviewed, but are not specifically addressed in this appendix.

The reviewer may feel that some comments are not substantive and should not have been included.

List of Those Who Commented

A list of all those who commented are contained in a data base which is part of the analysis file.

Letters from government agencies, public officials and Indian tribal governments are reproduced in their entirety in this appendix following the summary of comments and responses.

Summary of Comments and Responses

Comments on the draft environmental impact statement are organized and numbered so the identity of the commentor can be easily found. The three digit number corresponds with the resource area or topic which the comment addresses. Once coded by topic, the comments are then numbered consecutively.

**Planning
Code 100**

Components of Planning and the NEPA Process

Comments in this section discuss various components of planning regulations and NEPA process such as the identification of purpose and need, scope of the analysis, depth of analysis, cumulative effects and monitoring plans.

Comment 100-1. I would like to see some clause/provision that would allow for future modifications as required to any plan that is finally enforced. (Correspondent 2365)

Forest Service Response: Monitoring and evaluation are important components of management plans pursuant to the planning regulations in 36 CFR 219.11 (d) and Forest Service Policy. A monitoring plan is proposed in Chapter II which would be evaluated annually to determine if there is a need for change in the management direction.

Comment 100-2. The DEIS indicates that wildlife and fish might be hurt by powerboating, but doesn't provide any proof that this would happen. (Correspondent 101)

Comment 100-3. Cougar Country Lodge sympathizes with the Forest Service and LACs [Limits of Acceptable Change] concerns over environmental issues, however, we feel that the enactment of the Forest Service proposed plan would be a very expensive environmental experiment. There has been no concrete evidence submitted by the USDA EIS that proves recreational use of Hells Canyon either private or commercial detrimental to the natural habitats of the fish and/or wildlife. (Correspondent 972)

Comment 100-4. The Forest Service preferred alternative does not adequately address the ecological or recreational impacts of cattle grazing or motorized craft on the area. (Correspondent 2782)

Forest Service Response: The Forest Service is responsible, under the Wild and Scenic Rivers Act, to protect and enhance the ORV's identified for the river corridor and ensure there is minimal risk of degradation (reference Chapter III). The impact analysis displayed in Chapter IV utilizes the best data and research available to determine the potential for detrimental effects. Additionally, potential impacts on threatened and endangered species must have consultation with the responsible managing agency for those species prior to implementation of a decision to ensure that any impacts are acceptable within the intent of the Endangered Species Act.

The potential impacts of domestic grazing on recreational activities is not specifically analyzed in the EIS as addressed in Appendix D.

Comment 100-5. Preferred Alternative does not adequately address river use impact on the endangered chinook salmon. (Correspondent 2618)

Forest Service Response: Chapter IV, "Environmental Consequences on the Fisheries Outstandingly Remarkable Values" fully discloses the direct, indirect, and cumulative effects on the salmon. The FEIS preferred Alternative G has undergone consultation with the NMFS for evaluation and concurrence on our analysis and mitigation measures for the protection of salmon.

Comment 100-6. Forest Service foreclosed the opportunity to develop an integrated, cohesive plan for management of ORVs of the Wild and Scenic Snake River corridor, and examine all impacts to them. Joint impacts to federally listed salmonid species, the federally listed MacFarlane's Four-O'clock, bighorn sheep, and "unique ecosystem" as mandated for protection in the NRA Act, and as identified in the DEIS as ORVs (DEIS at III 5-13) are illegally excluded in the present document. (Correspondent 1196)

Forest Service Response: Cumulative effects analysis of the alternatives potential impacts on listed salmon, MacFarlane's Four-O'clock, and the ecological ORV is addressed in Chapter IV. Consultation for federally listed species has been completed with FWS and NMFS as addressed in Chapter IV. An environmental assessment that proposes to eliminate the conflict between domestic and bighorn sheep management is scheduled to have a decision notice released in April, 1994.

Comment 100-7. Cumulative effects analysis is not adequate in that there is very little attention paid to past activities/decisions/lack of regulations/lack of implementation of decisions, i.e., what has been the effect on ROS 7 attributes due to: a) lack of regs for powerboat use and numbers since 1975, b) increased access at Pittsburg and Hells Canyon Dam, c) lack of re-evaluation and regulations on powerboat use in Summer 1985, d) failure to implement the decision limiting commercial powerboat use as per Sec of Ag decision, e) buildup of Kirkwood as a destination attracting people, etc. or scenic - every thing done and not, etc. (Correspondent 2345)

Forest Service Response: Chapter III has been refined to display the desired ROS settings for the recreation ORV. Chapter IV cumulative effects analyses have been refined under the recreation and social/economic sections to better address these concerns. Many of these concerns have been the catalyst that led to the need for the visitor use study, LAC planning process recommendations, and the purpose and need for action as identified in Chapter I. Annual use figures were instrumental in the development of the range of alternatives and are available for review in the analysis file.

Comment 100-8. One obvious flaw in the draft is treating historical use data of power and float users similarly. This is incorrect since float boaters have been regulated from the beginning while power boaters have never been regulated. (Correspondent 2677)

Comment 100-9. Also it is never analyzed how this severe shift to powerboat use vs floatboat even addresses the key indicators you made up like - potential to displace recreation users? or - degree of user fairness and equitability or - user encounters river congestion (a one way raft trip has less impact on either than a 2-way plus jetboat trip). (Correspondent 2345)

Forest Service Response: Key indicators in Chapter I have been refined to tie more closely with management objectives. The environmental consequences of the alternatives are displayed in Chapter IV and summarized in Chapter II using those key indicators.

Comment 100-10. The DEIS "Environmental Consequences" mentions no positive points regarding Alternative B and speculates about possible negative points. These are potential increases in jetback use, diminished sense of remoteness and possible increased commercial use. Jetbacks and commercial use increases can be controlled by restricting use to current levels if necessary. Users concerned about the degree of remoteness need to be cognizant of the fact that Hells Canyon is a NRA not a wilderness area. Idaho and the Pacific Northwest are blessed with numerous wilderness areas for those who seek more remoteness than Hells Canyon affords. (Correspondent 1167)

Forest Service Response: The Forest Service agrees in principle, as presented in Appendix H. However, it is Forest Service responsibility to provide recreation opportunities that are compatible with the Wild and Scenic Rivers Act to protect and enhance the rivers ORV's.

Comment 100-11. The absence of important environmental studies to correctly characterize the environment and the possible impacts that the current activities are causing, Alternative B as modified would be the prudent action. (Correspondent 610)

Forest Service Response: It is the responsibility of the Forest Service to err conservatively in management of the Snake River to ensure the protection and enhancement of the rivers ORV's, pursuant to the Wild and Scenic Rivers Act. In selecting the DEIS preferred Alternative E and the FEIS preferred Alternative G the Forest Supervisor decided these alternatives provided use levels that would minimize potential degradation to the rivers ORV's and still provide an appropriate and compatible mix of recreational opportunities.

Comment 100-12. The decision is yours alone to make. I know what your planning team has recommended and as discussed, I feel that they are creating more problems with Alternative E than they are solving. (Correspondent 1190)

Forest Service Response: Thank you for your comment.

Comment 100-13. The degree of impact by different river users, we feel in the DEIS is not spelled out clearly. For example take 100 users days broke into a 4 day rafting trip versus a one day jet boat tour. Both trips begin at Hells Canyon launch site and go to Pittsburg Landing. The raft trip broken down would consist of 25 people total, each night during the trip they would be camping along the river spending a fair amount of time in camp, during the day stopping along the way at points of interest. The jet boat trip would consist of 25 people each of the four days. Spending a fair amount of time on the boat stopping at points of interest along the way. In a nut shell both groups are stopping at points of interest impact here is the same, the jet boat passengers though would not be camping in the canyon, thus not showing impact on the river banks as much, nor using the rest room as much while in the canyon. (Correspondent 1194)

Forest Service Response: The Forest Service agrees in principle that day-use is not as environmentally impactful as overnight use. But it is important to understand our management objectives to provide backcountry recreation opportunities that provide overnight opportunities for both motorized and non-motorized users. The FEIS preferred Alternative G proposes use level allocations, party size restrictions, active education programs, solid human waste carryout, and no burning of native vegetation with the intent of protecting and enhancing the river's ORV's.

Comment 100-14. We were extremely disappointed that the Forest Service preferred alternative included no directives for solitude from jet boats and skis or river corridor restoration from livestock. What about the impact of these factors on salmon? It is incredible that these issues are not specifically addressed in alternatives in the DEIS! (Correspondent 2570)

Forest Service Response: Both the DEIS and FEIS preferred alternatives provide periods of exclusive non-motorized use (reference Chapter II). Personal motorized watercraft are prohibited in the entire corridor in the FEIS preferred Alternative G. Potential impacts on salmon are clearly displayed in Chapter IV. Impacts from domestic grazing are not specifically analyzed as explained in Appendix D.

Comment 100-15. Your analysis has failed to consider the impact of all river user should you decide to implement your favored plan E. (Correspondent 1065)

Forest Service Response: The direct, indirect, and cumulative impacts of alternatives are clearly displayed in Chapter IV.

Comment 100-16. Hells Canyon National Recreational Act states as its purpose, "To assure that the natural beauty, and historical and archeological values of Hells Canyon area ... are preserved for this and future generations, and that the recreational ... and public enjoyment of the area are thereby enhanced, ..." (emphasis added). Any alternative other than Alternative A does not serve the purposes of the Act in preserving the recreation and public enjoyment of the area. Rather, they serve the purpose of a private area shared only by a limited few. (Correspondent 2339)

Forest Service Response: Alternative A does not meet the intent of the purpose and need for action to develop a new management plan for the river corridor for resolving both social and environmental concerns. Alternative B was developed under an LAC planning process and used as the proposed action. Alternative B generated the significant issues in Chapter I, from which Alternatives C through G were developed to resolve. Recreation is an ORV (reference Chapter III) and all action alternatives strive to protect and enhance the recreation opportunities provided they are compatible with the protection and enhancement of the rivers other ORV's.

Comprehensive Management Plan (CMP) Adjustment

Many comments were received regarding the CMP for the HCNRA, and how a recreation management plan for the Snake River corridor would relate to adjustments in the CMP.

Comment 100-17. Piecemeal planning as represented in the DEIS illegally forecloses the option to examine cumulative impacts to a variety of resources, uses, and values that are specifically mandated for protection. Impacts to water quality, river riparian quality, riverine wildlife habitat for chukar, elk, songbirds, raptors, and listed salmon species are affected cumulatively through a variety of human activities, not just river boats and their inhabitants. Again, the limited scope of the DEIS does not allow examination of all relevant impacts to the river ecosystem, for example, increased numbers of campers, ORV's, cattle and sheep. Salmon, for instance, are cumulatively affected by dams, sedimentation and water pollution from livestock, timber cutting and roadbuilding, and jetboats. But the DEIS analyzes only impacts from jet boats. Implementing a new river plan prior to an overall NRA CMP also creates a perceived, but artificial "safety net" in determining impacts to salmon. Impacts to listed salmon species allowed in the river plan could be determined to be under the legal threshold of "may effect" in isolation. But ongoing, or considered future activities in the CMP revision could subsequently exceed the threshold, or be bound by the magnitude of affects from river plan activities. (Correspondent 1196)

Forest Service Response: The Forest Service purposely chose to narrow the scope of the proposal and analysis of this EIS to concentrate planning efforts on developing a resolution to a very controversial subject. The cumulative effects analysis for the ORV's and social/economics adequately addresses the connected actions to the proposal, inclusive of the past, present, proposed, and reasonably foreseeable actions. Reference responses in this section addressing salmon for further discussion.

Comment 100-18. No AMP's for livestock allotments on the HCNRA are complete. The DEIS references the analysis process for livestock allotments at D-2, stating that it will occur sometime in the future. However, the time required to complete all of these analysis as per NEPA will be great, and their

absence at this time allow continuing identified and potential impacts to occur. Although the proposed CMP revision will have to address these issues, it will take time to prepare, for research and monitoring to be conducted, for scoping, public involvement, meetings, and preparation of draft documents and allowance of comment periods. This would result in a window of time in which significant impacts could occur, or continue to occur, due to the failure to recognize connected actions and cumulative impacts. The window of time between when the DEIS is approved, and the new CMP EIS is approved, allows for degradation to occur to listed species and may foreclose joint alternatives for reducing or eliminating impacts to them through an integrated EIS and plan.

Failure to address obvious public concern over livestock impacts disregards documented public concern that the Forest Service is required to encourage. The NRA cannot be managed as an ecosystem with piecemeal planning. The river plan will have to be re-analyzed in context during the CMP revision process in order to consider and integrate new information and conditions elsewhere in the canyon. The Forest Service should table the river plan project, releasing no decision based on its directives, but integrating its information into the CMP revision. In the interim, implement restrictions on jetboat levels as per our recommendation in the "jetboat numbers" section, and regulations as per our "jetboat use regulations" section to ensure protection of NRA resources. (Correspondent 1196)

Comment 100-19. Implementation of the preferred alternative in the DEIS will, inevitably trigger livestock management actions related to the protection of water quality, habitat, scenic and wilderness values and recreational management. For example, the DEIS provides that implementation of any of the listed alternatives would result in powerboat use impacts to spawning Snake River Sockeye Salmon, a federally listed endangered species and Spring, Summer and Fall Chinook Salmon which are federally listed threatened species. DEIS, at IV-59-61. Therefore, none of the alternatives may legally proceed without additional agency actions such as reductions in livestock grazing or improved riparian management in order to protect these fish. In addition, it is highly likely that any such actions, particularly if they are likely to affect an endangered species, will require the production of another EIS. (Correspondent 2344)

Forest Service Response: The cumulative effects of active domestic grazing allotments are being analyzed as part of the biological assessment for consultation with NMFS on the listed salmon species. Management of the domestic grazing allotments would be adjusted pursuant to the terms and conditions of the biological opinion rendered by NMFS.

The CMP adjustment strategy will review the issue of domestic livestock grazing based on new information from salmon recovery plans, the Columbia River Basin Ecological Assessment, NEPA/NFMA planning process for adjusting the CMP, the ongoing AMP process for the Pittsburg Allotment, and the environmental assessment for bighorn-domestic sheep management.

Comment 100-20. Continuation of livestock grazing, timber cutting, and roadbuilding, which are currently allowed in the CMP, will combine with recreation impacts allowed in the DEIS preferred alternative to affect listed salmonids, bald eagles, bighorn sheep, peregrine falcons, and wilderness values. The preferred alternative may cumulatively affect elk, cougar, lynx, marten, and other solitude-dependent mammals when combined with ongoing recently completed, and planned road grading and paving. The DEIS does not sufficiently analyze the cumulative impacts of jetboats, aircraft, and automobile traffic. We are urgently concerned with the cumulative impacts to archaeological sites, solitude dependent wildlife, and recreationists seeking silence and solitude via creation of a "national motorized area." (Correspondent 1196)

Forest Service Response: The focus of this EIS is on the purpose and need for developing a new recreation management plan for the river corridor. This allows the planning team, responsible official,

and the public to clearly understand and focus on river management issues rather than on the broader, more complex, controversial issues addressed in the forthcoming analysis of and potential revision of the CMP, now a component of the current Forest Plan. Chapter IV adequately addresses the direct, indirect, and cumulative effects of the alternatives on the ORV's of the river and on other river-related resources. The effects analysis fully discloses the potential impacts and provides the responsible official a solid basis from which to make an informed decision.

The CMP was incorporated into the current Forest Plan. This EIS tiers to the Forest Plan as provided for by 40 CFR 1502.20; 1502.4 (d); and 1508.28. The CMP, as part of the Forest Plan, is undergoing its tenth year review and evaluation to determine if there are needs for change. New information related to the river corridor will be considered in this effort. If needed, the river management plan will be amended to accommodate any changes to the CMP, and, consequently, to the Forest Plan. Ecosystem sustainability will be analyzed in detail through the Columbia River Basin Ecological Assessment EIS and CMP adjustment process.

Comment 100-21. The limited scope of this DEIS is also inconsistent with the directives of the NEPA. NEPA required that closely related actions and issues be analyzed in the same document (40 CFR 1508.25a). IRU [Idaho Rivers United] feels that many of the issues raised but not included in the detailed analysis (Appendix D) such as domestic livestock grazing, exotic vegetation, facilities development, and other activities within the canyon corridor such as timber harvest, road building, and hydro-system operations, are so closely related as to require analysis in the same document. IRU recommends preparation of a Hells Canyon Comprehensive EIS that examines the full range of human activities within the HCNRA. We recommend suspension of the SR [Snake River] Recreation Mgmt Plan EIS process until a revised comprehensive plan can be developed. (Correspondent 2501)

Comment 100-22. NPCA [National Parks and Conservation Association] is concerned that the proposed plan (1) will be implemented before the HCNRA management plan is amended or rewritten, (2) focuses on recreational activity on the river disregarding serious environmental and legal concerns, (3) lacks scientific research to justify actions and, (4) fails to include a complete economic analysis.

We believe the DEIS to be deficient for the reasons outlined above and should be withdrawn. Consideration of the river issues should be incorporated within a revised management plan for the NRA. Within the interim, all degrading uses of the river would be halted to ensure protection of the river ecosystem. (Correspondent 2343)

Comment 100-23. I believe the Forest Service needs to take a management approach that looks at the resources in a more connected fashion rather than one that addresses issues separately. For example, we are currently in the middle of an environmental impact statement process that looks only at arranging the different recreational uses of the Snake River. It does not take into account how activity on the river fits into total recreational use of the area or how it affects the resources. Without a system-wide planning approach, the resources of Hells Canyon will be in jeopardy. (Correspondent 2217)

Comment 100-24. The attempted intermeshing of the new river plan with the 14-year old NRA plan creates an obvious inconsistency in directives based on inconsistent, and/or invalidated information, and represents piecemeal planning. (Correspondent 1196)

Forest Service Response: The decision from this EIS will need to be reviewed in the CMP adjustment strategy. Review of the new management plan would be based on new information or research that indicates that the new management direction is not adequate in protecting or enhancing the river's ORV's or meeting the objectives of the HCNRA Act.

The analysis conducted in this EIS is of an appropriate nature to make an informed decision prior to completion of the CMP adjustment strategy. The scope of this EIS comprises complex and controversial social and biological issues that have required the near full time attention of a planning team to address. Incorporating the river management issues into the larger CMP adjustment strategy and potentially the formal adjustment of the CMP could "water down" the issues and detract the planning team from the full attention these issues require.

Comment 100-25. As for the proposed regulations, I would like to emphatically state you are in error when at IV-95 you state, "Alternatives in this DEIS would not conflict with the management of the Lower Salmon River Management Plan administered by the BLM." Quite the contrary. This DEIS will greatly affect both the management and use of the Lower Salmon. (Correspondent 973)

Forest Service Response: The statement is correct. The DEIS preferred Alternative E would have the potential to displace Snake River users to the Salmon River as addressed in Chapter IV under the recreation and economics sections. The FEIS preferred Alternative G minimizes displacement of recreational users as displayed in those same sections of Chapter IV.

Comment 100-26. The benefits clearly seem to be aimed at the Snake outfitter in respect to creating a more regulated "wilderness like" experience being perceived as a more valuable commodity. On the other hand, Salmon outfitters will not have significant "wilderness like" improvements, hence the perceived value of the experience will not rise. Combine this with increased users and a decrease in anticipated revenues and you have a financial situation that takes money out of our pockets and makes the Lower Salmon a less desirable place to float. You can't take your problem and just dump it on another river without addressing these issues in your DEIS.

In summary, while I think many of the issues are valid, I strongly believe that this DEIS is not complete and is not adequately dealing with the use conflicts that these regulations will impose on the Salmon River. With so little regard for Salmon users, both commercial and private, I think a halt should be made until these issues can be properly addressed, commented on and implemented into this document. (Correspondent 973)

Forest Service Response: Chapter I clearly articulates that the proposal for action and the purpose and need for action is specific to the Wild and Scenic Snake River corridor. The cumulative effects of management actions resulting from the proposed alternatives on the Salmon River are considered in Chapter IV.

The planning team has coordinated with the Salmon River managers to ensure compatibility of management direction and Salmon River user transition onto the Snake River. This management coordination is embodied through a Memorandum of Understanding between the two managing agencies (Reference the Analysis File).

Limits of Acceptable Change Planning Process

Many comments were received concerning the use of the LAC planning process and the recommendations brought forward in the DEIS and FEIS as Alternative B. The following comments are representative of the comments received.

Comment 100-27. We have had representatives from all factions of our community and other communities/businesses working on the LAC task force, generating Alternative B. The plan is the successful culmination of 22 months of hard work, thousands of man-hours and dollars spent

producing a simple, self-regulating, workable plan placing no hardships on anyone. We feel that this task force is the fair and democratic way to handle this issue as opposed to Alt E cut from whole cloth and out of touch with the needs of both the tourist industry and the tourists. (Correspondent 1020)

Comment 100-28. The plan [Alternative B] was developed by a diverse group of interested, concerned, educated users and managers of the river corridor after hundreds of hours of research. It represents the most desirable, multiple use of the area and can be implemented to protect the river ecosystem without undue hardship on any one group of river users. (Correspondent 1024)

Comment 100-29. The only limits that could be acceptable are those suggested in Alternative B. Those suggested by the Hells Canyon Alliance. (Correspondent 1141)

Comment 110-30. On the very first page of the DEIS, the Forest Service states, "The proposed action has been developed using the recommendations from the LAC Task Force Report." Yet, in selecting its preferred alternative, Alternative E, the Forest Service specifically rejects the most important part of the package--motorized and non-motorized craft limits. The LAC recommendations were made by representative of the very groups that the Forest Service claims to be accommodating in its proposed amendments. Those recommendations are the product of two years of thought, discussions, consensus building, and compromise. It is arrogant and unfair for the Forest Service to reject those recommendations and to presume that it can balance the needs of the recreational users better than the users can do themselves. (Correspondent 2110)

Comment 100-31. We understand that the ID team may feel that Alternative E responds to some of the concerns expressed by people at meetings held almost two years after the LAC Task Force. However, they have failed to recognize that Alternative B not only responds to these same concerns, but also accounts for the greater good of the public by providing opportunities to wisely use the river as a shared resource. (Correspondent 2224)

Comment 100-32. Adopting other than Alternative B will just add to the general populace's list of discontent with governmental actions. (Correspondent 1178)

Comment 100-33. Alternative E contradicts consensus by the 22 member LAC task force and lacks reasonableness. (Correspondent 1153)

Comment 100-34. The Company [Idaho Power] supports the LAC Task Force's recommendation concerning motorized and non-motorized use year round. The Co. believes that most powerboaters and floaters are able to be courteous to one another and cooperatively share the river. With proper education and enforcement, cooperation and understanding between user groups can be established. (Correspondent 1170)

Comment 100-35. The LAC task force volunteers represented not only a very diverse cross section of the user groups concerned with the future of the area but also many, many years of personal and professional experience within Hells Canyon. The wisdom of their concerns and comments were coming from those years spent in the canyon. Their proposals for workable future management came from personal knowledge of the facts, not economic reports, sociology degrees and computer models. They spoke the truth as they know and saw it, not as shown to them by any high powered lobbyist team or a mailing list generated write in campaign. (Correspondent 1190)

Comment 100-36. The assertion that floaters and powerboaters are unable to agree on levels of combined use to achieve the desired recreation experience and that we are unable to reach a consensus on use levels is flatly untrue. Representatives of both user groups participating in the LAC process generally were able to come to a consensus. (Correspondent 126)

Forest Service Response: Having conducted a publicly open NEPA planning process, the FEIS preferred Alternative G proposed to fully or partially implement many of the management components brought forward from the LAC planning process. Those management components not implemented are those that have been the primary issues in this EIS related to a fair and equitable allocation of recreational use levels.

There was a minority report submitted by two members of the LAC committee because they felt the allocated numbers for commercial and private powerboats were too high. The minority report submitted deals with some of the same significant issues in this EIS. (Reference the analysis file.) Using the recommendations from the LAC planning process as the proposed action showed substantial disagreement between the diverse users on what is or should be a fair and equitable allocation of recreational use. The disagreement continued with the selection of Alternative E as the DEIS preferred alternative.

The Forest Service planning team has spent over 18 months on a nearly full-time basis exploring resolution to the issues generated by the recommendations from the LAC planning process. In addition, the LAC planning group was at a disadvantage in its deliberations due to the lack of viable recreational use data in which to establish consensus for use levels. As part of this EIS process the Forest Service planning team has initiated data bases with recreational use figures from 1973 to 1992. This recreational use data has been an integral component for the planning team to explore options for fair and equitable use while protecting and enhancing the rivers ORV's.

The Forest Service planning team identified the river corridor's ORV's and DFC's early in the planning process to display to the public the need to provide recreational opportunities while protecting and enhancing those ORV's for which the river was designated wild and scenic. The ORV's and DFC's were used as a framework to develop alternatives to the proposed action and resolve the issues it generated.

The LAC planning process might have resulted in a different recommendation if the new data and the same clear management objectives for ORV's, DFC's, and ROS had been available to them.

Comment 100-37. Over a period of two years a task force assembled by the Forest Service labored over a management plan for the river. This task force included representatives from all user groups, local governments and conservation organizations. The result of their efforts is displayed in the DEIS as Alternative B. It has the support of all major user groups involved in the canyon. These folks have come together and formed the Hells Canyon Alliance. (Correspondent 2333)

Forest Service Response: Recommendations from the LAC planning process were used as the proposed action in the initial scoping for issues in the DEIS and was developed as Alternative B in both the DEIS and FEIS. Through the scoping process, many issues were identified which showed that there was not strong support for the LAC planning process recommendations from the diverse group of users. Other alternatives were developed to address those issues.

Comment 100-38. Forest Service representatives stated that the "new" guidelines used to create Alternative E were not devised until after the task force was disbanded. It seems to me that the reasonable method for handling this situation would be to reconvene the task force and allow them to update their recommendations armed with the entire package. (Correspondent 1017)

Forest Service Response: The LAC planning process ended with the completion of its recommendations in September 1991. After making its recommendations, the LAC planning process recognized

that the Forest Service would take the recommendations forward into the NEPA planning process. Members of the LAC planning group have been individually involved through this EIS process.

Comment 100-39. There was obviously no recreation input to this proposal or any input from anyone that works in the river canyon. I encourage you to adopt the task force recommendation. (Correspondent 1085)

Forest Service Response: A considerable amount of input from recreation managers is included in this analysis. Reference the list of preparers in this FEIS for their qualifications and responsibilities.

Comment 100-40. I think the IDT and deciding officer should re-evaluate the level of influence the illegal Federal Advisory Committee played in this process - the entire NEPA process is suppose to be "open" while the LAC group worked without full and open public involvement for several years before the public was involved. The LAC group included non-Federal employees so should have been set up under the Federal Advisory Committee Act. It appears the LAC group had a big influence in defining DFC, issues, and key indicators used in the analysis. (Correspondent 2345)

Forest Service Response: The Forest did enter into a cooperative agreement with the University of Idaho to develop a LAC planning process. However, this effort ended well before the NEPA process for the Snake River Management Plan began. Although the proposed action was developed using some of the recommendations developed through the LAC planning process, at the time the NEPA process began, extensive scoping took place in which the Forest gathered opinions, comments, ideas, and suggestions from a wide variety of sources and interest groups. This allowed for development of alternatives which address river management issues and achieve the DFC's and ROS settings for the river corridor. The key river management issues and the different alternatives are a direct result of public comment and recommendations from individuals and interest groups gathered in the scoping process.

Comment 100-41. Alternative E was devised by people not personally involved in the use of the canyon or as indepth study as the LAC plan. (Correspondent 1142)

Forest Service Response: Reference the list of preparers in this EIS for list and qualifications of the planning team members. The EIS process has resulted in a great deal of analysis and public involvement, as referenced in previous comments with the objective of developing a management plan that strives to achieve a balance of local, regional, and national interests while protecting and enhancing the rivers ORV's.

Comment 100-42. I feel that Alternative B, based on the LAC task force recommendations, with some minor modifications should be the implemented alternative. Since the foundation of this DEIS is based on the proposed actions recommended by the LAC task force as stated on page I-1, then the LAC recommended solutions should also be part of the final decision.

Comment 100-43. IOGA [Idaho Outfitters and Guides Association] is concerned with the impact of adoption of any set of recommendations or actions substantially different from the LAC task force recommendations. Substantive rejection of the LAC task force recommendations and proposed actions will negatively affect the ability of the Forest Service to solicit similar support from the public to be involved in LAC in the future. Was the multi-year, expensive HCNRA LAC process substantive and credible? Your actions should answer that question. (Correspondent 1185)

Forest Service Response: The recommendations from the LAC planning process were comprised of 23 general management components. The FEIS preferred Alternative G propose to fully or partially implement the majority of those management components for which there has been wide public support. Those management components not implemented are those that have been the primary issues in this EIS related to a fair and equitable allocation of recreational use levels.

Comment 100-44. I strongly support the selection of Alternative B as detailed in the LAC plan proposed by the public task force. You have not shown adequate reasons for not selecting this alternative. (Correspondent 1174)

Forest Service Response: Alternative B was not selected as the DEIS preferred alternative because the Forest Supervisor felt it did not provide the best mix of recreation opportunities and did not adequately resolve the significant issues generated by the public using Alternative B as the proposed action in the scoping process.

Comment 100-45. IOGA [Idaho Outfitters and Guides Association] recommends the adoption of the recommendations and proposed actions of the LAC task force. The majority of the elements of the task force position are contained in Alternative B. The efforts of the Task Force represent years of work by a diverse group of citizens, interest groups and the Forest Service. During that process, the groups learned a lot about the resource, about other group's perspectives and about themselves. The recommendations and actions adopted by the LAC task force, in IOGA's opinion, represent the best chance of striking an acceptable and sustainable compromise on the issues identified by the process for HCNRA. IOGA bases its recommendation on the following beliefs: There is no alternative available that will meet all the needs of all the interest groups. The small team of Forest Service resource specialists faced an impossible task in trying to fashion an alternative that can replace, in scope and substance, the efforts of the large, diverse (including Forest Service) LAC Task Force. Use of the LAC process and citizens task force as a management planning tool should commit the Forest Service to a very stringent standard for adoption of any alternative that is substantially different from the task force recommendation. (Correspondent 1185)

Forest Service Response: Participants of the LAC planning process fully understood that their recommendations would need to be carried forward into the NEPA planning process prior to a formal decision (page 2 of the LAC planning process recommendations). The LAC planning process recommendations listed in Chapter I of this EIS were used as the proposed action in the identification of significant issues from the public, relating to the possible implementation of the recommendations.

The Forest Service planning team has spent over 18 months on a near permanent basis exploring resolution to the issues generated over the LAC planning process recommendations. As part of this EIS process we have initiated data bases with recreational use figures from 1973 to 1992. This recreational use data has been an integral component for the planning team to explore options for fair and equitable use while protecting and enhancing the rivers ORV's.

Comment 100-46. The creation of a set of guidelines entitled the LAC is the best step in the right direction. I've listed below some ideas that I believe will help to create harmony among all users in the canyon, lower environmental impact and provide a chance for guides and outfitters to continue their livelihood in Hells Canyon. Leave the float launch system intact. The limits provided by this system work. Limit float trips to 8 inflatables total. Use the LAC number of 600 power boats per season with 20% of those commercial. Limit each jet boat to the wild section of the river to two round trips through the wild section of the river each day. Set jet boat operating hours at 8-5 in the wild section of the river. Establish a decibel limit on power boats. Educate jet boaters to use one side of the river

to pass, when possible. No wake for all craft that are passing boats that are tied up. (Correspondent 1088)

Forest Service Response: Thank you for your comment. Your ideas are appropriately addressed through other sections of this appendix.

Comment 100-47. Use the LAC task force recommendations in developing your plan rather than so much on public comment which is often based on emotion or opinion rather than documented studies and facts. (Correspondent 1089)

Forest Service Response: The public comments received during the scoping and comment periods act as a barometer to the planning team and responsible official on the needs and desires of the local, regional, and national publics. Chapters III and IV provide detailed analysis of the environmental, social, and economical impacts on the river environment and its users.

Comment 100-48. The Forest Service exceeded the Limits of Acceptable Change when you constructed the new campground at Pittsburg Landing. (Correspondent 437)

Forest Service Response: The limits of acceptable change were not exceeded. First, the recommendations from the LAC planning process did not set management policy. Implementation of the project was already well underway by the time the LAC planning process was used to review the proposed development. Recommendations did not set management direction or policy prior to development because they have only recently been brought forth in scoping as the proposed action. The development at Pittsburg Landing was within the guidelines recommended through the LAC planning process.

Second, while it is a new development with the normal, visual changes as a result of new construction, we feel that the major vegetative screening program established on site, involving the planting and drip irrigation of over 400 trees, will mitigate visuals over the long term. For instance, as these irrigated trees grow and mature, the site will become less visually obtrusive from the river than it was prior to construction when no designated parking was available for river users' vehicles, minimal vegetative screening was present, and parked vehicles were scattered across the hillside.

Finally, the existing CMP, developed through an EIS and implemented in 1983, provided management direction for the development of a modern campground at Pittsburg Landing (CMP, page 26). NEPA analysis for this development was conducted in an environmental assessment that was signed long before the LAC planning process revealed recommendations on the site. New management direction can only be arrived at through completion of planning in accordance with NEPA guidelines.

Alternatives Code 101

Many comments were received through modified form letters concerning the Alternatives C, D, E, and F and their perceived inadequacy or unacceptability. The following comments are representative of the comments received.

Comment 101-1. Alt C, D and F are nothing short of obscene. They discriminate against powerboaters and treat them as second class citizens. (Correspondent 101)

Comment 101-2. Alt C, D and F are completely unacceptable and would cause severe disruption to recreation in the canyon. (Correspondent 846)

Comment 101-3. Alt C, D, and F are also completely unacceptable, with even more severe impacts on area economics and the river's users than E. (Correspondent 501)

Comment 101-4. Please do not consider plans C, D, E or F. To contemplate not going to Kirkwood Landing and beyond is unthinkable. (Correspondent 1057)

Comment 101-5. The Asotin County Board of Commissioners are opposed to alternatives C, D, E, and F. (Correspondent 256)

Forest Service Response: Alternatives C, D, E, and F were developed in response to the significant issues generated through the scoping process using the LAC recommendation as the proposed action (Alternative B). These alternatives were developed to resolve significant issues and meet the intent of the purpose and need for action. As noted in the content analysis summary in the introduction of this appendix, comments on the DEIS were received from local, regional, and national interests. The users of the Wild and Scenic Snake River have diverse recreation interests and values, so the scoping resulted in a wide range of alternatives.

None of the alternatives eliminate valid motorized or non-motorized watercraft. They strive to develop alternative management scenarios for management of the river corridor that meet the intent of the purpose and need for action and management direction in Chapter I and respond to the issues generated by the vast public at local, regional, and national levels.

More specific responses on economics and access can be found within portions of this appendix.

Comment 101-6. All alternatives in an EIS such as this should be viable. Alternative F clearly is not and indicates a disturbing bias on the part of the ID team against powerboating. (Correspondent 126)

Forest Service Response: As stated under "Alternative Development Process" in Chapter II, all of the action alternatives are designed to meet the intent of the purpose and need for action as addressed in Chapter I.

Comment 101-7. If the Forest Service was to leave the Plan B open to changes and modifications over a trial period I'm confident equitable and desirable solutions will be found. (Correspondent 147)

Forest Service Response: The FEIS preferred Alternative G proposes a monitoring period to test the long-term durability of the non-motorized windows and whether the periods should be adjusted.

Comment 101-8. Because alternatives do not have a strong tie to the law, previous decisions and WO [Washington Office] and Regional guidelines, they have a very strong flavor of local interpretation of the law (Administrative Branch is to implement, not interpret or change law). Most alternatives seem to either not implement law/Washington/Regional guidelines, or only implement on one portion of the river or for a few weeks out of the year (7 to be exact). (Correspondent 2345)

Forest Service Response: All of the Chapters in this FEIS have been amended to more clearly define the intent of the acts, planning regulations, management direction, and Forest Service Manual/Handbook guidance.

Comment 101-9. ...an adequate range of alternatives would include the prohibition of motorized watercraft on both the wild and scenic sections of the river. Although Alternative F provides that the wild section of the river will be dedicated to non-motorized use, it allows for a significant amount of motorized use on the scenic section. (Correspondent 2340)

Forest Service Response: Development of an alternative that would prohibit motorized watercraft on the entire river corridor would not meet the intent of HCNRA Act which states under Sec. 10 (d) that motorized and non-motorized craft are recognized as a valid use within the recreation area, nor would it meet the objectives of the purpose and need for action addressed in Chapter I. Thus, such an alternative was not considered or developed by the planning team.

Comment 101-10. I would support an Alternative G to do away with all non-power boat traffic; i.e., rafts, dories, canoes, or kayaks. (Correspondent 427)

Forest Service Response: Developing an alternative that would prohibit non-motorized watercraft would not meet the intent of the purpose and need for action as addressed in Chapter I. Thus, such an alternative was not considered or developed by the planning team.

Comment 101-11. It is our feeling that a permit system here is unwarranted and cannot effectively cover the needs of salmon anglers. Because migration conditions can effect salmon run timing which subsequently alters the times that salmon are available from one year to the next, it is our recommendation that this area be removed from the DEIS. A new alternative should be prepared that sets the upper-most boundary at the top of Wild Sheep Rapids. (Correspondent 2338)

Comment 101-12. ISSU [Idaho Salmon and Steelhead Unlimited] cannot support any of the Alternatives proposed in the DEIS. We request a new alternative be prepared that recognizes the importance of the area from Hells Canyon Dam to Wild Sheep for its anadromous salmon fishing potential. This alternative must be more inclusive than exclusive as it pertains to salmon fishing areas. (Correspondent 2338)

Forest Service Response: The Forest Service recognizes the importance of the upper wild river and its fishing potential. But more importantly we recognize the importance of managing the wild river corridor to protect and enhance the identified ORV's. The planning team did not develop an alternative that emphasizes access specifically for fishing in this portion of river.

Steelhead season for both Idaho and Oregon generally opens on September 1. Under the proposed primary season, this would effect the first 10 days of the season, when the non-motorized periods are no longer in effect. Based on historical use data, there would be ample opportunity during those first 10 days to acquire a permit for that section of river. As an example, in 1991 there were five private powerboat launches from Hells Canyon Dam for the period of September 1 through September 10. Only one launch downstream had that section of river listed as a destination.

The FEIS preferred Alternative G maintains access for those fishing opportunities in both the primary and secondary seasons as noted in Chapter II.

Comment 101-13. In order "to provide an adequate basis for identifying the alternative that comes nearest to maximizing net public benefits...", NFMA requires that such problems be addressed in the formulation of the list of alternatives discussed in the DEIS. 36 CFR 219.12(f). (Correspondent 2344)

Forest Service Response: Although the reference to the Code of Federal Regulations is correct, it does not apply to the intent of this EIS. As stated in the introduction of Chapter I, the proposed federal action is significant in relation to NEPA, but not significant in relation to the planning regulations under 36 CFR 219.12 that guide the preparation, revision, or significant amendment of Forest Plans. Reference the analysis file for direction on adjusting forest plans.

40 CFR 1500-1508 requires an adequate range of alternatives to be considered by the responsible official that respond to the purpose and need for action. The range of alternatives must also address resolution of the significant issues; the alternatives presented in both the DEIS and FEIS encompass the intent of that direction.

Comment 101-13. The significance of the "public benefit" of improved livestock grazing management policies in the Snake Wild and Scenic River Corridor is illustrated by the increasing concern generated by this issue. For example, the "Solitude Alternatives" sponsored by the HCPC [Hells Canyon Preservation Council] call for consideration of the full spectrum of resource uses in the river corridor. Specifically, in addition to managing recreational uses, this proposal would close vacant federal allotments within the corridor; phase out all in-use livestock allotments in the corridor or implement modifications within such allotments to exclude livestock and associated facilities and prevent impacts; close the Sheep Creek allotment; remove range improvements and facilities that are not qualified for historic status or used for administrative recreation management; and restore ecosystems including the restoration of native plants and tributary streams. See the HCPC, the Solitude Alternatives, Citizens' Recommendations for Management of the Snake Wild and Scenic River in the HCNRA 13, (1993) [hereinafter the "Solitude Alternatives"]. (Correspondent 2344)

Comment 101-14. Indeed, the LAC task force initiated by the Forest Service itself for the specific purpose of developing the new Snake River management plan. See DEIS at I-1, recommended that the agency not restock any allotments within the Snake Wild and Scenic River Corridor, that the agency minimize contact between domestic and wild sheep and the implementation of efforts to remove livestock wastes from campsites and beaches. These recommendations, however, are noticeably absent from any of the alternatives listed in the DEIS. (Correspondent 2344)

Comment 101-15. Rest the West therefore specifically requests that the Forest Service take all actions necessary to address the concerns listed in these comments. In addition, because they fail to consider the wide range of resource uses in planning the future of the river corridor, we reject as acceptable any of the alternatives listed in the DEIS. (Correspondent 2344)

Comment 101-16. It appears to me that the Forest Service alternatives place higher value on motorized and livestock use as opposed to less obtrusive activities. I am particularly frustrated with the dominance of the jet boats. (Correspondent 2558)

Forest Service Response: Chapter I clearly articulates the specific recommendations, considered connected actions, brought forward from the LAC planning process as the proposed action. Implementation of LAC recommendations concerning domestic grazing allotments and big horn sheep management are ongoing through other environmental analyses. Reference comments under the domestic grazing section of this appendix and Appendix D for further discussion.

The CMP adjustment strategy will further review domestic livestock allotment issues.

Reference responses to use levels in this appendix for additional discussion.

Comment 101-17. Kirkwood, Cache Creek, and Jim Creek Roads lead to the river corridor and must be included in the analysis. (Correspondent 1196)

Forest Service Response: Chapter III has been rewritten to acknowledge that these roads provide potential access to the river corridor. Currently, the Cache Creek and Jim Creek roads are closed to public use. Administrative use of these roads does occur. The long-term objectives and management of these roads will be considered further under the ongoing CMP adjustment strategy. The Kirkwood road is currently being managed pursuant to the CMP direction and will be further reviewed under the ongoing CMP adjustment strategy.

Any analysis that could lead to opening and/or managing these roads for public access to the river corridor would need to consider the potential impacts on the ORV's and desired ROS characteristics.

Comment 101-18. The Forest Service planning team seriously erred in not providing an alternative similar to B that appropriately addresses the scenic section of the river. (Correspondent 1179)

Forest Service Response: Alternatives C, D, E, F, and G do provide for allocating use levels within the scenic section as addressed in Chapter II.

Comment 101-19. Alternative B leaves the Scenic Snake River open to both float and power use. The original version of this alternative provided a trigger point at which use limits would be considered, but these do not appear in the DEIS. (Correspondent 260)

Comment 101-20. The original LAC version of Alternative B provided a trigger point at which use limits would be considered, but these do not appear in the DEIS. (Correspondent 970)

Forest Service Response: Thank you for bringing this to our attention. This "trigger point" has been added to the description of Alternative B in the FEIS. However, since use levels would only be established at an unknown "trigger point" in the future based upon monitoring, there was no rationale to establish a set limit in the DEIS. Therefore, for analysis purposes and to compare the level of use in Alternative B with all other alternatives, the existing situation of unlimited access was used as the baseline for analysis.

Comments Opposing Alternating Exclusive Use Weeks

Many comments were received concerning the alternating exclusive use weeks of the DEIS preferred Alternative E. Following are examples of those comments.

Comment 101-21. Alternative E with its alternating weeks in the wild section will cause serious damage to both float and powerboat operations. (Correspondent 932)

Comment 101-22. Alternative E, separating the uses by alternating weeks between floaters and powerboaters, is unnecessary and overly restrictive. (Correspondent 1116)

Comment 101-23. Alternate weeks, this proposal does not allow enough flexibility for float trip scheduling. I spend about one week during the summer floating this section and for me to continue that under this plan I would be forced to obtain a permit for a Thursday put on. (There would be about 10 available for the summer season) Competition for those put ons plus the fact that the week begins on a Thursday (competition from floaters that just have a weekend) would most likely prevent me from ever spending a week in this section again. Also the last two days of this float period would essentially be a dead zone for floaters unless they just wanted exercise rowing down the river as fast as possible. Power boats would have an advantage of more user time on the river because of their greater mobility. I would prefer to have longer on/off periods if this is implemented, on the order of 10-14 days. (Correspondent 2808)

Comment 101-24. Alternating weeks between rafters and power boaters is a bad solution for a non-existing problem. We have several friends that are rafters and we like to meet one another for mini camping trips. (Correspondent 1122)

Comment 101-25. By offering to segregate the major river users, you end up punishing the majority of people who either visit the canyon each year or earn their living there. What appears as an effort to appease a few small but vocal user groups who make a career of attacking the Forest Service, instead ends up hurting everyone. (Correspondent 1190)

Comment 101-26. By using the alternating week scheme each user group would have their access to the river cut in half, which in turn makes it much more difficult to get a launch permit during the regulated period. And I cannot imagine there is that much powerboat usage above the Kirkwood Ranch. (Correspondent 2402)

Comment 101-27. Float trips take three days or more. It will be a management problem to get floaters to their destination without conflicting with powerboaters. (Correspondent 738)

Comment 101-28. Floating the Snake is a challenging logistical and scheduling experience. It is already difficult enough to try and get six or eight peoples schedules together to make a trip. If an alternate week plan is implemented, half of our opportunities are gone before we start, even worse if you consider that launches late in "our" week would by your proposed rules be limited to less than a week. (Correspondent 1128)

Comment 101-29. I do not think that floaters and boaters should be forced to alternate weeks for use of the river. I think that approach is a hardship for outfitters, especially those using motorized craft. Outfitters have distinct seasonal employment that would be cut in half by proposed restrictions. Floaters have several alternative rivers to use in off-weeks, motorized craft operators do not have that luxury. The proposed severe limits on access will probably put a lot of people out of work. (Correspondent 2821)

Comment 101-30. The way you have the preferred plan, I would have to float from Hells Canyon Dam to Kirkwood (a regular 4 day trip) in two days so I was off the wild stretch before the jet boats came in. It then would put me having to take out at Dug Bar which is an added expense and a worse road than at Pittsburg Landing. (Correspondent 1162)

Comment 101-31. This [overnight stay proposal], coupled with the proposed 24 powerboat launches to 12 floatcraft launches in the wild section will mitigate any beneficial effect the proposed alternation of motorized and non-motorized weeks will have. (Correspondent 2741)

Comment 101-32. When we go into Hells Canyon area it is when friends or relatives come from out of town, and we then want to show them about the Hells Canyon area. You can't plan several weeks ahead of time on weather conditions. (Correspondent 1130)

Comment 101-33. [Alternating exclusive use weeks] would segregate me from the pleasure of watching the younger groups in the rafts, kayaks, and canoes. There is still great pleasure in watching (up close) a sport that I can no longer perform or participate in. (Correspondent 1786)

Forest Service Response: The alternating weeks of exclusive use for the upper wild river was not brought forward into the FEIS preferred Alternative G. Public opinion was mixed on the "on/off" management concept proposed. Throughout the public scoping process and the DEIS comment period, it was obvious that many motorized and non-motorized users favor regulating motorized use (reference the content analysis in the introduction of this appendix). Many of the non-motorized users were mixed on their preference for encountering motorized use. A portion of non-motorized users like the presence of motorized craft from a safety and convenience factor. The remaining non-motorized users would prefer exclusive non-motorized use in the entire wild river, or at least a portion of it.

There appears to many misperceptions about the use of alternating weeks of exclusive use. Many motorized users, both private and commercial, understood this management concept would apply to either the entire river or entire wild section; thus precluding them from recreational or financial opportunities. A thorough review of the alternative description in Chapter II and potential environmental effects in Chapter IV would clearly display the management proposal and impacts.

The DEIS preferred Alternative E was presented in its present form with the intent that the responsible official and planning team understood there would be potential conflicts identified in the management of the basic concept. The responsible official and planning team had hoped that through the DEIS comment period the public would provide feedback that would allow the planning team to adjust the "on/off" strategy to allow for it to be carried forward into the FEIS as a viable preferred alternative.

Based partially on the public comment received, Alternative G was developed to emphasize shared-use of the river while providing a non-motorized period for users who prefer that type of experience in Hells Canyon. The non-motorized period is designed to miss the major holidays and is scheduled during the historically low use days of the week to minimize impacts on motorized users. Reference Chapters II and IV for a full discussion on the alternative and the potential environmental consequences.

Comment 101-34. One proposal in the preferred alternative that has generated much comment is the idea of alternating weeks set aside for exclusive use by power boaters or float boaters. I can understand the notion of providing certain times in the wild river experience portion of the Snake River during which river experience is not intruded upon by the sights and sounds of motor boats. I do not think the approach of alternating weeks as presented in the Draft is workable or fair. Rather, I would suggest two separate weeks be set aside during the summer season for float boating only, and then let the lottery process sort out if river users really demand more time each year when the river is motor free. If there is overwhelming demand for river trips free of motorized water craft, that adjustment can be made in the future. But to divide the summer into alternating weeks at this time is unfair to the majority of users who enjoy the river on power boats and who have indicated a willingness to have a river with both power boats and float boats. (Correspondent 2217)

Forest Service Response: The FEIS preferred Alternative G is designed with this approach in mind. Alternative G provides three-day non-motorized periods (Monday through Wednesday) for a total of eight weeks. The non-motorized period does not begin until after the Fourth of July holiday and ends prior to Labor Day to avoid impacting these major holidays. This management approach will be monitored to test its long-term durability, the demand for this type experience, and potential user and management conflicts. If monitoring and evaluation indicate a need for change, the management approach will be adjusted accordingly.

Comment 101-35. River users on a schedule may not have the opportunity to take a boat trip and experience the canyon. I recently took my parents on a commercial trip to the canyon and if they had been here on an "off week", they may have missed some or all of the experience. (Correspondent 1128)

Forest Service Response: The alternating exclusive use of Alternative E was for the upper portions of the wild river, from Hells Canyon Dam to Kirkwood Historic Ranch. Over two-thirds of the river, both wild and scenic would be available for motorized use, both commercial and private, during the "off-week" for motorized in the upper wild river. Reference Chapters II and IV for a complete discussion of Alternative E and the potential environmental consequences.

Comment 101-36. Segregation of groups due to the inappropriate actions of a few may simplify management for Forest Service personnel, but is certainly unnecessary and becomes punitive to the majority of responsible users. Separation may temporarily solve staff frustrations over how to deal with two different philosophies but it doesn't provide any solutions. The only solutions will come through education. (Correspondent 1190)

Forest Service Response: An active education program for river users at the major portals is an important component of the FEIS preferred Alternative G as noted in Chapter II.

Comment 101-37. The cooperation between the two groups has already improved so dramatically that the preferred plan is really addressing a problem well on its way to being solved. Education and cooperation are the keys to meshing these users, not segregation. (Correspondent 1118)

Forest Service Response: As stated previously, an active education program is an important component of any management strategy. The Forest Service disagrees with the statement that cooperation between the two groups has already improved dramatically. The social conflict between the types of river uses is very real and continues to grow as motorized use increases yearly. Through the public scoping and the DEIS comment period, this conflict between uses was a common theme of many of the non-motorized users.

Comment 101-38. The idea one week rafting, one week powerboating is very non-realistic, both in terms of user standpoint and management standpoint. At no time did the LAC committee even consider this as a viable alternative. The only positive point that I can see as a result of this choice is that it did unite the rafters and powerboaters as being unanimously opposed. (Correspondent 1092)

Forest Service Response: Rafters and powerboaters were not unanimously opposed to the DEIS preferred Alternative E. Reference the content analysis in the introduction of this appendix for presentation of respondents preferences.

Comment 101-39. The preferred Alternative E presented in your DEIS appears to be a solution for a non-existent, or at the very least, grossly overstated problem. As a frequent Snake River user, both as a private floater and a customer of commercial powerboat outfitters, I have never experienced any problems in the relationships between floaters and powerboaters that would begin to justify Alternative E's meat-axe approach to managing the river. Some type of campsite reservation system for all river users in the wild and scenic sections of the river is all that I would ask for. (Correspondent 1128)

Forest Service Response: Reference comments/responses on campsite reservations in this appendix.

Comment 101-40. Very few jet boats are capable of navigating above Granite, so why limit the number of people that can enjoy the river above Granite for 7 days every other week? (Correspondent 2827)

Forest Service Response: Your comment was considered in the development of the FEIS preferred Alternative G.

Comments Supporting Alternating Exclusive Use Weeks

Many comments were received supporting the concept of alternating weeks of exclusive use. Following are representative samples of those comments.

Comment 101-41. Alternating one week of "powerboats only" and one week of "rafts only" use. This will provide the powerboats an opportunity to use Hells Canyon as well as giving the rafters a motor free experience during the "raft only" week. (Correspondent 2812)

Comment 101-42. Although I would prefer no powerboats on this section of the river, I could support an alternating series of permit periods where powerboats and rafts could use the river exclusively. (Correspondent 2800)

Comment 101-43. The concept of alternating exclusive use periods promises to provide both float and motorized boaters with an experience more consistent to the Desired Future Conditions. As you may know, a variation of the weekly alternating schedule is currently being used on the lower Deschutes River. (Correspondent 2226)

Comment 101-44. The more I think about all this the more I feel that Alternative E is the best approach. First of all, you will never please everyone, but I strongly believe you have to keep the powerboats and rafts separate. Float people do so to have the quietness and the adventure that floating provides. You cannot mix the two. By having a week for each one, you would be able to let more powerboats on the river and therefore please more people. (Correspondent 2824)

Comment 101-45. The separation of the river use into alternate weeks for floaters and power boats would seem to meet the needs of both groups. It would likely mean heavier use by floaters in their week and additional pressure on campsites, but this can be worked out.

Comment 101-46. While obviously alternating weeks between power and raft use on the river creates some inconvenience and scheduling difficulties, it seems this provides the best experience for each type of use of the river and prevents conflicts which inevitably arise when substantial numbers of powerboats and rafts are trying to use the river at the same time. (Correspondent 2249)

Forest Service Response: Thank you for your comments, they have been considered in the development of the FEIS preferred Alternative G.

Comment 101-47. No jet backs for floaters would be a real problem. They have sometimes meant the ability to float when our schedules would otherwise not permit. (Correspondent 1128)

Comment 101-48. I would like to see the jet back option available from the dam through Granite even during non-motorized use. (Correspondent 1166)

Forest Service Response: FEIS preferred Alternative G allows for jetbacks at the discretion of the commercial motorized permit holder, within the allocated daily launches available to that operator.

The Solitude Alternatives

Many comments were received concerning the Solitude Alternatives (S1 and S2) submitted by the Hells Canyon Preservation Council. The following comments are representative of the comments received.

Comment 101-49. The Forest Service showed their bias by not providing a full range of alternatives by deliberately excluding the solitude alternative that has widespread environmental support. (Correspondent 2506)

Comment 101-50. Why were S1/2 not fully considered? NEPA requires that you "rigorously explore and objectively evaluate all reasonable alternatives." S1/2 are certainly reasonable and the FEIS must be amended to fully consider them. Readers want to evaluate the relative merits of your preferred alternative with S1/2. (Correspondent 2585)

Comment 101-51. I have reviewed both the Forest Service [alternatives] and S1/2 and I feel very strongly that only the latter will provide the protection to ensure a healthy and enjoyable river for our future and beyond. (Correspondent 2630)

Comment 101-52. I urge the planning team to change the DEIS so that it conforms to the S1/2 in fact and spirit. (Correspondent 2599)

Comment 101-53. I was very dismayed that the DEIS did not contain any of the significant directives proposed in S1/2. (Correspondent 2610)

Comment 101-54. The DEIS fails to contain an adequate range of alternatives. It should have included one or both of the "Solitude Alternatives" submitted by Hells Canyon Preservation Council. (Correspondent 2340)

Forest Service Response: Reference Chapter II, "Alternatives Considered, but Eliminated from Detailed Study" and Appendix F for a discussion of how the Solitude Alternatives were incorporated into the range of action alternatives and for rationale why certain components of the alternatives were not carried forward for analysis.

Comment 101-55. I don't understand how the Forest Service chose to ignore Alternatives S1 and S2 (DEIS, pp. 11-2 and 11-3). Both alternatives embrace the intent and mandate of PL 94-199, to prescribe a management scenario appropriate to recognition of inherent resource value(s) and capability(ies) and maintenance thereof - something the preferred alternative (plan) does not do. Moreover, the rationale for dismissal of Alternatives S1 and S2 is flawed and self-serving. (Correspondent 2707)

Forest Service Response: The proposed action and the purpose and need for action identified in Chapter I is very specific to addressing recreation-related management. Many of the proposed management directions in the Solitude Alternatives are incorporated into the action alternatives (Reference Appendix F). Some aspects of the Solitude Alternatives are not within the scope of the proposed action, and therefore not addressed in this EIS. Many of the Solitude Alternative aspects not addressed in this EIS are currently under environmental analysis through other efforts, i.e., domestic and bighorn sheep management environmental assessment, and the Pittsburg Allotment

management planning process. On a larger scale, the CMP adjustment strategy will review and evaluate monitoring data, new research information, and social needs and wants to determine the need for changing the management objectives and direction in the CMP through the NEPA/NFMA planning process.

The Forest Service has the authority to invoke its own expertise in evaluation of public comment and proposals, and is not required to accept at face value the self-serving comments of interested parties or users.

Comment 101-56. By not analyzing, studying or including HCPC S1/2 the Forest Service has demonstrated extreme insensitivity to environmental interests and has possibly broken the law by not exploring the "full range" of potential management strategies as required under the NEPA. (Correspondent 2531)

Comment 101-57. None of the Solitude Alternatives that have been endorsed by over 15 conservation organizations were considered in the DEIS. NEPA requires a full range of alternatives, failure to display an alternative that addresses non-motorized recreation is not in compliance with NEPA. (Correspondent 2516)

Forest Service Response: 40 CFR 1500-1508 requires an adequate range of alternatives to be considered by the responsible official that respond to the purpose and need for action and address resolution of the significant issues, of which, we feel the alternatives presented in both the DEIS and FEIS encompass the intent of that direction.

Comment 101-58. No supportable reason for excluding the Solitude Alternatives from display in the DEIS was given. They should be displayed in the FEIS, with amendments to reflect 1974-1977 jet boat use levels, and protection for endangered salmon. (Correspondent 1196)

Forest Service Response: We feel the reasons stated in Chapter II, "Alternatives Considered, But Eliminated from Detailed Study" and Appendix F articulate the reasons for not fully considering and analyzing the alternatives in detail.

Comment 101-59. The Forest Service deliberately did a disservice to the public by leaving out a viable alternative, by saying little about grazing impacts, big horn sheep, elk and beach recovery. For these reasons, the draft EIS should be redone to include the Solitude or any other citizen alternative that has broad support. (Correspondent 2506)

Forest Service Response: Reference the comments under comprehensive management plan adjustment planning in this appendix for a response to this comment.

New or Changed Information Code 102

Comment 102-1. By relying on the unscientific data on river use in shaping its river recreation use proposals, the Forest Service has contradicted both the letter and spirit of NEPA. Any systematic approach to analyzing river recreation use cannot be founded on data which the Forest Service acknowledges lack scientific integrity. Therefore, the Forest Service should make every reasonable effort to obtain valid, scientifically sound data on river recreation use. (Correspondent 1198)

Comment 102-2. Pursuant to 40 C.F.R. S 1502.22(a), the Forest Service must perform the studies necessary to make a reasoned decision. See Section II.C., supra. If the cost of such studies would be prohibitive (which seems unlikely, because the BLM is performing such studies for the Rogue), then the Forest Service must acknowledge that in the EIS and include, among other things, a statement describing the relevance of the information to the EIS analysis and a summary of "existing credible scientific evidence" relevant to evaluating environmental impacts of the action. 40 C.F.R. S 1502.22(b). (Correspondent 1198)

Forest Service Response: Incomplete and unavailable information is disclosed in Chapter IV pursuant to 40 CFR 1502.22. The environmental consequences displayed in Chapter IV incorporate the best information and research available at the time of the analysis.

Comment 102-3. Based on recent comments by Forest Service personnel, it appears that the Forest Service intends to include this information (1992 use data) in its final EIS.

The Forest Service must prepare a supplement to a draft EIS if "there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." 40 C.F.R.S 1509(c) (1) (ii). For new information to be "significant" enough to trigger this obligation to supplement, the information must show that the federal action at issue will "affect the quality of the human environment in a significant manner or to a significant extent not already considered." (Correspondent 1198)

Forest Service Response: Use data from 1991 continues to be the basis for analysis in this FEIS. The planning team decided to continue to use 1991 data, instead of 1992 or 1993 data, since it represents maximized growth for all types of boating. It was determined that this would represent a valid basis in which to base the analysis.

Disclosure of Effects Code 103

Comments in this section focus on the purpose and adequacy of the key indicators for identifying environmental effects.

Comment 103-1. Even more subjective are indicators such as "alternative's degree of providing primitiveness and remoteness." These indicators serve no useful purpose. (Correspondent 1198)

Forest Service Response: The use of the recreation opportunity spectrum characteristics has been restructured as displayed throughout the EIS.

Comment 103-2. The "key indicators" are similarly flawed. Key indicators are to be "measured and predictable," DEIS at I-11, but with the exception of commercial permittee revenues, the key indicators subsequently listed are entirely subjective. (Correspondent 1198)

Forest Service Response: The key indicators introduced in Chapter I have been revised. Although the respondent may still feel the key indicators are flawed, they are an appropriate measuring tool, using established agency standards, for the public and the decision maker.

**Regulatory Concerns
Code 104**

Comments in this section raised various planning issues, including questions on the intent of Congress in establishing the National Recreation Area Act and the Wild and Scenic River Act. Both of these acts affect the management of the Snake River.

Comment 104-1. Foremost among the reasons offered for amending the CMP is "a concern that the increase in recreation use in the river corridor was negatively impacting visitors' recreation experiences." DEIS, at I-3. By the Forest services own admission, amendments to the CMP are not being proposed as necessary to protect the lands of the HCNRA and, in fact, are not even intended to protect the federal land. Nowhere in the DEIS is there any indication of concern for users of the adjacent federal lands or of protecting the federal lands.

Attempts to justify the proposed restrictions on the need to protect campsites on federal property would be unavailing. The proposed amendments curtail all uses of the river, not merely overnight uses. If the goal was to limit campsite degradation, a permit system would suffice. Limits on day users have no bearing on the harm caused to campsites and thus cannot be supported on a Property Clause analysis. Nor are the proposed limitations directed toward protecting archeological or cultural resources. Protecting such resources, though an important part of the Forest Service efforts, is not the paramount focus of the DEIS and certainly was not identified as a crucial need for action.

The proposed amendments to the CMP are not "reasonably necessary" to protect federal lands. Any additional protection of federal land resulting from the proposed action can only be described as incidental and of secondary importance to the efforts to improve visitors' recreational experience. Thus, the action cannot be supported by the Property Clause. (Correspondent 1198)

Forest Service Response: Reference Chapter I for the significant issue on minimizing onshore degradation. Chapter IV discloses the environmental consequences on the ORV's identified from Chapter III. As identified in Chapter IV there is the potential for degradation of plant and animal habitat and potential for taking of threatened and endangered species from river related recreational use, both day and overnight use.

Although a campsite reservation system is one method available to minimize onshore degradation, the planning team felt limited party sizes, crafts per party, stay lengths, and user education would be more effective, particularly in minimizing river regulations.

The proposed amendments are reasonably necessary to protect and enhance the rivers ORV's as directed under the Wild and Scenic Rivers Act and are compatible with the HCNRA Act Sec. 7 objectives.

Comment 104-2. If the Forest Service selects any alternative other than Alternative B, additional steps must be taken and other issues examined before the requirements of NEPA and its regulations will be satisfied. For the reasons set forth below, if Alternative B is not selected, then the Forest Service should consider starting its NEPA process anew. (Correspondent 1198)

Forest Service Response: The NEPA process has been fully implemented with an adequate range of alternatives that meet the intent of the purpose and need for action, full disclosure of environmental consequences, and thorough public participation.

Comment 104-3. Page I-5. DECISIONS TO BE MADE--This section is a bit confusing. Where an array of alternatives is being analyzed it would seem that determining which alternative best serves the canyon and its users would be one of the decisions. (Correspondent 1198)

Forest Service Response: This section has been rewritten to provide more clarity.

Comment 104-4. The DEIS recognizes the congressional intent to broaden opportunities to enjoy the canyon, but fails to implement it. The Forest Management Plan provides for management "to maintain recreation experiences available at the time the area was established." DEIS, at I-10. But the Forest Service now seeks to take the unprecedented step of barring types of boating during the regulated season, denying boaters the access that they have enjoyed for decades and that Congress acted to protect. (Correspondent 1198)

Forest Service Response: To "broaden opportunities" does not equate to expanding or increasing use levels. The legislated requirements and management direction in Chapter I provide a management framework in which to provide for quality recreational opportunities compatible with the HCNRA Act objectives and Wild and Scenic River Act and protection and enhancement of ORV's.

Comment 104-5. The Wild and Scenic Rivers Act does not compel any other result. That legislation is intended to protect the rivers, but they are to be managed for the public use and enjoyment. 16 U.S.C. SS 1273, 1281(a). Wild and Scenic Rivers are to be "administered in such a manner as to protect and enhance the values which caused it to be included in said system..." 16 U.S.C. S 1281a. Among those values for the Snake River is the recreational potential that Congress sought to protect. See generally, 16 U.S.C. S 460gg(a). (Correspondent 1198)

Forest Service Response: The Forest Service agrees, although the Wild and Scenic Rivers Act requires the protection and enhancement of all identified ORV's as displayed in Chapter III and for establishing user capacities as noted in Section 10. The HCNRA Act requires the Forest Service to manage recreation in a manner compatible with the objectives stated in Section 7.

Comment 104-6. Thus, the Forest Service is authorized to regulate only the "use and number" of rivercraft, 16 U.S.C. S 460gg-7, but is not authorized to regulate the type of rivercraft on the river. Alternatives D through F include provisions governing what type of rivercraft is to be allowed on the river during the regulated season. Those alternatives, therefore, exceed the statutory authority of the Forest Service. (Correspondent 1198)

Forest Service Response: Forest Plan Amendment 5 provides the definitions for valid and non-valid crafts as recommended through the LAC planning process.

Comment 104-7. I would point your attention to that portion of the rules and regulations within the Act which provide that the use of motorized river craft, "...is hereby recognized as a valid use of the Snake River within the recreation area; ..." Any alternative that restricts that use is contrary to the Act. (Correspondent 2339)

Forest Service Response: The Forest Service is delegated the authority and responsibility to protect and enhance the river's ORV's pursuant to the various sources of management direction as listed in Chapter I, "Legislated Requirements and Management Direction".

Comment 104-8. Due to the segregation of potentially impacting activities by their arbitrary exclusion from the scope of the DEIS, and failure to observe the cumulative impacts of all activities that could have an impact, outstandingly remarkable values mandated for protection under the NWSRA will not be guaranteed protection until some unspecified time in the future, if at all.

We would suggest these implications show that the spirit of these laws is (at least) being stretched to the limit to compulsively allow jet boat use at the astoundingly high levels prescribed in the Preferred Alternative, at least in the "wild" designated river section. The designation of this stretch of river as a permanent non-motorized corridor would be an observation of the spirit of these Acts. (Correspondent 1196)

Forest Service Response: The scope of the EIS was designed to ensure that connected actions are analyzed and considered in the process of selecting a new management plan. Chapter IV discloses the potential direct, indirect, and cumulative environmental impacts on the outstandingly remarkable values and other resources of the river corridor.

Comment 104-9. Timber management, access to the rim and trails into the canyon, air travel into the canyon, and grazing of livestock have the potential to have significant environmental impacts on both the river and river users. Likewise, the management activities proposed for the river in the DEIS promise to have environmental impacts on areas outside the river corridor.

NEPA and its implementing regulations do not allow this piecemeal approach to river management. The amendment of the river management plan and the planned amendment of the non-river plan promise to have "cumulative and synergistic environmental impacts" on all of the HCNRA. To limit the scope of the DEIS to the narrow Snake River corridor makes no sense given the closely interconnected environmental impacts that river and non-river management actions will have on the entire recreation area. Beyond the logical weakness of such an approach, the strictures of 40 C.F.R. S 1508.25 preclude an EIS limited only to management actions for the river. (Correspondent 1198)

Comment 104-10. Moreover, the CEQ regulations expressly provide that federal agencies avoid segregation of resource management by integrating "the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process and to head off potential conflicts." 40 CFR 1501.2. This is interpreted by federal courts to mean the point at which agency decision makers "retain a maximum range of options." *Conner v. Burford*, 836 F.2d 1521, 1527 (9th Cir. 1988) citing *Sierra Club v. Peterson*, 717 F.2d 1409, 1414 (D.C. Cir. 1983). See also *Env'tl. Defense Fund, Inc. v. Andrus*, 596 F.2d 848, 852 (9th Cir. 1979) ("...assessment [of environmental factors] should occur at an early stage when alternative courses of action are still possible and environmental damage can be mitigated."). (Correspondent 2344)

Comment 104-11. The Forest Service failed to include in the DEIS analysis of the environmental impacts of other proposed actions which are "connected actions" or "cumulative actions" when viewed in conjunction with the proposal for managing the Snake River in the HCNRA. Specifically, the DEIS fails to analyze the environmental impacts which will occur as a result of management decisions for the areas of HCNRA outside the narrow Wild and Scenic Snake River section of the HCNRA. This failure renders the scope of the DEIS inadequate, and necessitates its supplementation with an analysis of impacts relating to proposed management actions to be taken in the HCNRA as a whole. (Correspondent 1198)

Forest Service Response: The proposed actions in this EIS are being considered in response to specific management changes needed within the river corridor. Other ongoing or reasonably foreseeable actions are within the scope of this EIS if they are connected or cumulative actions, or if

considering them is "... the best way to assess adequately the combined impacts of similar actions or reasonable alternatives..." 40 CFR 1508.25 (a) (3). Other foreseeable actions (such as the proposal to eliminate domestic sheep grazing within the HCNRA) have been found to be outside the scope of this EIS. The respondents do not identify any specific actions which should have been considered in this EIS.

In January 1994, the Forest initiated a CMP adjustment strategy with the intent of evaluating CMP implementation effectiveness. Through involving the public in this review process while a planning team works simultaneously, the objective is to identify by June of 1994 needed changes in management objectives and direction for the CMP. Following the identification of needed changes in June, the Forest anticipates immediately beginning the formal NEPA/NFMA planning process to adjust the CMP.

The river management plan will be amended at that time if necessary to comply with revisions to the Forest Plan which affect the management of the Hells Canyon NRA.

Comment 104-12. The CEQ regulations contemplate that livestock grazing and recreation management actions will be considered at the same time in situations such as resource planning in the Snake Wild and Scenic River. "Similar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography." 40 CFR 1508.25(3). This is particularly relevant in the planning process for the HCNRA, where Congress intended that livestock grazing, recreation and numerous other management actions be considered together. The Act provides: The Secretary shall administer the recreation area in accordance with the laws, rules, and regulations applicable to the National Forests for public outdoor recreation in a manner compatible with the following objectives: ... (7) such management, utilization, and disposal of natural resources on federally owned lands, including, but not limited to timber harvesting by selective cutting, mining, and grazing.... 16 USCA 460gg-4. (Correspondent 2344)

Forest Service Response: Interaction between domestic grazing within the corridor and river-related recreation use can be considered similar actions. We feel the concern of domestic livestock grazing is appropriately addressed in Appendix D.

Comment 104-13. The Forest Service maintains that analysis of livestock grazing management in the DEIS is "outside the scope of the proposed action and the purpose and need" identified in the document. See DEIS at F-13-14. The CEQ regulations which implement the NEPA, however, provide that in determining the scope of an EIS, agencies shall consider actions which may be "[c]onnected... which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they:...(i) Automatically trigger other actions which may require EISs...[or] (ii) [c]annot or will not proceed unless other actions are taken previously or simultaneously." 40 CFR 1508.25(a)(1). (Correspondent 2344)

Forest Service Response: Connected actions to achieve the purpose and need for action are appropriately identified in the proposed action in Chapter I. The project area is defined as the boundary to the Wild and Scenic Snake River Corridor (Management 8), reference Chapter I. Domestic livestock allotments comprise thousands of acres beyond the river corridor itself and is appropriately dealt with through the allotment management plan process. Appendix D addresses the schedule of AMP development in addition to ongoing environmental analyses for domestic and bighorn sheep interaction, the Pittsburg Allotment Plan development, and formal consultation with NMFS concerning ongoing domestic grazing activities and the protection of threatened salmon.

Comment 104-14. The failure to acknowledge public concern regarding livestock grazing in the Wild and Scenic River area not only violates the NFMA planning regulations, but it disregards the importance of public participation which is so essential to forest planning that the Forest Service must take specific measures to encourage it. See 36 CFR 219.6(a)-(1). The intent of public participation, in part, is to "[b]roaden the information based upon which land and resource management planning decisions are made" and to "[e]nsure that the Forest Service understands the needs, concerns and values of the public..." 36 CFR 219.6(a)(1) and (2). Moreover, as part of forest planning, the agency must "identify and evaluate public issues, management concerns, and resource use and development opportunities, including those identified throughout the planning process during public participation activities...." 36 CFR 219.12(b). (Correspondent 2344)

Forest Service Response: Public participation is being conducted through the ongoing environmental analyses for domestic and bighorn sheep interaction and the Pittsburg Allotment Plan development. The public is currently being asked to participate in the CMP adjustment strategy to consider potential management objectives and direction needing change.

Validity of Both Motorized and Non-Motorized Uses

Many comments were received concerning the intent of Congress in stating that both motorized and non-motorized are "valid uses". The following comments are examples of those received.

Comment 104-15. Clearly, any approach that bases motorized vs. nonmotorized launches on historical regulated non-motorized use and unregulated motorized use is unfair, discriminatory and potentially subject to legal challenge. (Correspondent 2840)

Comment 104-16. Congress enacted laws protecting recreation and stating that motorized and non-motorized craft are valid uses of both the wild and scenic sections of the river. Any efforts made to prohibit access to either type of user would be inconsistent with Congressional intent. (Correspondent 128)

Comment 104-17. Alternative D is patently unfair to powerboaters and violates the HCNRA's designating legislation, PL 94-199. For these reasons I find this alternative to be unacceptable. PL 94-199 recognizes both motorized and non-motorized craft as valid uses of the Snake River. It does not specify for certain segments of the river corridor or for certain seasons. There are 35 rivers in this region, 32 of these 35 offer exclusive use for float craft. Only 3 of the 35 are available for powerboat use. (Correspondent 126)

Comment 104-18. It may be true that there is currently no legal requirement to exclude motors in the wild segment. It also may well be true that there is no legal requirement to include motors. Since I honestly doubt that the use of motors can be validly justified as a benefit to the wilderness, wildlife, or plant life of Hells Canyon then it should be imperative to proceed with the exclusion of motorized travel in this segment. (Correspondent 2843)

Comment 104-19. If Congress intended to allow the Forest Service to designate times or locations in which one form of boating is to be prohibited, it would have so provided, as it did for hunting. The NRA Act provides, "the Secretary may designate zones where, and establish periods when, no hunting or fishing shall be permitted for reasons (of) public safety, administration, or public use and enjoyment." NRA Act S 12, 16 U.S.C. S 460gg-9. Section 10(d), authorizing the regulation of boating, includes no such authority, 16 U.S.C. S 460gg-7(d), but it is precisely that type of authority the Forest Service is attempting to exercise: the creation of boating "zones" and "seasons." (Correspondent 1198)

Comment 104-20. It is a nearly universal rule of statutory interpretation, as well as a matter of common sense, that the inclusion of one thing implies the omission of another. 2A Sands, Sutherland Statutory construction S 47.23 194 (4th ed. 1984). Thus, when Congress authorizes a mode of regulation for one subject -- for example, hunting -- but does not mention that mode of regulation in addressing a different subject, such as boating, it is presumed that Congress intended to prohibit that mode of regulation as to the latter subject. See, e.g., Longview Fiber Co. v. Rasmussen, 980 F.2d 1307, 1313-14 (9th Cir. 1992). Put in the context of the NRA Act, when Congress expressly authorized the Forest Service to create zones and seasons for hunting, but did not do so for boating, one must conclude that Congress deliberately intended not to allow the creation of zones and seasons in which boating is to be allowed. If Congress had intended to authorize such prohibitions on boating, it would have said so in Section 10. (Correspondent 1198)

Forest Service Response: Section 10 (d) of the NRA Act (16 USC 1281 (d)) allows the Secretary of Agriculture to use general statutory authorities relating to the National Forests in such a manner as he/she deems appropriate to carry out the purposes of the Act. In addition, the Secretary retains his/her general regulatory authorities which can be found in 16 USC 551 and allow regulation of the occupancy and use of National Forest lands. Additionally, the Forest Service has the responsibility under Section 10 (a) of the Wild and Scenic Rivers Act to administer each component of the wild and scenic rivers system in such a manner as to protect and enhance the values which caused it to be included in the river system.

The HCNRA Acts use of "valid use" does not vest any rights in users to a particular level of use, nor does it prevent severe limitations on such uses if it is deemed necessary to ensure compatibility with the Section 7 objectives of the Act. The "valid use" language merely means that the use cannot be terminated without sound resource justifications. The FEIS preferred Alternative G does not terminate use.

Comment 104-21. The House Report accompanying the legislation that became the NRA Act explains that the valid use language is intended to provide "that boating use is appropriate for the Snake River within the area." H. Rep. No. 94-607, 94th Cong., 1st Sess. 12 (1975). The Senate Report accompanying the legislation is even more specific: "The Committee specifically recognizes that the use of such motorized craft as jet boats are a valid use and thereby allowed within the recreation area." S. Rep. No. 94-1153, 94th Cong., 1st Sess. 8 (1975). Nothing in either of these reports suggested an intent to allow the Secretary to prohibit any type of boats within the recreation area. (Correspondent 1198)

Forest Service Response: Some insight into the intent of the Act can be gleaned from a review of past records and communications. In a letter to Chief Peterson on 3/5/82, both Senators Packwood and Hatfield stated:

"It seems to me we've got to have some controls on power boats, just as we do on float boats. The safety problem dictates this, as does the need to protect the river environment and minimize the conflict between float and power boaters."

"There is room in the NRA for many kinds of activity. This is why the Hells Canyon Act requires the management plan to provide for a broad range of recreation opportunities. The Act recognizes power boating as a valid activity in the NRA, but it also calls for the protection of other public values, such as wilderness, scenic and ecological."

"I feel strongly that providing a broad range of recreation opportunities does not mean we must allow them to take place all at the same time and all in the same place. It would be a mistake to do so. I'm convinced we'd all come to regret having locked ourselves into such a precedent. We

all know that public use of the Snake River in Hells Canyon is going to increase." (Reference analysis file).

Additionally, in a 7/15/81 letter to Chief Peterson, Senator's McClure and Symms and Congressman Craig stated:

"We strongly feel that at this time sanctions on the use of powerboats on the Snake River are premature and unnecessary. While the Act itself states that powerboating is a valid use of the Snake River, the House and Senate Reports that accompany the Act are more specific."

"The House Report states that restrictions would only come about after careful consultation with public and private groups and agencies." (Reference analysis file.)

The EIS process fulfills the intent of this letter and of Assistant Secretary Crowell's 1983 appeal decision on the CMP:

"Notice will be given and public comment solicited before any adjustments to boating use levels are put into effect." (Reference analysis file.)

Comment 104-22. I would point your attention to the provision dealing with present and future use of the Snake River, which provides in part, "No provision of the Wild and Scenic Rivers Act (citations omitted), nor of this Act, nor any guidelines, rules, or regulations issued hereunder, shall in any way limit, restrict, or conflict with present and future use of the waters of the Snake River ... for beneficial uses, whether consumptive or nonconsumptive,..." The proposed language in the environmental EIS other than Alternative A is contrary to this provision of the Hells Canyon National Recreational Act. (Correspondent 2339)

Forest Service Response: This reference from the HCNRA Act relates to the uses of waters of the Snake River and its tributaries upstream from the boundaries of the NRA, including, but not limited to, domestic, municipal, stockwater, irrigation, mining, power, or industrial uses (reference Sec 6 (a) of the HCNRA Act). More appropriately, the HCNRA Act states in Sec. 7 and 10 management objectives which are more specific to management of recreational activities.

Comment 104-23. Management under this plan would be as Congress intended use in the Hells Canyon Snake River corridor to be. A national recreation area for both motorized and non-motorized use. (Correspondent 126)

Forest Service Response: All of the action alternatives presented in the FEIS fulfill the intent of Congress and the enabling legislation.

Comment 104-24. The Wild and Scenic Rivers Act established 31.5 miles from Hells Canyon dam to Pittsburg Landing with a wild designation. This section is required to be managed as a wild river. The Draft plan arbitrarily changes the management of the wild section from Kirkwood Ranch to Pittsburg landing. This in effect changes the wild section length. Only Congress has the authority to make such a change. The final plan must be consistent with the length and management designation of the Act. (Correspondent 2677)

Forest Service Response: It was never the intent of the proposed action nor the DEIS preferred Alternative E to recommend a change in the wild and scenic boundary. The DFC's in the DEIS proposed a more refined management objective for the Kirkwood Historic Ranch to Pittsburg Land-

ing. The DFC's by river segment have been dropped from further consideration in the FEIS. The FEIS preferred Alternative G is consistent with the directives of the HCNRA and Wild and Scenic Rivers Acts.

Comment 104-25. You consistently overstate the intent of the NRA relating to motorized uses. In fact, section 7 of the NRA specifies that the Wild and Scenic Rivers Act supersedes the NRA for administration of the river corridor. The use of motorized boats on the river above Kirkwood Ranch and below Hells Canyon dam is incompatible with the "wild" classification. This is true even if no floaters are on the river at the time. We urge you to prohibit motorized boat traffic on the wild section of the river at all times of the year. (Correspondent 2340)

Forest Service Response: The Wild and Scenic Rivers Act is silent on the issue of motorized and non-motorized use within sections designated wild. Forest Service handbooks and manuals provide direction using the recreation opportunity spectrum (reference Chapter III, "Recreation ORV") and clearly state there are exceptions to motorized use pursuant to the enabling legislation for the areas and/or rivers.

Comment 104-26. "... does not limit the number of daily trips by powerboats..." Seems the reference that the decision did not affect numbers, etc., for commercial powerboating was conveniently left out. (Correspondent 2345)

Forest Service Response: Although the Assistant Secretary's decision on appeals was not intended to change the CMP direction for commercial motorized use, the revised Snake River Recreation Management direction, December 1984, adjusted the original management direction to state that "Consider the issuance of additional permits to qualified applicants for commercial powerboat operations in the scenic river and the wild river upstream from Pittsburg to Hells Canyon Dam." Reference page 3 of Snake River Recreation Management Plan. This overall increase in motorized use has been a primary concern in the management of the river corridor, as evidenced by the initiation and completion of the visitor use study, LAC planning process, and the purpose and need for action in this EIS.

The FEIS preferred Alternative G proposes use restrictions that attempt to provide a balance between commercial and motorized use allocations while meeting the desired ROS characteristics and protecting and enhancing the ORV's.

Comment 104-27. A coordinated management strategy will be necessary since some of the proposals in the DEIS will require a change in the BLM's Lower Salmon River Management Plan, a change in commercial outfitter operating plans, or modification of the proposed action described in the DEIS. (Correspondent 2221)

Forest Service Response: The BLM has coordinated in the final development of the FEIS preferred Alternative G to ensure fair and equitable implementation for both the Snake and Salmon river users.

Comment 104-28. All of these legitimate user groups would lose, at least, 50% of their Hells Canyon launches under this alternative. Restricting or eliminating some user groups from Hells Canyon in order to benefit others is definitely unethical and perhaps even illegal. (Correspondent 1138)

Forest Service Response: The FEIS preferred Alternative G maintains multi-day float launches at their current level. Reference Chapter II and IV for discussion of the alternative and its environmental consequences.

Comment 104-29. As stated in the DEIS, a Forest Service decision based on the document would amend the Wallowa-Whitman NF Land and Resource Management Plan. DEIS at I-1. The implementing regulations for the NFMA provide that if the Forest Supervisor determines that a proposed amendment to the Forest Plan is "significant, [he] shall follow the same procedure as that required for development and approval of a forest plan." 36 CFR 219.10(f). While the DEIS does not specifically provide that the amendment to the plan would be significant, it does provide that "preparation of [the] EIS is in accordance with... the associated National Forest Service Land and Resource Planning Regulations (36 CFR 219). DEIS at I-1. The Forest Service, however, fails to abide by these regulations by excluding livestock grazing decisions from the DEIS. The forest planning process requires the agency to develop a broad range of alternatives in order "to reflect to the extent practicable the full range of major commodity and environmental resource uses and values that could be produced from the forest." 36 CFR 219.12(f)(1). The reversal of impacts caused by livestock grazing in the Snake Wild and Scenic River Corridor and the need to address grazing management problems are essential components of this goal and therefore must be included in any planning process. (Correspondent 2344)

Forest Service Response: The planning team recommended to the Forest Supervisor that this amendment to the Forest Plan would be non-significant under the NFMA, in accordance with the requirements of 36 CFR 219.10(e) and (f), FSM 1922.51 and 1922.52, and FSH 1909.12, 5.32. This determination of NFMA significance must be documented in the Record of Decision. The planning team and Forest Supervisor believe this to be a significant federal action under NEPA, thus the preparation of an EIS, pursuant to 40 CFR 1501.4.

This has been further clarified in Chapter I, Introduction.

Comment 104-30. Failure to explore the full range of potential management options has left the Forest Service open to litigation through a failure to follow applicable NEPA procedures as well as failing to protect a federally-listed endangered species from Forest Service-approved management activities. (Correspondent 2531)

Forest Service Response: A full range of action alternatives that meet the intent of purpose and need, and that follow NEPA procedures, have been presented. Biological assessments have been prepared for the potentially affected threatened and endangered plant and animal species found in the river corridor. These biological assessments have been submitted to the responsible agencies for concurrence on the protection of the species pursuant to the Endangered Species Act.

Comment 104-31. I feel that management should be guided by law. Upper level decisions including DFC, and by Regional guidelines. Locally derived DFCs, issues, and analysis criteria should show a tie back to the laws/decisions and guidelines. (Correspondent 2345)

Forest Service Response: These concerns have been addressed through expansion of Chapters I and III.

Comment 104-32. I feel the 7/1/92 guidelines for managing wild rivers and scenic rivers can and should be fully implemented within the direction of the WSR Act and NRA Act. Wild River - managed

as primitive or semi-primitive non-motorized. Scenic River - managed as semi-primitive non-motorized or motorized. (Correspondent 2345)

Forest Service Response: The desired ROS characteristics for the river corridor have been refined to more clearly state management objectives and are found in Chapter III. Regional ROS guidelines clearly state there are exceptions to the guidelines based on the enabling legislation for areas or rivers, as is the case with the Snake River.

Comment 104-33. In general it appears the DEIS DFC issues or analysis key indicators are based on local input that is likely weighted to the powerboat use side of the spectrum and does not tie back to laws higher levels of decisions and Washington Office and Regional guidelines. (Correspondent 2345)

Forest Service Response: Chapter I in the FEIS more completely discusses this issue than it did in the DEIS.

Comment 104-34. Issues - Socio Economic - Just because many of the people- powerboaters you scoped had concerns about economic impacts and recreation use allocations from a regional perspective, does not mean this should be a significant issue. None of the laws/decisions/guidelines focus on either economic or regional perspective. I feel this issue should be analyzed but NOT given the weight that it has. (Correspondent 2345)

Forest Service Response: The social/economic issues go beyond just motorized users. Both motorized and non-motorized users are concerned over the potential impacts of the various alternatives, both from a private and commercial perspective. (Reference comments and responses on economics in this appendix.)

Social/economic key indicators and analysis are just one of many decision tools for use by the responsible official in making an informed and reasonable management decision.

Comment 104-35. It is also obvious from reading the Hells Canyon National Recreational Act that Congress intended to expand and develop the usage of the area. A review of the Act would include the following quotations: "The Secretary shall, as a part of his comprehensive planning process, conduct a detailed study of the need for, and alternate routes of scenic roads and/or other means of transit to and within the recreational area." (emphasis added) In support of the original Act, Congress also provided for \$10,000,000.00 to be appropriated for the development of recreational facilities within the recreational area. These two provisions certainly are consistent with expanding recreational use rather than limiting or restricting it as the proposed EIS would do under alternatives other than Alternative A. I would add that the \$10,000,000 above is equal to the \$10,000,000 appropriated for the acquisition of lands within the recreational area. It is obvious that considerable funds were spent to acquire lands within the recreational area, but what happened to the \$10,000,000 appropriated for "development of recreational facilities within the recreational area?" Do you people seriously feel that Congress would on the one hand allocate \$10,000,000 to expand recreational facilities and on the other hand limit public access? Didn't Congress really intend to expand the public usage and enjoyment of the area? What alternative provides or contemplates that the Forest Service will work to expand the use within the area? (Correspondent 2339)

Forest Service Response: Use has increased, as noted in Chapter I, over 147% from 1979 to 1991. The comprehensive study required by the Act was completed in 1982 through an EIS resulting in the

CMP. The monies allocated for development and acquisition of lands has been ongoing since 1982, for the entire NRA, not just the Snake River corridor.

More importantly, Congress provided clear direction through the HCNRA Act and Wild and Scenic Rivers Act to maintain, preserve, and enhance those attributes for which the area was designated. The FEIS preferred Alternative G is designed to fulfill those requirements.

Alternatives A and B provide for increasing use of the river corridor.

Comment 104-36. Please read the enclosed law (State of Oregon Enabling Act 11 Statutes 383 (1859) which clearly shows that the Forest Service has no jurisdiction along the river. I do not expect you to pay any attention to this law either. (Correspondent 1782)

Comment 104-37. The Snake is, after all, a navigable river and following the intent of Congress in the creation of HCNRA, always should be. (Correspondent 925)

Comment 104-38. Just as the proposed regulation of state-owned river property cannot be justified under the Property Clause, it also cannot be justified as an exercise of the authority to regulate use of waterways does not support restrictions on river use to improve recreation. Unquestionably, the federal government has authority to regulate navigation. The proposed action, however, has nothing to do with the regulation of navigation and, therefore, is unlawful.

For decades, courts have recognized the limited nature of the federal government's right to control navigable waters. In *United States v. River Rouge*, 269 U.S. 411, 419 (1926), for example, the Supreme Court explained, "The right of the United States in the navigable waters within the several states is ... limited to the control thereof for the purposes of navigation." (Emphasis added.) That standard remains the law.

As set forth above, the primary purpose of amending the river management plan is to improve recreation, not navigation. Indeed, if the Forest Service intended to enhance navigation, it would not be proposing the removal of navigational markers.

Moreover, the regulation of navigation is a function of the Coast Guard and the Department of Transportation, not the Forest Service. See Generally 14 U.S.C. § 2 (requiring Coast Guard to regulate navigation safety). Congress clearly did not intend, by enacting Section 10 of the NRA Act, to place the Forest Service in the business of regulating navigation. (Correspondent 1198)

Comment 104-39. The Admission Act for Oregon recognizes that navigable boundary waters, such as the Snake River, "shall be common highways and forever free..." 11 Stat. L., ch. 33, § 2. Congress has never retreated from its desire that the waterway remain navigable. By proposing regulatory restrictions that have the effect of prohibiting free navigation, the Forest Service is ignoring a century-old Congressional mandate that the Snake River is to remain a "common highway." Serious questions cloud the Forest Service authority to limit access over this common highway for any citizen of the United States. (Correspondent 1198)

Comment 104-40. The Property Clause affords limited authority for the federal government to regulate non-federal lands. What the Forest Service proposes, however, goes far beyond what is authorized under the Property Clause. The Property Clause provides: The Congress shall have the Power to dispose of and make all needful Rules and Regulations respecting the Territory or other Property belonging to the United States. (Correspondent 1198)

Comment 104-41. The States of Oregon and Idaho own the Snake River in Hells Canyon. See generally *United States v. Lindsey*, 595 F.2d 5, 6 (9th Cir. 1979). The river is not federal property. Therefore, the federal government does not have plenary authority to regulate recreation activities on the river. (Correspondent 1198)

Comment 104-42. To understand the meaning of a statute, the statute must be read as a whole. Reference to other provisions of the statute aid in determining the meaning of a specific provision. E.g., *King v. St. Vincent's Hosp.* 122 S Ct. 570, 574 (1991). Read in the context of other provisions of the NRA Act, the authority to regulate boating under Section 10(D), 16 U.S.C. S 460gg-7(d), does not include the authority to prohibit specific boating activities, either during certain periods of time or on certain portions of the river. (Correspondent 1198)

Forest Service Response: The authority and duty of the Secretary to regulate users of the Snake River, including motorboats, is stated in the HCNRA Act, as well as court decisions. The Secretary has dual concurrent regulatory authority under petty offense authority (16 USC 551) and the HCNRA Act (16 USC 460gg-7), to regulate such use.

Two significant cases are:

U.S. v. Lindsey, 595 F.2d 5 (1979), raised the question of whether the federal government could regulate public use of state-owned land within the Hells Canyon NRA. The Ninth Circuit's per curiam decision, which reversed the lower court, said that such regulatory powers are inherent under the Property Clause.

Under the Property Clause, Congress may enact legislation regulating "activities occurring on nonfederal public waters in order to protect wildlife and visitors on the lands." (522 F2d 817, 827).

U.S. v. Hells Canyon Guide Service, 660 F 2d 735 (1981), concerned whether the Forest Service could regulate commercial outfitters operating on the navigable waters of the Wild and Scenic Snake river. A unanimous Court of Appeals upheld this authority of the Secretary of Agriculture.

Under the Commerce Clause, Congress may regulate activities on or affecting navigable waters, such as section 13 of the Rivers and Harbors Act of 1899 and the Federal Water Pollution Control Act Amendments of 1972, as amended. These laws also regulate those activities on lands which may affect the navigable waters.

The Forest Service views the Wild and Scenic Rivers Act and the HCNRA Act as being based on both the Property and Commerce Clauses. The Forest Service further maintains that the Wild and Scenic Rivers Act and the HCNRA Act provide sufficient authority for the Secretary of Agriculture to regulate conduct in these areas protected by these Acts (Sec 1 (b), Sec 10 (a), Sec 13 (d), Sec 10 (d) of the Wild and Scenic Rivers Act and Sec 7 and Sec 10 (d) of the HCNRA Act).

Comment 104-43. Recreation Experience - this should be a significant issue; however, I feel the selection of key indicators is arbitrary. I suggest key indicators should first represent the laws, then higher level decisions, then Washington and Regional level guidelines... and then maybe including some of the IDT thought up indicators. (Correspondent 2345)

Forest Service Response: The key indicators for the recreation experience issue have been refined to more closely tie with Forest Service guidance for the ROS. The "Legislated Requirements and Management Direction" section of Chapter I has also been rewritten to further clarify the relationships of the various requirements and direction.

Comment 104-44. Sec 10 "... Secretary shall promulgate ...regulations shall include..." d. provisions for the control of the use and number of motorized and non-motorized river craft, provided, that use of such craft is hereby recognized as a valid use..." (Many times throughout the document I saw "powerboat use is a valid use" used out of context to justify analysis and alternatives.) I suggest whenever the law is quoted on "valid use" that it NOT be out of context. (Correspondent 2345)

Forest Service Response: The HCNRA Acts use of "valid use" does not vest any rights in users to a particular level of use, nor does it prevent severe limitations on such uses if it is deemed necessary to ensure compatibility with the Sec. 7 objectives of the Act. The "valid use" language merely means that the use cannot be terminated without valid resource justifications.

Comment 104-45. Sec. 10(d) of the NRA Act has never been promulgated despite litigation brought by Hells Canyon Preservation Council to compel the Forest Service to do so. The Ninth Circuit Court of Appeals has already ruled that these regulations are nondiscretionary. These should have been promulgated within one to two years after passage of the NRA Act. (Correspondent 1196)

Forest Service Response: Under the 9th Circuit Court decision, the public land use regulations are scheduled to be published in July of 1994.

Comment 104-46. Section 10(d) of the NRA Act regulations for control of the use and number of motorized watercraft. Should be in force prior to implementation of a SWSR plan. The Act's only reference to "traditional uses" occurs in Section 13, and is a direct reference to "ranching, grazing, farming, timber harvesting, and the occupation of homes..." There were no implications that the use of motorized watercraft should receive priority even if it impedes other uses. Reference as a "valid use" in no way implies that the "unique values of this river...." are to be "emphasize(d).... based on....its history and established patterns of use." (Correspondent 1196)

Comment 104-47. Congress did not provide for the regulation of boating through the Comprehensive Management Plan (CMP) process. Based on the statutory language, it appears that any regulation of boating should be the product of rulemaking under Section 10, rather than the CMP planning process set forth in Section 8. (Correspondent 1198)

Comment 104-48. Section 10 authorizes the Secretary to amend rules and regulations when it is necessary to do so. No such authority exists in Section 8 governing the CMP. Because Congress demanded that the Secretary submit the CMP for Congressional approval, 16 U.S.C. §460gg- 5(a), one could conclude Congress intended that CMP not be altered without additional Congressional oversight. By authorizing amendments to the rules pursuant to Section 10, however, Congress may have intended that rulemaking be the mechanism for regulating activities such as boating, that may require refinements to the management scheme over time. (Correspondent 1198)

Forest Service Response: The FEIS preferred Alternative G meets the intent of the proposed public land use regulations. If, upon publication of the final regulations, it is determined that the Record of Decision for the Snake River management plan is not in compliance, the plan would be adjusted through the appropriate environmental analysis.

Comment 104-49. Some of the criteria set out by the Forest Service is mere duplication of existing laws. (Correspondent 936)

Forest Service Response: Yes, with the intent of refining the direction from the various legislative requirements and management direction to ensure a clear understanding for management of the river corridor.

Comment 104-50. The DFC as written represents a major change from the existing DFC and should be treated as a revision of the Forest Plan. The appropriate level (the Regional Forester) should be in all aspects of the decision process if this changed DFC is pursued. Components of a DFC that is not a major change should be able to tie back to laws or previous decisions (the latest version) at higher levels. Other components that do not tie to the laws or the latest version of previous decisions should be subordinate with components that are tied taking precedence when there is a conflict. Components of the laws/decisions/guidelines outlined on the previous page should all be included in the DFC. Definitions of appropriate levels of activities for differing ROS classes should defer to Regional or Washington Office definitions when they are available, i.e., FSM and ROS guidelines. (Correspondent 2345)

Forest Service Response: Changes may be made to the Forest Plan (goals, objectives, DFC's, allocations, standards and guidelines) as non-significant amendments (in relation to NFMA) if the change does not "significantly alter" or does not have an "important effect on the entire Forest Plan" or does not "affect land and resources throughout a large portion of the planning area during the planning period". Reference analysis file for further discussion.

Public Information/Involvement Code 110

Comment 110-1. Common management requirement (page 08) column 3, paragraph 2 does not appear to agree with the summary of alternate management requirements (page 06) re: private powerboat use. (Correspondent 2409)

Forest Service Response: The paragraph referenced on page 8 of the DEIS summary refers to the use of personal motorized watercraft, not to be confused with powerboats.

Comment 110-2. The only alternative for the Forest Service to use is to let the people who use the river system come up with a workable agreement between boaters and rafters. Why let people, who don't use the river system, try and regulate it so nobody is happy. (Correspondent 709)

Forest Service Response: Forest Service planning regulations require the use of interdisciplinary planning teams to conduct the NEPA process for proposed federal actions. The interdisciplinary planning team for this EIS was selected by the Forest Supervisor based on their resource skills and knowledge of the natural and recreation resources in the river corridor. The LAC planning process recommendations were used as the proposed action with many of the recommendations incorporated in the FEIS preferred Alternative G. Reference comments/responses on the LAC planning process in other sections of this appendix.

Comment 110-3. Recommend that this plan be given a years trial period. (Correspondent 724)

Forest Service Response: Although this comment was focused on the DEIS preferred Alternative E, the FEIS preferred Alternative G does have provisions, as addressed in Chapter II and the Record of Decision, to monitor the long-term durability of the "non-motorized periods".

Comment 110-4. Implementation of any new program could become a management nightmare for the Forest Service and the users. For this reason, I feel the various user groups should be consulted and help play a part in decisions made toward new management plans. Programs such as campsite and launch reservation systems need to be flexible and "user friendly." (Correspondent 740)

Forest Service Response: A major requirement in the development of the FEIS preferred Alternative G was to ensure administrative efficiency and long-term durability for implementation of the alternative.

Comment 110-5. I feel we need to join together to protect and preserve this resource. I don't totally agree with any of the plans discussed (B, C, D, E, or F). The Hells Canyon Alliance is a good start, it has varied interest represented. Alternative B is a starting point. (Correspondent 751)

Forest Service Response: Thank you for your comment.

Comment 110-6. Alt E is extremely complicated, confusing, and contains specific doctrine that is prejudicial to special interest groups. (Correspondent 1017)

Forest Service Response: FEIS preferred Alternative G has been designed to provide for ease of administration and to achieve a reasonable balance of recreational use levels for the diverse user groups.

Comment 110-7. I would like the names published of this so-called "resource specialists" planning team. (Correspondent 1045)

Forest Service Response: Reference the "List of Preparers" section (required by regulation) in this FEIS.

Comment 110-8. If the Forest Service wants to lessen "conflict" between floaters and boaters, it should specifically describe examples so persons can intelligently address what the Forest Service is trying to do. (Correspondent 1095)

Forest Service Response: The types of conflicts between user groups appear in Chapters I and IV.

Comment 110-9 . Cooperation and joint use should be encouraged as we develop this region. (Correspondent 1781)

Forest Service Response: The FEIS preferred Alternative G reflects a commitment for shared-use of the river.

Comment 110-10. As pointed out in your letter the U. S. Postal Service has an obligation to serve a number of customers along the river. This obligation is a legal responsibility as well as a historical precedent. (Correspondent 2231)

Forest Service Response: The FEIS preferred Alternative G would not impede mail service as currently contracted.

Comment 110-11. Regulation and allocation measures should not be designed arbitrarily. They must be mindful of both the environmental impacts on the resource and of the social impacts of users and their crafts, on other users and their enjoyment of this spectacular resource. In addition to the minimum impact camping rules, the number of crafts/day, crafts/party, users/craft, and types of craft allowed/time period must be considered and regulated, if these measures are to be effective. (Correspondent 2324)

Forest Service Response: The environmental impact statement process demands thorough analysis of alternatives, requiring analysis of direct, indirect, and cumulative impacts as displayed in Chapter IV. Additionally, the EIS process requires open public participation throughout the entire planning process.

Comment 110-12. My question is this "preferred by whom," not the majority of river users? (Correspondent 2342)

Forest Service Response: The DEIS preferred Alternative E was selected by the Forest Supervisor as responsible official for the EIS. The intent of identifying a preferred alternative in a DEIS is to inform the public of the direction the Forest Service is proposing to manage the area. Through the public comment period on the DEIS, a variety of opinions and suggestions are collected to provide insight into what people want to see in the final preferred alternative. The Forest Supervisor's responsibility in selecting a preferred alternative focuses on social demands and needs, economic effects, and, most importantly, protection of the river corridor's ORV's pursuant to the Wild and Scenic Rivers Act.

Comment 110-13. The solution to the deterioration of ORV within Hells Canyon lies in drafting a management plan that recognizes the ecosystem and its complexities. (Correspondent 2377)

Comment 110-14. I oppose the Preferred Alternative of Forest Service DEIS because it would be too detrimental and destructive to an already fragile environment. (Correspondent 2621)

Forest Service Response: The FEIS preferred Alternative G is designed to protect and enhance the ORV's of the river corridor and provide recreation opportunities that are compatible with the objectives listed under section 7 of the HCNRA Act. Chapter IV displays the direct, indirect, and cumulative effects of the alternatives on the river's ORV's. The effects displayed for Alternative G and its applied management direction and mitigation do not indicate "detrimental and destructive" impacts are occurring. Without additional specifics from the respondent, it is difficult to further address this comment.

Comment 110-15. There are many fine Wild and Scenic Rivers in the Northwest on which satisfactory, even excellent, conditions have been created. The Wild and Scenic Snake River use could be regulated in a similar way. (Correspondent 2694)

Forest Service Response: This comment lacks clarity as to what conditions or management scenarios the respondent was referring to.

Comment 110-16. Your preferred Alternative seems to ignore the intent and spirit and perhaps the letter of the National Wild and Scenic Rivers Act. You have allowed the creation of a conflict situation between floaters and boaters which has made use of the river unpleasant for all parties. These antagonisms will no doubt increase unless floaters and jet boaters are separated. (Correspondent 2694)

Forest Service Response: The issue of conflict between competing uses and campsite competition has been further clarified and addressed in Chapters I, II, and IV.

Comment 110-17. DEIS is both inaccurate and inadequate. (Correspondent 203)

Comment 110-18. The DEIS is totally inadequate. (Correspondent 936)

Forest Service Response: Thank you for your opinion, but the comments are not specific about which portions of the DEIS are inadequate or unacceptable.

Comment 110-19. I commend you for an outstanding DEIS. The fact that the purpose and need is driven by monitoring (visitor use reports) makes it exceptionally strong. Excellent work and keep up the monitoring! (Correspondent 2311)

Forest Service Response: Thank you for your view.

Comment 110-20. I think you should maintain the status quo, but if that is not feasible then please adopt the management plan that imposes the least restrictions. (Correspondent 2407)

Forest Service Response: The Forest Service agrees in principle on managing for the least restrictions. Administrative efficiency was a primary driver in the development of the FEIS preferred Alternative G, while also protecting and enhancing the ORV's of the river corridor. Additionally, Alternative G provides management control at the portals with minimum regulation while on the river.

Comment 110-21. I feel it is unconscionable what has been done to this area and what the Forest Service Preferred Alternative would allow to continue to occur. (Correspondent 2618)

Forest Service Response: Without knowing the respondents specific concerns, it is difficult to respond to this comment. The FEIS preferred Alternative G sets a new management emphasis for the river corridor to protect and enhance its ORV's and meet the intent of the Acts that established the NRA and designated the river as wild and scenic.

Comment 110-22. It seems awful contradictory to spend over 2 million dollars at Pittsburg Landing to draw more people in and then limit the number of boaters more than in the past! (Correspondent 645)

Forest Service Response: The FEIS preferred Alternative G provides daily limits on the number of watercraft allowed on the river, but does not eliminate any uses outright. The Forest Service anticipates continued visitor demand to utilize the Pittsburg Landing area, for river related activities, sightseeing, and camping. The Pittsburg Landing facilities is developed to facilitate this continued demand.

Comment 110-23. The improvement of facilities at Pittsburg Landing should be an indicator of the public's desire to visit the area. (Correspondent 1781)

Forest Service Response: The FEIS preferred Alternative G allows for continued access to the river for both non-motorized and motorized users on a daily basis, in addition to sightseers and camping enthusiasts.

Comment 110-24. We would like to see the camping facilities at Pittsburg Landing scaled down in magnitude. Your campgrounds at Pittsburg Landing and elsewhere should provide minimal equipment. To those who desire developed campgrounds, the private sector is better equipped to provide them. (Correspondent 2325)

Forest Service Response: The development of the facilities at Pittsburg Landing is done. Future development of recreation facilities listed in Chapter II would follow the management direction listed under Chapter II and need to meet the desired ROS characteristics listed in Chapter III.

Comment 110-25. The organization of the DEIS is difficult to follow. It is not possible to understand the implications and implementation of any alternative by looking at any one place. (Correspondent 1198)

Forest Service Response: The format of the DEIS and FEIS follows the direction set forth in 36 CFR 219, 40 CFR 1502, FSH 1909.12 and FSH 1909.15.

Comment 110-26. Your plans and alternatives listed in the DEIS were based on a user survey conducted in 1989. Evidently the results of this survey showed there was a problem with the aesthetics of peoples' experiences in regards to competing user groups. (Correspondent 1805)

Forest Service Response: Yes, Chapter's I, II, and IV have been refined to more clearly state the types of conflicts and proposed resolution.

Comment 110-27. Your own visitor use survey "indicated most visitors found the amount and mix of river activity acceptable." Those studies simply do not support the contention that floaters and power boaters cannot share the river. (Correspondent 1105)

Comment 110-28. All of your alternatives mention a study done some years in the past. Gentlemen, that study is not accurate to the upper end of Hells Canyon. When Hells Canyon Adventures guests were given questionnaire cards, they were asked to fill them out at the beginning of the trip. Most of the cards I found on the deck. To my knowledge none of the rafters who used a jet back were questioned. Rafters were only questioned at Pittsburg and Heller Bar. The people doing the study were very anti-power boat. Private powerboaters at Hells Canyon launch had very little if any, opportunity for input. (Correspondent 2435)

Forest Service Response: Regardless of the perceived subjectivity of the Visitor Profile and Recreational Use Study, we have conducted full public disclosure of the proposed action and the DEIS preferred alternative and public participation through this EIS process to ensure adequate opportunity for recreation user's involvement, as required by NEPA.

Comment 110-29. If you were to make any changes to your proposed plan, it would sure surprise the hell out of me. (Correspondent 1091)

Forest Service Response: The FEIS preferred Alternative G does propose a different management scenario in the wild section over the DEIS preferred Alternative E.

Comment 110-30. Both private and commercial users should be included in the development of any new launch reservation systems. (Correspondent 1190)

Forest Service Response: A launch reservation system is proposed in the FEIS preferred Alternative G as referenced in Chapter II. User compatibility is a primary consideration in the implementation of a launch reservation system and can be easily adjusted based on user feedback.

Comment 110-31. I strongly encourage the Forest Service to consider adopting the compromise alternative, presented by the Hells Canyon Alliance for Hells Canyon. This alternative treats all users fairly and is based on sound footing. It is the basic plan created by the LAC task force. (Correspondent 1138)

Forest Service Response: Reference Chapter II, Alternatives Considered, But Eliminated From Detailed Study.

Public Involvement Process Code 111

Comment 111-1. My experience in the canyon has been cooperative with other users, if not beneficial to them. It's evident that a small minority of radical environmentalists have had a great impact on the recommendation of Alternative E. (Correspondent 1113)

Comment 111-2. The EIS process was allowed to be swayed by the 500 letters opposing jet boats in the canyon. (Correspondent 1105)

Forest Service Response: The purpose and need in Chapter I identifies the primary purpose and underlying need in establishing new management direction for the river corridor that proposes, among other things, to regulate motorized use levels. Additionally, Chapter I clearly states the significant issues and user compatibility conflicts. This NEPA/NFMA planning process has followed the intent of the laws and planning regulations in providing the responsible official to select appropriate management scenarios which protect and enhance the rivers ORV's.

Comment 111-3. Public input is nothing but comments to be disregarded by the Snake River planning team. (Correspondent 2334)

Forest Service Response: Local, regional, and national public input has played a very significant role in the identification of significant issues, alternative development, effects analysis, and selection of the preferred alternatives. Further, the local, regional, and national public input received on the DEIS that comprises this appendix was instrumental in developing the FEIS preferred Alternative G.

Comment 111-4. We were very disappointed in the lack of public input incorporated into any of the Alternatives. Idaho Steelhead and Salmon Unlimited (ISSU) representatives, including myself, attended most of the meetings leading to the DEIS and believe we are correct in making this statement! (Correspondent 2338)

Forest Service Response: Public input has been evaluated based on its individual merit of meeting legislated requirements and management direction as defined in Chapter I. Meeting the intent of the various laws and planning regulations was a primary screen for evaluating the merit of public comment. The Forest Service has the authority to invoke its own expertise in evaluating public comment, and need not accept at face value the self-serving comments of interested parties or users. Most comments are written with a particular point of view and are more often than not, pieces of advocacy rather than models of objectivity.

Comment 111-5. Your scoping concentrated efforts on the local which results in reaching a very high % of powerboaters and a relatively low % of floaters. (Correspondent 2345)

Forest Service Response: The content analysis summary in the introduction of this appendix shows the total number of respondents from local, regional, and national levels. Although, by the nature of the public meeting locations, they were predominantly attended by local motorized users, the overall public participation effort for both the scoping and DEIS comment period was a success at generating both written and verbal comment from local, regional, and national users.

Comment 111-6. Before the close of the comment period, the Forest Service should make available an explanation of how it will analyze and grade the comments. (Correspondent 2110)

Comment 111-7. Make available before the close of the comment period an explanation of how it will analyze and grade the comments. (Correspondent 810)

Forest Service Response: The review and evaluation process for public comment on the DEIS was explained in the series of public meetings held during the 90-day comment period. In addition, a brief explanation was provided in the DEIS summary.

Comment 111-8. The process of collecting public input is ill defined. Several times the question was asked if public comment would be measured by quantity or quality. Will the teams evaluation of public comment be based on the number of replies or the quality of the replies. (Correspondent 1801)

Forest Service Response: As was stated in the series of public meetings held during the DEIS comment period, there is no hard and fast rule related to "evaluating" public comment. The public comment received on the DEIS was coded and analyzed based on a variety of aspects to ensure complete representation of the information to the responsible official. A summary of the analysis of public comment is contained in the introduction of this appendix. The complete file of public comment, coding, and analysis is available for review in the analysis file.

Comment 111-9. I firmly oppose Alternative E of the DEIS. I feel the Forest Service has polarized the users of the canyon by endorsing this alternative. (Correspondent 1113)

Forest Service Response: Your comment has been vocalized by many through the series of local and regional public meetings held on the DEIS and from the written comment received on the DEIS. The FEIS preferred Alternative G was developed to facilitate shared-use for local, regional, and national interests based on historic use patterns and use levels.

Comment 111-10. If the powerboat associations and float associations could make up committees, and have a representative from the Forest Service, I feel they could hold a type of a court. Then if

you had problems on the river concerning any problems between people on the river there could be a hearing on the problem and determine who is at fault or if both parties are at fault. One time offenders would be suspended 2 weeks from river use. Two time offenders a season of river use. Three time offenders off the river permanently. (Correspondent 2427)

Forest Service Response: The Forest Service prefers to work within established enforcement procedures, working cooperatively with county, state, and federal officers to ensure compliance with the appropriate laws.

Comment 111-11. The best way to do that is to write a letter and get it in the mail before Nov 17. Letters must be received before Nov 22! I've included a form letter for your use if you would prefer that option. Some personal comments in the section provided for that purpose would vastly increase the letter's impact. The best letters are personal, written by the author. If you elect to write a personal letter, the form letter can serve as a guide for key points. The following are some other suggestions for a personal letter: Address it to: The Snake River ID Team, Wallowa-Whitman N. F., P.O. Box 907, Baker City, OR 97814 (we would appreciate a copy).

Support adoption of Alternative B with changes recommended by the HCA [Hells Canyon Alliance]. Make it clear that Alternatives C, D, E and F are unacceptable, unfairly reducing the opportunity for a large segment of the American public to experience Hells Canyon, including those with physical limitations. Powerboaters and floaters can and do get along quite nicely. Trying to create a wilderness-like experience at the expense of legitimate user groups, floaters and powerboaters, is misdirected. Congress specified that motorized and non-motorized craft are both valid uses of the entire river. If Congress intended that the river corridor be managed as wilderness, it would have designated it as such.

The best trout and sturgeon fishing in the HCNRA is in the wild section of the Snake. Alternative E will cut my fishing season in half. The analysis of economic impacts ignores the fact that implementation of Alternative E would put several float and powerboat outfitters out of business. Outfitters cannot make a living with half of a season. Drop Alternative B's seasonal caps for both float and powerboaters. Alternative B's direction for Commercial Powerboaters is acceptable except that the original language from the LAC plan, "reflecting historical use patterns", should be included. An average of 12 boats per day as shown in Alternative B is acceptable as long as it is not used as a daily limit. The boat size limits in B are acceptable, but the Coast Guard should set the number of people boats can carry; drop the 49 passenger limit. (Correspondent 2333)

Forest Service Response: The above comments, generated as a request to river users by a special use permit holder within the river corridor, are addressed in individual comments through out this appendix.

Environmental/Conservation Education Code 112

Many comments were received concerning the implementation of an active user education program as proposed in Chapter II. The following comments are representative of the comments received.

Comment 112-1. All river users need to be educated on the vulnerability of the resource we all enjoy. All river users need to learn etiquette to help increase awareness of each others needs. But after the user does this, some regulation is indeed necessary. (Correspondent 2342)

Comment 112-2. Consider entering into an educational program of all river users in the NRA at the Forest Service entrance area by hand outs outlining the proper behavior while in the canyon. Conduct meetings with organized users with the idea of self governing peoples actions. (Correspondent 1787)

Comment 112-3. Educate all users on river etiquette and low impact camping. Enforce low impact camping rules. (Correspondent 2331)

Comment 112-4. Floaters should be instructed about "good housekeeping" while in the area. (Correspondent 2853)

Comment 112-5. I feel that the problems of social conflicts that develop on the river can be best addressed by education. (Correspondent 935)

Comment 112-6. If there truly are safety concerns, education is the answer. (Correspondent 876)

Comment 112-7. Many jet boaters are either unaware of minimum impact camping techniques, or they flagrantly disregard them. (Correspondent 2795)

Comment 112-8. Please spend more resources educating members of both groups about etiquette, camping practices and respect for cultural antiquities. (Correspondent 1808)

Comment 112-9. Outlaw camp running. (Correspondent 1118)

Comment 112-10. The final recreational management plan should instead focus on regulatory measures directed at the manner of vessel use, without selectively excluding any boating use altogether. In particular, the Forest Service should focus more attention on programs for education of river users to increase boaters' awareness of river etiquette and understanding of appropriate vessel operations. (Correspondent 2346)

Comment 112-11. We are glad that all alternatives include an educational program. Recreationists need to be respectful of the natural environment and each other. That means leaving no waste or garbage and not trying to burn garbage. Education in "clean camping" is a must and the Forest Service will have to make sure it has adequate funding for this. (Correspondent 2894)

Forest Service Response: Public comment on the implementation of a active education program for river users was overwhelming in support. The Forest Service agrees that an active education program at all the portals would be an effective tool in achieving our management objectives with minimal on-site enforcement. A detailed framework of the education program is available in the analysis file.

Comment 112-12. We concur with the direction concerning visitor education and want to work with the Forest Service in development of those programs. (Correspondent 1198)

Forest Service Response: The Forest Service anticipates working actively with the various user groups in the establishment and implementation of the user education program.

Comment 112-13. There should be strict enforcement of "courtesy" towards other boaters: powerboats should cut their power and allow rafts to pass. Private powerboaters, as well as commercial operators, should be subject to these regulations. (Correspondent 2653)

Forest Service Response: The best approach to proper river etiquette is through a user education program for the portals as proposed in Chapter II. Although enforcement is difficult, the user education program will resolve many of user compatibility conflicts that currently occur on the river.

Comment 112-14. Number of trips/day up and down a stretch of river. Many powerboats aimlessly cruise up and down river throughout the day. Each encounter a float group has with a powerboat is a negative experience for most people who elect to float. - passing guidelines, rules of road between motor and motorless craft need to be developed. - conformity with low impact camping rules must be extended to powerboat users. (Correspondent 2324)

Comment 112-15. An idea might be to add some sort of way to police those operators both powerboaters and floaters where conflicts arise from poor river etiquette. This might stop the occasional powerboater who thinks it is fun to disturb the rafters while floating and stop the float boat operators from blocking boat ramps while they serve lunch to their clients. (Correspondent 1110)

Comment 112-16. Commercial or private jetboat use rules should include: Slowing for floaters, whether they are moving on the river or moored at shore, and avoiding contact with float parties while on the river operating a jetboat should be compulsory. (Correspondent 1196)

Comment 112-17. It is critical to effective management of the Canyon for powerboaters to have clear rules when they encounter floaters and other users. These motor/float encounters will still occur on the river between Kirkwood and Pittsburg and downstream on the Scenic Section even if Alternative E is implemented. (Correspondent 2324)

Forest Service Response: User education in regard to proper river etiquette will continue to play an important role in resolving the potential for on-river conflict between users. User education is thoroughly addressed in Appendix L.

Comment 112-18. The Marine Board is also very interested in boating safety and education. The DEIS calls for an active and timely education program at all portals. We have cooperative programs to provide information/education kiosks on a number of rivers in Oregon and are willing to assist NRA staff in the development of educational messages and formats that can help mitigate any safety or conflict issues on the Snake. (Correspondent 2226)

Forest Service Response: Boater education would be coordinated with the states of Idaho and Oregon, whenever possible, in the development and implementation of the the active education program addressed in Chapter II.

Scenery Code 300

Comment 300-1. Minor improvements at isolated campsites, such as olive drab picnic tables, would not detract from the backcountry setting. (Correspondent 1198)

Forest Service Response: Your comment will be considered for management of picnic tables in the scenic section, pursuant to the management direction common to all alternatives listed in Chapter II and in the ability of meeting the desired ROS settings.

Comment 300-2. Page IV-7. The analysis of consequences to the scenic resource seems to have concentrated on social rather than scenic issues. Unrealistic criteria have resulted in unrealistic conclusions. Primitiveness and remoteness are measured against use levels, not degrees of modification of the physical setting. When the ROS is considered, there is little significant difference between B through F as it relates to the Scenic Resource. (Correspondent 1198)

Forest Service Response: The ROS Primer and Field Guide describes remoteness as the extent to which individuals perceive themselves removed from the sights and sounds of human activity. The use of "primitiveness" in the FEIS has been further clarified as noted in the key indicators in Chapter I, desired ROS characteristics in Chapter III, and effects analysis in Chapter IV.

Comment 300-3. The Forest Service asserted that the structures are "non-conforming," but failed to explain the standards for conformance. (Correspondent 1198)

Forest Service Response: Reference the desired ROS characteristics in Chapter III under the recreation ORV for the visual quality objectives of the affected areas. Refer also to Chapter IV under the scenery section.

Recreation Experience Code 401

There were many comments suggesting the type of recreation experience that should occur on the river. The following are examples of these comments arranged by category:

Manage the Area for a Wilderness Experience

Some correspondents felt that the end result of the management plan should provide the user with a non-motorized wilderness experience or that management should protect wilderness values associated with a wilderness trip.

Comment 401-1. If seven launches at Hells Canyon Dam are allowed with two day stays on the Wild and Scenic section, the launch site area would be overly congested and campsites in the Wild and Scenic section would be overused, overcrowded and highly impacted. The float trip through the Wild and Scenic section would not be a good wilderness experience for our guests. (Correspondent 1060)

Comment 401-2. It may be true that there is currently no legal requirement to exclude motors in the wild segment. It also may well be true that there is no legal requirement to include motors. Since I honestly doubt that the use of motors can be validly justified as a benefit to the wilderness, wildlife, or plant life of Hells Canyon then it should be imperative to proceed with the exclusion of motorized travel in this segment. (Correspondent 2843)

Comment 401-3. Dedicating the upper, "wild" river section of Hells Canyon to non-motorized use would be an excellent alternative to the present situation. In addition to enhancing the wilderness experience of recreationists, I can't imagine it wouldn't pay dividends in terms of habitat protection. (Correspondent 2890)

Comment 401-4. In the time since I first floated the river I have witnessed many changes most of which have diminished the quality of the wilderness river experience especially from Hells Canyon Dam to Rush Creek but also as far down river as Salt Creek and Pittsburg Landing. Years ago there was virtually no power boat activity in the wild section of the river; now there is a licensed outfitter running commercial trips from Hells Canyon Dam and many power boats enter the upper river, inappropriately, in my opinion. The social experience of the river from the dam down to Rush Creek has been severely compromised by the management carried out by your agency over the last twenty years. (Correspondent 2560)

Comment 401-5. The idea to create a more "wilderness-type" experience sounds great but is ludicrous to me as long as the dams fluctuate the water level so radically almost every day. (Correspondent 455)

Comment 401-6. Western reservoirs and lakes often restrict powerboat usage, even where suitability is not an issue. That restriction on a whitewater river with some level of wilderness protection would not be taken in this same spirit is probably more a result of Lewiston being the "jetboat capitol of the world" than an overwhelming public interest. (Correspondent 2393)

Comment 401-7. I was appalled to hear the calm wilderness silence of the area shattered by the raucous noise of jet boats roaring up and down what moments before had been a serene expanse of placid river. Are there to be no places in our once magnificent country free from the soul shattering, destructive effects of our modern mechanization? Our few remaining scenic wild rivers MUST be kept as wild and primitive as possible. Certainly the superb Snake as it flows through Hells Canyon, the deepest of canyon on our continent, deserves to be kept in a pristine condition. To my mind jet boats and jet skis should not be permitted on the Snake in Hells Canyon at any time. (Correspondent 2887)

Comment 401-8 . In my remarks, I have assumed that a high level of artificial noise is incompatible with Wild River and Wilderness management. That is the main objection to power boats (aside from the effects of their wakes on the beaches and river ecology). For the same reason, I believe that continuation of power boat and aircraft travel on the Wild segment of the Snake is incompatible with the established land uses there. (Correspondent 2341)

Comment 401-9 . Motorized travel should be limited to the extent necessary to assure that a primitive type experience is possible (for a citizen willing to wait if necessary for a permit, a quality experience in the wilderness should be protected.) (Correspondent 2472)

Comment 401-10. Never have we had the kind of wilderness experience we had this summer and which should remain an experience available to our children's children. Clearly this will not be the case if you move to allow power boats on the river at any time in which rafters also are on the water. (Correspondent 2816)

Comment 401-11. There are very few protected multi-day wilderness whitewater rivers left in the lower 48. (Correspondent 2378)

Comment 401-12. As a frequent rafter on the Salmon and Snake River system, and also a recent user of jet boat transportation up the Snake and then up the lower Salmon, I think I have a good insight into both modes of transportation on the river system. Given the increasing demands on the river system, it is essential that the Snake River portion of Hells Canyon be managed in a way that maximizes the wilderness and outdoor experience enjoyed by rafters, but at the same time also provides controlled access for the continued use of jet power boaters on a more limited basis. (Correspondent 2807)

Comment 401-13. The Preferred Alternative seems to favor the interests of jetboat users over those of float craft users. I believe that any management plan for a unique resource such as Hells Canyon should prefer non-motorized uses over motorized uses. Motorized uses are prohibited in U. S. Forest Service land designated as wilderness. The Snake River should be equally protected. (Correspondent 2599)

Forest Service Response: The fact that comparing the legal guidelines of the Wilderness Act with those of the Wild and Scenic Rivers Act can be like mixing apples and oranges. They are separate and distinct laws and the Wilderness Act does not apply within the boundaries of any portion of the Wild and Scenic Snake River corridor.

The psychological perception of having a "wilderness-like" experience in a natural setting is different than being physically present within the boundaries of a Congressionally-designated wilderness area where the guidelines of law establish the management direction. For example, a motorized user can have a psychologically perceived "wilderness-like" experience in a backcountry setting but generally can not have that experience within the boundaries of a Congressionally-designated wilderness area.

Congress chose to designate the Snake River as a component of the wild and scenic rivers system separate from, rather than within, the boundaries of a Congressionally-classified wilderness area. Only Congress can change this mandate regardless of what an individual user thinks the law or associated experience should be. Refer to Appendix C for additional information.

Managing for a Wilderness Experience is Inappropriate

Some correspondents felt that the intent of the Forest Service was to impose a "wilderness" experience based upon guidelines of the Wilderness Act on a non-wilderness resource. The following are examples of these comments:

Comment 401-14. I'm sure you understand that many commercial floating companies want jet boats off the canyon so they can sell their trips as "wilderness experience". (Correspondent 1105)

Comment 401-15. The word "solitude" is not significant to either the Wild and Scenic Rivers Act or the HCNRA outside of the designated wilderness. (Correspondent 1198)

Comment 401-16. There seems to be a contingency who wants to create a wilderness area where one does not exist. This country has plenty of wilderness areas already. What it is lacking is areas where the majority of people can enjoy themselves without the restraints of a full-blown wilderness experience. That is what Hells Canyon should be. (Correspondent 1138)

Comment 401-17. The Forest Service is trying to create a more wilderness-type experience at the expense of legitimate user groups. (Correspondent 936)

Comment 401-18. The Desired Future Conditions (DFC's) set forth in the DEIS seem to ignore Congress' intent with regard to the NRA. Congress unmistakably intended to create an area where all forms of boating could take place, knowing full well that some boating activities may detract from a sense of solitude or primitiveness. Yet, the Forest Service, apparently at the urging of certain local environmental groups, is undertaking an effort to create a primitive, almost wilderness, setting for recreational activities. (Correspondent 1198)

Comment 401-19. Trying to create a more wilderness-type experience at the expense of legitimate user groups, floaters and powerboaters, is, in my opinion, a misdirected goal of the Forest Service. Congress enacted laws protecting recreation and stating that "motorized and non-motorized craft are valid" uses of both the wild and scenic sections of the river. Thus, the Forest Service's efforts to prohibit access to one of the groups on alternating weeks during the control period is inconsistent with Congressional intent. Also, Congress intentionally left a half mile wide non-wilderness corridor along the river. If Congressional intent was to manage this corridor as wilderness, it would have been so designated. (Correspondent 2110)

Comment 401-20. To fulfill its statutory mandate, the Forest Service must manage the recreation area to maximize recreational opportunities. Efforts to create a more wilderness-like or primitive setting run contrary to that statutory mandate. (Correspondent 1198)

Comment 401-21. It moves the river's recreation opportunity from primitive- motorized to a more wilderness-like experience. This was not the intent of Congress. (Correspondent 1)

Comment 401-22. Page II-54. Restrict powerboats is not the only way to achieve primitiveness or remoteness. What this table reflects is the myth of incompatibility of powered and non-powered recreation. When powerboater numbers are dropped, primitiveness increases; when powerboaters are gone it increases; when floaters aren't around, no one cares, so give it a high. You seem to be judging these characteristics against wilderness standards. (Correspondent 1198)

Forest Service Response: The intent of Alternative G is to manage the river within the guidelines of the the Wild and Scenic Rivers Act, not the Wilderness Act. However, there is nothing inherently wrong with the desire for some users to have a "wilderness-like" experience outside of the boundaries of Congressionally-designated wilderness.

Relative to a psychologically perceived recreation experience outside of Congressionally-designated wilderness, the main difference between a "wilderness-like" experience and a "backcountry" experience is semantics. Many areas of National Forest that are remote, but are not within Congressionally-designated wilderness are managed for a "backcountry" recreation experience. Backcountry experiences are based upon a sense of remoteness but often include motorized uses. They fit well within the ROS guidelines of a semi-primitive motorized setting. Many people can meet their expectations of a "wilderness-like" experience in a backcountry area if the setting sounds or looks like they interpret the word's meaning, i.e., individual perception.

The written history of the United States provides many examples of both positive and negative references to a perceived "wilderness-like" experience and many people had such an experience long before passage of the Wilderness Act in 1964. Since 1964, many people who enjoy motorized recreation have become overly sensitive when the word "wilderness" is used, believing that use of the term focuses too much attention on the Act and associated lands and waters where motorized uses are not allowed, which could result in additional loss of recreational opportunity for them.

The University of Idaho study indicated that 48% of floaters and 39% of powerboaters stated that visiting a wilderness was an important reason for taking a river trip in Hells Canyon, thus indicating that the psychological perception of wilderness does apply to travelers on the Snake River even though they never travel within Congressionally-designated wilderness during their trip.

A problem with use of the word "wilderness" only arises when the expectation associated with the word is based upon the incorrect perception that the guidelines of the Wilderness Act should apply in areas that are not within the boundaries of Congressionally-designated wilderness. The problem is compounded if people are surreptitiously led to believe that the opportunity for a true wilderness experience would be possible because they would actually be traveling upon a resource that is within the boundaries of a Congressionally-designated wilderness when, in fact, they would not. This has occurred on the Snake River and is neither fair to the mis-informed visitor nor other legitimate users.

Comment 401-23. Page IV-11. Primitiveness is defined as lack of evidence of human activity. If we define this as physical evidence, this measure could be useful, although the Forest Service must recognize that any human presence at campsites will result in impacts. Such minimal impacts must be accepted as a price paid for our use and enjoyment. However, if primitiveness is defined in terms of human encounters, a description of the social setting, we are moving outside the realm of this term's applicability to wild and scenic rivers. (Correspondent 1198)

Forest Service Response: Minimal impacts are unavoidable whenever human presence is introduced into a natural setting and reducing those impacts is dependent upon limiting access to a specific number of people within that setting. If minimal impacts enhance the primitiveness of the setting, it would be the direct result of limited numbers of people. In this instance, the indirect effect of limiting numbers of people to manage campsite impacts would be a reduction in encounters. The

primitive ROS standard is discussed in Chapter III with additional information contained in Chapters II and IV.

Manage the Corridor for a Quality Recreation Experience

Many comments suggested that we manage the river corridor for a quality recreation experience. Some felt that management of the experience should move toward the primitive end of the recreation opportunity spectrum, especially in the wild river. Others felt the guidelines of law mandated a semi-primitive motorized standard on the entire river. While there was general concern that the experience be protected or improved, there were many different ideas about how to achieve a primitive or semi-primitive experience, based largely on whether the respondent favored motorized or non-motorized recreation.

Comment 401-24. Manage the wild section of the river as primitive above Kirkwood and semi-primitive non-motorized from Pittsburg to Kirkwood - see 7/1/92 ROS guidelines for attributes and definitions - THIS MEANS NO POWERBOATS and much more (7 attributes). (Correspondent 2345)

Comment 401-25. Manage the scenic and study sections as semi-primitive motorized. Use 7/1/92 guidelines to set numbers, encounter rates, etc., (all 7 attributes). My guess is that there are way too many powerboats to meet the guidelines now. (Correspondent 2345)

Comment 401-26. Motorized travel should be limited to the extent necessary to assure that a primitive type experience is possible. (Correspondent 2472)

Comment 401-27. I strongly urge the planning team to chart a course giving major priority to preservation and solitude values already mandated by the NRA act. (Correspondent 2875)

Comment 401-28. Adopt an alternative that would promote peace and quiet, restoration of wildlife and "naturalness," and diminution of internal combustion engines on the river and in the surrounding land areas. (Correspondent 2372)

Comment 401-29. Guarantee that this general Snake River area, including Hells Canyon, is a lasting natural sanctuary with no impacts by man so as to fully benefit man and all life. (Correspondent 2510)

Comment 401-30. Wild and Scenic river sections to be managed as semi-primitive motorized all year. (Correspondent 1190)

Comment 401-31. Limit use to based on Forest Plan DFC 1974 levels - HCNRA FEIS pg 84. Manage that use as an anomaly within the primitive and SPNM ROS. (Correspondent 2345)

Comment 401-32. The DEIS fails to consider that the reason float launches are not filled every year. Jet boat domination of the river has degraded the quality of experience on the Wild and Scenic Snake River to the point that it is undesirable to many people. (Correspondent 1196)

Comment 401-33. The fundamental problem with the current management plan for the wild section of the Snake is the diminished outdoor experience caused by too many users competing for limited camp sites. The problem should first be dealt with by treating all users equally. (Correspondent 2827)

Comment 401-34. It is a humbling experience to feel the power of nature's roaring rapids and to be able to just sit back and listen to and look at one of our great unspoiled treasures. The current technology of man is just out of place in areas like Hells Canyon. (Correspondent 2839)

Comment 401-35. The preferred alternative eliminates 7000 recreational opportunities below the 1991 level. Talk of managing growth misleads the public into believing that future growth will be regulated - the fact is that the plan is to operate at pre-1991 levels. There is no consideration given to the level of the experience that those who are eliminated from visiting the river have - we are told that the reductions are to enhance the recreational experience of those on the river but no where is there an accounting of the level of the experience of those 7000 folks who will not be allowed to have any recreational experience on the Snake River at all. (Correspondent 1801)

Comment 401-36. There must be a way to accommodate jetboats and power boats without destroying everyone else's enjoyment of the Snake River. I strongly urge you to adopt a plan which allows hikers, rafters, and those who do not use noisy, expensive means of transportation to enjoy longer periods of time without the racket. (Correspondent 2818)

Comment 401-37. We think both groups, especially floaters, would rather have most of the wild section without jet boats even if it might mean the future possibility of few trips. For us it boils down to quality of the experience, not quantity. (Correspondent 2237)

Comment 401-38. Given the very limited number of individuals that run the wild section in a jet boat, the emphasis placed on maintaining that experience is quite frankly astounding. (Correspondent 1196)

Comment 401-39. The greatest problem on your river is the absence of opportunity to enjoy and experience the Snake River, below Hells Canyon Dam, in peace and solitude. One motorized craft lays waste to contemplation of the environment and what it offers the visitor, yet your proposed alternatives provide for the roar of motors in almost unabated measure. It would seem reasonable to prioritize the use of the remaining free flowing waters in favor of non-motorized use and solitude, with the floatwater providing new and enhanced opportunities for the people who enjoy their water in motorized craft. (Correspondent 2870)

Comment 401-40. Each day, the clamor of the burgeoning population make the rare places like the Scenic and Wild Snake River even more and more essential. Why must the pristine places succumb to the demands of the internal combustion noisy few? I hope future generations may see it in all its untarnished beauty without the raucousness of jet traffic. (Correspondent 2877)

Forest Service Response: Due to the unique provisions of the HCNRA Act allowing for valid motorized use, as well as the need to manage administrative, interpretive, developed, and resort sites within the corridor, specific ROS guidelines have been developed for the entire wild and scenic river. A discussion of these guidelines is presented in Chapter III.

Regional ROS guidelines for river management acknowledge that inconsistencies in standard ROS river guidelines can occur "...due to a given law or regulation." The guidelines also state that "Any subdivision into smaller ROS management areas must include consideration of our ability to manage the discrete segment and the length of time a user experiences the segment" (reference analysis file). Additional information and environmental consequences on ROS standards are found in Chapters II and IV.

Alternative G would place important emphasis on providing a great variety of different opportunities for all users to help them achieve their common goal of a quality recreation experience on a wild and scenic river based upon their individual expectations. Limited on-river use, limits on access to launches, and personal scheduling of time would be the controlling factors in determining whether or not each river user achieved their expectations.

Regional River Opportunities

Several correspondents felt that opportunities for river recreation were available for both floaters and powerboaters on other rivers, therefore one group should relinquish their use of the Snake River in favor of the other. Others felt that only those people who couldn't get along with both uses occurring at the same time should find another river for recreation.

Comment 401-41. On my second trip down the Snake, one of my traveling companions related that her parents had gone down the river twenty years earlier and had been envious that she too, would see so much wildlife. In our six days on the river we saw little wildlife, but the assault of several jet boats per hour at mid-day, small aircraft taking off and landing at Big Bar and Sluice Creek, and livestock grazing go far in explaining why there aren't many wild animals. Isn't there enough to the West outside of this unique canyon for these other activities??? (Correspondent 2741)

Comment 401-42. What is truly ironic about the situation is that the motor enthusiasts destroy the very qualities that draw them to a natural area in the first place. If those who are so fond of this means of recreation think their activities are not innocuous, why are they not happy on the hundreds of thousands of acres of land and water already dedicated to their passions, and populated by others like them? Why, because they don't like the constant noise, pollution and other disruptions made by others of their kind any more than anyone else. And though they probably won't admit it, they actually seek the same bit of solitude and adventure a rafter might yearn for. (Correspondent 2400)

Comment 401-43. I know of no suitable western rivers on which jetboats are not allowed (with the possible exception of the Grand Canyon), even though some misleadingly stress "only three of the Pacific Northwest's 35 top rated whitewater rivers" allow jetboats. (Correspondent 2393)

Comment 401-44. Please do not further limit access to Hells Canyon. People who want a pure wilderness experience can find it on other rivers. (Correspondent 638)

Comment 401-45. Those who do go rafting for extended periods have many wilderness areas already set aside for their exclusive use, i.e., other rivers with powerboat restrictions. (Correspondent 604)

Comment 401-46. Why lock up an area like Hells Canyon so only one minority group can enjoy it? There are a lot more rivers in the US that are for rafting only, why can't this part of Snake River stay as a multiple use river. Any one of Hells Canyon Adventures two tour boat show Hells Canyon to far more people than all of the commercial rafting companies combined during a season. (Correspondent 1194)

Comment 401-47. Heavy consideration should be given to the fact that the Snake River is one of the few places [rivers] power boats can navigate. Power boats are restricted by nature in most places, all of which are open to floaters and other types of recreation. (Correspondent 1139)

Comment 401-48. These are the only two rivers in our area and in most of the nation where powerboats have access to class 3-4 white water. So, people used to rafting in other areas get "culture shock" when they come here. Well, there are dozens of rivers in the United States that don't allow powerboats. If they desire that experience they can go to those rivers. Power boaters don't have that option. (Correspondent 1105)

Forest Service Response: Appendix H provides information on regional river opportunities. The appendix only examines other rivers classified within the wild and scenic river system in the Northwest that are regularly used for boating recreation because this is the comparable recreation experience being managed on the Snake River.

It is not the intent of Congress to have recreationists give up their opportunity to recreate on a nationally recognized river for the benefit of other groups when the river is open for both uses by law. Rather, it is the responsibility of the Forest Service to develop a method that provides that each visitor would at least have an opportunity to experience Hells Canyon in a way which best meets their individual understanding of what a wild river experience should be. At the same time, it is also the responsibility of the Forest Service to educate users on what that experience can be within the legal guidelines provided by the Wild and Scenic Rivers Act.

Both floaters and powerboaters come to the Snake River for many of the same reasons (reference University of Idaho study). However, they often have vastly different perceptions of how to achieve those goals. For that reason, FEIS preferred Alternative G is designed to provide a variety of different levels of recreation experience based upon a number of factors including river classification, time periods, and user expectations.

Desired Future Conditions

There was some confusion in regard to the difference between desired future conditions and Congressional river classifications (wild and scenic). A particular point of confusion was caused by a misunderstanding of the two DFC's that were in different segments of the wild river.

Comment 401-49. Don't make any change of river classification above Kirkwood. It is not necessary to use that as a way to control boat use--the difficulty of the rapids up there is enough to restrict boats. (Correspondent 1041)

Comment 401-50. Don't re-classify the river above Kirkwood to "wild". Leave it as it is. Don't reclassify the river between Pittsburg and Kirkwood to "wild". (Correspondent 1087)

Comment 401-51. Don't re-classify the river above Kirkwood thereby restricting its use even further! The difficulty of navigation up there will take care of the numbers of boats who travel that section of water. A floater has no more entitlement to a "wilderness experience" than does a boater! None of it will ever be wilderness again. (Correspondent 1089)

Comment 401-52. I favor an alternative consistent with eventual wild river classification for the dam to Kirkwood Ranch section and scenic classification from Kirkwood to Heller Bar. I prefer adoption of Alternative F for the dam to Kirkwood section and Alternative C downstream of Kirkwood. This combined alternative approach is similar to the solitude I alternative which was eliminated from detailed study. (Correspondent 2840)

Comment 401-53. The enforcement of a different use allocation in the four-mile section between Kirkwood and Pittsburg is ludicrous, and further confuses users while complicating enforcement. Since it is part of the wild designated river, it should be included in that allocation. (Correspondent 1196)

Comment 401-54. The river segmentation used in E is unrealistic, unnecessary and unresponsive to the needs of the boaters. Using Sheep Creek, the end of navigation, as a controlled point allows people to see the highest point that can be seen from the river, Dry Diggins at 7828 in elevation. Even better, if Rush Cr. were used as the controlling point, passengers could view Hat Point, which at 6982 in elevation, is almost exactly one mile above the river. Rush Cr., the first major rapid on the journey upstream, a Class IV, is where most of the upstream tour and private boats turn around. It has worked very nicely for many years and I can see no justification or rationale that would lead me to believe otherwise. To make this change denies the vast majority of the canyon's visitors the opportunity to experience its grandeur. (Correspondent 126)

Forest Service Response: Due to the confusion caused by segmenting the river based upon DFC's in Alternatives C, D, E and F and the Congressionally-designated boundaries for the wild river and scenic river, the concept of managing different river segments to meet different DFC's has been dropped in the FEIS. The river classifications of wild (between Hells Canyon Dam and upper Pittsburg Landing) and scenic (from upper Pittsburg Landing to the Wallowa-Whitman National Forest Boundary) are designated by Congress in the HCNRA Act and can only be changed by Congress.

Comment 401-55. The Desired Future Conditions developed for this DEIS are not definitive and can not be used objectively as a tool for analysis. These one sentence descriptions which are to account for emphasis by river segment are nearly identical and are completely generic. Any river corridor could be described in these terms and practically any river management course of action could be supported. We do not believe that any Alternative could be compared scientifically or otherwise utilizing these descriptions. Any analysis based on these DFC's must be seen as completely subjective. Although features and values of the corridor to be protected, maintained or achieved were discussed in detail by the public and agency task force, none of these elements appear in the ID Team description. We question not only the usefulness of these DFC's but the apparent resistance to look at any scoping information gathered prior to the DEIS which illustrates the desires of the public. (Correspondent 2224)

Comment 401-56. The Desired Future Conditions are defined in such vague terms that nearly any management plan could be viewed as a step toward achieving them. The Forest Service should be more specific in what it is trying to achieve. For example, if the Forest Service wants to lessen "conflict" between floaters and powerboaters, it should describe what type of conflict it is talking about, with specific examples, so that commentators can intelligently address what the Forest Service is trying to do. (Correspondent 2110)

Comment 401-57. The principal drawback of the DFCs is the absence of definition and standards. The best approach would have been to show which of the desired future conditions already defined would apply to each section. (Correspondent 1198)

Comment 401-58. From Sheep Creek to Kirkwood the travel by powerboat DFC says that "it would remain available as an area for powerboaters to travel and camp in a major river setting that includes major rapids." It would seem, therefore that the "travel by powerboat" DFC would have to be included for that segment since it has all of the river's major rapids. (Correspondent 1198)

Comment 401-59. DFC - Travel by powerboat "... premier year-round whitewater powerboating river in North America" - How does this tie to the laws or previous decisions or guidelines/directions for managing "wild" and "scenic" rivers. (Correspondent 2345)

Comment 401-60. It appears that Forest Service had predetermined the DFC's prior to the scoping. The DEIS states, for example, "A majority of comments on recreation use focused on the effects of noise from motorized watercraft and aircraft in relation to the intended recreation experience for the wild and scenic sections." DEIS, at I-12. Such comments apparently were measured against an intended recreation experience determined before the scoping started instead of being represented by an array of alternatives in the DEIS. (Correspondent 1198)

Forest Service Response: As stated in Chapter I of the DEIS, the DFC's are broad vision statements and were used during public scoping to focus public comment and involvement during planning. As vision statements, the DFC's meet the intent of the Forest Plan, the Hells Canyon NRA Act and the Wild and Scenic Rivers Act. As a result of public comment regarding segmentation of the river based upon DFC's, the FEIS focuses recreation analysis on the guidelines of ROS and has dropped segmentation of the river based upon DFC's.

Comment 401-61. One of the DFC's appears to be maintaining the river as the premier year-round whitewater powerboating river in North America. The proposed limits on boaters seem contrary to the goals of this DFC. (Correspondent 880)

Forest Service Response: In order to protect and enhance all ORV's, limits on all use are necessary. In regard to enhancement of the recreation ORV, limits are necessary to assure a high level of quality for the powerboating experience.

Comment 401-62. Pages I-7 and 8 list a number of DFC's dealing with floatboating, powerboating, sightseeing, viewing wildlife, fishing and handicapped accessibility. These DFC's are omitted from the evaluation of alternatives in tables IV-1, 2 and 3. (Correspondent 1198)

Forest Service Response: The Forest Service has dropped the segmentation of the river based upon DFC's, and have addressed these concerns in Chapter IV within the context of ROS.

Comment 401-63. Table IV-1 has a number of rankings that the Alliance [Hells Canyon Alliance] disputes. Alternative B should rank an H [high] in ability to achieve the DFC's listed on pages I-7 and 8 for all users. (Correspondent 1198)

Comment 401-64. Table IV-2 also is problematic. Alternative B should rank an H [high] for all under interpretation if the recommended changes were made. (Correspondent 1198)

Comment 401-65. Table IV-3: There is no reason to rank B as L [low] for powerboating and floating under the recreation DFC. (Correspondent 1198)

Forest Service Response: Since these comments deal with DFC's by river segment, they have been addressed in the FEIS in Chapter IV as part of ROS.

Comment 401-66. Page IV-52. Alternative B provides the most opportunities for the diversity of interpretive, sightseeing and wildlife viewing opportunity DFC. (Correspondent 1198)

Forest Service Response: The Forest Service agrees that alternatives that provide increases over existing use can increase opportunity. However, since Alternative B could produce substantial increases in use, this could lead to on-river congestion and congestion at interpretive sites with the potential to reduce the quality of the experience for all visitors.

Comment 401-67. The high and moderate table rankings for campsite competition during the unregulated season are unfounded. For the vast majority of the unregulated season very few campsites are even used. The only times any competition might be encountered are on the tail or beginning of the regulated season. If the competition for campsites really does become high, every alternative should have a campsite reservation system built into it to mitigate any potential for conflict. (Correspondent 1198)

Forest Service Response: Alternative G provides for a campsite reservation system only if other mitigation measures fail to reduce campsite competition to reasonable levels. Rankings were based on the fact that use has been substantially higher on the shoulders of the primary season, especially in the fall as long as weather remains favorable and steelhead fishing as well as hunting opportunities are optimal. If necessary, implementing campsite reservations into this time period would only occur

after the primary season had been extended and if mitigation measures failed to reduce campsite competition.

Comment 401-68. To emphasize the interpretive potential only from Pittsburg to Kirkwood ignores the canyon's premier attractions. To lock these attractions and their interpretation away from the majority of the canyon's visitors, as Alternatives C, D, E and F do, is unreasonable. (Correspondent 1198)

Forest Service Response: The Forest Service agrees that interpretation needs to remain a key element in the Recreation ORV. Alternative G focuses on providing reasonable access to Kirkwood with additional opportunities for commercial powerboat passengers from Pittsburg Landing to mitigate economic impacts to Idaho County. It also provides reasonable access for all visitors throughout the Wild and Scenic River corridor.

Comment 401-69. Our interpretation of "Desired Future Conditions" is to maintain the integrity of the ecosystem for all creatures. There can be no price tag placed on the loss of a species or the destruction of habitat. (Correspondent 2337)

Comment 401-70. The Desired Future Condition of Hells Canyon should be one that enhances and supports the native wildlife and plant life. It should be a place where humans could go for a revival and revitalization of their wild and natural spirit. A place where real risks could be taken and real adventures lived. The last time I visited Hells Canyon it was a place of great noise created by the contained explosions of the internal combustion engine accompanied by the awful smell of petroleum fuels. It was also a place of hustle and bustle and crowds. (Correspondent 2843)

Forest Service Response: Management of the recreation experience within both the wild and scenic sections of river has been refined within the guidelines of the ROS. Analysis of ROS for the river corridor can be found in Chapter III. Specific topics addressed in user comments concerning DFC's have been reformatted and addressed in Chapters II and IV as they relate to ROS.

The Wild and Scenic Rivers Act requires the identification of ORV's. Many of the ORV's identified were not recreation based and FEIS preferred Alternative G is based on protection and enhancement of all ORV's within the river corridor. A detailed description of the ORV's are discussed in Chapter III.

Comment 401-71. This outlook does not seem to be shared by the Forest Service in the DEIS for the management of the Snake Wild and Scenic River. All impacts on the environment are measured by the type and amount of recreational use in that area. Our aboriginal area, including the major portion of the HCNRA, has been and is used by our people for very specific and essential purposes, including worship. Sacred sites exist in this area, the location of which we are unwilling to reveal because those sites which have already been discovered have the potential of being damaged or destroyed. (Correspondent 2337)

Forest Service Response: Traditional use sites are those locations for which a continuous record of use exists from the historic past to the present. No documentation of traditional use by Native American groups exists for the Hells Canyon. It is difficult to protect or assess the value of sites without knowing what and where they are.

Comment 401-72. The Desired Future Conditions are defined in such vague terms that any management plan could be viewed as an effort toward achieving them. The Forest Service should be specific in what it is trying to achieve. (Correspondent 1095)

Forest Service Response: The DFC's in Chapter I have been refined to clarify their objectives and intent in the planning process.

Comment 401-73. Congress recognizes both motorized and non-motorized rivercraft as valid uses of the entire Snake River in the HCNRA. It also recognizes the provision of recreation opportunities for the American people as an important objective of this NRA. Any management plan should capitalize on those recreational opportunities to the extent that they are compatible with the area's magnificent resources. (Correspondent 2218)

Forest Service Response: That is correct; although the HCNRA Act does state that motorized and non-motorized are valid uses, it is silent on defining the intent of the term "valid". It is clear in Sec. 7 of the Act that recreation is to be managed so that it is compatible with objectives listed.

Comment 401-74. Alternative F adequately satisfies the intent of the National Wild and Scenic Rivers Act. We are unable to locate supporting information for the statement in the DEIS at Appendix H-1 that "...rivers classified as wild encompass a very broad spectrum of uses and access in areas with adjoining wilderness." (Correspondent 1196)

Forest Service Response: This statement is a professional judgement made by the planning team recreation specialists based on the Agency's interpretation of the Wild and Scenic Rivers Act and the examples of different types of rivers designated as wild by Congress.

Use Levels (Private and Commercial) Code 402

Criteria Used to Determine Use Levels

There were many correspondents who discussed the relative merits of using one time period compared to another in order to establish use limits. This is based on the concept that at some point in time since the river was designated in 1975 or prior to designation, there was a specific level of use that did or will occur that is the "correct" level of use in regard to protecting the resource. This level meets the guidelines of the Wild and Scenic Rivers Act, provides a certain level of experience, or is the right use equation for compatibility of motorized and non-motorized users. The following are examples of these comments.

Comment 402-1. Private and commercial jetboat use levels during the time period between 1975 and 1977 should be used as a "cap" from which to judge compatibility with protection mandated in Sec. 7(1-6) of the NRA Act, the ESA, the NWSRA. It should not be viewed as a quota to be met. This would set jetboat launches at three per day each for commercial and private during the high-use season, and would allow elimination of motorized use in the wild section. (Correspondent 1196)

Comment 402-2. The maximum combined private and commercial jetboat use on the entire Wild and Scenic Snake River between 1974 and 1977 averages 6.6 private and commercial boat launches per day on the entire river during the high use season. It can roughly be broken down into 3.3 launches per day each of commercial and private, respectively, on the entire river. This conflicts sharply with the levels prescribed in the preferred alternative. The preferred alternative prescribes levels approximately five times the estimated traditional numbers at the time limits on the number of motorized watercraft were legally required. Illegally allowing jetboat use to build up, then locking it in at built-up levels does not represent fair use allocation based on resource protection and facilitation of use conflicts. (Correspondent 1196)

Comment 402-3. If the Forest Service intends to make a conscious decision to determine jetboat levels based on established use levels, it should use the numbers that were recorded at the time regulation of the number of jetboats was required by law. (Correspondent 1196)

Forest Service Response: The HCNRA Act at Sec. 10(d) did not "require" regulation of the number of jetboats. It did establish "provision" for the Secretary of Agriculture to promulgate rules and regulations "as he deems necessary" (Sec 10) which could include "...control of the use and number of motorized...river craft...". According to Black's Law Dictionary, the term "provision" is defined using terms that speak to the future rather than the present. For example, part of the definition speaks to "foresight of the chance of an event happening...". The definition goes on to imply that a situation where a provision needs to be created must be properly influenced during the present, "...in full contemplation of it as a **future possibility**" (emphasis added). In this instance, Congress provided a "stipulation" in the law requiring the Secretary to follow the guidelines in Sec. 10(d) if "he deems it necessary" to establish management controls on motorized or non-motorized water craft. If Congress had mandated immediate regulation of powerboats or other water craft, they would not have left the decision up to the Secretary of Agriculture to determine the future point in time to establish controls on use. They recognized this only as a "future possibility" and had the "foresight" to include language to deal with the situation if necessary.

There is no section of Public Law 94-199 where Congress superseded the authority of the Secretary by "requiring" the Secretary to regulate powerboats or floatcraft at a certain level or where Congress expressed an opinion that a potential threat to the resource was imminent in 1975 due to the number of jetboats operating in Hells Canyon at the time of designation.

Nor did Congress express an opinion in the legislation that immediate steps needed to be taken to regulate jetboat use in order to protect ORV's as required by the Wild and Scenic Rivers Act. Congress did not even specifically identify the ORV's for the Snake River in the legislation, thereby leaving this as another duty for the Secretary to complete. In fact, the original intent of the Wild and Scenic Rivers Act has sometimes been referred to as "dam busting" legislation. Over the years the law has been understood to focus more on its resource protection provisions. The "imminent" threat that had been hanging over the Hells Canyon area for a number of years was recognized by Supreme Court Justice William O. Douglas and was addressed in Sec. 4(a) of the HCNRA Act where Congress provided specific language closing the area to future dam construction.

There are also no references made in the law that would indicate that Congress felt the recreation experience present at the time of legislation should set the limits for power or float use. In reference to river management, the "provision" language in Sec. 10(d) of the HCNRA Act that has led to the greatest controversy since the enactment of the legislation has been the recognition language of motorized river craft as a valid use of the Snake River. This was due to the law's concurrent designation of the river as wild and scenic (which has created the perception of an anomaly within the wild and scenic rivers system) and designation of the adjoining land base as wilderness which has complicated visitors' perceptions about how they think the entire area should be managed.

Using 1975 data to establish both float and powerboat limits was an option that could have been selected to resolve this issue during the first planning phase in 1981. Powerboaters followed through on the appeal process to resolve their differences on use levels at that time. As a result, the decision was made to allow that level of private powerboating to continue in an unregulated manner, to not re-examine powerboat use levels prior to 1985, and not establish limits without full public involvement. Since Congress provided for the Secretary to make the determination on when these regulations were "deemed necessary", Assistant Secretary of Agriculture Crowell's 1983 decision makes it quite clear that the Secretary had no intentions of using pre-1985 powerboat use levels to make that determination.

As a result of this decision and the decision in 1973 by the Pine Ranger District to place all float use under an allocation system, floaters have felt they have been treated unfairly and their use has been regulated while powerboat use has remained unlimited. In reality, while the number of daily float launches has been limited to five per day since 1973, the utilization of those launches, number of float craft per party, and the number of people participating in those trips has grown substantially since 1973 (reference analysis file).

There is much better information to base a decision upon at this time than there was in 1975 or 1981. The guidelines established by the Crowell decision in 1983 have been met, including a study of visitor use and perceptions in 1988-89. An LAC planning process was used to examine recreation use for one and a half years and provided recommendations to improve management of the area. For this planning cycle the river staff assigned to the ID planning team and the resource consultants are familiar with the resource and have worked and recreated in Hells Canyon for many years. This has provided them with a personal, working knowledge of the resource, the recreational users, and their desires. For the first time since the river was designated, ORV's have been identified. A great deal of information on all user groups is available to analyze broad patterns of use over time.

Comment 402-4. At a minimum analysis should include numbers of boats/people for 1975 and 1982 and 1985, to determine how well the alternative "provides recreation experience available at the time the area was established" (Forest Plan) and to see how well CMP decisions (with subsequent Chief and Secretary changes) have been implemented. (Correspondent 2345)

Forest Service Response: The Wallowa-Whitman Land and Resource Management Plan (Forest Plan) was released in 1990, approximately seven years after the Crowell decision in 1983, and fully incorporated the HCNRA CMP within the document. The Forest Plan reference to the Snake River represents a broad guideline which acknowledges the unique provision in the HCNRA Act that allows for the continued use of both motorized and non-motorized valid watercraft as well as aircraft and trail use. These recreation experiences were available at the time the area was established.

The paragraph goes on to say "Maintenance of visual quality is especially important." The Forest Plan did not identify specific ORV's for the river. Although the paragraph does not use the term "ORV" in its reference to recreation and scenery, the importance of other ORV's is not being disregarded. As a result, the overall statement is general rather than specific and does not indicate that any specific level of use at the time of designation must be tied to a recreation experience.

Comment 402-5. Limit use based on Forest Plan DFC 1974 levels - HCNRA FEIS pg 84, i.e., Dam to Wildsheep - 37 private use days/ season 2 commercial operators (see your record for # of people). Wildsheep to Granite - No private or commercial. Pittsburg to Rush Cr - 72 private use days/season commercial (see your records). Rush to Granite - 64 private use days/season commercial (see your records) (Correspondent 2345)

Forest Service Response: The above referenced numbers were contained in a description of the powerboat use that took place from the best available data in 1974. These numbers were not recommended limits but were contained in the description of the Snake River's recreation resource in the chapter on affected environment in the 1981 FEIS for Hells Canyon.

The resulting CMP adopted after all appeals were resolved did not place any limits on powerboats. There is no information available supporting the rationale that levels of use in 1974 were optimum for managing the recreation experience on the river for all users. If levels of existing use were adopted as the correct standard at that time, even float use would be significantly less than it is today because

of the difference in total numbers of people participating in float trips at that time and the associated lower number of launches utilized in a season.

Comment 402-6. HCPC has attempted to calculate the number of jetboats that navigated the SWSR during the approximate time that regulations limiting their numbers should have been enacted. This time period would have been generally around 1977, one to one and a half years after the NRA Act was passed into law. This would constitute a reasonable time frame to complete the process of implementing regulations. These data, recovered from a July 1, 1993 Freedom of Information Act request, are not conclusive since surveys at that time were not diligent in monitoring specific kinds of use at specific locations on the river. They often did not delineate commercial from private jetboat use, and sometimes did not separate float from jetboat launches. Some of these surveys count people, not launches. However, they do provide a reasonable perspective on use levels during the general time period:

A) A 1974 report from "Chesnimnus District Boatmen" indicates that a total of 292 powerboats navigated what is now the SWSR between June 19 to September 14, 1973. This includes both commercial and private jetboat use and encompasses the entire river. This calculates to a total of 3.3 jetboats per day during the high use season.

B) A September 1975 report by Ken Witty of the ODFW entitled "A Comparison of Recreational Use at Cache Creek on the Middle Snake River, 1969 and 1974" shows that between June 1 and August 31, 1974, a total of 752 "party trips" passed Cache Creek. It is not clear what a "party trip" entails, since no glossary could be found in the document. If this represents total boats as opposed to user days, this would represent 8.2 commercial and private jetboats, and float parties per day. This would break down probably to 6 jetboats per day.

C) A July 1978 document entitled "Interim Management Guidelines" states that in 1974, "jetboat trips" (presumed to be individual jetboats, both commercial and private) totalled 1,858 for the entire calendar year on the entire river. This represents 5.1 commercial and private jetboats per day during the calendar year.

D) A report entitled "River Use Below Hells Canyon Dam" shows that between May 14 and September 30, 1974, a total of 404 people entered the river corridor on private jetboats, while 873 went on commercial jetboat tours. This can be converted to actual boat launches by assuming four people per private boat, and 10 per commercial boat. This amounts to a total of 101 private and 87 commercial jetboats during the high use season, an average of less than one each per day.

E) A 1978 report by Terry Kincaid of the BLM is perhaps the most noteworthy. It was a reliable count of commercial and private jetboat trips that went upriver from the mouth of the Grande Ronde. It counted a total of 374 private and 209 commercial jetboats between June 27 and September 12. This averages out to 4.85 private and 2.7 commercial boats during the high-use season. This figure was used in the February 1980 Final Snake W&SR Study Report. (This figure does not include launches from Pittsburg to Dug Bar, but use of these portals was infrequent in 1977.)

F) A 1978 report by Debby McAtee of the Nez Perce National Forest indicates a total of 462 private and 174 commercial jetboats proceeding upriver from the Grande Ronde between July 1 and mid-September. This averages out to 6.0 private and 2.25 commercial boats.

G) An untitled report shows that in 1977, a total of 135 people embarked from Hells Canyon Creek in private jetboats, an estimated 33 boats, averaging out to one every two weeks.

H) A 1972 report listing all launches from Hells Canyon Creek between May 26 and October 25, shows a 1972 total of 41 private jetboat launches from that site, an average of one every 3.7 days.

I) An undated document from Jim Hulbert to Art Seamans contains a list of all jetboats travelling above Pittsburg Landing in 1974 from June 1 to August 31. A total of 13 private jetboats were observed, an average of one per week.

Despite the vagueness of the data provided by these surveys, they do indicate that jetboat use during the time when control of the number of motorized river craft was first required was markedly lower than it is today, and as prescribed in the Preferred Alternative. (Correspondent 1196)

Forest Service Response: Use in the 1970's was substantially lower than it is today and as presented in Alternative E. The quality of the use data from those early years of administration were questionable for the reasons mentioned above, and for the following reasons.

The law creating the HCNRA and designating the river as wild and scenic was signed on December 31, 1975. Prior to that date, the only accurate use information available was for commercial and private float use which became regulated at Hells Canyon Creek in 1973, commercial and private powerboat use that operated from that site, and several studies conducted by the State of Oregon at Cache Creek.

The reason float use and powerboat use at Hells Canyon Creek was regulated earlier than other locations in Hells Canyon is due to the fact that the Hells Canyon land base had not been consolidated as a single administrative unit prior to passage of the HCNRA Act in 1975. Prior to 1975, the launch site at Hells Canyon Creek was managed by the Pine Ranger District at Halfway, Oregon and the majority of use associated with that site was either powerboat use that only used the river between Hells Canyon Dam and Wild Sheep Rapid or float use. The site only became easily accessible for boating access and Forest Service administration following completion of Hells Canyon Dam in 1968. All of this use came under Forest Service management by the Pine Ranger District in 1973.

Other outfitter activities in Hells Canyon that were associated with a land operation were under permit earlier than 1973 but only for the resort aspects of their operation, such as the Dick Rivers resort at Copper Creek in what is now the scenic river and Floyd Harvey's resort at Pine Bar (Willow Creek) in what is now the wild river. For instance, Copper Creek had been under special use permit to Dick Rivers since 1958. Both of these were commercial powerboat operations. Self-issued permits available at non-staffed permit stations for private powerboats did not begin until 1978 after the newly formed HCNRA was organized as an administrative unit to manage the entire river corridor. All outfitters and guides operating commercial powerboat businesses were brought under special use permit beginning in 1979. The quality of use information improved as permit compliance improved through education and law enforcement, portals became staffed, and adjustments were made to the reporting system.

Comment 402-7. I find Alternative C to be totally unacceptable. Using numbers of 1985 through 1989 is unjustified, nothing about use levels in the 1990's reflects the need to turn back the clock. (Correspondent 126)

Comment 402-8. The Alliance [Hells Canyon Alliance] believes that the seasonal cap should be eliminated, use levels should not be based on average use levels. Nor should use limits be based on use levels occurring in the 1980's, such as those levels contemplated in Alternative C. (Correspondent 1198)

Comment 402-9. To summarize, the numbers for any given year do not matter. They simply provide a tool with which to compare one year with the next for management purposes. What counts is the experience people are having. If the experience on days with a certain level of use was acceptable to most visitors, then the numbers on that day were appropriate; conversely, if the experience was unacceptable, the numbers were too high. Averages of seasonal use mean nothing and result in unnecessary reductions of recreation opportunities. (Correspondent 1198)

Comment 402-10. I think rolling back to 1985-89 powerboat levels (when limits should have been implemented before achieving the problem level of today) is a good idea. (Correspondent 2796)

Comment 402-11. The other compromise position that would work is Alternative C which would not affect rafters much but would limit jet boats to the numbers they had about ten years ago. Something that should have happened then. (Correspondent 2803)

Forest Service Response: NEPA regulations require us to display a full range of alternatives for consideration. Crowell's 1983 decision on boating activities stated that adjustments to boating use levels could not occur prior to the 1985 summer season and that the Forest Service would "...monitor effects of boat use on other values." Those "values" were interpreted to be the outstandingly remarkable values identified in the DEIS which are required to be protected and enhanced by the the Wild and Scenic Rivers Act. The user survey conducted by the University of Idaho gathered information on visitor perceptions during the 1988 summer season that can be used to determine areas of concern about recreation use that were occurring at that time.

In developing use levels for the wild river in Alternative G, the summer seasons of the mid- to late-1980's were considered to historically and presently represent the greatest period of demand for private powerboat access. This time period occurs on weekends in July and August. The use needed to be averaged in order to eliminate future peaks in use. A factor for non-compliance was also calculated into these figures to arrive at six powerboat launches per day into the wild river. The cumulative use levels occurring on weekends during the busiest months of the summer were generally acceptable as reflected in the results of the University of Idaho's Visitor Profile and Recreation Use Study which analyzed the perceptions of summer visitors during the summer of 1988.

Comment 402-12. The number of jetboats allowed to navigate the SWSR during the high use season in virtually all alternatives is based on the "maximum established numbers," the large numbers that have only recently dominated the SWSR. (Correspondent 1196)

Comment 402-13. Analysis seems to use "present" as a baseline even though the law was written and signed in 1978. (Correspondent 2345)

Forest Service Response: Use information from 1991 was not used as a baseline because it represented maximum use. It was the first year where the best use information was available for all types of river uses from all river portals and where all of these uses (commercial and private, float and power) peaked at their maximum level in a single season. Therefore, 1991 use as displayed in Alternative A represents the existing situation in order to compare all other alternatives.

Comment 402-14. In 1992, jetboat use figures reveal that 352 private jetboats ventured upriver from Kirkwood, or launched from Hells Canyon Dam. Assuming that many of these were repeat visits by the same local jetboaters who know the wild section well, and can safely navigate it, this amounts to a very low number of actual individual boaters, maybe 100 to 150, who would actually be excluded from jetboating the wild section by dedicating it as a non-motorized river. Unchecked increases in

jetboat use has resulted in an expectation of continued current use levels and continued unrestricted use. This situation cannot rule the future management of the SWSR. (Correspondent 1196)

Forest Service Response: Use limits need to be established for the entire river at this time. Alternative G proposes powerboat limits in the wild river with a three-day, non-motorized period of opportunity for floaters on a weekly basis during July and August.

Private powerboats should not be excluded from use in the wild river corridor simply because only a few, individual boaters would be affected based upon skill level. According to the University of Idaho study, "The most striking finding is how similar were the floaters' and power boaters' reasons" for taking a river trip. Two of these common elements were "going through rapids" and "excitement".

Based upon this rationale, an argument could also be made for reducing private float use since theoretically, only the individuals who are skilled at running Class IV whitewater and who own their own boats would be affected. The increase in both powerboat and float use that has occurred on the Snake River and other rivers since 1975 is the direct result of more people being involved in river recreation, individuals improving their level of skill to navigate whitewater rapids and design improvements to equipment. Boaters should not be penalized with loss of access based upon these factors.

Analysis of Use Information

There were several correspondents who questioned how use estimates were established or asked what assumptions were made when examining historic use in the absence of complete information. Some examples follow.

Comment 402-15. Page III-21. Figure III-4 states that an adjustment had been made for estimated compliance, based on one year of experience at Cache Creek. It is an uncertain assumption that the minimal experience with that facility in place represents the compliance rate for every previous year. In figures III-2 and 3 there is no such specification, so we have to conclude that the graphs represent the raw permit data. The post-Cache Creek data cannot be compared with any reliability to pre-Cache Creek data. Apparent large increases in use from 1990 to 1991 are likely due in large part to improved compliance associated with staffing that site. (Correspondent 1198)

Forest Service Response: Cache Creek was staffed seven days per week beginning in late June 1991. Pittsburg was staffed seven days per week during the primary season beginning in 1992. Hells Canyon Creek has been staffed seven days per week since the 1970's and compliance at that location has been very high for a number of years. The "jump" in use in 1990 and 1991 was in part due to better compliance as a result of staffing Cache Creek seven days per week.

Using private powerboat permits at Hells Canyon Creek as a control for compliance provides some indication of the trend in growth patterns over time. A review of raw permit data without determining a rate for non-compliance also shows a growth trend in powerboating over time (reference analysis file). Yearly records required to be submitted by commercial powerboaters confirm this trend.

During the LAC planning process, rates of non-compliance were discussed with no documentation available to develop any rationale and was estimated to be approximately 20%. After Cache Creek was established as a staffed entry portal, the estimates developed during the planning process were considered to be underestimated. During development of the DEIS and after developing a new, preliminary estimate, the ID team conferred with the Northwest Powerboat Association on rates of compliance in order to verify the assumptions made on estimates. Their recommendation was to use a non-compliance rate of 44%.

The Forest Service use analysis is based on an estimate of a non-compliance rate of 40% for all time periods when portals into Hells Canyon were managed by self-issued permit stations only. Northwest Powerboat Association staff agreed that their estimate and ours were fairly close and 40% was reasonable to use. Forest Service staff who conducted permit compliance checking from 1986 through 1990 on the river indicated that the rate of non-compliance started at roughly 50% during Memorial Day weekend and compliance progressively improved as a result of warnings and citations issued.

Based upon a thorough analysis of powerboat use over time, this data represents the best available information.

Comment 402-16. We do not possess enough data to suggest a method of limiting daily use. Perhaps a yearly application and drawing would be fair, on the order of the Fish and Game drawings for some hunting permits. (Correspondent 2335)

Forest Service Response: Use data for float activities since 1973 is very accurate. Commercial powerboat information since the 1970's is available and provides a high level of accuracy. Use information in the 1970's for private powerboating is more sporadic with a greater margin of error but available for comparison purposes. Private powerboat data has been gathered on permits since 1978 and has improved substantially since that time as a result of compliance enforcement and staffing of portals. Information on user preferences as a result of the study conducted by the University of Idaho in 1988 is also available. Each year, data has become more accurate and reliable. Like all data, it will never be 100% accurate and it can always be improved upon as better collection and analysis methods are developed.

Comment 402-17. Page III-22. During the LAC process, the number of commercial powerboat launches could not be displayed because of the way data was reported in the 1980's. It is not clear how the Forest Service was able to develop this information for those years in figure III-4. The most current use report still does not display numbers of commercial powerboat launches. The Forest Service should have considered the reasons for the increase in commercial powerboat use during the non-regulated season. Three ship lines now bring customers into Clarkston's port in the spring and fall. Trips into the canyon are featured as part of each cruise. (Correspondent 1198)

Forest Service Response: The commercial powerboat launches are estimates based upon a thorough analysis of yearly use records submitted by each commercial powerboat outfitter. This involved review of the daily operations for each outfitter from 1993 back to the 1970's for all current outfitters and previous owners of the businesses. It also involved analysis of these records by river personnel who spent many hours on the river in the past ten years and who were familiar with the number of boats operated by each outfitter, an examination of daily use counts for boat trips per outfitter at Hells Canyon Creek and Cache Creek, and estimates on passenger capacities relative to number of boats in operation. This was the most detailed analysis of commercial powerboat activity on the Snake River ever undertaken and represents the best available information (reference analysis file).

Since numbers of daily trips by commercial powerboats was new information developed specifically in response to analysis needed for the DEIS, it is relatively new information and has not been incorporated into the yearly river use report. As a result of the analysis, the reporting methods have been changed for all commercial powerboat outfitters and use report forms will include information on the number of boats used to conduct trips on a daily basis year round. To monitor the consistency of reporting, the figures submitted will be audited against the counts made at the portals.

Comment 402-18. The DEIS proposed limiting private powerboat permits in the wild river to a maximum of 635 in the regulated season. DEIS, at I-2. That position was not derived from the Visitor Use Study. It was based on the 1990 use figures with a small factor for growth. The assumptions of compliance incorporated in those figures were much too high, making this figure much too low. The figures should be adjusted, using more realistic estimates of actual compliance. (Correspondent 1198)

Forest Service Response: The 635 was one of two limits set for private powerboating by the LAC planning process. It represents the more conservative limit of the figures arrived at by that group. Therefore, both this figure and the daily limits were displayed in the proposed action. Since the proposed action is based upon the LAC recommendations and they were using the best available data at the time, it is not appropriate to change the number using current information. Since consensus was not reached on the issue of powerboat numbers during the LAC planning process, one reason to display it in Alternative B was to generate comment from the public. As a result of that comment yearly caps have been dropped in Alternative G in favor of daily limits.

Comment 402-19. The study group should be aware that by basing prior usage on the permit system issued to jet boaters could be distorted and misleading. For example, over the last few years I frequently obtained a permit for more areas than I anticipated going because I did not want to be in violation of the permit if I change my mind. For example, I frequently enter the canyon from the north and only go as far as the mouth of the Salmon River despite marking on the permit that I want a permit for the lower portion of the Salmon as well as up the Snake above Rush Creek. In other words, if the study group assumes that I made trips above Rush Creek simply because my permit says so, it would be totally untrue. I assume other jet boaters do the same as I do when they obtain their permits. (Correspondent 2339)

Forest Service Response: The current permit system allows unlimited use, so the information on destination is for planning and emergency use only. You are not confined to travel only in the section of river that you indicate as a destination. However, using the argument you have presented would actually lead to a conclusion that even less powerboat use occurs in the upper sections of the river than calculated based on the analysis. Records indicate most people stay within the area between the portal and the destination they have indicated on the permit. Analysis also shows use estimates and boat densities within sections of the river based on the portal entry, direction of travel, destination, and length of trip (reference analysis file).

Use Levels and Planning Concerns

There were a number of comments that dealt with issues surrounding interpretation of the HCNRA Act and the Wild and Scenic Rivers Act with respect to the validity and levels of motorized and non-motorized use as intended by Congress. Some examples of these comments are as follows:

Comment 402-20. I have witnessed a change to the river corridor since my first trip in August of 1979 to my most recent trip this year in August. In August 1979 there was one mail boat (jet boat) running the river, friendly and courteous. The USFS [Forest Service] set up the float launches so that most of the time a group would not see another group the whole stay on the river. The upper section of the river was quiet, a place to reflect and meditate. This past August, on the same section of river, I quite frankly lost count of how many jet boats that went by our group each day. However, I think it safe to say 20 to 30 boats each day went by.

In most places in the United States the definition of a wild section meant non-motorized. If that is true, what we have been seeing on the Snake River is a flagrant disregard to the laws of the United States by our local government and motorized craft users at the expense of those who do enjoy nature as

it was intended to be viewed. The wild section is supposed to be protected from motorized use, is to be seen with the least amount of damage to the land, water, and habitat. (Correspondent 2687)

Forest Service Response: The HCNRA Act states that motorized use "...is hereby recognized as a valid use of the Snake River within the recreation area;". Congress recognized the historic, prior use of the Snake River by motorized watercraft. Congress' intent has been interpreted as being so specific as to the validity of motorized use was that they recognized this type of use would be considered outside the norm of the wild and scenic rivers system and wanted to recognize its historic and prior use. (A similar situation is the specific language in the Central Idaho Wilderness Act of 1980 that allows aircraft within the Frank Church - River of No Return Wilderness due to prior, historic use). Therefore, if the Secretary "deemed it necessary" to regulate use, Congress wanted to ensure that motorized use was among those uses that would be regulated and managed.

Comment 402-21. We are concerned about the precedent for prohibiting non-motorized use other than for safety or resource protection reasons. The FEIS should describe other places where this occurs. (Correspondent 1196)

Forest Service Response: The Wild and Scenic Rivers Act does not specify that any type of boating use is appropriate or needs to occur in order to manage the river to protect its ORV's. Access for both non-motorized and motorized boating only becomes relevant based upon historic uses and subsequent acknowledgement of these uses as valid in the HCNRA Act. Analysis of this law, and identification of ORV's as required by the Wild and Scenic Rivers Act then leads to a finding that both non-motorized and motorized boating are part of the Recreation ORV because they have been specifically identified in the HCNRA Act, acknowledging their importance as activities with ties to recreational access. Since protection and enhancement of ORV's is required by the Wild and Scenic Rivers Act, then it is well within the guidelines of law to alternate weeks of use in order to resolve conflict between uses because user conflict could never enhance a recreation experience.

In Yellowstone National Park, rivers are managed to protect resources and do not allow non-motorized use. However, the river management plan for the park recognizes, while many of these rivers would be suitable for non-motorized recreation and would not adversely affect the river resources, there is ample opportunity for this activity to take place on other rivers outside of the park boundary. While recreational bank fishing is allowed on some of these rivers, non-motorized use is viewed as incompatible with the overall objectives of river management of Yellowstone National Park. If these rivers were managed under guidelines of the Wild and Scenic Rivers Act (they are currently not designated but American Rivers is interested in having them added to the system), the park's management objectives would be to continue to exclude non-motorized use (pers. comm., Stuart Coleman). By managing Yellowstone's rivers in this manner, the National Park Service is actually complementing an overall system of regional river recreation opportunities.

In Alternative E, non-motorized use would have been prohibited on alternating weeks from Hells Canyon Dam to Kirkwood Historic Ranch. Under Alternative G, there are no time periods where non-motorized use is prohibited.

Comment 402-22. If the NRA Act is interpreted to allow use on the entire river (there is nothing in the law that I read that indicates this is the case). Limit use to based on Forest Plan DFC 1974 levels - HCNRA FEIS pg 84. Manage that use as an anomaly within the primitive and SPNM ROS. Also if the NRA Act is interpreted that way give documentation on the parts of the law that say that and how you arrived at the interpretation. (Correspondent 2345)

Comment 402-23. Private Powerboat Use. Comments: This section of Alternative D is in direct conflict with the provisions of HCNRA Act (Appendix A DEIS) Section 10 subsection (d) which states,

"provision for the control of the use and number of motorized and non-motorized river craft; Provided, that the use of such craft is hereby recognized as a valid use of the Snake River within the recreation area." Control does not mean to eliminate for a three and one half month period (the controlled use period), control does mean to manage based on the valid use which prior to has been determined by past practice the inception of the HCNRA Act. (Correspondent 2342)

Comment 402-24. One of the purposes of the NRA Act was to keep the Snake River in Hells Canyon available for recreational boating -- all of the river, all of the time. Prohibiting any type of boating on any stretch of the river for any period of time would violate Congress' design for the management of the river, as would severe restrictions on boating use of the river. Alternatives D, E, and F all call for outright prohibitions on boating activities on portions of the Snake River, and Alternative C calls for significant limits on the number of boats allowed to use the river. Implementing any of those alternatives would frustrate Congress' intent for the management of the HCNRA. (Correspondent 1198)

Comment 402-25. It may be fashionable for the planning team to favor limiting power boat usage and other types of tree-hugging concepts, but it is not what people want and it is not what the U.S. Congress anticipated when they designated this as a recreation area. Your team is supposed to be making sure that people have access to the area for recreation; the ideas that I hear coming from the Forest Service is that access to the area should be limited, and I take extreme objection to that idea. (Correspondent 1798)

Comment 402-26. The law does not say that the upper part of the Snake is to be managed as a wild river for 7 weeks/year or only during regulated season... likewise scenic. (Correspondent 2345)

Comment 402-27. At no point should one recreational use be put above in importance or displace other diversified uses. National Recreational Areas are for the pleasure and use of all.

Forest Service Response: While motorized and non-motorized uses are allowed within the entire river corridor, they may be restricted in numbers and their use may be controlled by many different methods such as determining which sections of the river they can travel through, specific time periods of operation, and numbers of trips per day. "Control of the use" indicates that guidelines may be set for operations based upon sound rationale as long as the intent is not an attempt to preclude either motorized or non-motorized uses and access from the entire river corridor. All alternatives were designed based in part upon the legal guidelines for "control of the use" of both types of craft.

Comment 402-28. The starting point for determining what Congress intended is the language of the statute itself. E.g., *Reeves v. Ernst and Young*, 113 S Ct. 1163, 1169 (1993). Congress authorized the Forest Service to promulgate rules that include "provision for the control of the use of the number of motorized and non-motorized rivercraft..." 16 U.S.C. s 460gg-7(d). In the very same sentence, Congress declared that motorized and non-motorized rivercraft are "hereby recognized as a valid use of the Snake River within the recreation area..." *Id.* (emphasis added)... The "valid use" language limits the scope of the Forest Service authority to regulate boating. Congress did not say that boating is a valid use within portions of the recreation area, nor did it say that boating is subject to approval by the Secretary (or the Forest Service). Thus, while Congress contemplated regulation of use and number of rivercraft, it simultaneously provided, without limitation, that boating is a valid use of the river within the recreation area. The only reasonable inference to be drawn from that language is that boating is to be allowed on the entire river. (Correspondent 1198)

Forest Service Response: The intent of Congress is to provide for both motorized and non-motorized uses on the river. Alternative G would continue to allow both motorized and non-motorized uses on the entire river but use and numbers of craft would be controlled as provided by law.

Comment 402-29. HCPC conducted research into jetboat use levels during the 1992 high-use season. (See "Solitude Alternatives," Appendix B.) We found that a total of 353 private jetboats entered the wild river section. Thus, locking in jetboat levels at 424 is in fact an increase of exactly 20 percent over actual 1992 numbers. Using the maximum established numbers formula for determining jetboat numbers is arbitrary and capricious: There is no statutory, legal, or administrative requirement that traditional numbers of jetboats, or any other recreation use, be maintained, and yet no alternative considers other basis for jetboat numbers, e.g., numbers based on consistently retaining wilderness values in the Hells Canyon Wilderness area, for eliminating jetboat impacts to salmon, or restoring use to levels that existed when regulations governing jetboat numbers were required in the NRA Act. Jetboat levels should be established based primarily on recognition of their impacts to the values mandated for preservation in Sec. 7, not arbitrarily based on the current, highest known levels of use. (Correspondent 1196)

Comment 402-30. I am also concerned about the implicit trivialization of "Wild and Scenic" values suggested, given the extent of motorized use favored by the Forest Service. (Correspondent 2686)

Forest Service Response: Sec. 7 (2) of the HCNRA Act specifies "Conservation of scenic, wilderness, cultural, scientific, and other values contributing to the public benefit." "Other values" have been interpreted to be the ORV's required to be identified through the Wild and Scenic Rivers Act. One of these values is recreation which specifically includes motorized craft on the river. The provisions of Sec. 7 are "subject to the provisions of section 10 of this Act" which addresses the validity of motorized and non-motorized water craft and makes provision for the control of their use and number.

There are no references in the law to indicate Congress felt the recreation experience present at the time of legislation should set the limits for power or float use. In reference to river management, the "provision" language in Sec. 10(d) of the HCNRA Act that has led to the greatest controversy since the enactment of the legislation has been the recognition language of motorized river craft as a valid use of the Snake River. This was due to the law's concurrent designation of the river as wild and scenic (which has created the perception of an anomaly within the wild and scenic rivers system) and designation of the adjoining land base as wilderness which has complicated visitors' perceptions about how they feel the entire area should be managed.

Since there are no buffers provided by the Wilderness Act, there is no legal basis to establish an effect on wilderness values caused by motorized use on the Snake River. There is insufficient scientific evidence to support a finding that there are significant impacts to salmon on the Snake River caused by the presence of jetboats. See additional information in Forest Service responses concerning the appropriate years on which to base use levels.

Comment 402-31. If any use is deemed to be detrimental to the purposes for which the area was created, particularly protection of natural and cultural features, or is impacting another use, it must be regulated and restricted. The wild designated section of the SWSR should be for non-motorized use only, year-round. (Correspondent 1196)

Forest Service Response: The HCNRA Act provides specific language allowing motorized use. The regulation of use is appropriate since the volume of use is impacting the recreation experience of some of the other motorized and non-motorized users. However, there is no conclusive evidence that motorized or non-motorized uses are adversely affecting natural or cultural features.

Comment 402-32. I am especially concerned with the direction the Forest Service is going with the Snake River Plan in allowing power boats to continue to dominate use even on the Wild section of

Hells Canyon from Hells Canyon Dam to Pittsburg Landing. The requirements and guidelines for the Wild and Scenic Rivers Act clearly point in the opposite direction. (Correspondent 2888)

Comment 402-33. Jetboat usage is incompatible with a wild river designation. (Correspondent 2575)

Comment 402-34. Prohibiting power boat use from the dam to Kirkwood during the regulated use season is more compatible with the HCNRA act and the Wild and Scenic Rivers act; will best move this segment toward the DFC's and will preserve the ORV's. (Correspondent 2829)

Comment 402-35. Providing a consistent, year-round non-motorized experience in a "vestige of primitive America." Paramount in this objective is dedication of a year-round non-motorized river section. Due to the fact that the wild designated section is by far the least used by jetboats and most heavily used by floaters, and that the NWSRA strongly implies that motorized use is not appropriate in wild-designated river sections, the section from Hells Canyon Dam to Pittsburg Landing should be dedicated to non-motorized use. (Correspondent 1196)

Comment 402-36. The increasing access by motorized transport is completely unacceptable. Motorized transport dominates the majority of our outdoor recreational sites. The purpose of wilderness areas and wild and scenic river areas is to preserve an intact natural system removed from the noise and disturbance of motorized transport and protected from environmental degradation by other impacts. (Correspondent 2743)

Comment 402-37. Wild rivers are supposed to be free of impoundments and generally inaccessible except by trail and, with watersheds or shorelines essentially primitive and waters unpolluted. Motorized use is inconsistent with this description. Let's keep the aquatic equivalents of stock cars, formula races and motorcross bikes from converting our aquatic shady country lanes into speedways and drag strips. (Correspondent 2869)

Comment 402-38. We believe that motorized boats are incompatible with a wild river and a federal wilderness area, designations which emphasize solitude, primitive recreation and wilderness values. The Forest Service has been careful to point out that motorized boats have been determined to be a "valid use" on the Wild River. That may be true. Hard rock mining has also been determined to be a valid use in federal wilderness areas.

Perhaps the better question would be: are the uses compatible and appropriate for the area. Within the narrow and relatively short river corridor from Hells Canyon Dam to Pittsburg Landing, it seems apparent that jetboats are no more compatible and appropriate than would be an open-pit mine above Wild Sheep Rapids. (Correspondent 2739)

Forest Service Response: The Wild and Scenic Rivers Act does not address the compatibility issue of motorized or non-motorized boating use on a river. The purpose of the law is to protect the river's ORV's. Boating only becomes relevant if it is identified as a component of the recreation ORV.

There is no legal basis to support the assumption that the Wild and Scenic Rivers Act implies motorized use is not appropriate or compatible with wild river designation. This involves another example of a perception issue where "wild" and the "vestige of primitive America" language found in the Wild and Scenic Rivers Act is being compared to "wilderness" and values associated with the Wilderness Act. While the Wild and Scenic Rivers Act is not specific toward any type of boating, the HCNRA Act acknowledges the validity of both motorized and non-motorized rivercraft.

The laws can be found in Appendices A and B.

Limit Commercial Use

A number of correspondents expressed concern over the numbers of commercial businesses, both powerboat and float, operating on the river and felt that this use should be limited to present levels or less. Examples are included below.

Comment 402-39. Commercial operators should continue to be regulated and their numbers limited to present levels throughout the river system. (Correspondent 2402)

Comment 402-40. Limit all day jet boat tours from Hells Canyon Dam to Pittsburg Landing to 2 per day for both commercial and private users. (Correspondent 1162)

Comment 402-41. Possibly a cap on commercial power boat use at its present level. (Correspondent 1785)

Comment 402-42. We realize that this mode of transport is the only way many people would have an opportunity to see this great area, and hopefully appreciate it more, but we believe some limits should be applied. (Correspondent 2371)

Comment 402-43. Restrict the number of floaters and floating companies who can use the river. (Correspondent 2847)

Comment 402-44. I would like to see a reduction in commercial boating and rafting. On any nice, quiet day running the river as a private jet boater, the commercials are constantly "making waves" from dawn to dusk...the traffic is constant, busy, and tends to "clog" things up especially in the warmer months. (Correspondent 2073)

Comment 402-45. River management in the western US has always given preference to commercial outfitters and guides based on economics. Remember, these are public waterways owned by every United States citizen and to give preferential treatment to a tiny few whose goal is to make a living off of public land is wrong! (Correspondent 2719)

Comment 402-46. Additionally this proposal turns the river into a largely commercial operation. Why do you think a commercial industry should be given rights to use a public property to earn their living when many private citizens are unable to gain access because commercial outfitters own the rights. (Correspondent 2425)

Comment 402-47. The plan is skewed towards power boat and commercial use. Why? (Correspondent 2276)

Comment 402-48. The present impact comes from the large commercial outfitters, both power and float. (Correspondent 2497)

Comment 402-49. I prefer Alternative B because it allows a more equitable use of the river based on the needs of visitors as opposed to the needs of either commercial power boaters or commercial floaters. (Correspondent 1054)

Comment 402-50. More equitable sharing of the river by motorized/non-motorized boaters. The Forest Service's plan is weighted toward motorized boating and, worst of all, permits more commercial runs than should be allowed. (Correspondent 2524)

Comment 402-51. Some of the professional float companies would like the exclusive use of the river for their own economic and business reasons. Treating a natural resource this way does not benefit most of us. (Correspondent 1104)

Comment 402-52. The Forest Service alternatives gives commercial floater's an increase of 50% usage permits. (Correspondent 2700)

Comment 402-53. The restriction for the wild area for float crafts is just as unbelievable! A reading of the preferred alternative makes me wonder if the Forest Service is attempting to only support commercial outfitters who operate jetboats. (Correspondent 2640)

Comment 402-54. Preserve the upper 42 miles of the river for non-motorized use. Limit the number of commercial jet boat launched in the lower river. (Correspondent 2530)

Comment 402-55. The preferred alternative seems to reflect past administration's emphasis on commercial use of public lands over all uses of our natural resources. There is way too much stress laid on power boating and jet skiing. (Correspondent 2749)

Comment 402-56. I feel your proposed plan favors everyone who has a commercial interest and disfavors the public at large. (Correspondent 2482)

Comment 402-57. A variety of uses should be promoted for the general public, such as, sports access, fishing, camping, hiking, hunting, etc, and not just tourist access by a few commercial operators. (Correspondent 2401)

Comment 402-58. Our trip was a 3-day white-water trip which we enjoyed very much except for one thing, the number of jet-boats coming up and down the river. This was the discussion in the car all the way back to Spokane the day we took out. I wish the conversation of four hours would have been on the scenery or the peace and quiet of the canyon, but no, it was on the loud, and just plain ugly boats that cruised by us for three days. My suggestion is that either no jetboats are allowed on the river or the boats are heavily regulated like the float trips are. Example - only allow a few companies, on a few days a week to be able to put in. Also put an increase on the amount permits costs for jetboat operators - a big one. The float boats (white water rafters) were there first and do not take away from the beauty and expanse of the canyon bottom. Therefore, they should have priority. (Correspondent 2858)

Comment 402-59. Wild means an area in its natural state where one can see the native animals and listen to them and the river rather than see herds of domestic cattle and be on the lookout for jet craft. I urge your management to abandon their first-use-is-commercial-use view. (Correspondent 2749)

Comment 402-60. Your draft management plan for the Snake Wild and Scenic River is an extremely disappointing sellout to commercialization, and a tragic degradation of the wild and scenic values of the river. (Correspondent 2723)

Comment 402-61. The Forest Service DEIS is a ludicrous attempt to commercialize the river. (Correspondent 2626)

Forest Service Response: Under management guidelines for Alternative G, commercial float use would be managed within the current ceilings on daily launches under the existing allocation system. Commercial power use would have daily limits set that reflected trends in use that have been constant and established over many years. Commercial power use would be managed by number of boats, area of operation and number of daily trips.

Several steps would be taken to limit commercial use in the river corridor. All temporary outfitter permits would be terminated upon expiration at the end of 1994. This would include two, one-day commercial float permits that operate in the wild river only, and one commercial powerboat permit that operates in the scenic river only. The sixteenth commercial float permit currently vacant would not be filled and the use would be re-allocated between private and commercial floaters on the 60/40 launch ratio, to provide private floaters with more guaranteed launches in the primary season. Commercial float trips would not be allowed to originate at Pittsburg Landing or Dug Bar and all float launches at these locations would go to private users only.

Guidelines for managing outfitters in Alternative G can be found in Appendix G.

The Sixteenth Commercial Float Launch

Several correspondents supported elimination of the sixteenth commercial float launch to make sure that it was not issued to a new float outfitter, creating an overall reduction in available launches for all users who currently access the launches associated with this permit through the common pool.

Comment 402-62. Commercial Float Permit Limit. Considering the limits set by this alternative on allocation, I support the cancellation of this unfilled permit. The limit should be reduced to 15 to support the viability of the existing businesses. (Correspondent 2329)

Comment 402-63. Do Not Re-Issue the 16th Float Permit. Since the proposed float outfitter allocation under Alternative E is restrictive to existing float outfitters businesses, it would be a mistake to further compound the problem by re-issuing the 16th permit. The time for more permits is well past on Snake River. The challenge now is to make sense out of the permits and businesses that already exist. (Correspondent 2325)

Comment 402-64. Eliminate the 16th float outfitters slot and pass the date on to the private floaters. (Correspondent 2382)

Forest Service Response: The Forest Service agrees in principle that the sixteenth commercial float permit, available and not filled since the CMP was implemented in 1983, should not be filled. Comments have been received which expressed the belief that there is too much commercial use on the river at the present time. However, since Alternative G would keep the existing float allocation system essentially intact, these launch opportunities should remain within the system.

In the past, these launches have been used to provide flexibility for scheduling commercial trips and later became available as pool dates for private floaters if not used. Private floaters should have access to some of these launches earlier in the season in order to plan their trips. For that reason, Alternative G provides for the launches to be made available by not filling this additional commercial permit would become a split allocation and shared between private and commercial floaters on a 60/40 split in accordance with the existing private/commercial float allocation. This would provide approximately eight additional launches per year for private users during the season. If possible, these would be made available through the lottery. If this is not possible due to the lottery's computer programming capability, these launches would become available at the start of the call-in period for private floaters which usually occurs in February after the lottery has been run.

Issuance of Second Commercial Powerboat Permit at Hells Canyon Creek

The existing CMP allows two commercial powerboat permittees to provide services downstream from Hells Canyon Dam. One of these permits authorizes the use of two jetboats and the other authorizes the use of one jetboat. Currently, only the permit authorizing the use of two jetboats has been issued

and the second permit has never been filled since implementation of the CMP. Historically there have been two commercial powerboat businesses operating from that site but they have never been filled at the same time since 1976. By only filling one permit for commercial powerboating at that site, the Forest Service has created a long-term monopoly for the business holding the permit.

The following comments address the issue of how to resolve whether or not the second powerboat permit should be filled:

Comment 402-65. The filling of the vacant powerboat permit at Hells Canyon Dam was not addressed during the LAC process. It is probably not a good idea to fill the permit as long as the present permittee is meeting demand for those services. (Correspondent 1198)

Comment 402-66. I support eliminating the vacant permit at Hells Canyon Creek. The time for more permits on the river is past. The challenge now is to make sense of the existing businesses and permits. (Correspondent 2324)

Comment 402-67. Issuing the other commercial jetboat permit at Hells Canyon Dam is a bad idea. (Correspondent 426)

Forest Service Response: When the Forest Service first analyzed this situation in the DEIS it appeared that eliminating the vacant permit was the simplest way to resolve this issue and manage use. However, with development of a different allocation system for commercial outfitters in Alternative G, it was determined that a better method was available to resolve this matter and, at the same time, provide a way of eliminating the monopoly over the long-term. The outfitted public would be the beneficiary of eliminating the on-site monopoly and the issue of fairness and equity concerning commercial powerboat operations at this site would be resolved.

The most effective way to assure the continuation of quality outfitter services for visitors to the site is to create a competitive business atmosphere for pricing of services and variety of trip options is to have two businesses operating from Hells Canyon Creek. Alternative G would split the two boat permits and issue two separate permits, each allowing the use of one jetboat for conducting business. The two new permits would both be issued to the existing business which currently holds the single permit and they would both be operated in accordance with guidelines established in Appendix G.

At the discretion of the existing business, there would be an opportunity to sell half of the business and the equivalent amount of activity that is conducted using one jetboat and allow subsequent transfer of one of the permits to the new owner. Prior to this, the single permit could not be sold or transferred. This permit action would be coordinated with the Idaho Outfitters and Guides Licensing Board per the existing memorandum of understanding between the IOGLB and the Forest Service. All sales of business must be approved by the IOGLB and the Forest Service in advance prior to issuance of an Idaho outfitter's license and a Forest Service special use permit.

The level of commercial powerboat use allocated in Appendix G would remain unchanged by either action.

Allow More Commercial Powerboat Use

There were a number of correspondents who suggested various methods to allow higher numbers of commercial powerboats on the river and rationale for this increase. Examples are included below.

Comment 402-68. Alternative B with these exceptions for small commercial power boating, moderate and low use and one boat per day per company. Limit of 1 boat per outfitter during the control season,

moderate and low use, daily. High use limit 2 to 3 boats depending on outfitter past use, daily. All permits stay same section of river - permitted for in 1991. One boat per outfitter from Rush Creek Rapid to the dam, with the exception of Armacost -2 boats on a daily basis. (Correspondent 1084)

Comment 402-69. Commercial Powerboat Use Wild River: During the regulated season, allow 1368 boat days. All Commercial powerboaters should be thoroughly involved in developing the system used to implement this direction. Include the language in the LAC plan "reflecting historical use patterns." An average of 12 boats per day as shown in Alternative B is acceptable. However, this should not be confused with and implemented as 12 boats per day maximum. Boat size of 44 feet with one deck is acceptable. Passenger capacities should be regulated by the Coast Guard. Unlimited use outside the regulated season. Scenic River: An average of 19 boats per day (one allocated launch per permit) during the regulated season. Unlimited use outside the regulated season. (Correspondent 1190)

Comment 402-70. Outfitters have asked me to comment upon their counter- proposal whereby each outfitter use one power boat on the Snake River per day during the controlled season. I support them in their counter proposal. (Correspondent 2235)

Comment 402-71. Commercial Powerboat Use. Comment: This proposal based on current use is adequate to handle commercial traffic in the river corridor the review until process occurs again. It seems to be a fair proposal by itself and as compared to the other proposals in Alternative B. The economic and environmental impacts would stay proportionate to this use pattern and could be monitored very easily by experts. (Correspondent 2342)

Comment 402-72. It needs to be recognized that those commercial jet boats running consistently above Rush Creek should be given more use on this section. (Correspondent 426)

Comment 402-73. Limits on 12 boats per day might be OK (work with outfitters in area). Personal count should not be added. (Correspondent 62)

Forest Service Response: By this proposal, the status quo continues, commercial powerboat use continues to grow and many of the social issues involving encounters with other groups would go unsolved. These options would not address protection and enhancement of ORV's in the foreseeable future and essentially leave the commercial powerboaters an opportunity for expansion at the expense of all other users. This is not a reasonable management solution and would not resolve the concern from some members of the public who believe the system is not fair and there is already too much commercial use of public lands and waters in Hells Canyon.

By using averages rather than specific numbers as limits, use would be allowed to increase by more than double the present levels in some sections of the river. This would be at the expense of all other users who would have specific limits set on their level of access.

Commercial Powerboat Allocations Based on Historic Use

Several correspondents felt that commercial powerboat use levels for individual outfitters should be based on historic use. These comments came mainly from commercial floaters who felt that use based upon an individual businesses' historic levels represented a fair allocation of use.

Comment 402-74. Commercial Powerboat use. I support your analysis of historic use in terms of High, Medium, Low Use Outfitters and your analysis of Areas of Operation. Such analysis is essential to make sense of future allocation. There is sufficient use on the Snake/Hells Canyon that there can be no windows for growth in commercial powerboat permits. If a powerboat outfitter wants to grow in

the future, he should do so by purchasing another outfitting business. Commercial powerboat outfitters should have assigned launch schedules just like float outfitters. I support eliminating the vacant permit at Hells Canyon Cr. The time for more permits on the river is past. The challenge now is to make sense of the existing businesses and permits. I support special consideration for Hells Canyon Adventures (powerboat business) to allow them to move to Pittsburg Landing or further downstream to originate trips during the motorless week. Otherwise they are stranded at Hells Canyon Cr. and totally out of business during the motorless week. (Correspondent 2325)

Comment 402-75. Commercial powerboat use should reflect each outfitter's historic use and areas of operation. (Correspondent 2383)

Comment 402-76. Commercial Powerboat Use. The historic use analysis indicated in the plan is acceptable for the High, Medium, and Low Use Outfitters. Since Commercial Float Outfitters are accepting cutbacks in this plan, I feel that the Commercial Powerboat group needs to accept a no growth limit on the number of permits. (Correspondent 2329)

Comment 402-77. As a member of the LAC Task Force, I feel this alternative [Alternative B] has potential if Alternative E is not supported. However, Alternative B can only be effective with detailed fine tuning. For instance, it would be essential that powerboat outfitters be limited to their historic areas of operations and levels of use as defined in the DEIS under Appendix G. It is also essential that commercial powerboat outfitters be assigned launches just like float outfitters. If a powerboat outfitter missed an assigned launch, his next chance to use that date would be the next year. (Correspondent 2325)

Forest Service Response: Adjustments were made in outfitter allocations between the DEIS and the FEIS in consideration of the concerns of outfitters and private users. Appendix G displays the allocation system for commercial powerboats under Alternative G. This allocation is based in part on historic use by these businesses and applies to the primary season only, but also considers the number of available launches per day to distribute the use fairly. In the secondary season outfitters would continue to have unlimited access to the river corridor but use would be monitored.

An allocation based on past business performance is the only fair way to distribute a limited amount of use. In order to manage the river corridor to protect and enhance ORV's, the continuation of unlimited growth potential for powerboat outfitters is not a viable option.

Commercial Allocations and Effects

Comment 402-78. Appendix G. This information belongs in the report body, at least in summary form. (Correspondent 1198)

Forest Service Response: A summary of Appendix G has been incorporated into the narrative portion of Chapters II and IV of the FEIS.

Economic Impacts of Commercial Allocations in Alternative E

Many letters commented that the commercial allocations in Appendix G would cause severe economic difficulties for outfitter businesses. Some of the correspondents suggested that large businesses would profit at the expense of small businesses, there would be no room for economic growth and the allocation system as described in Appendix G was not fair to all commercial users. Examples are included below.

Comment 402-79. Out of the 19 outfitters who are currently permitted in the present management plans, who loses their permit? This proposal is too far off base. All river users need each other to make a definite balance for safety, tourist attraction, for economics and plain old hospitality. The people in this area of the U.S. pride themselves on being friendly, this proposal does not seem to be a good example of that virtue. (Correspondent 2342)

Comment 402-80. See comments listed under private powerboat use under Alternative D. Also, who would get to determine what outfitter must sell out because of this restriction. This proposal is a head in the sand proposal. (Correspondent 2342)

Comment 402-81. This section of Alternative C would put some existing commercial powerboat users out of business. Currently there are 19 outfitters who hold use permits in the river corridor from the North Boundary to Hells Canyon Dam. This proposal is unfair to the commercial outfitter (powerboat) and would have a dramatic effect on bookings and dollars earned. This would reduce the economic influence in the surrounding communities that support this activity by 75%. See DEIS Appendix G-3. (Correspondent 2342)

Comment 402-82. That the viability of outfitting services of all user groups for which there is public demand be protected. (Correspondent 2324)

Comment 402-83. This section of Alternative C reduces the launches by commercial outfitters by as many as one per day not including day use permits. The economic effect would have an impact of a 33% reduction in bookings for commercial float trips and may cause some outfitters to go out of business. It would reduce the numbers of people in the river corridor. What we need is to better manage the people use of the resource in maximizing the economic gains derived from this with the least possible impact to the river corridor. (Correspondent 2342)

Comment 402-84. In drafting the Environmental Impact Statement please do not exclude powerboats or impose such severe limits so as to make their operation impractical and force them out of business. (Correspondent 535)

Comment 402-85. As previously mentioned in the comments on private powerboats in Alternative E, this section is way off base. All river users can have ORVs in the river corridor with a proper management system. This means to manage with a common sense approach not too far to the left or right. Commercial powerboaters on the Hells Canyon are the most courteous I have encountered anywhere. If this proposal of alternating weeks is put into effect, 50% of commercial bookings will be lost per season from now on. Based on information recently received from River Ranger, Lyle Hill, of approximately 350 river user/day entering HCNRA and subtracting by estimate the number of people involved in floatcraft activities commercial and private, and private powerboat people use, the decrease in commercial powerboat bookings would be reduced approximately by \$7,500 to \$10,000 per day. (Correspondent 2342)

Comment 402-86. The comments of this section mirror the comments of floatcraft - private for Alternative E. It reduces the opportunity to launch by 50%, this will drive some commercial operators out of business; but if that is the intent of this proposal, let the Forest Service bear the burden of this not the other river users.

Comment 402-87. The increased use of boat activity has not been created by HCA [Hells Canyon Adventures] in the past 5 years. We don't have a problem continuing under this cap. For this to be cut in any way is unacceptable. How much will the general public be denied access to this end of the canyon? (Correspondent 1194)

Forest Service Response: There is no intent to force companies out of business or eliminate outfitter services for the public. However, like all businesses that operate in a free enterprise system, when changes occur, adjustments have to be made to stay viable in the market place. Commercially operating on public lands owned by the American people is a privilege, not a right. This privilege is dependent upon the ability of the Forest Service to properly manage a limited resource within the guidelines of law. Outfitted uses are only appropriate if they can be managed within the constraints that are necessary to manage these resources.

In Alternative G there would be three businesses that would no longer be issued permits to operate within Hells Canyon. None of these businesses hold priority use permits with a long, established record of use. All of these permits have been issued since 1990 as temporary use permits, with the full understanding and assumption of risk by the companies they were issued to, that the FEIS had the potential to discontinue operations if outfitter capacity was not available. Each of these three permits were issued to businesses which have other viable permits which would continue to operate under Alternative G, or which have established businesses not affected by the FEIS.

Alternative G would allocate levels of use for powerboaters based on historic use at levels that would protect and enhance ORV's. Commercial floaters would continue to operate under the existing float allocation system.

Commercial Businesses - Large Versus Small

There was concern expressed that small businesses would be eliminated while large businesses would be favored under the allocation system displayed in Appendix G of the DEIS.

Comment 402-88. We encourage the establishment of quantitative seasonal limits on both power boats and floaters, but urge you to avoid schemes (as in Plan E) which would reduce commercial access by half, probably eliminating all but the giants in the river tourist business. (Correspondent 1051)

Comment 402-89. Your proposed guidelines for outfitters and guides in Appendix G is totally unacceptable. You're trying to change their areas of operation, their types of permits, their number of boats, and their daily launches. You would be putting the smaller businesses out of business and limiting the larger ones. With the tourism and the boat building industries growing in this area you would also be affecting those businesses too. (Correspondent 1112)

Comment 402-90. There is no room for some of the newer businesses to expand and grow as was given the bigger longer established businesses. By implementing these proposals without modification only ensures that the bigger commercial businesses will get bigger and the small people will be eliminated completely. (Correspondent 1171)

Comment 402-91. The net effect of this allocation system would be to slowly dry up our income and to leave me with nothing to sell if I wished to do so. Another outfitter would have no reason to purchase my business since it carried with it no additional launch opportunities and no one new to the river would invest in a business from which they could generate little if any income during the peak season. On the other hand, it gives a few larger businesses a windfall by either restricting or eliminating their only legal competition. (Correspondent 1190)

Comment 402-92. I would support equal considerations given to commercial uses on the complete Snake River in the NRA. My business cannot survive on the outfitter and Guide Operating Guidelines that you propose unless just compensation or consideration can evolve from modifying Alternative B. The DEIS proposals are not fair to the existing commercial powerboaters nor floaters, a couple of

the commercial floaters as well as a couple of commercial powerboaters will stand to profit greatly at the expense of the rest of the commercial business. (Correspondent 1171)

Comment 402-93. This plan tends to re-align the outfitter permits in a manner where all permittees do not share this burden equally. It instead solicits the support of a few of the larger permittees who stand to gain a tremendous competitive advantage if Alternative E is implemented. (Correspondent 1190)

Forest Service Response: Going from the present system of unregulated access to a system that involves any type of access limitations would require adjustments to all business operations. These adjustments would be more difficult for some businesses, but not necessarily because of the size of the existing operation. Any allocation system with set limits on daily use or a change in an existing allocation system would require commercial businesses to make adjustments in their operations.

Although future growth for some businesses would still be possible in Alternative G, it would be based on operational adjustments made by individual businesses or purchase of another permitted business rather than the past reliance upon essentially unlimited access. In essence, "blue sky value" would be relatively insignificant for commercial powerboating businesses at times of sale just as it has become increasingly less important for most commercial float outfitters under a limited allocation system as their launch utilization has grown toward maximum limits. The value of a business relative to sale would be more focused upon how successfully the business has been operated over time or what additional benefits it would provide if purchased by an existing outfitter who is trying to expand an operation.

Commercial use in the secondary season would continue to be unlimited. This would provide some opportunity for growth for powerboat outfitters who have a limited use allocation during the primary season based upon historic use. Some outfitters may have to focus on this season of use to maintain the viability of their business. The secondary season would be monitored to determine if and when use reaches levels which would indicate the need to extend the primary season dates.

Concerns about the distribution of commercial powerboat use has been addressed by modifying Appendix G in the FEIS. While allocations would still be based on historic use, a more equitable method has been used to allocate commercial powerboat use to reflect past use patterns and share the effects of change on a more equal basis between all outfitters.

Adjust the Commercial Float Allocation to Make It Fair for All Float Outfitters

Comment 402-94. Adjust float Outfitter Launch Allocation to more Closely Parallel Historic Use. The Appendix G allocation for Float Outfitters is too simplistic. Allocation under Appendix G is fair to a permit such as my Hughes permit even though it does reduce my allocated launches below the average of my two best years(20.5 launches/season), and below the average of all five years (88-92) (16.6 launches/season). I support allowing the largest historic users 2 allocated launches per motorless week, and allowing these 3 businesses the opportunity to select dates first. I feel this part of your plan rewards businesses that have established busy operations, and I think such a management technique is fair. I also believe that allocation under Appendix G is fair (or perhaps more than fair) to the businesses with the least historic use. However, it does not take into account the difference between medium sized businesses and small businesses. I suggest altering your plan to better accommodate medium sized outfitters.

Under my suggested plan, launch allocation would be handled basically as your system provides but with more refinement to take into account each permit's actual use. Sample system:

Group A. (6 allocated launches/motorless week)
 Hughes 2 allocated/motorless week
 Holiday
 Dories
 Group B. (6 allocated launches/motorless week)
 NW Voyageurs
 ROW
 Idaho Afloat
 HCA
 1 allocated launch/motorless week and a 2nd allocated launch every second motorless week.
 Group C (5-6 allocated launches/motorless week.
 Canyon Out. #2
 Anderson
 Steen
 Canyon Out. #1
 1 allocated launch/motorless week and a 2nd allocated launch every third motorless week.
 Group D (3-4 allocated launches/motorless week)
 Davis
 Oreg. Trail
 Peer
 Beamer
 1 allocated launch/motorless week

This system would provide for a total of 157 launches per float season. (7.5 motorless weeks/year X 21 float launches/week = 157.5). Total launches per season will vary with the calendar year and when the Fri before Memorial Day falls in a given year. Note that for this to work, it would be necessary to use a system similar to my suggestions above II.1.i. page 3 to expand to 21 viable float launches for a minimum float trip of 3 Days/2 Nights each motorless week. Selection of dates would be done as in the DEIS with Hughes selecting first and Beamer selecting last. The outfitters in the last position would be forced to take the dates that were left, and these last dates may fall into the calendar in a jumbled fashion.

Some float outfitting businesses in Groups B and C will have to accept outfitting two trips at one time, since some outfits in these groups will not be able to set up trips dates so that they can run back to back 3 or 4 day trips. However, many outfitting businesses, such as mine, often outfit multiple trips during a single time period now. Such an adjustment may be inconvenient, but it can be done. There are different ways to plan the selection of the dates by permittees. I prefer Example #1 below.

Example #1: Each outfitting business selects their dates in descending order based on historic use. This process most accurately rewards outfitters who have conducted the most consistent businesses during 88-92. I consider this to be fair and equitable.

Example #2: Group A selects first (2 allocated dates per week). Group B could select their dates for every week, then Group C could select their dates for every week and then Group B could select their dates for every other week, followed by Group C selecting their dates for every third week. The Group D could select from what was left.

Example #3: Like #2, but have Group D selects their dates before going back to Groups B and C for their every other week and every 3rd week dates. Correspondent 2325)

Comment 402-95. Alternative E - The preferred Alternative. In order for my business as well as the other major float boat businesses to fully support this plan, the following changes would need to be made. Float Allocation based on Historic use: I support basing commercial float allocation on historic

use of "multi-day" trips by permittees during the 1988-92 seasons. It is essential to connect the historic use of each permittee to future allocation. Unfortunately, the system used in the DEIS Appendix G is quite unfair to many medium-sized outfitters, such as myself, and is too simple a system. (Correspondent 2328)

Comment 402-96. Commercial Float Allocation based on Historic Use. Relating past use during the 1988-1992 seasons is a fair and direct methods of allocating commercial use. I submit that the evaluation represented in the DEIS Appendix "G" is inadequate and needs further review and adjustment. The following 3 work sheets have been developed out of a working group of float outfitters and previously submitted by Jerry Hughes of Hughes River Expeditions. To summarize our proposal:

Establish four groups in order of past use. Group A: Hughes, Holiday and Dories would have first choice at two allocated launches per week. Group B: Voyagers, ROW, Idaho Afloat and HCA would have second choice of one launch per week and then in rotation choose a second launch every second week. Group C: Canyon #2, Anderson, Steen and Canyon #1 would have the third choice of one launch per week and then in rotation choose a second launch every third week. Group D: Davis, Oreg. Trail, Peer and Beamer would have the fourth and final choice of one launch per week. I believe this system allows a better distribution of opportunity for all outfitters. It is dependent, however, on the adjustment of the beginning and ending of the "motor only" and "motorless" weeks. (Correspondent 2329)

Comment 402-97. However, I feel that the system used in the DEIS Appendix G is too simple and therefore unfair to many medium-sized float outfitters. The system used should better reflect actual historic use. The Hughes permit allocation under the DEIS plan will work for my business, and is a fair allocation based on my historic use. However, medium sized float outfitters are especially hard hit by the allocation in the DEIS proposal. (Correspondent 2325)

Comment 402-98. Adjustments for Alternative E: 1. Float Allocation Based on Historic Use. I support basing commercial float allocation on historic use of "multi-day" trips by permittees during 1988-1992. It is essential to connect the historic use of each permittee to future allocation. However, I feel that the system used in the DEIS Appendix G is too simple resulting in an unfair allotment for many medium-sized float outfitters. I, therefore, support the Historic use allocation plan proposed by Jerry Hughes of Hughes River Expeditions, Inc. Please see Appendix A. (Correspondent 2324)

Comment 402-99. I wish to address some of the concerns that will affect my business as a commercial operation on the Snake River. First of all I have never been given the same considerations in the NRA as all of the other 18 permittees have, out of the 19 permits issued in the NRA only one is limited beyond Pittsburg Landing toward Hells Canyon Dam. I have talked with Mike Cole at least 6 to 8 times quite extensively about it, from yes it was possible to change the permit to include from Pittsburg to Hells Canyon Dam if I got a license from the state of Idaho, to that I should wait and see what happens with the LAC. Now we are into DEIS. I do not intend to wait any longer. (Correspondent 1171)

Forest Service Response: The areas currently used by outfitters are established by the State of IOGLB, not the Forest Service. Through a memorandum of understanding with the IOGLB commercial permits are issued only for the area of operation listed on the Idaho license. Issuance of a commercial permit is conditional on obtaining the license from the State of Idaho. This is true for all float and powerboat operations that are permitted in Hells Canyon and coordination with the IOGLB would continue under Alternative G.

Comment 402-100. Under ALLOCATE FLOATBOAT USE LEVELS, the 16 commercial special use permits differs from the LAC agreement. Page 37 of the LAC plan shows 15. The original CMP allowed up to 16 permits, but one was held vacant to provide some launch flexibility for the 15 permitted outfitters. The LAC plan also called for retiring a float permit and converting it to a one-day float; the

launches were to be transferred to the private sector. If that had been done, there would have been 14 permits for multi-day trips and two permits for 1 day floats, unless the vacant permit was filled. More correctly the "permits," as used here, should be handled as sets of launches. Some permittees have purchased other businesses and now have two sets of launches, allowing a four-day turn-around. (Correspondent 1198)

Forest Service Response: The proposed action (Alternative B) is developed from the LAC recommendations and is not necessarily verbatim.

Commercial Powerboat Allocations for Pittsburg Landing

There was some concern that commercial powerboat businesses operating out of the Pittsburg Landing area would be more seriously affected than other outfitters when daily limits were imposed on commercial powerboats or that visitors would not be able to obtain adequate services from the Pittsburg Landing area to the river.

Comment 402-101. With Alternative E there will be no more spring time, summer time donated auction trips, that I have done in the past 14 years for Idaho Steelhead Salmon Unlimited, Riggins, Whitebird ambulance and fire department for them to raise money to operate, or search and rescue with Sheriff Department. It will be limited. (Correspondent 1084)

Comment 402-102. As a business in Riggins for 14 years I am going to have to make a stand or lose everything that my company has worked for. When I bought my business from Paul Filer in 1980 my NRA use permit had no limits, so I have built my business on this unlimited use. In order for River Adventures Ltd. to stay in business it MUST have 1 boat every day during the new regulated season from Kirkwood to Hells Canyon Dam. Also unlimited use from Kirkwood to Lewiston. (Correspondent 1821)

Comment 402-103. We ask you to please give consideration to the proposal of the Riggins Jet Boat Outfitters to allow one jet boat launch per outfitter per day from Kirkwood to the Dam, with unrestricted use from Pittsburg Landing to Lewiston. This would certainly help any negative impact further Hells Canyon restrictions would have on Riggins and our struggling small businesses, as well as provide the public using the RV Park access to the canyon. (Correspondent 2233)

Comment 402-104. I talked with Mike Cole and he said that he thought that the LAC plan would fly and that I would have to get with the commercial outfitters to find out how the use would be split. In the mean time out comes the new plan, this new plan would put River Adventures LTD out of business in Hells Canyon. (Correspondent 1821)

Comment 402-105. The preferred alternative unjustly restricts the Riggins Jet Boat Outfitters. We have four outfitters operating out of our community and it appears that two will be eliminated completely from June thru August, and the remaining two will be severely restricted. Riggins is just recovering from the collapse of our timber-based economy, and we depend on the support and tourist dollars brought to the community by the outfitters. (Correspondent 1024)

Comment 402-106. I specifically request you to ensure that I have access to jetboats out of Pittsburg Landing, as I use Riggins as my base with groups I go out fishing with. I do not want to have to drive to Lewiston to get a guide. Also, if you restrict the number of days jetboats can be on the river, you also restrict free access to the river for people like me. (Correspondent 2500)

Forest Service Response: Outfitters operating out of the Pittsburg Landing area have never developed a level of historic use that provides for a guarantee of one launch per day for each outfitter.

Based upon their historic use, they do have some guaranteed daily launch dates and would have the opportunity to obtain additional launches from the common pool or by trade with other outfitters. The transition to a any new allocation schedule to be difficult for most commercial outfitters. It may be somewhat easier for outfitters who are familiar with the float launch reservation system since their allocation system would be patterned on that system. There should also be less impact on outfitters who have other areas or rivers where they conduct commercial operations.

Commercial powerboat outfitted use from the Pittsburg Landing area needs to remain an important and viable part of the outfitted services into Hells Canyon in order to provide economic support to the surrounding communities and customer service to HCNRA visitors. Each outfitter based out of Pittsburg Landing would be allowed to offer a variety of trips including overnight, day use and jetback-jetout services within the daily launch allocation.

As a mitigation measure, the allocation system guarantees one launch per day on a rotating basis per outfitter for day-use only between Pittsburg Landing and Kirkwood. This is meant to provide an opportunity and visitor experience similar to the different types of trips being offered between Hells Canyon Dam and Wild Sheep Rapid and mitigate the potential loss in revenue to the Pittsburg-based outfitters. The only time this opportunity would not be available during the primary season would be the 24 days during the non-motorized period in the wild river which would occur on Monday through Wednesday in July and August each year. These are exclusive business opportunities for Pittsburg Landing outfitters and can only be traded among that group.

Outfitters would be expected to make a transition in the type of trips they offer and/or how they scheduled trips on the Snake River. Visitors would also have to make this transition because there would be limited opportunities to plan a trip on short notice except for the daily trips from Pittsburg to Kirkwood.

Alternative G provides exclusive rights to originate commercial passengers at Pittsburg Landing prior to 10 a.m. each day to outfitters assigned to that location. This would allow other outfitters to pick up occasional passengers at Pittsburg later in the morning if they have available capacity within their Coast Guard certification. This would provide options for visitors at Pittsburg in the event that Pittsburg-based outfitters do not have a trip scheduled on a particular day.

If businesses are sold, only one of the three existing Pittsburg Landing-based businesses could move from that location and the business could only move downstream. A minimum of two businesses would be required to continue to operate out of Pittsburg Landing by the terms of their special use permits even if sold in order to meet the requirements for permit issuance, thereby assuring that outfitted services would remain in the area to support the economic base of local communities and provide visitor services to the public. A maximum of three businesses could be based at Pittsburg.

In the secondary season, outfitters would continue to have unlimited access to the river corridor. This is the time period when most Pittsburg Landing-based outfitters have focused their trips in the past so this should partially mitigate the effects on these outfitters of going to an allocation system during the primary season. The outfitters currently operating out of Pittsburg Landing also have commercial outfitting businesses on the Salmon River and/or commercial big game hunting areas outside of the HCNRA. Therefore, their income is not dependent solely upon Snake River access.

Appendix G

Some correspondents commented on Appendix G, feeling that the allocation system in Appendix G was too simplistic, favoring some outfitters over others.

Comment 402-107. The penalty system outlined in appendix G is neither fair nor workable. A two day advanced notice is not realistic. (Correspondent 1198)

Forest Service Response: Based upon additional analysis, Appendix G has been revised. Appendix G shows the method of allocating and administering launches could be negotiated whenever necessary between the outfitters and the Forest Service to improve the system based upon industry needs as long as the system remained workable, easy to manage, and continued to meet the guidelines of Alternative G by remaining within the maximum daily launch allocation in order to protect and enhance ORV's.

Comment 402-108. Limiting Launches per Float Outfitter. I do not agree with the two launches per week maximum. The priority should be to maintain a variety of business opportunities for the public to choose from. I propose you limit the minimum number of businesses realizing that this will provide for that goal. I support a limit of no fewer than six different businesses or a maximum of 3 allocated launches per week.

Comment 402-109. Maximum Number of Allocated Launches per Float Outfitter. I object to limiting the largest float outfitters in the Canyon to 2 allocated launches per motorless week. I suggest instead that you limit the number of float outfitters to no fewer than 6 different businesses or to a maximum of 3 allocated launches each motorless week. Even if every outfitting business in Hells Canyon had 3 allocated launches each motorless week, there would be 6 different businesses offering service to the public on the Snake river. 6 permittees (7 if you allocated the 3 open dates in Appendix G as I suggested above in II.I.i) will provide the diversity of service that the public demands on motorless weeks.

Also, 3 allocated launches each motorless week will likely be necessary for a permittee to operate an economically viable business on the Snake/Hells Canyon. As you know, it takes an economically stable and successful business to offer consistently good service to the public. The change to motorless/motors only alternating weeks will dramatically effect the economics of float outfitting businesses (pricing, gross receipts, total customers/season, etc.). I believe that float outfitters will need to have 3 allocated launches each motorless week in order to run a viable business on Snake/Hells Canyon under preferred Alternative E.

I assume that the alternating weeks will result in a shuffling of float businesses in Hells Canyon with smaller businesses either buying another business or being bought by another outfitting service. This plan takes away growth potential unless a permittee is willing to purchase another business to expand his allocation. I support this change, but I think the DEIS is too restrictive as to the maximum size of float businesses. I further assume that the alternating weeks will cause some HC float outfitters to establish float businesses on other rivers within the region in order to keep their crews and equipment busy on the motors only weeks. I consider this an acceptable inconvenience in order to have a motorless Snake River experience on the motorless weeks.

It is difficult to estimate what use, if any, we will be able to make of the float launch date available to outfitters. Only time will tell. With the current system, we use pool dates extensively. I anticipate probably needing to purchase another business with its allocated launches to make up for the pool dates we have used in the past, and under the DEIS I can't make such an expansion. (Correspondent 2325)

Comment 402-110. Maximum Number of Allocated Launches per Float Outfitter. The number of allocated launches should be limited to 3 (rather than the 2 proposed in "E") per motorless week and the number of float outfitters be limited to no fewer than 6 different businesses. This number still allows for healthy competition. In addition, it allows outfitters the ability to "specialize" in the Snake River, and still remain viable, something my 17 years of outfitting tells me cannot be done on a 2 launch/week

every other week seasonal business bases. The public has a greater variety of choice, a larger multi-river outfitter, or a smaller, local river-specific outfitter, both viable healthy businesses. Six permittees (7 if you allocated the 3 open dates in appendix G as is suggested in the plan presented in appendix A) will provide the diversity of service that the public demands on "motorless weeks," and room for outfitter expansion (through buy-outs) and continued business viability. The DEIS is too restrictive with only 2 launches/week every other week to allow for a viable one-river outfitting service, and will have a significant economical impact on the larger outfitters in the Canyon. (Correspondent 2324)

Forest Service Response: Alternative G would retain the existing float allocation system, providing non-motorized periods that each outfitter would have access to during July and August based upon the existing allocation system. The minimum number of commercial float businesses operating on the river would be set at twelve to assure sufficient opportunity for the public to select trip options and competitive prices. If a business was purchased by an existing Snake River outfitter, the purchased business would have to be absorbed into the existing business of the purchaser in order to qualify for issuance of a permit. Launches assigned to the purchased business would be reassigned to the buyer, doubling the launch opportunity. As businesses were combined through purchase, there would be an overall reduction in float outfitter businesses down to minimum of twelve businesses. Over time, this would cause a net reduction in the number of commercial permits.

The changes presented concerning allocation of use based on historic use levels were brought forward in the analysis. Since the concepts presented were relevant to allocations of commercial use in general, the suggestions were used to analyze commercial powerboat historic use and to develop the system to arrive at the commercial powerboat allocation in Alternative G and displayed in Appendix G.

Comment 402-111. As to allocation the national policy on this did not have a tool to deal with ties - as there are four outfitters with the same 12.5 launches in their two highest use years. I would like to say that we use either service days or fees paid to the Forest Service as the method to break a tie. I feel that once a method such as "launch dates used" results in a tie then another measure of use (either service days or fees paid to the USFS) should be used. (Correspondent 2326)

Forest Service Response: Since Alternative G would retain the same launch allocation system, this situation would be resolved.

Comment 402-112. Under trading for launches, this is illegal by Forest Service and the State of Idaho Outfitters and Guides Boards, three party agreement (Correspondent 1084)

Forest Service Response: This system has been used by commercial float outfitters on the Snake River for over ten years and is part of the launch allocation system. There is no exchange of money or customers involved, and only outfitters that are licensed and permitted on the Snake River can participate. This is a signed, documented trade of launch dates within a limited allocation system which results in two outfitters agreeing to exchange launch dates for their mutual benefit. A third party agreement involves subletting of a business opportunity to an individual who is not licensed or permitted as an outfitter on the river and is illegal.

Impacts to Commercial Tourists

Some correspondents expressed concern that limits on commercial trips would impact tourists and they would be adversely affected in regard to planning trips, cost of trips, availability of services, and loss of opportunity.

Comment 402-113. One other point worth mentioning is the fact that a 180-mile boat ride can be achieved in one day for those with limited time. Float rides require much more time to cover the same distance. Therefore, when time is a factor, the float ride is not an alternative. (Correspondent 1832)

Comment 402-114. The Forest Service plan interferes with the public's ability to choose the outfitter that offers the specific experience they seek. Restricted use attaches further burdens to scheduling which is often difficult even with the current use levels. Since clients generally have many constraints on their time without having to find times which fit into the established time slots, mandating allotted dates would diminish the ability to serve public needs. (Correspondent 972)

Comment 402-115. We take a lot of people into Hells Canyon for a wonderful jet boat ride and wonderful scenery and wild life. It would be stupid to tell these people that they can't see a canyon their tax dollars help pay to manage. (Correspondent 1143)

Comment 402-116. To restrict the use of powerboats would be discriminating to tourists who might arrive at the wrong time. (Correspondent 296)

Comment 402-117. With 32 other whitewater rivers available the Snake can have controlled use of powerboats and serve the needs of citizens from the entire world who would like to see and enjoy Hells Canyon. (Correspondent 2391)

Comment 402-118. I strongly urge you give more consideration to commercial motorized boat use. They provide the most access to the canyon in terms of numbers of people per boat and at least cost per person (less than \$100.00 per day). (Correspondent 2391)

Comment 402-119. This section of Alternative C would put some existing commercial powerboat users out of business. Currently there are 19 outfitters who hold use permits in the river corridor from the North Boundary to Hells Canyon Dam. This proposal is unfair to the commercial outfitter (powerboat) and would have a dramatic effect on bookings and dollars earned. This would reduce the economic influence in the surrounding communities by 75%. See DEIS Appendix G-3. (Correspondent 2342)

Comment 402-120. Would make a trip through Hells Canyon only for the privileged few as commercial outfitters would surely raise their prices. (Correspondent 946)

Comment 402-121. It is beyond my comprehension how an individual user in this country or world wide will be able to plan a week or more family vacation, a year in advance, is going to be able to determine which week is scheduled for motorcraft, and which week is scheduled for floatcraft, and then try to determine to which part of the river that applies. A program that may seem simple to you could have very devastating consequences to those of us who depend upon that tourist taking his vacation here rather than somewhere more hassle free. (Correspondent 1017)

Comment 402-122. Most of our customers are limited in time and finances and our frequent short jet boat and float trips just fit in their schedule. Alternating weeks would discriminate against the majority of our customers. (Correspondent 840)

Forest Service Response: Prices of commercial trips are projected to be based upon the same market factors that currently exist. The level of commercial use proposed in Alternative G is representative of the number of boat trips per day that have been accessing the canyon for many years. The overall increase in use for commercial powerboating has been the result of outfitters using larger boats to transport a greater number of people and running trips more consistently on a daily basis.

Forest Service special use permits required to conduct commercial services provide authority to regulate prices, if necessary, provided an outfitter will not be required to charge prices lower than those charged by comparable or competing enterprises. Based upon past use, business competition will determine business viability, including price of trips, type of trips offered, etc. It is anticipated that commercial powerboat outfitters would have to work within a greater spirit of cooperation than they have in the past to create a business atmosphere that maximizes the economic potential for each outfitter based upon their allocation.

Limit Powerboat Numbers

Numerous comments expressed the concern that powerboating needed to be limited to a level below the numbers originally presented in the proposed action and focused on alternatives that proposed such limits. There were various suggestions about why it needed to be done. The following are examples of these comments:

Comment 402-123. A daily limit of 8 powerboats. This would allow for powerboats and floats to co-exist on the river at the same time. (Correspondent 2812)

Comment 402-124. I urge both to limit powerboats to 8 daily and give floatcraft an opportunity and/or alternating weeks of only powerboats one week and only rafts the next week. (Correspondent 2467)

Comment 402-125. Of the other alternatives, Alt E is the most appealing (with a provision that only allows up to 8 power boats per day.) The next best is Alternative C. (Correspondent 2246)

Comment 402-126. Alternative C is also acceptable if 8 powerboat trips were spaced out throughout a day thus reducing the impact of noise, odor, pollution and wake, but they should be limited and there must be professional management. (Correspondent 2279)

Comment 402-127. Limiting the powerboats to only eight daily would give the floats a great opportunity. It is a very good compromise that would help the powerboat users and the float users to cooperate. (Correspondent 2261)

Comment 402-128. Permit ten private jetboats per day between Pittsburg Landing and the North Boundary. Do not reissue the first two cancelled permits. (Correspondent 2382)

Comment 402-129. Private Powerboat Use. Comment: This proposal addresses the concern of many float boaters to the increase in numbers of private power boaters that have caused problems in making campsites unavailable to float boaters who do not have the ability to go back up-river to acquire a campsite that is vacant. This proposal would spread out the power boat use season and not concentrate it to certain popular periods in the use season, increasing the outstanding remarkable values of the river corridor and having a potential to reduce visitor conflicts in Hells Canyon. This proposal would equalize the environmental impact in the river users to enjoy at a reduced decibel level. However, the number of daily launches should be reduced to a more equal level with permitted float boaters. Daily launches 5 boats/day to have overnight privileges and with 5 boats on a day use permit only. (Correspondent 2342)

Comment 402-130. Private powerboat use should not exceed: Hells Canyon Dam to Pittsburg Landing = 6 launches per day (if Alternative E is not adopted). Pittsburg Landing to North Boundary = 10 launches per day (except up to 20 launches per day on weekends between N. Boundary and Mouth of Salmon River). (Correspondent 2383)

Forest Service Response: Private and commercial powerboat numbers need to be limited. In Alternative G in the wild river commercial powerboats would be limited to seven boats per day. Private

powerboats would also be limited to six boats per day. A detailed discussion of these limits and effects can be found in Chapters II and IV. Commercial powerboat allocations are described in Appendix G.

Powerboat Limitations by River Section

Comment 402-131. I think we need to limit boats above Rush Creek on the Snake River but can't see any reason to change anything else at this time. For sure not plan E. (Correspondent 1075)

Comment 402-132. If you insist on increasing restrictions, I believe that the section of River between Wild Sheep Rapids and Rush Creek should be the only area of restricted use. It is the area of use restrictions placed upon floaters and similar restrictions on powerboaters in that section might be fair, not necessarily needed. (Correspondent 2358)

Comment 402-133. I would prefer an alternative that did not decrease the number of float trips by non-motorized commercial boats, but did decrease the number of motorized boats, at least between Hells Canyon and Dug Bar. (Correspondent 1046)

Comment 402-134. I would support eliminating any motorized use above Johnson Bar and severely limiting such use below Sheep Creek. (Correspondent 2560)

Comment 402-135. If they are going to put a stop to jet boat traffic on the Snake River, it should be above Granite Creek Rapids. There should be only 2 boats past Granite Creek Rapids. They are the ones who take floaters back to the dam and the fish and game people checking for illegal fishing and hunting. (Correspondent 1143)

Comment 402-136. Eliminate jet boat traffic from upper Hells Canyon--between Wild Sheep Rapid and Kirkwood Creek. Limit jet boat traffic below Kirkwood Creek through an equitable permit system, with a corresponding balance between private and commercial use. This use needs to be dramatically below current use levels. (Correspondent 2548)

Forest Service Response: Throughout the analysis, the effects of different management alternatives on different sections of the river were considered. Alternative G proposes a non-motorized period on Monday through Wednesday in July and August for a total of approximately 24 days during the year. The area of the river where this non-motorized use would happen would be between the top of Wild Sheep Rapid and Kirkwood Historic Ranch. Complete information on this analysis can be found in Chapters II and IV.

General Comments Regarding Limits on Powerboats

Comment 402-137. There are so few areas left unspoiled by "progress," even in the northwest, that I hope you will move to protect the Snake River and place necessary limits on boat access. (Correspondent 2398)

Comment 402-138. All motorized craft except for emergency craft should be banned from the river year-round. (Correspondent 2861)

Comment 402-139. I understand that there is probably no way that powerboats could be outlawed on the Snake River but they definitely need to be controlled. (Correspondent 2261)

Comment 402-140. I would like to see limited motorized uses of the river. (Correspondent 2568)

Comment 402-141. In the event that the strength of the power boat lobby is too strong to ban the practice, then I support any procedure that will limit the access of power boats. Whether that limitation

is alternate weeks or limited access permits or limited numbers of boats at any one time. (Correspondent 2268)

Comment 402-142. Jetboat launches in the canyon need to be limited in the interests of safety and environmental protection. Specifically, jetboat launches must not be allowed to increase in any portion of the Hells Canyon area. (Correspondent 2646)

Comment 402-143. Please also balance out floater and jetboat use of the river, I love jetboats, but being able to float down without manmade noise is a precious treasure. (Correspondent 2459)

Comment 402-144. The very quality that both user groups seek in canyon will be lost if powerboat use is not limited in some fashion. (Correspondent 2400)

Comment 402-145. We also request that there be a limit on the number of powerboats that are allowed on the river during the motor weeks and that no jetskis be allowed on the river. If the powerboats are left unmanaged, they could overuse this national resource and greatly impair its natural beauty and use by other visitors. Finally, the proposition should apply to all of the canyon not just the Wild Section of the river. (Correspondent 2366)

Comment 402-146. We support Alt F because motorboat use in the area is out of control. It should have been regulated much sooner. The sheer numbers of motorboats are objectionable and need to be reduced. (Correspondent 2849)

Comment 402-147. I also feel that the private boats are possibly less responsible and must be limited as to numbers, destination, and hours for traveling up and down the river. (Correspondent 2021)

Comment 402-148. I feel it would be beneficial to both floaters and jet boaters to limit the amount of private jet boats on the river by making them obtain licenses and/or permits. I suggest this mainly due to the problems I have observed on Labor Day weekend and at other times of peak jet boat usage. (Correspondent 644)

Comment 402-149. Powerboats should be managed by a limited permit system just as rafts on all sections of the river. (Correspondent 2487)

Comment 402-150. I realize that there is a history of jetboat usage on this waterway which can't be ignored. This usage should be regulated just as the raft usage has been controlled for years. (Correspondent 2449)

Comment 402-151. Curtail motorized use on the water now to restore the abused ecosystem of the Snake River and to preserve a river of quality for future generations. (Correspondent 2679)

Comment 402-152. I could not believe it when I read that jet boats are to completely dominate the scenic section and that jet boats are to receive even more launches than floaters in the wild section; this is exactly opposite of the kind of management strategy needed. The use of jet boats should be severely restricted in order to reduce short line impacts, noise pollution and wildlife habitat destruction. (Correspondent 2522)

Comment 402-153. Jet boats need restricting to the lower sections with limited use year around. Let's do what right instead of what's profitable. (Correspondent 2683)

Comment 402-154. The direction of current management is driving away an important, non-consumptive user group - the floaters. I haven't been back to Hells Canyon after I assisted in organizing a "thank you" trip for legislators who were helpful in protecting the canyon. The ever

increasing overuse by jet boats has simply kept me away. Jet boats ought to be able to use the canyon. They were a pre-existing user group and deserve to continue to use the Canyon. Limitations, however, must be placed on their usage to maintain some of the wild character of the canyon and before they drive away another pre-existing use, float boating. (Correspondent 2636)

Comment 402-155. Hells Canyon jetboats are practically an "exclusive use" by locals of this national resource because their noise, odor, wake, etc. impact raft and trail users very negatively. Limited permits should be required for powerboaters just as floaters have been managed and limited for years. (Correspondent 2805)

Comment 402-156. The number noise and disturbance of the ever increasing jet boat traffic on the river is a terrible problem. The upper "wild" river section of the canyon should be off limits to these motorized craft. Their negative impact on wildlife fish, people and the river banks is obvious. The time has come to restrict and limit their use to the lower canyon. (Correspondent 2863)

Forest Service Response: Alternative G establishes specific limits on all motorized use during the primary season and has a monitoring system built in to expand this season as use in the secondary season continues to grow.

Seasonal Caps

Many respondents felt that seasonal caps (limited numbers) on use were not needed. They felt that the caps should be dropped because if daily limits were suitable to provide the desired recreation experience, seasonal caps were redundant or overly restrictive.

Comment 402-157. The seasonal caps for both floaters and private powerboaters should be lifted. (Correspondent 970)

Comment 402-158. I do not feel that there should be seasonal caps for power boats or floaters either one. I think they get along well together. (Correspondent 1135)

Comment 402-159. I would support Alternative B with the following modifications: The seasonal cap for both powerboaters and floaters should be removed. (Correspondent 203)

Comment 402-160. Seasonal caps serve no purpose and like most of the E proposal would be impossible to enforce. (Correspondent 2401)

Comment 402-161. The Alliance believes that the seasonal cap should be eliminated, use levels should not be based on average use levels. (Correspondent 1198)

Comment 402-162. The seasonal cap for boats should be removed. If the daily limits are acceptable, the seasonal cap serves no purpose and may give additional reason for conflict in the future. (Correspondent 846)

Comment 402-163. Commercial Floatcraft Use Wild River: Remove the seasonal cap. If the daily limits are acceptable, there is no need for the seasonal cap. (Correspondent 1190)

Comment 402-164. Private Powerboat Use: Wild River; Remove the seasonal cap. If the daily limits are acceptable, there is no need for a seasonal cap. (Correspondent 1190)

Forest Service Response: All use allocations would be determined on a daily basis under FEIS preferred Alternative G.

Eliminate Peak Use Days for Powerboaters

There was concern that failure to implement limits on powerboat use would result in peaks in use during holiday periods or on weekends, leading to on-river congestion, competition for campsites, and multiple encounters between users. Some respondents favored only managing peak use on weekends and holiday while others felt that use should be managed over longer time periods to eliminate peaks in use and distribute use over time.

Comment 402-165. High use of the Snake only exists during a few weekends of the summer. Fix those and leave the remaining months-weeks-days as is. (Correspondent 844)

Comment 402-166. I feel it would be beneficial to both floaters and jet boaters to limit the amount of private jet boats on the river by making them obtain licenses and/or permits. I suggest this mainly due to the problems I have observed on Labor Day weekend and at other times of peak jet boat usage. (Correspondent 644)

Comment 402-167. Manage private powerboat use so it does not dominate weekends. Spread use evenly throughout the control season. Manage so total allowable boat days do not run out early in the season. Maximum of 4 private powerboat launches per day above Pittsburg Landing and maximum of 10 private powerboat launches per day on Scenic River from Pitts. to North Boundary. If one boat runs through both wild and scenic sections it must be included in the launch count for both wild and scenic. (Correspondent 2331)

Comment 402-168. Private Powerboat Use. Comment: This proposal addresses the concern of many float boaters to the increase in numbers of private power boaters that have caused problems in making campsites unavailable to float boaters who do not have the ability to go back up-river to acquire a campsite that is vacant. This proposal would spread out the power boat use season and not concentrate it to certain popular periods in the use season, increasing the outstanding remarkable values of the river corridor and having a potential to reduce visitor conflicts in Hells Canyon. This proposal would equalize the environmental impact in the river users to enjoy at a reduced decibel level. However, the number of daily launches should be reduced to a more equal level with permitted float boaters. Daily launches 5 boats/day to have overnight privileges and with 5 boats on a day use permit only. (Correspondent 2342)

Forest Service Response: The potential for peak use days as a result of unlimited powerboat use should be eliminated. Alternative G provides a management scheme that would eliminate peak use days. In the wild river, powerboat access would remain constant so users could have a constant expectation of how much use might occur before they launch a trip.

In the scenic river, peak use is also eliminated. However, a higher number of private powerboat launches are allowed on weekends (Friday, Saturday, Sunday) to address both regional river interests and in light of Lower Salmon River float use. There are also guidelines in place to monitor weekday traffic prior to implementing set limits, but specific requirements would be set that would limit any holiday periods during the primary season to meet the same limitations as weekend use.

Growth In Powerboating and Floating

There was interest from some correspondents to allow for an increase in levels of both commercial and private power and float boating over current use levels as well as increased levels of growth for float use. The following are examples of these types of comments:

Comment 402-169. Alternative B allows continuation of float access at the present levels and it imposes limits on levels of powerboat use that accommodate some growth, leveling out peak use periods. (Correspondent 903)

Comment 402-170. B allows continuation of float access at the present levels and it imposes reasonable limits on levels of powerboat use that accommodate some growth, leveling out peak use periods; these use limits should reasonably accommodate the needs of most recreationists, while protecting the canyon's resources. (Correspondent 920)

Comment 402-171. We do feel that the cap should be raised to allow for reasonable growth of the established NRA businesses. (Correspondent 1155)

Comment 402-172. We support Alternative B but believe the cap on power boats seems a little low - with the population growing and more people seeking to explore the back country and to learn the history of you beautiful area. (Correspondent 1059)

Comment 402-173. I can support Alternative B with the following changes: Raise the use limits for both rafters and powerboaters. (Correspondent 1056)

Forest Service Response: Alternative G allows for some growth in visitor use in both the primary and secondary seasons, levels out peak use periods, and improves the quality of the river experience for all users. But in addition, it effectively meets guidelines of the Wild and Scenic Rivers Act by protecting and enhancing all ORV's. It also allows for increased visitor use in the primary season for both powerboating and floating. It does not allow for an increase in the number of powerboat launches on the river on peak use days or the ability of floaters to launch a large number of watercraft in one group. Visitation by users is only limited by the capacity of boats to transport people, party size limitations, or Coast Guard passenger capacity limits. While the numbers of visitors per group is limited to 24 for all groups except day-use commercial powerboats, average use levels do not yet approach these numbers. Day-use commercial powerboat businesses also have room to expand their businesses by promoting a new era of cooperation between themselves to make sure that all boats entering the river have a full complement of passengers.

Maximum Utilization of the Recreation Resource

Comments from people interested in maximum utilization of the river's recreational potential focused on making sure that the river would not have periods of time not readily available for use by all groups. In some instances people believed this could only be possible if powerboats were continued to have unlimited access and launch restrictions for floaters were dropped to allow additional growth for those users. Others felt that alternatives which allowed growth in use were preferred in order to assure maximum utilization of the recreation potential of the area. Examples of these types of comments included the following:

Comment 402-174. Alternative E allows float launches for seven consecutive days but the phase-in time for parties to reach the lower portions of the river and the phase-out time probably only utilizes five of those days. There would be portions of the river that would be unutilized during certain times of the week. Alternative B ensures even distribution on the river over time as well as full utilization of the river.)Correspondent 2311)

Comment 402-175. I believe that the maximum use levels for all user groups is the most logical way to manage Hells Canyon. (Correspondent 474)

Comment 402-176. I don't feel controlling the use of powerboats and floaters on the river will solve the problem. I would like to see another way to take care of the problem. (Correspondent 1720)

Comment 402-177. Restricting power/float use or putting time restraints on usage would prevent too many people from experiencing what this river has to offer. (Correspondent 297)

Comment 402-178. The LAC Task Force determined that use of the scenic section of the Snake was not yet at point that threatened its resources or the targeted experience. If use increases and eventually exceeds acceptable limits, then restrictions should be implemented. Intrusive, burdensome restrictions are not needed at this time. Having a river segment with scenic and other attributes where a spontaneous trip can take place is invaluable to all of us. (Correspondent 1198)

Comment 402-179. Float launches should be allowed on the river, not limited, until such time as monitoring determines overcrowding is occurring. (Correspondent 2699)

Comment 402-180. The preferred alternative eliminates 7000 recreational opportunities below the 1991 level. Talk of managing growth misleads the public into believing that future growth will be regulated - the fact is that the plan is to operate at pre-1991 levels. There is no consideration given to the level of the experience that those who are eliminated from visiting the river have - we are told that the reductions are to enhance the recreational experience of those on the river but no where is there an accounting of the level of the experience of those 7000 folks who will not be allowed to have any recreational experience on the Snake River at all. (Correspondent 1801)

Comment 402-181. Motorized and commercial use should be maximized because it gives the maximum number of people the unique experience. (Correspondent 2568)

Comment 402-182. I prefer Alternative A with river shared between power boats and float boats. There is a lot of river for all. There is no need for controls on power boats. (Correspondent 2155)

Comment 402-183 My past experience has shown no need to cut back on its use. (Correspondent 62)

Comment 402-184. To fulfill its statutory mandate, the Forest Service must manage the recreation area to maximize recreational opportunities. Efforts to create a more wilderness-like or primitive setting run contrary to that statutory mandate. (Correspondent 1198)

Comment 402-185. Usage is low enough now that no change is justified. (Correspondent 640)

Comment 402-186. I'd enjoy doing this each year but would like to count on abundant access to the river and the ability to go at least 90 miles up from Lewiston. (Correspondent 1810)

Comment 402-187. We don't need to control powerboats in Hells Canyon. There is plenty of river for all. (Correspondent 1733)

Forest Service Response: Limits on recreational use should be established for all users in all sections of the river. In too many situations, planning which does not establish limits on use leads eventually to dissatisfaction among users, controversy, and user conflict as demand for the resource increases. A classic example is the Snake River where floaters that have had limits in place on a section of the river for over 20 years feel that they have been treated unfairly when compared to powerboaters and believe that powerboating has grown to the point where it effects the quality of the experience and the resource.

Years of controversy surrounding the issue of powerboat recreation on the Snake River has led us from the Crowell decision of 1983 which continued the controversy to our present situation where the question of appropriate levels of recreation on a mixed use river is still being argued. This issue needs to be brought to closure based upon the guidelines of the laws which established the HCNRA and the designation of the river as wild and scenic.

Maximum use levels establish a threshold to work within. To manage the river with an objective of maximum utilization of the resource on a continual basis pushes the capability of the river resources to the edge of that threshold, and allows for a very limited margin of error in the event that other circumstances create unforeseen changes such as naturally occurring events (debris flows, droughts, floods, weather induced stress on native species, etc) or impacts caused by visitors.

Limit All Types of Users

Some comments expressed the opinion that all types of use should be limited if the result was greater protection of the resource and enhancement of a quality experience.

Comment 402-188. I do understand the need to limit numbers, and will patiently wait my turn, as long as quality is the reward for the wait. (Correspondent 2668)

Comment 402-189. IRU [Idaho Rivers United] recommends selection of Alternative C w/modifications. Alternative C best and most equitably accommodates most of the expectations of the broadest range of users, while minimizing potential impacts by reducing total human use of the river corridor. Most perceived user conflicts are mainly the result of too many total users on the river, not on the type of users. Alternative C reduces total potential usage by limiting launches to the approximate level of use that occurred 1985-1989, and by reducing private and commercial float party size and number of craft. (Correspondent 2501)

Comment 402-190. If Alternative E cannot be adopted, NWRA [Northwest Rafter's Association] highly recommends that Alternative C be implemented. This alternative, by basing the various use numbers at 1985-1989 levels, would allow an appropriate and equitable amount of usage by commercial and private groups for both float and motorized users. The resource would be reasonably protected and the DFC for a backcountry whitewater boating experience would be achieved. Alternative C should incorporate the following changes to achieve the appropriate and equitable goals and the DFC. (Correspondent 2236)

Comment 402-191. Over the course of these years I have seen the popularity of both powerboating and float boating increase by a huge degree. It is important that a plan be developed and enforced to protect Hells Canyon from excessive and careless use. (Correspondent 2236)

Comment 402-192. The Forest Service needs to impose the same sort of strict use allocations, such as those found in the wild section under Alternative C to the scenic section. (Correspondent 2328)

Comment 402-193. People have to be regulated, so be it. But look at total use; horses, llamas, backpackers, airplanes, powerboats and rafts. Don't be segregating rafters vs powerboaters, or commercial vs. private. (Correspondent 2435)

Comment 402-194. Keep this beautiful, scenic river canyon protected to the fullest extent from power boats, jet skis and boats, plus float launches and cattle feedlots. (Correspondent 2564)

Forest Service response: Under Alternative G, all types of recreational use are regulated and monitored year-round. All types of river travel are limited during the primary season. Trail and aircraft

use within the river corridor is monitored to assure compliance with regulations and to avoid impacts with other users. Alternative G provides a fair allocation of use to provide a wide variety of experiences for all users while protecting and enhancing ORV's.

Use Levels Specific to Floating

Correspondents in this section include those opposed to any reductions in float use because floaters cause minor impacts, and those wishing to see the number of float trips reduced. Examples are below.

Comment 402-195. Another element common to most of the alternatives is the power boat bias of the planning team is evident. What science, or even common sense, can justify this sort of reduction when the same alternatives continue to allow for huge numbers of jet boats to cruise up and down the river. (Correspondent 2328)

Comment 402-196. How did you determine that floatboat use limitations were necessary? Are you absolutely sure they are necessary? Are your current controls accomplishing what they were intended to do? (Correspondent 2505)

Comment 402-197. I disagree with the Forest Service alternative's plan to reduce the amount of floaters allowed on the wild river section during the summer high use season. (Correspondent 2699)

Comment 402-198. Jet boats are a long-standing part of the use history of this area and provide a means for many people to visit Hells Canyon. I am not opposed to jet boat traffic on the river corridor as long as the number of private floaters is not reduced to accommodate them. It is already difficult for a private floater to get a permit for this trip and I am opposed to reducing the number any more. (Correspondent 2436)

Forest Service Response: Reductions in float use that appear in alternatives are based upon managing the river for a quality backcountry experience for all users including reducing encounters with other users and protection and enhancement of ORV's.

Comment 402-199. A week on, week off system would be appropriate for jet boats on the wild reach, while float boaters should be allowed on the wild reach all the time since their impact is so minor. (Correspondent 2238)

Comment 402-200. What is truly ironic about the situation is that the motor enthusiasts destroy the very qualities that draw them to a natural area in the first place. If those who are so fond of this means of recreation think their activities are not innocuous, why are they not happy on the hundreds of thousands of acres of land and water already dedicated to their passions, and populated by others like them? Why, because they don't like the constant noise, pollution and other disruptions made by others of their kind any more than anyone else. And though they probably won't admit it, they actually seek the same bit of solitude and adventure a rafter might yearn for. The difference is that the rafter's passage impacts far fewer users and native denizens of the canyon. (Correspondent 2400)

Comment 402-201. The preferred alternative places too many limitations on float craft which, by any measure, will have less severe impact on the area than will motorized craft. (Correspondent 2889)

Comment 402-202. I am disturbed at the proposal to reduce the amount of private floaters during "high use" season. It seems as though this alternative is trying to accommodate and promote high impact motorized use, while discouraging the low impact non-motorized use. Meanwhile it ignores the long term problems and solutions regarding the entire ecosystem. This alternative is far from being equitable, not only to those who use the river, but to the ecosystem itself. (Correspondent 2732)

Comment 402-203. Jet boating is OK, but you've allotted too many miles of river for it. Floating is a lower impact activity and it deserves clear preference over jetboats. (Correspondent 2447)

Comment 402-204. Floaters have always been limited and managed and their impact on the natural environment is negligible compared to the powerboaters with noise, odor, wakes and frequently a disrespect for the environment and natural resources. (Correspondent 2316)

Comment 402-205. Jetboats must be severely limited. The noise and dominant nature of jetboat use in the canyon make them inappropriate except in very limited numbers. Floatboating is far more compatible with other uses. Non-motorized use fits far better within the canyon. This is a wild and scenic river and heavy jetboat use makes the canyon both less wild and less scenic. (Correspondent 2696)

Forest Service Response: Float use does have effects that are different than powerboats but can still have an impact on the experience of other users and the environment. For instance, most float use is overnight, with larger party sizes than overnight powerboat parties, which creates a greater potential for impacts at campsites including soil compaction, erosion, and damage to trees. The number of boats per float party has a direct effect on the number of on-river encounters and the appearance of visual crowding which can have an effect on the experience of both other river users and trail users. On other river systems where powerboats are not allowed, research indicates that the disturbance caused by passage of floatcraft over shallow river areas may create impacts to salmon spawning.

Comment 402-206. Motorized boats and jet skis should be banned entirely from the Snake Canyon so that the noise and oils and gas fumes do not mar the scene. Non-motorized boats should be limited in number so that the experience of solitude is possible. (Correspondent 2555)

Comment 402-207. Curtailment of the number of float trips permitted to use the river. (Correspondent 2477)

Comment 402-208. Restrict permits for float craft. (Correspondent 2761)

Comment 402-209. Restrict the number of floaters allowed on the river! (Correspondent 2627)

Comment 402-210. Restrict the number of floaters and floating companies who can use the river. (Correspondent 2847)

Forest Service Response: Alternative G reduces the maximum party size of floaters to 24 and reduces the maximum number of boats per float party to eight in order to address resource and social issues. Temporary use permits issued for commercial one-day float trips are eliminated, causing a reduction in the number of daily launches. In addition, float launches originating from Pittsburg and Dug Bar are limited. Float use from the Lower Salmon River is managed under Snake River guidelines as soon as it enters the Snake River.

Management Should Emphasize Protection

There was a genuine concern from some comments that the river environment should be the primary focus in managing the river corridor and that recreation use levels should not preclude adequate protection of these resources.

Comment 402-211. Alternative E would provide some regulation, in terms of numbers of craft on the river during the regulated season, and the alternating week schedule will bypass some user conflict but it will not mitigate the gradual rate of degradation, which has risen with the rising use rate. (Correspondent 2384)

Comment 402-212. I think the use numbers as proposed in Alternative C should be used in the modified E instead of numbers you suggest for all use; outfitted, private, float and motorized. If you are seriously trying to protect the canyon, the amount of weekend use needs to be reduced over current use, both during the regulated season and the non-regulated season. (Correspondent 2238)

Comment 402-213. The overall number of visitors should be kept at a level that prevents human scarring of the area. I say this with the full knowledge that these restrictive changes could prevent me from being able to visit the area again. Limits of Acceptable Change should mean only those changes that will preserve and protect the wild area not degrade it. (Correspondent 2843)

Comment 402-214. The levels of use for the public should flow from a management plan that maintains the resource rather than consuming it. (Correspondent 2384)

Comment 402-215. We support regulating numbers of both floaters and powerboats-- as we see the protection of the canyon, the river and the native inhabitants as the primary importance. It seems that upper limits should be set for all seasons (not just the high use season) to prepare for the future and possible overuse in off-seasons. (Correspondent 2894)

Comment 402-216. Alternative F does the most to restrict motor travel above Pittsburg landing. Therefore it appears to do the most for protecting the wild segment of the Snake River and to preserve the adjacent wilderness areas. This alternative would do the most overall to bring about the DFCs while falling within the LACs. This alternative probably saves the wild segment somewhat at the expense of the scenic segment. (Correspondent 2843)

Comment 402-217. Until research can determine the effects of jet boats on the river ecosystem, their numbers must be further restricted. (Correspondent 2684)

Comment 402-218. As users of the Snake River and Hells Canyon, we would prefer no changes in the use of the canyon as represented by Alternative A. However, after careful consideration, we realize that the future will bring increased use of the canyon and feel that plans must be made now to protect the canyon for future generations. (Correspondent 1125)

Comment 402-219. Some limitation is clearly necessary, in addition to efforts to avoid conflicts between floaters and jet boaters. The central issue is protecting this fantastic national resource and allowing unlimited access (even on alternating weeks) by jet boaters is simply not enough. (Correspondent 2799)

Comment 402-220. The River will lose most of its value to the people of this country and to the local communities if it is not more strenuously protected. Protected areas in this country are becoming progressively more valuable to the native area. Unprotected and unrestored areas are usually run down and degraded by a few small self-interest groups. Jet skis and high powered boats destroy the area for fishermen, hunters, hikers, boaters and all other user groups. (Correspondent 2559)

Comment 402-221. Please make this wonderful river a place for environmental and recreational beauty and wonder - the way it used to be. As an "easterner" living on a motorboat - dominated section of the Connecticut River, I appeal to you to think of your resource in the long term: That is its highest value in every sense of the word. (Correspondent 2669)

Forest Service Response: Alternative G provides for reductions in the level of access to the river for both floaters and powerboaters in the wild river on a daily basis. It provides for monitoring the impacts of other uses within the river corridor such as aircraft and trail users through self-issued permits. In the scenic river it manages peak use while providing for some additional use on weekends to accommodate both powerboaters and Lower Salmon river floaters. There is also a system for expanding the primary season if use in the secondary season continues to grow. The limits on boating use are designed to manage numbers of people who can go on the river within the availability of launches and number of boats allowed to launch per day. These limits were developed based upon the associated affects of recreational use on all of the other ORV's that were identified for the river corridor. A thorough review of this analysis is included in Chapter IV.

As a resource management agency, the primary duty of the Forest Service lies in protecting and enhancing the ORV's for the river corridor as directed in the Wild and Scenic Rivers Act. Recreation is only one of the many ORV's identified in this unique river corridor and cannot take precedence at the expense of other ORV's. The end result is a delicate management balance based upon professional judgement and public opinion.

Boat Launching for All Users

Correspondents included in this section commented on the need to define launches for all users, comments on the existing allocation system, launch reservations, managing vacant launches, and ideas on different launch allocation systems. Examples are included below.

Comment 402-222. Apply the "launch rule" as used to describe a raft launch to a boat launch as well. (A party of three boats would be considered on launch just the same as a party of three rafts is considered one launch.) This would be applied if you proceed with your idea to restrict launches. (Correspondent 1065)

Comment 402-223. If you select a plan that reduces the number of boat launches, you need to change the description of a "launch" to include two or three boats as a "launch" just as multiple rafts are described as a "launch." (Correspondent 1089)

Comment 402-224. Re-define what a "launch" is. When referring to boats, it's "one boat" but multiple rafts, kayaks, whatever is a "raft launch". If the number of boat launches is greatly reduced, a group of boats together should be "one launch" just the same as a group of rafts are "one launch." (Correspondent 1041)

Forest Service Response: The Forest Service intends to manage the number of boats on the river at one time relative to the recreation experience being provided for all users. These suggestions would manage permits rather than boats. Issuance of permits is a separate issue from on-river management. Each powerboat is issued a separate permit due to their mobility compared to float parties. Floaters usually stay together in a group during their entire trip on the river. Powerboaters, due to their mobility, may camp together, but are not constrained to travel together during their trip or even to arrive at the launch ramp at the beginning or end of the trip at the same time. Without an individual permit issued to each powerboat, there is a very limited capability to manage powerboat use on the river.

Comment 402-225. A commercial jetboat "launch" should be defined as a run upriver to a specific point, and return, on a given day. (Correspondent 1196)

Forest Service Response: The definition of launches for all river users can be found in the Glossary of the FEIS. Additional information on launches can be found in Chapters II and IV.

Comment 402-226. Provision should be made to include more than one powerboat per permit. Because of the distance that we have to travel to reach the river we usually figure close to a week for a trip. Being limited to one boat means that you can't even include your immediate family. Also, whether using powerboats or floatcraft, as a matter of safety more than one boat is used. (Correspondent 2465)

Comment 402-227. One week a summer we like to go powerboating with another family, taking two boats for safety, etc. This would not be possible on the limited permit system as I understand it. (Correspondent 480)

Forest Service Response: There may be situations where more than one powerboat per group would be desirable. The launch permit reservation system that would be developed to implement a limited number of daily powerboat launches in Alternative G would be designed with the stipulation to allow powerboaters making launch reservations to obtain a maximum of two launch reservations at one time as long as the reservations were made in two different names and were assigned to two boats with different state registration numbers.

Comment 402-228. I would suggest that the launches per day for float craft remain at present use levels because of the number of craft allowed per launch. (Correspondent 361)

Comment 402-229. Still allow the existing permit system and number of floaters to continue. (Correspondent 2564)

Comment 402-230. Despite the fact that my float trip took place during high season, I was satisfied with the amount of privacy I had with respect to the amount of other float parties encountered, both commercial and non-commercial, during the trip. I encourage to maintain the existing permit system and numbers of floaters allowed to use the Snake River. (Correspondent 2719)

Comment 402-231. It seems to me the existing permit system and use level [for floaters] is working. (Correspondent 2637)

Comment 402-232. Maintain current float levels through the existing permits system, with the fair balance between private and commercial use now in place. (Correspondent 2548)

Comment 402-233. Overnight raft permit allocation should stay the same. This was figured out several years ago when it was needed, it is in place and it works. The preferred alternative grossly favors three commercial rafters and is unacceptable. Canyon Outfitters especially. They have two permits thus showing way more use than possible for other outfitters. The number of launches in the DEIS appears to have little to no significance, it appears to all be based on user days. We feel the number of launches should carry the weight not user days, if the permits are broken up. HCA's [Hells Canyon Adventures] overnight permit has shown strong steady use for the past 10 seasons. Canyon Outfitters 5 years ago was not doing half of what it is now. If the permits are broken up, you should go back farther in past historical use. (Correspondent 1194)

Comment 402-234. The final plan would contain these provisions: Continuation of current controls for private and commercial floatboat use. (Correspondent 1118)

Comment 402-235. The system we have now is preferable to the proposed plan to allow 367 launches in a 52 day period! (Correspondent 2671)

Comment 402-236. I believe the permit system for launches should be kept similar to what it is now. And if overcrowding and overuse is shown to be occurring outside of high-use season, that too should be controlled. (Correspondent 2695)

Comment 402-237. The existing permit system has worked well in restricting float launches during the high use season. (Correspondent 2604)

Comment 402-238. The floaters have been adequately controlled for years. The current system works and should be left intact. The currently uncontrolled user group, private power boaters, must have controlled use as well if the integrity of the canyon is to be preserved. The LAC proposal most adequately addresses this problem. The final plan must represent equitable control of all users groups. Uncontrolled and disproportionate use by powerboats cannot be allowed to continue. (Correspondent 1118)

Forest Service Response: With the development of Alternative G, the existing float allocation system of five float launches per day would continue to provide the best service for private and commercial floaters with the least disruption to the user group. However, party size and number of float craft would be reduced as a means to manage both on-river encounters and potential impacts at campsites. The system for managing the float launch reservations would remain the same to avoid any confusion for floaters.

Comment 402-239. I strongly support the proposal of Alternative E to require launch permits of all users on weekends for the lower (scenic) portion of the river. Much of this stretch now resembles a very unhealthy zoo on warm summer weekends. (Correspondent 2466)

Forest Service Response: Alternative G would require launch reservations for both floaters and powerboaters launching trips within the scenic river on weekends only (Friday thru Sunday) with monitoring of use during the weekdays to determine if it was necessary to implement additional limitations on those days.

Comment 402-240. Perhaps the only equitable allocation system would put all private users in one group, i.e., jetboaters and floatboaters would compete for launch dates in a common lottery. (Correspondent 2426)

Comment 402-241. In short I and many of the people I know that float are not unhappy with the present state of things except for the fact that powerboats are totally unregulated and we have to put in for our permits in January. We believe that its more than a little unequal. (Correspondent 2356)

Comment 402-242. I prefer a lottery permit system with three commercial and four private launches per day for all non-motorized and motorized users for the Hells Canyon Dam to Kirkwood reach during the present regulated season. All watercraft would have to draw a permit. Use by unpermitted jet boats would be not allowed. (Correspondent 2276)

Comment 402-243. Alternative C places restrictions on both powerboater and floatboater but still appears to meet future conditions in the river corridor. The only recommended change to Alternative C would be to make private powerboaters apply for drawing dates for their use the same as the private floatboaters. (Correspondent 2804)

Comment 402-244. I feel this plan is biased in favor of power boaters. If there is to be any trip reservation permit system at all I feel it should apply equally to all users of this section of the river. If floaters are required to apply for permits (and plan 6 months in advance) during January then power

boaters should have to also. I have never objected to power boats on the river but in the last decade the use has exploded and combined with their mobility they have an unfair advantage to monopolize the river use in this corridor. (Correspondent 2808)

Comment 402-245. If you decide you need to limit use from Hells Canyon Dam to Kirkwood or Pittsburg Landing during the high use season, the powerboats need to be limited just as the floatboats have. Using a lottery, the number of floatboat/powerboat launches allowed would reflect the current use ratio between these two groups. (Correspondent 2505)

Forest Service Response: For private floaters, the existing four river lottery would continue to be used for the initial allocation of float launches. For private powerboaters, they would be fully involved in developing the system of allocation to determine how launches would be issued within the daily limits established by Alternative G. This may or may not include allocation of launches by lottery but would provide for the same flexibility that floaters have for access to launches and would be patterned after the float system to the extent possible.

Comment 402-246. Even more preferable would be the system utilized on other rivers: the Rogue, the Tuolumne River in the Stanislaus National Forest. User days - not permits - it is not a problem on these rivers - you have the campsites. (Correspondent 2417)

Forest Service Response: Those systems maximize the daily number of people on the river. This has the potential to increase visual crowding and on-river congestion by launching more boats per day and increasing competition for campsites as more, smaller groups, who are favored in a system like this, compete for a limited number of these sites.

Comment 402-247. Launch reservations need to be required by all river users during the regulated season. (Correspondent 1078)

Comment 402-248. Launch reservations is the one section of the Forest Service preferred Alternative E that makes sense. Treat all river users with equality. (Correspondent 2342)

Comment 402-249. Launch Reservations. This section of the proposal Alternative C hits the nail on the head. One type of river user, i.e., float craft have been singled out for many years. To maintain control in the river corridor all river users in the controlled season must be permitted. (Correspondent 2342)

Comment 402-250. Launch reservations should be in effect for all river users with no exceptions to any type of use. This makes the base we all go into the river corridor equal. No river use group should be singled out and regulated anymore than another, strive for equality on the river corridor. (Correspondent 2342)

Comment 402-251. Limited permit system ("real" permit system with assigned launch dates) for all users including private and commercial powerboats. (Correspondent 2383)

Comment 402-252. It is not possible to implement a restricted use system for either power or float, commercial or private, without a reservation system. If the Forest Service imposes such restrictions, it undertakes responsibility of an expensive and difficult to run reservation system. (Correspondent 1198)

Comment 402-253. We were unable to locate an outline of the permit system for jet boats, whether it will be a lottery, or first-come-first served. Private jet boats will not actually be limited except on weekends, and the actual 1- per-day cap will not be enforced until after monitoring determines a need

(DEIS at I-11). This is contrary to the stated objective of reducing social conflicts by limiting use in the scenic section. (Correspondent 1196)

Comment 402-254. I support the requirement that all river uses be required to have launch reservations. (Correspondent 2793)

Comment 402-255. Launch Reservations. This section of the alternative offers a major inequity. From this persons point of view, all craft powered or float, private or commercial should be required to have launch reservations during the control period on the Wild (Dam to Kirkwood) and Wild (Kirkwood to Pittsburg) sections of the river. Floatcraft have been singled out for too many years and have been controlled but private power craft numbers have continued to increase with no number restrictions on launch reservations in the management plan. Environmentally this would be a number game also, by restricting power craft to reservations, it would reduce the number of people who have the potential to cause damage to the river corridor. The economic impact probably would show some negativity due to the reduction of numbers of launches. (Correspondent 2342)

Comment 402-256 I think it is good for all river users to go to a permit system. This plan has worked well with rafters and there is no reason why it should not be used with powerboats. Day permits for river use up to Kirkwood or below Rush Creek would allow powerboat usage to be further studied. (Correspondent 2802)

Comment 402-257. Our only down sides of powerboat use is that they are unregulated in the numbers and dates that they are allowed to use the river and that they can run up and down the river at will and select the most desirable campsite whereas the floatboat users are regulated as to the number of launches per day, and they cannot row back up river if a campsite down river is taken. In this day and age, this is a severe injustice and if one user is regulated the other should be just as regulated. (Correspondent 2364)

Comment 402-258. Power boats should be managed by a permit system just as rafts have been for two decades on the river. (Correspondent 2784)

Comment 402-259. Alternative E represents a supportable compromise so long as an effective permitting system is put in place that keeps powercraft off the river for times sufficient to allow a non-intrusive experience. (Correspondent 2831)

Comment 402-260. A permit system would be a terrible inconvenience for jet boaters as it would almost completely eliminate the spur of the moment trips that so many jet boaters enjoy. (Correspondent 2442)

Comment 402-261. Under Alternative E, many potential private powerboaters, particularly those outside the immediate area, will decide not to make the trip to Hells Canyon because of the risk that they will not be able to get on the river. The proposed limits on powerboating seem contrary to the goals of this DFC. (Correspondent 970)

Comment 402-262. Under Alternative E, many potential private powerboaters, particularly those outside the immediate area, will decide not to make the trip to Hells Canyon because of the risk that they will not be able to get on the river. Thus, the proposed limits on powerboating seem contrary to the goals of the DFC. (Correspondent 876)

Forest Service Response: A launch reservation system is needed to provide fair access to the river for all users and necessary to implement limits on all types of use. Alternative G implements a launch reservation system for all river users in the wild and scenic river with the exception that weekday use in the scenic river would be monitored for private float and private powerboat users to determine when

implementation of established limits would be necessary. This would allow spontaneous trips to occur on weekdays in the scenic river prior to the establishment of use caps and launch reservations.

Comment 402-263. It is not possible to implement a restricted use system for either power or float, commercial or private, without a reservation system. If the Forest Service imposes such restrictions, it undertakes responsibility of an expensive and difficult to run reservation system. (Correspondent 1198)

Forest Service Response: The Forest Service has operated a launch reservation system for floaters for many years and have staff in place at all portals to assure compliance with non-limiting permits for powerboaters. All systems and staff are already in place to implement a launch reservation system for all river users.

Comment 402-264. Require commercial float launches to be cancelled a minimum of three weeks in advance. If the trip was not used, the outfitter would lose the closest start date the following year. (Correspondent 2382)

Comment 402-265. Launch reservations are good for the Wild section with the boundary beginning at Rush Creek Rapid. I would suggest there be a weekly call-in for reservations, with penalties for those who call in a reservation, but don't show. I'd say after the second time of being a no-show to lose the reservation privilege for a season. (Correspondent 361)

Forest Service Response: The reservation system for floaters would continue to operate as it has in the past and is designed with enough flexibility that adjustments can be made as necessary to improve the system. The system designed for powerboaters would be developed with their participation, using the float reservation system as a model in order to have as much similarity as possible between the two reservation systems.

Comment 402-266. Do not re-issue the first float launch space cancelled each day on either a private or commercial launch. (Correspondent 2382)

Comment 402-267. Number of Float Parties on a Motorless Week. Seven float groups per week on a short stretch of river such as the Snake from Hells Canyon to Pittsburg Landing (32 river miles) will have potential for crowding. I suggest that you head this problem off by the following method. Eliminate and do not re-issue the first cancelled date (either commercial or private) on a given day during the Regulated Season or during the "heart" of the Regulated Season (late June through mid-August). Since many summer dates do have at least one cancellation, this would reduce many of the summer Regulated Season dates to a maximum of 6 float parties/day. However, this system would not limit the initial opportunity for floaters to sign up for launches. This restriction would take effect only if a cancellation occurred. Also, subsequent cancellations on that same day would be re-allocated as in your DEIS plan. This plan could be used initially, or perhaps provided for (with a triggering mechanism) once a certain number of "7 launches/day" dates occurred in the future. (Correspondent 2324)

Comment 402-268. Number of Parties during the Motorless Week. I support the elimination of the first cancelled launch each day to reduce the launches to 6 that day. Subsequent cancellations would be re-issued as suggested in the plan. (Correspondent 2329)

Comment 402-269. Permit five private jetboat launches a day above Pittsburg Landing. Do not re-issue the first cancelled permit. (Correspondent 2382)

Forest Service Response: Since Alternative G leaves the current float allocation system of five launches per day intact, it would be unnecessary to re-issue the first cancelled launch date for either float or power launches. This would result in a reduced opportunity for access below what is recommended in Alternative G. While our goal is not to maximize the number of launches on a daily basis, both floaters and powerboaters should have the best opportunity to gain access to the resource within these limits.

If monitoring indicates that congestion is occurring on the river after implementation, not re-issuing the first cancelled launch would be considered as an option to reduce congestion in order to avoid implementing a campsite reservation system.

Comment 402-270. Commercial powerboaters should be allowed 1,368 boat days and they should be thoroughly involved in developing the system used to implement this direction. (Correspondent 970)

Comment 402-271. Private powerboaters to be thoroughly involved in developing the launch system implementation. (Correspondent 1190)

Forest Service Response: There are certain guidelines necessary in order to make the system functional. When the system was developed for floaters in past years, the requirements outlined were that the system must be considered fair for the majority of users, have several options available for obtaining a launch, meet legal management guidelines, have some flexibility to make adjustments in it over time for improvement, and be a method that the Forest Service was actually capable of implementing and administering efficiently for the agency and the user.

Many of the necessary attributes of a launch reservation system are in place with the system developed for floaters. This system has been in place for many years, has been tested and adjusted as necessary. Using this concept, the float system could be adjusted to address the special needs for powerboat access under the Alternative G allocations. This would be the focus for involving powerboaters to assist in development of a launch reservation system to accommodate their use.

Comment 402-272. For Alternative B to work, it must manage all users, and it must provide thorough and effective management of powerboaters. We suggest the following. A real limited permit system for private and commercial powerboat use with actual launch dates. If a date is missed by an outfitter, that date is not available until the following year (just like the commercial float allocation). (Correspondent 2331)

Comment 402-273. I believe powerboaters should be managed and required to obtain permits just as floaters have for years. (Correspondent 2248)

Forest Service Response: A powerboat launch reservation system does not have to function identically to the floater system. The float system was set up to meet the needs of floaters specifically. Specific adjustments may need to be made for powerboaters in order to meet the needs of their group as long as the system keeps powerboat launches within the daily allocation limits as prescribed in FEIS preferred Alternative G.

Patterned after the float launch system that has been operating for many years, a powerboat system could incorporate such items as cross-over between commercial and private launches, waiting lists, walk-ons, penalties for no-shows, and other attributes that help boaters obtain launches as easily as possible. But it would also have to take into consideration the differences between power and float use such as the short window of opportunity for day-use commercial powerboat trips, the need to

obtain more than one permit when making a reservation and other aspects of powerboat use that were not applicable for planning a float trip.

Comment 402-274. I have no problem with letting them use the river on a daily basis but feel any overnight trips should be pre-planned and filed the same as float trips. If in the future number of boaters get out of hand, make them register then. At present where there are many jetboats the number is not too great. (Correspondent 2464)

Forest Service Response: Unlimited day-use by powerboats would add to both total number of encounters on the river between groups and on-river congestion. The system developed for powerboat reservations would be designed with the assistance of powerboaters and would be flexible enough to accommodate day-use and overnight use by powerboaters within the daily limits for powerboat access.

Comment 402-275. We were unable to locate an outline of the permit system for jet boats, whether it will be a lottery, or first-come-first served. Private jet boats will not actually be limited except on weekends, and the actual 1- per-day cap will not be enforced until after monitoring determines a need (DEIS at I-11). This is contrary to the stated objective of reducing social conflicts by limiting use in the scenic section. It allows conflicts to occur for at least 2 years until monitoring caps kick in. (Correspondent 1196)

Forest Service Response: The system used for private jetboaters would be designed with their involvement to make sure that it accommodates their needs while staying within the allocation limits. It may involve a variety of methods, similar to the floater system. Commercial powerboaters would have a specific daily allocation based upon historic use as described in Appendix G.

Historically, the amount of use on weekdays is well below the limits that would cap use. Even if use increased dramatically, there is little indication that use would exceed weekend limits which is established at an acceptable level. If a permit system were implemented immediately, there is no indication that floaters or powerboaters would be affected by their ability to access the river because of an increase in demand. The main attribute of implementing an allocation system prior to monitoring would be inconvenience to users.

These limits were established on the basis that both private power and float users should be able to have an opportunity to take a spontaneous trip on the scenic river in the primary season during periods of time that historically had less use. This should occur for as long as possible and as long as ORV's were not adversely affected. This allowance is an additional tradeoff for limits on commercial use throughout the river corridor and the opportunity for a non-motorized period in the wild river. On a river with mixed uses such as the Snake, it is unrealistic to have a management objective of eliminating all user conflict. The objective is to reduce it to acceptable levels while managing the river to provide a quality recreation experience for the majority of users.

General Comments

Several correspondents indicated that they would like to continue to have the option to launch small inflatables from powerboats as they were allowed to do under the existing management plan as long as it was done below Rush Creek Rapid.

Comment 402-276. I would like to suggest that the week you currently have designated as motorized only be changed to motorized and float boats together, this would accommodate the motorized

boaters who like to run small inflatable boats through the rapids, and then load the inflatable back on board the motorized boat. (Correspondent 2238)

Comment 402-277. Private Floatcraft. Comments: This section takes away from all river users the ability to put into the water a floatcraft play boat below Rush Creek Rapids to Pittsburg. (Correspondent 2342)

Forest Service Response: One of the objectives of Alternative G is to manage the level of encounters between groups. In the wild river, floaters are not allowed to have kickers for convenience, and as a trade-off, powerboaters should not have inflatables that would add to congestion. The inflatable itself adds to the total boats on the river and the powerboat that must run back and forth on the river to support the boat also increases encounters between groups. As a result, powerboats would not be allowed to launch inflatables in the wild river.

In the scenic river, the same situation would apply on weekends. However, during weekdays, until monitoring indicates a need to impose limits, powerboats could launch inflatables as long as the people in the inflatable had a self-issued permit in their possession. This use would apply toward the daily limits for floaters for the purposes of monitoring use in the scenic river.

Comment 402-278. Individuals who wish to make a day trip above Pittsburg Landing, I feel, will not adversely affect the environment or the quality of the experience of boaters camped above Pittsburg Landing. (Correspondent 42)

Comment 402-279. Secondly I fail to see the justification for limiting day access for the area from Cache Creek. I feel that day use should not be capped at all, especially given the numbers the commercial powerboats have to work with. (Correspondent 2469)

Comment 402-280. I think it is good for all river users to go to a permit system. This plan has worked well with rafters and there is no reason why it should not be used with powerboats. Day permits for river use up to Kirkwood or below Rush Creek would allow powerboat usage to be further studied. (Correspondent 2802)

Forest Service Response: Day-use should be limited. Day-use by powerboats adds to the total number of boats on the river, increasing the potential for encounters with other users and can effect their experience. In Alternative G all powerboat use, regardless of length of stay, would be limited except for weekday use in the scenic river prior to implementing caps on use as the result of monitoring.

Fair and Equitable Use Code 403

Use of Jetback Services

Comments in this section focused on jetback services offered as a convenient alternative to car shuttles for floaters and as a way to take a float trip on a short time schedule. Some were in support of continuation of the service, and some were opposed. Examples of these comments follow:

Comment 403-1. Alternative E would eliminate 20-25% of all float launches without provision for jet-outs during the non motorized period. Those should be a consideration for commercial jet outs at least on Sundays. (Correspondent 1068)

Comment 403-2. An integral part of our operation, currently and historically is a jet back to return our customers. (Correspondent 426)

Comment 403-3. Eliminating jetbacks on the non-motorized week will eliminate the possibility for many floaters to use Hells Canyon, those who do not have the luxury of taking three to five days to float the river and shuttle vehicles. (Correspondent 970)

Comment 403-4. Other than being just a bad idea, the proposal would eliminate the ability of floaters to take advantage of jetboat services such as jet-backs from Johnson Bar to Hells Canyon Dam. (Correspondent 2389)

Comment 403-5. If they are going to put a stop to jet boat traffic on the Snake River, it should be above Granite Creek rapids. There should be only two boats past Granite Creek Rapids. They are the ones who take floaters back to the dam and the fish and game people checking for illegal fishing and hunting. (Correspondent 1143)

Comment 403-6. Many rafting parties currently using our jet back services would be cut by 95% or more. Are you people wanting Hells Canyon to be enjoyed by those who desire to see it by whatever mode of transportation, or lock it up so only a few can experience it? (Correspondent 1194)

Comment 403-7. At this time most of my clients say that the float trip jet back return is the only way that they could afford the wonderful adventure of both worlds, be able to see the canyon and return as so to keep important schedules. (Correspondent 800)

Comment 403-8. I like the convenience of taking a jet boat back up the river after floating down from Hells Canyon Dam. (Correspondent 2537)

Comment 403-9. We could not have had a float trip and jetback if the Forest Service adopts a plan for alternating weeks of use for powerboaters and floaters. (Correspondent 407)

Comment 403-10. We have ridden a raft down the Snake river and power boated back. I would not want that experience denied to anyone. It was a thrill. (Correspondent 2285)

Comment 403-11. The full experience of Hells Canyon includes a jet boat ride. Alternative E doesn't allow for jetback (unless you hit it just right on a transition day). Alternative B allows for jetbacks. (Correspondent 2311)

Forest Service Response: Alternative G allows jetbacks and jetouts to take place subject to the availability of a powerboat launch within the daily commercial powerboat allocation. The only circumstances where jetbacks and jetouts would not be allowed would be within sections of the river during non-motorized periods.

Comment 403-12. Alternative E ignores and fails to specifically analyze and address the impact on a major user group - jet backs. Jet-backs comprised 25% of all launches last year. (Correspondent 1179)

Forest Service Response: Additional detail and analysis of impacts to jetback/jetout users has been addressed in Chapters II and IV.

Comment 403-13. When rafters jet out, they usually don't go down further than Johnson Bar. This would decrease the pressure on campsites in the lower end for jet boaters. (Correspondent 1068)

Comment 403-14. We have limited our rafting to one day trips to Johnson Bar, return to the Dam by jetboat, and then return home the same day. The end result is a minimum impact to the environment and a personal benefit to us. This is in the best interest of the environment and us, a win-win situation. (Correspondent 2394)

Forest Service Response: Most jetback services occur between Johnson Bar and Pittsburg Landing (reference analysis file). Many of these are not one day trips and do use campsites downstream from Johnson Bar. While one day float trips have less of an impact on the shoreline than overnight trips, they have a greater potential impact to the backcountry experience of other users by increasing the rate of encounters with other groups while floating. Both one day and multi-day trips increase the rate of encounters as a result of the jetback. Information on these effects can be found in Chapter IV. Also refer to Forest Service responses to comments concerning one day float trips.

Comment 403-15. I support the elimination of jetback trips during the "motorless" week. I strongly feel there should be no motorized uses of any kind from Hells Canyon Creek to Kirkwood during the "motorless" week, nor from Kirkwood to Pittsburg. Such a motorless corridor is the key characteristic that floaters are willing to give so much up for in supporting Alternative E and the alternating weeks. There should be no compromise to allow motorized uses between Hells Canyon Creek and Pittsburg during the "motorless" week. (Correspondent 2324)

Comment 403-16. I support the elimination of jetbacks during the "motorless" weeks. (Correspondent 2329)

Forest Service Response: Jetback and jetout services should not be available within a section of river where a non-motorized period is in effect. To allow any type of motorized use during this time period would seriously compromise the intent of managing for a non-motorized experience.

Under Alternative G, jetback or jetout services would continue to be allowed from any location in the wild and scenic river corridor with the exception that jetbacks or jetouts could not take place between Wild Sheep Rapid and Kirkwood on non-motorized days. These trips would have to be offered within the daily allocation limits for commercial powerboats. Additional boats or multiple trips by one boat above the daily powerboat allocation to accommodate jetback services would not be allowed.

Also under Alternative G, to further the intent of assuring that river users were provided with the best opportunity for a non-motorized experience, float trips could not be shuttled by aircraft out of Big Bar airstrip during a non-motorized period.

Comment 403-17. I would like to see the jet back option available from the dam through Granite even during non-motorized use. (Correspondent 1167)

Comment 403-18. I feel a two (2) week float period followed by a 2 week power boat period might be fairer for floaters who take longer to get down river. I would have no problem with a commercial powerboat operation during the floater period for haul backs ice and safety. The Forest Service could control a commercial operation. (Correspondent 2305)

Forest Service Response: Motorized use for convenience should not be allowed on a section of river that is being managed specifically to provide a non-motorized backcountry experience. As you have described, this activity would be a convenience at the expense of all other floaters who wanted the opportunity for a non-motorized experience. In regard to safety, there are many non-motorized rivers without the immediate availability of jetboat service in the event of an emergency and this has not hindered the popularity in float use on those rivers. There are certain trade offs that must be weighed

when managing for different recreation experiences. In this situation, ease of access and egress by powerboat for floater convenience is given up in order to provide an uncompromised non-motorized backcountry experience.

Comment 403-19. The document should also explain why new uses to the river have been allowed to (a) exist and then (b) continue. The two that seem most foolish and destructive of the river are the use of jet skis and other Japanese toys for the rich, and secondly, the process of floating down from the dam toward Kirkwood and the jetboating back. I believe that neither of these activities existed when the law protecting this area was passed, and therefore do not in any way enjoy the "grandfather" provisions that permit jetboat use on other portions of the river. There is no lawful reason, given the overall goals of the law, to permit either use on any reach of the river within the NRA. (Correspondent 2466)

Comment 403-20. The Snake and Salmon have become river highways for upstream shuttles. I agree with the concept of historic motor boats use for people who live on the river and private parties, but commercial jet boat shuttles for convenience and profit are stretching the concept. (Correspondent 2276)

Comment 403-21. Eliminate the jet back process by floaters which is putting additional excessive pressure on the canyon. This just impacts the upper most primitive portion of the canyon and encourages too many one day trips. (Correspondent 2401)

Comment 403-22. If there is such a problem why even consider jet back for floaters. Do they only want the powerboats there for their convenience only? (Correspondent 1171)

Comment 403-23. I support banning outboards on rafts and jetbacks during the "motorless" week. My guests will truly value a motorless river experience. Jetback use has dramatically increased powerboat use on the upper Snake (Kirkwood to Hells Canyon Creek) in recent years. I feel the terms of future float permits should exclude the option for the jetback of both people and gear in this stretch of the canyon. When you weigh the adverse impact of jetbacks on the resource and other float users (noise, odor, wake, congestion, etc.) against the convenience of a jetback, I feel that jetbacks should not be allowed on the Wild River section of the Snake whether Alternative E is implemented or not. (Correspondent 2324)

Forest Service Response: The jetback option can be more appropriately managed when included as a service offered within a limited commercial powerboat allocation. Under Alternative G, only one boat per day would be allowed to leave Hells Canyon Creek to travel downstream as far as Pittsburg Landing to conduct any type of one day trip. This may or may not include a jetback. This substantially diminishes the higher level of encounters associated with multiple powerboat trips per day for the express purpose of conducting jetback services.

Under Alternative G, a specified number of commercial powerboats would be authorized to operate on the river on a daily basis. It is unnecessary to determine the type of services those trips can offer, including jetback services. Placing unnecessary restrictions on the type of outfitted services that businesses could provide in addition to limitations on daily use could adversely affect the economic viability of a business. Jetback services have developed over the years as a result of floater demand for these services as a convenient and time saving alternative to car shuttles.

Comment 403-24. The one day floats meet an important public need and should be retained at one launch per day. (Correspondent 1198)

Comment 403-25. Also eliminated are the one day raft trips. It should be abundantly clear after two years of non-use by one permittee that does not return to Hells Canyon launch site by jetboat, while the other (using a jet boat return) has had over 700 users in 1993. Some of those on an overnight permit and the Forest Service refuses to recognize these as one day use. (Correspondent 2435)

Comment 403-26. If in a raft for the day, we feel very strongly that history has proven the jet back is a big player. It is clearly to long of a day to raft from the launch site to an access road. The only possible exception would be airplane returns, and to us, history has shown this was not successful either. (Correspondent 1194)

Forest Service Response: Under Alternative G, both commercial and private one day float trips are still possible based upon three factors: 1) they must be included within the daily total launch allocation of five commercial and private float launches per day; 2) the jetback service associated with returning the one day float trip is subject to the availability of a powerboat launch within the daily commercial powerboat allocation; and 3) neither jetbacks or one day float trips can take place within sections of river during periods of time designated for non-motorized use only. Chapters II and IV and Appendix G provide information on the relationship between one day floats and jetbacks.

Increased Opportunities for One Day Float Trips

Several comments addressed the issue of converting a multi-day commercial float permit into a one day commercial float permit as provided for in Alternative B. There was also interest in adding a one day float launch for private users to balance the one day commercial permit opportunity.

Comment 403-27. Page II-18. The conversion of a full service permit should be dropped. The increase recommended in the private sector would make this conversion unnecessary. (Correspondent 1198)

Comment 403-28. As for the one day float issue under the LAC plan we are not at all willing to give up an over night float permit. We do have some question as to why Adventures Afloat seems to be able to hang onto their One Day Float permit and not run any trips? In 1993 HCA [Hells Canyon Adventures] took more people on a raft than any other Float Outfitter operating in HC! (Correspondent 1194)

Comment 403-29. During the regulated season an additional launch should be added to the 3 launches for private floaters. This additional launch should be added to the 3 launches for private floaters. This additional launch would have to move through the Hells Canyon Dam to Rush Creek segment in one day, not camping in that segment. The purpose of this change is to equalize private opportunities with the one day float opportunity allowed to the commercial sector. The conversion of a multi-day float permit to a one day float should be dropped for the commercial operators and there should be no limits during the unregulated season. (Correspondent 2110)

Comment 403-30. During the regulated season an additional launch should be added to the three launches for private floaters. This additional launch would have to move through Hells Canyon Dam to Rush Creek segment in one day, not camping in that segment. The additional use would be offset by the reduction of the party size to 20. (Correspondent 331)

Comment 403-31. I do like the suggested revisions to Alternative B as put forward by HCA [Hells Canyon Alliance]. I really like the extra private permit launch that would have to get below Rush Creek in one day. I often do a dam to Pittsburg float on a weekend and that would be great for those floats. (Correspondent 1105)

Comment 403-32. The Alliance [Hells Canyon Alliance] recommends a small increase in private float launch opportunities. During the regulated season, allow 3 regular launches plus one launch that will move through the Hells Canyon Dam to Rush Creek segment in one day, without camping in that segment. The additional launch is to equalize private opportunities with the one day float opportunity allowed to the commercial sector. This party moves through the canyon section with the fewest campsites very quickly. The social impact of day use is minimal. (Correspondent 1198)

Forest Service Response: Alternative G does not convert a multi-day commercial float permit to a one day commercial float permit and does not add an additional one day launch opportunity for private floaters. It also does not allow for re-issuance of the temporary one day commercial float permits after they expire at the end of 1994.

Providing an increased opportunity for one day float trips would be impractical because the social conflict of a day use float trip is significant. The one day float adds congestion at the launch site twice daily, first when the trip begins and later, when the passengers are delivered back to the launch site by jetback at the end of the day. The one day float increases the number of encounters on the river with other users. It adds to on-river congestion by allowing additional float craft on the river. As noted in your comment, these boats travel on the river at a faster rate in order to take in all the major rapids on the river in a single day. As a result, it overtakes other raft trips that have launched on the same day or prior days. It generally requires a jetback, which can create two jetboat encounters with float and powerboat parties traveling in the section of river the float group has traversed.

Comment 403-33. The one and two day Snake/HC private trip with jetback is a unique phenomenon among Western river trips, and one that I don't think is necessarily desirable. (Correspondent 2325)

Comment 403-34. The one day trip permit for commercial float boats makes little sense and robs an opportunity for an extended trip launch. I would suggest that this trip permit be eliminated. (Respondent 2793)

Comment 403-35. Commercial Floatboat Use. This section of Alternative B offers an increase in the one-day trips, which would probably increase commercial jetboat traffic between the Dam to Kirkwood section for jet backs. This concern needs to be reviewed further for additional comment. (Correspondent 2342)

Forest Service Response: The option for one day float trips should not be eliminated. Alternative G allows floaters to determine the length of their trip based on personal preference and time schedule. Those that choose to make shorter trips would have the option of jetback service which would only be subject to availability of commercial powerboat services within the limited powerboat allocation.

Favor Private Use Over Commercial Use

Several correspondents felt private users should be favored over commercial users on specific management points as follows:

Comment 403-36. I would like to see the ratio of personal to commercial float permits changed from a 3:2 ratio to a 4:1 ratio. (Correspondent 2238)

Comment 403-37. Maximum of 8 floatcraft per party be eliminated on private parties. (Correspondent 2321)

Comment 403-38. There is no need to limit access for private boaters or floaters in my opinion. I would like to see only commercial floatcraft operators and tour boats on a workable compatible schedule; since that area is where the conflict arises. (Correspondent 2066)

Comment 403-39. From my river experience commercial use has overwhelmed private use. Commercial use should be reduced and private use allowed to fill the vacated niche while maintaining current use levels. Lets encourage individual initiative and adventure. It will heighten the experience. (Correspondent 2276)

Comment 403-40. Maximize private boat usage and minimize commercial usage. (Correspondent 2433)

Comment 403-41. I oppose issuing more commercial rafting permits at the expense of private rafters. (Correspondent 2482)

Comment 403-42. Permits should be available on random lottery to commercial and non-commercial users equally (no private citizen should stand to gain more from a public resource than any other). (Correspondent 2472)

Forest Service Response: Management practices under FEIS preferred Alternative G are fair and equitable among users and do not favor one group over another. Outfitting on public lands is a privilege, not a right, and management would attempt to manage levels of commercial use to address these two concerns. Outfitters with assigned priority use and an established history of use would be given preference in allocating commercial launches.

However, commercial services play a valuable role in providing access to the river corridor for people who would not otherwise be able to see this area. There is a great benefit to natural resources everywhere as people learn about and experience special places, gain an appreciation of their importance, and gain an understanding of how minimum-impact-use protects these environments and affects their everyday lives. Commercial outfitter services continue to evolve as an important and effective method of delivering this information to visitors.

Favor Commercial Use Over Private Use

Several correspondents expressed a desire to favor commercial use over private use.

Comment 403-43. I think it would be best to limit the power boats to a specified number of outfitters and not allow any other power boats on the river. You could limit the number to the existing number of outfitters and tour boats using the river today. (Correspondent 1156)

Comment 403-44. I would prefer an alternative that did not decrease the number of float trips by non-motorized commercial boats, but did decrease the number of motorized boats, at least between Hells Canyon and Dug Bar. (Correspondent 1046)

Comment 403-45. Since the most people receiving the most good from commercial jetboat, I believe they should be given first preference. (Correspondent 2454)

Comment 403-46. Motorized and commercial use should be maximized because it gives the maximum number of people the unique experience. (Correspondent 2468)

Forest Service Response: Fairness and equity were two of the main issues addressed by the users during the public scoping meetings. To eliminate a private use in favor of a commercial use would be in direct opposition to this public demand.

Implement a Freedom of Choice Allocation System

Several correspondents supported a "freedom of choice" method of allocating use to all users. This system allows a person to obtain a launch and then decide whether to do the trip with their own equipment or hire an outfitter. Another variation on this theme was a "freedom of boat choice" system where, once a person obtained a launch on the river, they could independently choose what type of equipment, motorized or non-motorized, to use.

Comment 403-47. Some of the parts of Alternative F are acceptable such as the Freedom of Choice method of allocating limited use by treating all float users equally, and allocating by people rather than launches. (Correspondent 2677)

Comment 403-48. The Willamette Kayak and Canoe Club endorses the view that all citizens should have equal chance of getting on the river. On the Snake this means that powerboaters, floatboaters, commercial boaters and non-commercial boaters should all have equal chance of getting on the river. Alternative F appears to provide for this equality and we therefore support Alternative F on this point. Our club supports the "Freedom of Choice" permit allocation system advocated by the National Organization for River Sports (NORS).

Comment 403-49. Permits should be available on random lottery to commercial and non-commercial users equally (no private citizen should stand to gain more from a public resource than any other). (Correspondent 2472)

Forest Service Response: This concept was addressed in Alternative E as the method to administer float use at Pittsburg Landing and Dug Bar once monitoring indicated that use levels would need to be allocated. It was also the allocation system used for floaters in Alternative F.

A "freedom of choice" system would have a major economic impact on outfitted businesses where there has been a long and established history of outfitted services. The commercial "survivors" resulting from implementation of such a system would most likely be larger, diversified outfitters who could financially withstand the time it would take to adjust to a unknown market and companies that operate on more than one river which would provide them with some additional stability to get through the adjustment. The end result would probably be fewer outfitters and less choices for consumers looking for an outfitted trip.

The biggest loser could be the inexperienced commercial passenger who would have to learn how to get a launch even before looking for a commercial outfitter service. These people generally do not have the skills or equipment to take a river trip and are dependent upon commercial outfitters to provide this expertise.

This type of system would work best on rivers or locations where no commercial services had been previously established such as Pittsburg Landing and Dug Bar. While Alternative E proposes this method for all float use at Pittsburg and Dug Bar, there was a great deal of response to the DEIS concerning the need to limit commercial uses. As a result, Alternative G allocates all float launches at these locations to private use only, eliminating the need for this type of system at these locations.

In Alternative G the present float allocation system would continue in the wild section and the allocation system for powerboaters would be designed based in part on the float system to address the issue of fairness and equity.

Comment 403-50. There should be no restrictions on type of boat/float/raft use on the river. All users should have equal access. (Correspondent 1744)

Forest Service Response: The "freedom of boat choice" system is addressed in Chapter I as an alternative that was considered but eliminated from detailed analysis.

Day Use Versus Overnight Use

Comment 403-51. Your proposal severely limits our use of the Ranch [Sheep Creek Ranch] for lunches and the many overnight guests that stay there. (Correspondent 446)

Comment 403-52. The DEIS implements restrictions on commercial powerboat use by giving some outfitters high, moderate, or low use, overnight camping or none, day use permits, number of boats, allocation of launches. I don't see consideration given to all uses, only to tour boats. You seem to be real hung up on numbers. My business was rated at moderate use with no overnight camping. How was this determined? Almost all of my trips are overnights in the canyon. My area of operation is from the north boundary to Pittsburg. This has been a sore subject with me from the onset. My business suffers because I can't take people to Rush Creek Rapids, end of navigation nor Kirkwood. I have always had to refer those people that wanted to see these places to another outfitter thus loss of revenue for me and my business. You only wish to allow me one boat. I have many times had two boats per day in the NRA and sometimes three a day. Just because we only have 4 to 6 people per boat fishing as opposed to the big tour boat with their 35+ people per boat that takes precedence over my fishermen. Then you only want to give me one launch for every three days when most of my trips are multi-day trips. Again the big tour boats are given precedence by numbers. The proposals that you have made do not take into consideration many of the different uses by commercial powerboaters only the touring aspect. (Correspondent 1171)

Forest Service Response: Appendix G does not penalize overnight use in favor of day use. During the 1980's and 1990's, commercial power day use has always been a far greater use of the river than overnight commercial use. Limits have been established based upon this historic pattern of use rather than potential use since, collectively, this method impacts existing businesses the least. This still allows all existing activities to occur including day sightseeing trips, day fishing trips, overnight trips, jetbacks and jetouts, etc.

Nor were use limitations developed based upon the number of boats that each business owns. The number of boats each business consistently ran on each trip was considered when determining numbers of boats for businesses that own more than one boat. Under Alternative G in the FEIS, by obtaining pool dates or trading dates with other outfitters, there is the potential for an outfitter to run one extra boat per day providing they already have a one boat allocation for any given day. This would allow a maximum of two boats per day under each special use permit but this additional boat could not increase the total daily allocation for all commercial powerboats in the different river sections.

Overnight use allocations were determined based upon an outfitter's established record of overnight camping at campsites on Forest Service lands only within the river corridor in the 1980's and 1990's including lands where permits were issued for resort operations (Copper Creek) or for use of Forest Service owned buildings (Sheep Creek). Also, all outfitters based out of Pittsburg Landing were

allowed overnight camping allocations in order to maintain viable operating capabilities in support of economic considerations for local communities in Idaho County.

Several outfitters who regularly provide overnight camping on private lands on the Snake or Salmon Rivers or on private lands outside of the HCNRA downstream from the boundary were not allocated this use. Overnight camping on private lands was not addressed since this activity is a decision of the landowner. However, in some situations, if an outfitter owns private land within the river corridor and does not have an allocation to use Forest Service lands or waters for overnight use, this would require that any overnight use must occur on the outfitter's land.

An allocation for commercial overnight use for a private land owner is different than access and egress rights to private land. These rights allow direct access and egress to the private land only, with no rights for stops along the way for recreational activities such as fishing, hiking, hunting, etc. during the primary season due to the limitations on access for all recreational users.

Reduce Powerboat Use and Increase Float Use in the Scenic River

Correspondents addressing this subject felt that most alternatives gave too much use to powerboaters in the scenic river and not enough access to floaters. Floaters also indicated that in addition to more access, they wanted an improvement in the recreation experience in the scenic river that was more closely associated with a wild river experience.

Comment 403-53. If Alternative E is selected I think the Forest Service should take a hard look at modifying the use in the scenic section by staggering use in a similar fashion as proposed by Hughes in the wild section. The goal would be to allow five and six-day float trips to have a moderate amount of contact with jet boats during their float in the scenic section rather than a large amount of contact. (Correspondent 2328)

Comment 403-54. Our family opposes the Forest Service preferred alternative. This proposed management plan would enable jetboats to dominate the scenic section of the river and less rafts would be allowed on this peaceful river. (Correspondent 2700)

Comment 403-55. There are drawbacks to Alternative F in our view. One of these drawbacks is the emphasis this alternative puts on motorized recreation in the scenic section. We do not feel that floatboat launches from Pittsburg and Dug Bar should be prohibited during the regulated season. Nor do we think that powerboats use should be allowed to increase in the Scenic section to the extent allowed under Alternative F. (Correspondent 2841)

Comment 403-56. Given the Preferred Alternative limitations on float launches on the scenic section to one per day, the allowance of jet skis, and 100 jet boat launches per week, the access levels between motorized and non-motorized will be anything but equitable, particularly if access is defined by the number of launches. (Correspondent 1196)

Comment 403-57. If the Forest Service prefers a Solomon-like solution to river management -- slicing the river in half to appease the two factions -- we would suggest the river is already sliced in half at Pittsburg Landing. The Forest Service notes that few floaters use the river downstream from Pittsburg because of heavy motorized traffic, and it has decided to manage that section of the river primarily for motorized boats. Thus even under Alternative F, the most floater-friendly option presented by the Forest Service, jetboats continue to monopolize over half the river.

Under the Forest Service's preferred alternative, motorized boaters would be required to share only the short stretch from Hells Canyon Dam to Kirkwood. They would continue to dominate the remain-

der of the river. This is unacceptable. It also strikes us as a strange and dangerous precedent to make a wild river the exclusive domain of motorized boats -- even on alternate weeks. We encourage the Forest Service to give equal consideration to float boaters on the entire river and not ask us to "share" the allegedly wild section of the Snake River while abandoning the rest of the river to motorized use. (Correspondent 2739)

Comment 403-58. In your plan, jet boats dominate the scenic section of the river. My personal preference is that jet boats be eliminated completely (except for maybe the mail) from the scenic section of the river. But if they must be allowed, my vote is more stiff limitations. (Correspondent 2565)

Comment 403-59. I cannot understand how the Forest Service could even consider only one float trip (launch) in the scenic river section per day! (Correspondent 2640)

Comment 403-60. I see no need to limit the raft usage from Pittsburg Landing to the Northern Boundary. (Correspondent 436)

Comment 403-61. Private Floatcraft Use. The number of launches in this proposal are acceptable; however, on the scenic section of the river corridor, no launches would be allowed. This does not make much sense, because the major pressure on use for float craft diminishes at Pittsburg. These launches should be allowed. (Correspondent 2342)

Comment 403-62. Private float craft launches should not be limited to only one per day. This may be somewhat above the current average, but it is anticipated that some floaters displaced from the Wild Section due to overall decreased permit availability there will choose to float the Scenic Section rather than entirely forego the HCNRA experience. It seems extremely arbitrary and certainly not appropriate or equitable to so severely restrict floaters when private powerboaters would be allowed 10 launches per week day and 20 per day on Friday, Sat and Sun. To maintain your desired intent to establish appropriate and equitable levels of boating opportunities, this limit should be raised to 6 launches per day for floaters. (Correspondent 2236)

Comment 403-63. I support Alternative D with a change allowing floatcraft to launch in the scenic section year around. With this change Alternative D would move all 3 segments of the wild and scenic river toward the desired future conditions of providing appropriate and equitable use. (Correspondent 2829)

Comment 403-64. The number of launches for float boaters below Pittsburg Landing is too low a number and the number allowed for powerboaters is 10 times the amount. This is another of the inconsistencies between the two user groups that should not be allowed. Although the number of float boat launches from Pittsburg Landing is currently low, that number may and should be allowed to increase slightly in the future. (Correspondent 2364)

Forest Service Response: The use levels for the scenic river would provide a different experience than the wild river. They focus more on regional interests and associated opportunities for access on weekends while the wild river focuses more on addressing national interests. The use levels in both sections of river provide for a variety of opportunities and experiences dependent upon scheduling of trips and competing for launches which is left up to the user to choose from rather than trying to manage for a continual experience in two different river classifications.

Float launches from Pittsburg Landing and Dug Bar are minimal. In 20 years there has never been a great deal of interest from the public in launching from these locations. The primary reasons have been the difficulty of access and the desire by the majority of floaters to travel through the wild river portion of the canyon above Pittsburg. Few floaters launched from this location even when numbers of powerboats were substantially lower.

Use records reflect a continual downward trend in float trips originating at the dam continuing downstream from Pittsburg Landing; currently, only 25%. A major contributor to this trend has been the national trend in shorter, less expensive vacations. In Alternative G, one of the trade-offs of limited launches from these portals is the opportunity for a non-motorized trip from Wild Sheep Rapid to Kirkwood and lower numbers of powerboat launches in the wild river. In addition, unlimited Lower Salmon float use, which has grown 15 fold in the last 20 years, would continue to enter the Snake River from the mouth of the Salmon.

Under Alternative G, float use would still be unlimited at Pittsburg Landing and Dug Bar on weekdays until monitoring indicated the need to implement caps in daily use. In addition, only private use would be able to utilize launches for these locations.

Adjust Alternative E to Accommodate Motorless Window and Equal Access

A number of correspondents had suggestions for methods to improve Alternative E in the DEIS so it would be more effective in providing an equal amount of time for both floaters and powerboaters. Other comments focused on problems with Alternative E associated with the mobility of powerboats compared to the slower travel capability of float craft. Some examples of these comments include the following:

Comment 403-65. 1st Choice, we support preferred Alt E (alternating weeks - motors only/no motors) if the following adjustments are made. Adjust the alternating weeks so that all 7 launch days each motorless week can be used for a 3 day (2 nights) trips. Make commercial float outfitter allocation more closely parallel to historic use so that large, medium and small sized float outfitters future use allocation represents use established or not established in the past. DEIS was fair to large outfitters but was unfair to medium sized outfitters. We support Hughes proposed allocation schedule for the motorless week. Do not re-issue the 16th float permit. Allow float outfitter businesses to have up to 3 sets of allocated launch dates. Make your limit, a minimum number of 7 outfitters. Increase party size to 25 people but retain the 8 craft limit (greatly increases float outfitter economies with little additional impact on resource). We support a party size of 25 if there are 7 float parties per day launching under an Alternative E style plan. If an Alternative B style plan is adopted with only 5 extended float trips launching per day, we support a party size of 30 people. Reduce number of float parties (hence congestion) to 6 daily (when possible) by not re-allocating the first cancelled launch date, either private or commercial. (Correspondent 2331)

Comment 403-66. Adjust the beginning and ending of both the "Motorless" and "Motors Only" weeks to allow maximum equal use. One day one of the "motorless" week powerboats should be allowed to operate upriver from Kirkwood Bar to Rush Cr. rapids since float groups will not travel farther than Rush Cr. on the first day of the "motorless" week. Conversely, on day one of the "motors only" week, powerboats should be allowed down river only from Hells Canyon Cr. to above Granite Cr. rapids. This will give floaters who launched on Day #7 of the "motorless" week a motorless window to get past Kirkwood Bar from their first night's camp. I feel strongly that this sliding window of opportunity is the only way to provide a fair opportunity for a full 21 commercial and 28 private launches during the "motorless" week. The option mentioned by the planning team of forced jetbacks or jetouts for those floaters who launched on the last day of the "motorless" week is simply unfair, undesirable and inconsistent with the spirit of this alternative. (Correspondent 2329)

Comment 403-67. Alternative E ignores the fact that floaters would ultimately have far fewer launch days. A major feature of Alternative E is that floaters and power boaters would have access to the river on alternating weeks. While this may be acceptable to powerboaters who could launch and use the river on each day of "their week," the same would not be true for floaters. Floaters could only launch on the first three or four days of the "float week" because it takes them three or four days to

travel down river. Therefore, they could not launch on the last three days of the "floaters" week because they would still be on the river when the "powerboat week" began. The Task Force discussed this approach to management and did not find it to be politically viable. (Correspondent 2224)

Comment 403-68. Alternate week launches for jets and rafts at first seems like an intriguing idea, but not the way presently proposed. The Forest Service preferred alternative appears to just cram all the raft launches into a smaller space, which will ruin the trip for everyone. (Correspondent 2411)

Comment 403-69. I feel a two (2) week float period followed by a 2 week power boat period might be fairer for floaters who take longer to get down river. I would have no problem with a commercial powerboat operation during the floater period for haul backs ice and safety. The USFS [Forest Service] could control a commercial operation. (Correspondent 2305)

Comment 403-70. Limiting specific recreation activities should be based on eliminating environmental damage, or disruption of other recreationists caused by a specific use. The DEIS emphasis on maintaining jet boat levels is curious given the Preferred Alternative reduction in both commercial and private float opportunities. There will be few applications for the last 3 days of the non-motorized week, due to the fact that float parties will have to be downstream from Kirkwood by nightfall on Wednesday. (Correspondent 1196)

Comment 403-71. One suggestion is to extend the week to noon on Thursday, so that floaters who launch on Wednesday have enough time to get to Kirkwood. This Wednesday launch is a problem for floaters and not one for jet boats. (Correspondent 2237)

Comment 403-72. Page II-33. Allowing one additional private float launch will not offset the loss of opportunities that will result from Alternative E. The last day of the float week is basically unusable. The next to last day is of limited use, giving us a real float week of 5 days. This is neither desirable or necessary. The loss of launch opportunities is in excess of 50%. (Correspondent 1198)

Comment 403-73. Powerboat only on Thursdays below Waterspout Rapids until 2 pm and floaters allowed on river above Kirkwood on motorized Thursdays. (Correspondent 2321)

Comment 403-74. Using alternating weeks powerboats would get their full 7 days of usage in all parts of the regulated portion of the river. Where as the floatcraft would lose essentially 2 launch days as it is impractical to try and reach Kirkwood Ranch in less than 2 full days of floating; in essence, giving powerboaters greater access to the resource than floaters. (Correspondent 2402)

Comment 403-75. Wild (Dam to Kirkwood) - Regulated Season. The alternating weeks should be smoothed out to allow powerboats to operate on "float only Thur." below Waterspout Rapids until 2:00 PM local time. Allow float craft to operate on "powerboat only Thur." as long as they camped at or below Kirkwood Thur. night. These modifications are designed to allow powerboats use of the lower restricted Wild Section before floaters arrive and to allow floater that launch late in the exclusive week sufficient time to reach Kirkwood. Campsite reservations would not be affected. (Correspondent 2236)

Comment 403-76. I support your "motors only" week. However, I feel that 24 private powerboats along with the commercial powerboats that are allowed in the Wild Section at one time is too much use for such a small stretch of river. 24 private boats + commercial boats will cause congestion in the Wild Section. Also, 20 private powerboats/day on weekends is too many boats on the Scenic Section. (Correspondent 2324)

Comment 403-77. Alternative E reduced the launch opportunities of the private and commercial floaters on the wild section of the river by more than 47% in the summer season. Additionally, each

party size would be reduced from 30 to 20 persons. Launch opportunities would be further reduced since most floaters could not reach the museum in one or two days. (Correspondent 331)

Comment 403-78. Floatboaters launching on "the last day of the permit week" will have a hard time clearing the wild section in one day. Efforts to "push" and achieve this may even be hazardous, especially for boaters unfamiliar with big water. In effect, this cuts nonpower access even further. (Correspondent 2393)

Comment 403-79. I propose the following changes. (Note: I am discussing floating primarily from the Commercial Perspective. However, I believe these same adjustments can work for the Private Float Public as well.) Adjust the Beginning and Ending of the Motorless and Motors Only Weeks. I suggest that: Day #1 of the motorless week (Thur.) powerboats should be allowed to operate from Kirkwood up river to Johnson Bar since float groups will not travel farther than Johnson Bar on the first day of their motorless week. Day #1 of the motors only week (Thur.) powerboats should be allowed to operate only from Hells Canyon Cr. to above Wild Sheep Cr. Rapids (or some other point between Wild Sheep and Johnson Bar). This will give floaters who launched on Day #7 of the motorless week a motorless window to make their way to Kirkwood Bar from their 1st night's camp.

Such trading of time is equitable, and it makes the final 3 launch dates for commercial floaters (and the final 4 private float launches) on Day #7 (Wed) of the motorless week into viable float launches for 3 day Trips (3days/2nights) instead of mandatory 1 day trips with jetback or jetout as in the DEIS. This change increases the viable number of commercial float launches during the motorless week from 18 launches/motorless week to 21 launches/motorless week - a significant increase. This adjustment gives powerboats one more motor day than they have now. Powerboats would be somewhat limited on Day #1 of the motors only week (operating only from HC Cr. downstream to Wild Sheep or some other point), but powerboaters would pick up use on Day #1 of the motorless week (operating from Kirkwood upstream to Johnson Bar). This balances with how floaters must expect to see more powerboats as they progress from Kirkwood to Pitts. Landing on Day #1 of the motors only week as float trips exit the Wild River Corridor.

The increase from 18 to 21 viable commercial launches per motorless week is essential to making a fair allocation to the float community. Without such a change, floaters are truly limited to a 6 Day week while powerboats are given a full 7 day week. In order to be a true usable date, a float launch must allow for at least a 3 day/2night float trip opportunity (sufficient time to float from Hells Canyon Cr. to Pittsburg Landing). Further, I predict that the motorless Snake will become a major draw for the private float public that now uses the Middle Fork, Selway, Green, Yampa, etc. (other motorless rivers). These users will want an extended trips, not a 1 day trip with a jetback or jetout. The 1 and 2 Day Snake/Hells Canyon private trip with jetback is a unique phenomenon among Western river trips, and one that I don't think is necessarily desirable. Another 2nd options to consider would be to simply allow the Day #7 of the motorless week float launches to co-exist with the Day #1 of the motors only week powerboaters on the second day of their float trip (as they progress downstream to Kirkwood). However, I think the system proposed above is better for all users. (Correspondent 2325)

Comment 403-80. I support the adjustments of the motorless and motors only weeks as written in the comments from Jerry Hughes. This makes the final 3 launch dates for commercial floaters (and the final four private float launches) on Day #7 of the motorless week into viable float launches for three-day trips instead of mandatory one-day trips with a jetback, or jet out. This change also increases the viable number of commercial float launches during the motorless week. (Correspondent 2328)

Comment 403-81. In order to allow a true, full week of nonmotorized launches, and to avoid floaters having to rush out of the wild section, the first two days of motorized use should also be open to

floaters that launched on the last 3 days of the nonmotorized week. Jet boat launches should be reduced during those 2 days, or at least on Thursday, to avoid campsite scarcity and provide for fewer encounters between motorized and nonmotorized users. A limit of 2-4 jet boat launches on Thursday and Friday with the wild section as a destination would be necessary given that as many as 21 float parties could be on the river. (Correspondent 1196)

Comment 403-82. Your proposal will further restrict float trip launches in order to be off the river by the end of their week. In effect, you will restrict your four private launches a day at the dam (theoretically 4 launches X 7 days or 28 launches per week) to the first three days, or 12 launches per week. Even the Selway River isn't that restricted. And I haven't begun to comment on how the boat traffic coming off the Salmon will screw up your proposed limits on the scenic portion of the river. (Correspondent 1085)

Comment 403-83. Only three days of the non-motorized week would actually be free of motorized use. (Correspondent 2789)

Comment 403-84. The maximum of 4 private floatcraft launches per day should be raised to 5. The present system allows 3 launches of 30 people for a total of 90 people per day. As proposed, Alternative E would allow 4 launches of 20 people for a total of 80 people per day which equals a net loss. Increasing the number of private launches to 5 per day would eliminate this loss which is neither appropriate or equitable. If you must, reduce the maximum party sized to 18 to remain at 90 people per day with 5 launches. (Correspondent 2236)

Comment 403-85. Floaters should have use of the river without jet boat traffic. There should be an equitable sharing of river time. The Preferred Alternative which purports to dedicate alternate weeks of each type of craft does not treat float boaters fairly because only three days of the non-motorized week would be free of jet boats. (Correspondent 2509)

Comment 403-86. The Forest Service preferred alternative is unacceptable because it fails to limit the number of jetboats throughout the season, favors jetboat use over use by floating rafts by offering significantly more time and use for jetboats. (Correspondent 2643)

Comment 403-87. Alternative E however simply will not work. Although it sounds good at first, it is completely inequitable for float boats. Where powerboats can be off the river in a few hours, a float boat needs at least two, preferably three days for Hells Canyon dam to Pittsburg. That leaves only a four day put-in window on the "float" week. (Correspondent 2796)

Comment 403-88. If you choose to implement alternate week uses by rafters and jetboats, please consider allowing 7 days of raft launching that allows 3 day trips - this would recognize a 2 day overlap of rafts and jetboats as the jetboats phase in to their 7-day period but allows rafters 7 full days of launch. (Correspondent 2385)

Forest Service Response: Alternative E was presented in the DEIS to provoke thought from users who would suggest preferences for different strategies to interface the two user groups during the weekly time periods when uses would change on the wild river. For example, one option was to mesh the week on, week off with a week of mixed use sandwiched in to allow the different groups adequate time to get on and off the river. However, readers of the DEIS were given the opportunity to provide suggestions for managing this interface without being "led" in one direction or the other.

The concept of a non-motorized period as presented in Alternative G has been developed after analyzing information provided by respondents concerning such problems as interfacing of motorized and non-motorized uses, number of launches for power and float, and overall fairness of an on-off allocation system balanced with total loss of launch opportunities for each user group.

Justification for Reductions in Use

Some correspondents felt that reductions in use in the DEIS preferred Alternative E were not fair, equitable, or justified. They did not understand the rationale for establishing the levels of use in that alternative. The following are examples of those comments:

Comment 403-89. Alternative E - I find it very disturbing that for the wild section of the river (which should be managed for nonmotorized recreation according to most written guidelines, Forest Service Manual, logical interpretation of "primitive" "wilderness values"). Alternative E would reduce the number of floatboat launches by 1/3, reduce the number of boats per launch by 2/3rds, and reduce the max number/party by 1/3 as well as reducing the stay limit for floatboaters by 10% and increasing it by 30% for powerboats. Allowing powerboats to stay 2 times as long as floaters!? While on the other hand you provide for a 25% increase over present use levels in powerboat numbers for the regulated season on the wild sections. And also provide for a significant increase in powerboat use on the scenic section while severely restricting float use. (Correspondent 2345)

Comment 403-90. Alternative E effectively cuts float launches in the wild river by 57% and powerboat access by 50%. This major slash in historic use of both classes of boaters is not backed by any demonstrated need. (Correspondent 876)

Comment 403-91. Alternative E effectively cuts float launches in the wild river by 57%. Under Alternative E, HCA [Hells Canyon Adventures] Raft would be cut by at least 50%. There is no demonstrated need to slash our use by this much. Our use has not been able to grow past the already set limits. (Correspondent 426)

Comment 403-92. [Alternative] E reduces launches by around 50% for floaters, and the same for jetboats. It will further decrease the number launches on the days prior to "usage change" for rafters since it usually takes us 2-3 days to make the trip. (Correspondent 923)

Comment 403-93. I do not like Alternative E. It is unnecessarily restrictive and would be difficult to manage. Alternate weeks of power/non-power use would be confusing. As you indicated in DEIS "Environmental Consequences", all use would be reduced, float 30%, private power 50%, and commercial power 25%. The actual reduction would be even greater. Float launches would have to be concentrated in the first three or four days of the float week to allow enough time to get off the river by the end of the float week. This would result in a further reduction of around 50% of the proposed launches. The use level is fine just the way it is and does not need to be cut. (Correspondent 1167)

Comment 403-94. The public for many years have used jet boat services in far larger numbers than rafting services to take them into Hells Canyon. To shut way more than half of the river users down every other week we don't feel is what the majority of the general public has shown in past use. To shut down all of the rafters is not fair either. We feel that the real conflict here is between a minority known as environmentalist extremists, who many are involved with Hells Canyon Preservation Council. (Correspondent 1194)

Comment 403-95. Commercial Floatcraft Use. Out of the 14 outfitters who have permits to operate a commercial float operation, 50% of the outfitters would be eliminated from having a launch for as many as two weeks. Currently, an outfitter has the ability to launch once every eight days. This reduces an opportunity to launch by approximately 43%. (Correspondent 2342)

Comment 403-96. Alternative E severely cuts the amount of float launches by 57% and the powerboat usage by 50%. There has been no accurate documentation throughout the historical use of both types of boaters to support that these cuts are needed. A lot of the concerns and decisions addressed

in the Draft Environmental Impact Statement (DEIS) have been biased by opinions and not through factual information. (Correspondent 203)

Comment 403-97. The Forest Service seems to have missed the point while trying to please two opposing special interest groups (Northwest Power Boaters and Hells's Canyon Preservation Council), meanwhile ignoring the majority of the river users. The main point is that floaters are already regulated and have been for years, while power boaters haven't been and their numbers have increased. Cutting floaters's by 47% and powerboats by 17% seems "grossly" unfair to the already regulated floaters. (Correspondent 2794)

Comment 403-98. This section of river has long been held up as an example of poor management with its unrestricted jet boat use and tight restrictions on human powered craft. The new plan continues and expands on this travesty. Further restrictions on human powered craft (50% fewer launches during high season) while imposing only token restrictions on powered craft (the figure I heard was 10 to 20 jet boats launches per raft party launch with jet boats allowed twice as many nights on the river) is an affront to those of us seeking recreation away from the noise and pollution of contemporary civilization. (Correspondent 2754)

Comment 403-99. What possible rationale can there be for limiting float numbers so drastically and allow such high usage by jet boats? This proportion is inverse to the relative impacts on the river and serves to maximize the conflict between user groups. Correspondent 2594)

Comment 403-100. I don't think Alternative E is the answer. It punishes rafters, who have been regulated for years for the excesses of jet boats. Alternative E would take away about 75% of the launch dates from the dam since anything less than a three-day trip is not practical from the dam. (Correspondent 2803)

Forest Service Response: Reductions in use in Alternative E were based on several factors. These included managing the amount of use appropriate for a backcountry experience for each user group during their exclusive use period; managing to protect and enhance ORV's; and moving a level of use that normally would occur over a two week period of time into one week with associated numbers of boats, people per trip, and trip length. The result was an overall reduction in use that varied between groups due to their established patterns of use while on a river trip. A thorough discussion of the analysis that resulted in these proposed reductions is included in Chapter IV.

Fairness and Equity

Comment 403-101. Powerboats in Hells Canyon already do have a significant, and unfair built in advantage when allocation is determined by "historic use." Their growth has increased unrestricted, for the past 20 years, while during that same time span, floatboaters have been strictly limited, obviously skewing "historic use" figures in favor of the powerboaters. (Correspondent 2324)

Comment 403-102. In the lower Snake, powerboats should be managed just as rafts are managed. (Correspondent 2653)

Comment 403-103. I believe the proposed balance between number of motorized and non-motorized launches as unfair. (Correspondent 2695)

Comment 403-104. I do not support any alternative that reduces the number of float launches on the wild and scenic sections. There is already a tremendous imbalance between float craft and jet boats. (Correspondent 2509)

Comment 403-105. I feel very strongly that if there are to be regulations affecting one group of users the same regulations should apply to all groups or individuals using the river. (Correspondent 2484)

Comment 403-106. Powerboat interests have made much of "elitists who don't want to share the river", I suggest any solution which does not address fair access will institutionalize unfairness and lead to more conflict. (Correspondent 2393)

Comment 403-107. The limitations on powerboats versus the number of float launches is unfair and inequitable. (Correspondent 126)

Comment 403-108. What concerns me is the management of Hells Canyon seems inequitable with its limits on all float boaters and commercial jet boaters and no restrictions on private jet boats. (Correspondent 2239)

Comment 403-109. I urge you to reconsider adoption of Alternative B as it provides the public fair and equal access to Hells Canyon. (Correspondent 828)

Comment 403-110. We favor Alternative C as the fairest method to manage this unique area, and we feel that it is the most practical and politically acceptable plan. (Correspondent 2805)

Forest Service Response: Fairness and equity were two of the major issues revealed during public scoping meetings at the beginning of this planning process. They are also the factors addressed by floaters for a number of years because of unlimited powerboat access. The HCNRA Act specifically addresses motorized use as a valid use of the river. Many floaters have used this fact to their advantage over the years by running outboards engines on floatcraft and by supporting jetback services for their own convenience. There are many more wild and scenic rivers in the Northwest that "favor" float use over powerboat use (reference Appendix H).

The Snake River should not favor one type of river use at the expense of another. Alternative G has been developed to recognize the needs of all users, and to provide the opportunity for all recreationists to fulfill those often conflicting needs.

Limitation on Hours of Operation Code 404

There was interest in establishing hours of operation for jetboats in order to provide for periods of quiet in early morning and evening hours at campsites. The following are examples of these comments:

Comment 404-1. I support Alternative B with the following changes. Limit jet backs to 2 per day with none before 9 am and none after 5 pm. (Correspondent 1162)

Comment 404-2. No motorized craft below Granite Creek on the water and running until 9 am and none after 5 pm. Shut them off for the night and have some quiet. (Correspondent 1162)

Comment 404-3. Jetboat hours of operation 8:00 - 5:00 during regulated season. (Correspondent 2382)

Comment 404-4. Rules of powerboat operation - limited hours of operation (8:00 a.m. to 5:00 p.m.) daily. (Correspondent 2383)

Comment 404-5. All powered craft should be required to be off the river by 8 PM and not allowed to be back on river until 6 AM. (Correspondent 2464)

Comment 404-6. IRU [Idaho Rivers United] recommends establishment of time limits on powerboat operation in the wild section. For example, powerboat operation could be prohibited between one hour after sunset and one hour after sunrise, except in emergencies. (Correspondent 2501)

Comment 404-7. I recommend jet boats restricted to hours of operation between 9am and 6pm. (Correspondent 2791)

Comment 404-8. I believe that power boats and float users might best be limited to using at certain times of the day. (Correspondent 2817)

Comment 404-9. Do cut back on the use of jetboats especially early in the a.m. (Correspondent 2891)

Comment 404-10. I suggest the following: - establish hours of jetboat operation (8 a.m. to 5 p.m.). Currently, many peaceful mornings and evenings in camp are disturbed by jetboats cruising by campsites. (Correspondent 2324)

Forest Service Response: Management of motorized use in early morning and late evening hours would be appropriate in order to provide all river users with periods of isolation from the sights and sounds of others while they are in camp. This type of management would also help achieve the ROS standard for remoteness in the river corridor.

Limits on numbers of powerboats would partially resolve the issue of time of operation because there would be fewer opportunities for boats to be in operation.

Commercial powerboat activity during the primary season would be managed as a condition of the special use permit. During the primary season, commercial powerboats would not be allowed to start a new trip within the river corridor prior to 8AM and one day operations (tours, jetbacks, etc.) would be required to terminate operations within the river corridor no later than 6PM. Based on historic use patterns, this should have a negligible effect on commercial powerboat day-use. During the secondary season, all powerboaters would be allowed to access the river corridor at their convenience after completion of appropriate permit requirements.

Private powerboat access to the river corridor would be managed at all portals by establishing staffed hours of operation at the portals. During the primary season, private powerboat and floatboat permits would be issued seven days per week between the hours of 8AM and 6PM. Funding levels may reduce this time period to a minimum of eight hours per day (8AM to 4:30PM).

Outboard motors used for kickers on rafts would not be allowed in the wild river.

Commercial and private powerboaters in the wild and scenic sections of the river, and floaters with kickers in the scenic river who already have permits would be encouraged to not operate their engines before 8AM or after 6PM. However, generally accepted guidelines for time periods in which it is prudent to safely operate motorized boats on the river would allow operation from one-half hour before sunrise to one-half hour after sunset. User education concerning this issue is addressed in Appendix L.

The frequency of occurrence and any associated effects of powerboats that continued to operate on the river before 8AM and after 6PM would be monitored through user surveys. If monitoring indicated that operation of boats outside of this time period was affecting the ORV's, the Forest Supervisor has the authority to prohibit operation of motorboats during certain hours through issuance of a special order under 36CFR 261.58 (n).

Encounters and Congestion Code 405

Many comments dealt with issues concerning encounters between different user groups. Encounters generally addressed the need to limit jetboat traffic because of the effects on non-motorized users' experiences. Comments about encounters often involved a perception of incompatibility between motorized users and non-motorized users based on such items as jetboat wakes, noise, gasoline fumes, fuel spills, and multiple encounters with individual powerboats. Respondents felt that low impact rules needed to be developed for all users with specific rules needed for powerboaters in order to mitigate the physical effects of their use on the experience of other users and to protect river resources.

Crowding, Congestion and Encounters

Many correspondents commented on crowded conditions in Hells Canyon while others felt that no problem existed. Examples of their comments are included below:

Comment 405-1. River conditions during these trips, most notably the amount of runoff sediment in the water, were not conducive to jetboat use. Nonetheless, jetboats dominated the river. On Saturday, June 5, we recorded 37 encounters with jetboats (those that passed our boats or our camp) and 32 on Sunday the 6th. (Correspondent 2455)

Comment 405-2. Alternative E, Chapter II-13 suggest that alternating weeks is an "equitable blend" for river users yet this approach eliminates 50% of the time available for use of the river by both powerboaters and floatboaters. Also it cuts back the numbers of floatboaters that use the river today. This appears to be a real one sided approach. As identified above, it is not the floatboaters that are creating the overcrowding of the river, but the powerboaters, yet the floatboater are the ones penalized to the greater inequity. (Correspondent 2804)

Comment 405-3. Restricted use should provide for the opportunity for river experiences without powercraft encounters. The closest option we see is Alternative D and this is what we would recommend. (Correspondent 2831)

Forest Service Response: Alternative G provides for a level of powerboat use in the wild river similar to the late 1980's and eliminates peak use days to manage number of encounters and crowding. It also provides for non-motorized periods of time in July and August on Mondays, Tuesdays, and Wednesdays.

Comment 405-4. First, the new visitor center and road improvements at the Hells Canyon Creek launch site have drastically increased recreation use in this narrow section of the canyon. Since this site is at the expiration of a dead-end road with limited parking and space, there is little elbow room even for persons launching river trips. Additional visitors to the site generally find cramped, crowded conditions when they arrive. This has created an uncomfortable and potentially dangerous situation. There have been many reports of tour bus passengers walking in groups down the steep road to the launch ramp, oblivious to vehicles on that road. As you know, most of these are heavily laden trucks hauling flat gear, or trailers hauling jet boats. Many visitors mingle at the ramp, intrigued by the boats, contributing to crowding at the launch site. (Correspondent 2456)

Forest Service Response: Chapter III contains a thorough discussion on the ROS standards for this site. A site management plan will be developed for Hells Canyon Creek Recreation Site that will address these types of concerns.

Comment 405-5. The Forest Service alternative does not sufficiently restrict float launches to help reduce overcrowding. (Correspondent 2655)

Comment 405-6. While there are restrictions on the number of floaters allowed to launch each day, there are no such regulations on the power boats. This seems completely absurd to me, particularly in light of the heavy congestion we viewed on the weekend. (Correspondent 2778)

Comment 405-7. On my most recent trip, I felt at times I was on a freeway. I cannot believe this intensive use of the area will result in the Desired Future Condition (DFC). (Correspondent 2790)

Comment 405-8. Finding a camp was fairly difficult, with most taken by jet boats. It was Labor Day weekend and the river was overcrowded. To wait to get a permit and then find unlimited jet boats was disappointing. (Correspondent 2834)

Comment 405-9. The most recent trip was a private float trip over Labor Day 1993. The number of jet boat encounters from the dam to Pittsburg were in excess of 100. Frankly, there was no solitude on this trip. Most of the time on the river I was just trying to stay alive, and while on shore tried to ignore the noisy approach of another jet boat. Clearly, there is a management problem on the Snake River. (Correspondent 2840)

Comment 405-10. The river has never been overcrowded in my extensive use of it. Any restriction on usage is contrary to the expansion of the recreational facilities at Pittsburg Landing. I assume that expansion is intended to bring more people to the area. Without use of the river, where do you intend these users to go? (Correspondent 2339)

Comment 405-11. There seems to be no problem with overuse or crowding. (Correspondent 2347)

Comment 405-12. I did not really find the jetboat traffic all that busy, although this may have been due to the unseasonably wet, cool weather. But I have never thought it was all that high on the river below the confluence with the Salmon except on weekends anyway. (Correspondent 2411)

Comment 405-13. I do not believe that the Snake River is now crowded. A reasonable limit to both powerboaters and rafters is to see +10% over the 1993 use levels! (Correspondent 2460)

Comment 405-14. There are two or three weekends each summer that the River is crowded, however, the few problems that occur each year do not necessarily occur on those weekends, so you cannot justify restrictions for that reason. (Correspondent 2358)

Forest Service Response: Under Alternative G, limits would be set on numbers of jetboats and floatboats in all sections of the river, monitoring of stay lengths would be used to manage total river use, and peak use days caused by unlimited powerboat launches can no longer occur during the primary season. All of these factors would result in the potential for encounters between different user groups to decrease from the current situation. In addition, user education would emphasize the effects floaters and powerboaters can have on other users' experiences and encourage proper river etiquette among users.

Comment 405-15. We firmly believe that given the long visual stretches in Hells Canyon, launching 7 float trips per day (Alternative E), would have as adverse an effect on the social experience in the canyon as the present average jetboat use. Neither plan B or plan E addressed the problem of managing for a quality river experience below Kirkwood Ranch. (Correspondent 2382)

Comment 405-16. I disagree with Alternative E on river use for floaters thinking you will be crowding the river and taking away floater access. (Correspondent 2832)

Forest Service Response: Based upon comments to the DEIS, there is a potential for visual crowding to occur unless specific mitigation measures take place. There were many comments that favored keeping the existing float system. Alternative G maintains the existing situation of a total of five private and commercial launches per day but eliminates the two, one-day commercial float permits that were issued with temporary use only.

Comment 405-17. Page II-59. The use of undefined and subjective terms is not appropriate. As used here, the terms and the table displaying them are meaningless. It is impossible to determine how many encounters per day make the potential low, moderate or high. (Correspondent 2329)

Forest Service Response: Determining the specific rates of encounters in the absence of detailed research specific to the Snake River is subjective. However, on-river encounters continue to be an issue on the Snake River as a result of the shared use. The table is a simple representation to display the fact that alternatives which allow higher use levels would create conditions where there could be an expectation of more congestion at launch ramps and more on-river encounters over the existing situation. The opposite would be true for alternatives with lower use levels. Regardless of the baseline number, the potential increases or decreases from the existing situation based on the change in total use level by alternative.

Congestion at Launch Ramp at Hells Canyon Creek

Some correspondents expressed concern that the proposed increase in the number of float launches in Alternative E would create congestion at the launch area at Hells Canyon Creek. Still others felt that limits on float use should be related to the ability of launch facilities to handle the use on a daily basis.

Comment 405-18. have you given any thought to what it would be like at the put-in below the dam if this proposal were put in place? The wait at the put-in was pretty bad as it is. It would be a horrendous bottleneck with even more launches per day. (Correspondent 2411)

Comment 405-19. As for noiseless craft, I see no need for limits except as it relates to the adequacy of ancillary facilities. (Correspondent 2474)

Comment 405-20. If seven launches at Hells Canyon Dam are allowed with two day stays on the Wild and Scenic section, the launch site area would be overly congested...(Correspondent 1060)

Comment 405-21. The increase from five to seven float launches a day in Alternative E would exacerbate already crowded conditions at the dam put in...

Forest Service Response: Under Alternative G, the present float allocation system of five launches per day would continue. The permit for the sixth additional weekday launch allowing the one day commercial float trips would not be renewed and the number of daily jetboat trips would be limited from Hells Canyon Creek. There would be a limit of eight floatcraft per party. Launches would continue to be assigned on a daily time schedule to separate parties using the launch areas. With the addition of a launch slide and improvements to the launch ramp in the last few years, any congestion on site in regard to launching a trip on the river should be resolved.

Multiple Trips by Jetboats

There were some comments expressing a concern that some powerboats ran multiple trips up and down the river in a single day, creating an excessive number of encounters with other river users, thereby affecting the quality of the experience.

Comment 405-22. All craft on river only allowed two trips per day (up and down = one trip), past any given point. (Correspondent 2382)

Comment 405-23. Jetboat "runs" up and down the river, or up and down rapids should be regulated to only allow transit, such as from camp to trailhead or fishing hole. In addition to being compatible with protection mandates, any jetboat use on the SWSR should be limited as a mode of transportation as opposed to thrill riding or racing. (Correspondent 1196)

Comment 405-24. Establish limits for number of upstream trips per day, two per boat within the wild section. (Correspondent 1118)

Comment 405-25. Rules of powerboat operation - limit of 2 trips (up and down = 1 trip) per day by any one powerboat past any given point. No "playing" at rapids (up and down running numerous times). (Correspondent 2383)

Forest Service Response: This can be a problem. Conversely, kayakers that are improving their skills in "play waves" during their trip can impede the ability of powerboats to travel on the river. The difference in this perception is probably related to noise more than other factors. This type of regulation would be difficult, if not impossible, to enforce.

The limits on number of powerboats and elimination of peak use days in Alternative G would reduce the frequency of occurrence of this activity by powerboaters. The creation of non-motorized periods provides powerboat-free time for floaters. The Forest Service does not want to place any additional restrictions on powerboaters once they gain access to the river any more than we would want to discourage kayakers from spending time at "play waves." Boater education would encourage powerboaters and kayakers to avoid these activities when other users are in the immediate area, either on the river or on adjacent trails.

Specific Regulations and User Education

Comment 405-26. Private Powerboat Use. The numbers of boats allowed by this alternative is just too high. I support multi-use, but these limits for powerboats need to be lowered. The serious challenge is to set rules of safe and courteous operation for all users, especially during powerboat and floatboat encounters. There are several key points: hours of operation limited to 8 a.m. to 5 p.m., decibel limitations (research has been done to help set standards), wake management rules (to avoid property damage to other parked boats), limit number of trips up and down river per day, passing guidelines (rules of the road) between float and motor craft need to be developed and enforced. (Correspondent 2329)

Comment 405-27. If powerboats and floaters are to co-exist on the Snake River, strict rules of the road must be developed. Some key issues are decibel levels, wake management, hours of operation for jetboats, number of daily trips up and down river by each boat, fuel spills, retrieval of sunken boats, mitigation measures for fuel spills during sinkings, campsite reservations, etc. If a shared resource approach is used, care must be taken to assure that rules to protect the environment are imposed and enforced consistently on all users - motor and float. (Correspondent 2325)

Comment 405-28. Powerboats and rafters need the same set of rules, ethics-wise. (Correspondent 498)

Comment 405-29. I think that all users should be under the same constraints and guidelines. Currently float boaters need permits and also get an informational lecture before getting on the river. Motor boaters should also be permitted and informed. (Correspondent 2238)

Comment 405-30. Strict rules of the road for powerboat use on wild and scenic Snake. Limited hours of operation (8:00 am to 5:00 pm daily). Limit of 2 trips (up and down = 1 trip) per day by any one powerboat past any given point. No "playing" at rapids (up and down running numerous times). Wake management (no wake when passing moored craft going downstream and minimum wake when passing moored craft going upstream. (Correspondent 2331)

Forest Service Response: All users need to have specific guidelines for operating within the river corridor and an active education program is necessary to ensure compliance with these guidelines for the protection and enhancement of the river's ORV's. Information on boater education can be found in Appendix L.

More specific guidelines need to be in place to address specific river user issues. The Forest Service would work with the Coast Guard and the states of Idaho and Oregon to develop "rules of the road" specific to situations on the Snake River with its restricted channels, river current, rapids, and mixed uses. This effort would be coordinated with user groups and when completed, would become an emphasis item in boater education efforts including pre-launch talks.

In the past, sunken powerboats and drift boats have been retrieved if done without extreme risk. This activity is usually done by commercial powerboat outfitters or boat manufacturing companies who have the expertise and equipment to remove the wreckage. Alternative G would authorize the Area Ranger to approve additional daily powerboat launches for activities specific to removal of damaged or sunken boats, or search and rescue on a case-by-case basis. Specific guidelines would be developed to address the timely retrieval of sunken boats (when feasible) including coordination with the owner's insurance company, salvage rights, and accident reporting.

Mitigation for fuel spills as a result of boat sinkings would be coordinated with the EPA and state water quality agencies. The potential effect of fuel spills on water quality is described in the discussion of the fisheries ORV in Chapter IV.

Comment 405-31. Measures to preserve this resource must be applied and enforced equally, across the board to every user group, land, air or water based, year around, in a consistent, all-inclusive manner. (Correspondent 2324)

Forest Service Response: Alternative G limits powerboat numbers in the primary season and requires self-registration for trail and aircraft users. With the current permit requirements in place for floaters and self-issued permit for all users in the secondary season, this would provide all users within the river corridor with specific conditions of use as part of their visit in order to protect resources and provide for a reasonable opportunity for visitors to meet their expectations without having their experience impacted by other visitors.

Education would play an important role in enforcement in order for people to learn the purpose of new requirements while implementing these programs. While education would be continual, different levels of enforcement action would need to take place to assure compliance and gain cooperation. This would apply to all user groups and is described in boater education in Appendix L.

Comment 405-32. Why has the Forest Service never implemented and enforced regulations governing jetboat use, such as slowing down for floaters, whether moored or moving on the river? There are "no wake" regulations even on urban lakes. Why are readily visible numbers not required on private jetboats, as is the case with private floaters? Our understanding is that the parameters of your regulatory authority allow you to impose some limits on jetboat numbers before the new river plan is finalized. Why is there no indication that the Forest Service has any interest in doing so, when the existing policy is so clearly inequitable (given that there is a limit on float launches, but not on jetboat launches), and even dangerous. (Correspondent 2455)

Forest Service Response: The only applicable regulation is at 36 CFR 261.58 (q), "Operating any watercraft in excess of a posted speed limit." There are very few Forest Service regulations that deal with water-based recreational activities. Alternative G proposes no-wake rules be established at portals and docks.

Enforcement of speed limits in river currents compared to lakes is extremely difficult, if not impossible because, depending on location, forcing a boat to slow to a no-wake speed could jeopardize both the craft slowing down and the craft being overtaken, creating a collision. The Coast Guard has regulations at 33 CFR Pt. 81, App. A that deal with safe speed of vessels and other "rules of the road." However, only the Coast Guard has authority to enforce these regulations and many of them are not very applicable to whitewater rivers.

There are a number of variables in determining the size of wakes, and in some situations, it is safer for boaters to speed up and reduce the size of their wake rather than slow down which can produce a large wake.

Registration numbers are required on powerboats by federal and state law. They must be located in a specific location, be a certain size and be readily visible. Based upon the legal requirements for these numbers, they are required to be of a size that is larger than the numbers issued on boat tags to floaters. Float tags are not generally readily visible. The main purpose of the colored and numbered tag system for floaters is to provide a system of checks and balances as a method to identify float craft which have launched without a permit.

Alternative G requires private powerboaters to have state registration numbers on their boats prior to entry or a permit would not be issued. Commercial powerboats are required to have their business name on each boat and meet state and federal licensing requirements prior to operating on the river. FEIS preferred Alternative G relies on user education and limits on powerboat use to resolve boat wake issues.

Congestion Caused by Too Many Powerboats

Many commented on the impacts of powerboats on the non-motorized recreation experience. Examples are included below:

Comment 405-33. Floaters have always been limited and managed and their impact on the natural environment is negligible compared to the powerboaters with noise, odor, wakes and frequently a disrespect for the environment and natural resources. (Correspondent 2316)

Comment 405-34. I believe in order to maintain any type of pristine environment, limits on all motorized vehicles, whether it be on land or water should be restricted. This creates visual, olfactory and auditory pollution. (Correspondent 2851)

Comment 405-35. I strenuously object to the saturation of the river with jetboats and jetskis. This use is an offense to the senses of sight, smell, and hearing of all those who would seek to be as non-intrusive as possible. Such use is an insult to the intelligence of anyone who would utilize the notation of "wild and scenic" and Snake River in the same paragraph. You are creating an oxymoron. (Correspondent 2874)

Comment 405-36. I think jetboats are unacceptable in Hells Canyon. They are noisy, they stink, their wake is disruptive to the fragile shore line. They create a negative impact on the canyon. (Correspondent 2811)

Comment 405-37. Powerboats and in particular jetboats obscenely intrude upon the quality of a Snake River expedition. Their noise assaults the ears, their wakes degrade the streams and habitat, their odors insult the nose, and their overall presence is a rude intrusion into one's conscience. (Correspondent 2831)

Comment 405-38. The noise, odor, wake, etc. of those boats interfere so strongly with the raft and trail users in Hells Canyon. (Correspondent 2822)

Comment 405-39. The number of powerboats should be limited because most people who pay for a scenic float trip or apply for a private permit to float this river do not appreciate the high traffic of powerboats; frequently this detracts from the experience. Trail users and rafters are negatively impacted by the noise, wake, odor, etc. of powerboaters. (Correspondent 2806)

Comment 405-40. I am not against powerboats, but I feel they and rafts will have a difficult time being together on the river. The noise and water wake, I believe would not be appreciated by the float people and mark my word, trouble would abound between the two. (Correspondent 2824)

Forest Service Response: Alternative G mitigates the effects of motorized use on the experience of non-motorized users several ways. It provides a non-motorized period during the most desirable part of the float season but on days when demand for powerboat access is lower. It manages the numbers of powerboats at mid to late 1980's levels when visitors indicated that use levels were conducive to a high level of user satisfaction (University of Idaho study). By limiting access for powerboaters, disallowing kickers on floatcraft, and eliminating peaks in use, there is an overall reduction in potential for non-motorized boaters to be affected by noise, odor from powerboats and outboard engines on other floatcraft, and wakes from jetboats.

Alternative G is in compliance with the Clean Air Act as described in Chapter IV.

Powerboat Encounters and Safety

Comment 405-41. Driving jet boats through the canyon is like driving your motor bike through a cathedral. The real value in Hells Canyon is the vastness, the solitude, the untouched quality. Even running into a herd of scrawny cattle destroys that atmosphere but fast. But what does a noisy, speeding jet boat do to a party of rafters, or perhaps a lone kayaker? It could even be a hazard. (Correspondent 2745)

Comment 405-42. It isn't surprising that "motorized use has increased tremendously in the last decade" as there has been no limitations. Private non-motorized use has not increased for two reasons -- (1) the combined four river lottery system for obtaining private float permits is inefficient and impractical, and (2) many floaters, like myself, have been forced off the Snake River because of the hazards of sharing the river with so many power boats. (Correspondent 2888)

Comment 405-43. I am very concerned about problems resulting from mixing high speed, high noise jet boats with non-motorized river use. The mixture is dangerous and intrusive. I urge you to limit jet boat travel to the lower Snake. (Correspondent 2864)

Comment 405-44. The pollution, noise and unsafe traffic from motorized craft is destroying the river and canyon. (Correspondent 2861)

Forest Service Response: Alternative G provides for a level of powerboat use and a maximum number of float craft per party that should reduce the rate of encounters between groups and improve safety when both types of craft are traveling on the water at the same time. User education would address boater safety awareness relative to mixed use on the river and is addressed in Appendix L.

Competitive Sporting Events

Comment 405-45. I support Alternative E in BANNING all competitive sporting events in the W&S Corridor. Activities such as jetboat races, etc. are inappropriate on a W&S River. (Correspondent 2324)

Comment 405-46. I support banning all competitive sporting events in the Wild and Scenic Corridor. (Correspondent 2329)

Comment 405-47. No competitive sporting events allowed (jet boat races, kayak races, fishing tournaments, etc.) on wild and scenic Snake. (Correspondent 2331)

Comment 405-48. No competitive sporting events allowed (jetboat races, kayak races, etc.) on the Wild and Scenic River. (Correspondent 2383)

Forest Service Response: Alternative G does not allow any type of competitive sporting event to take place in the canyon. These types of activities can add to safety concerns, noise, encounters, on-river congestion, are not conducive to protection and enhancement of ORV's, and do not enhance the backcountry experience in the wild river. Prohibited activities would include those that took place on the river as well as on the trail system within the river corridor and would include, but not be limited to, such activities as races, poker runs, organized running events, fishing derbys, organized fly-ins or any type of sporting event in excess of the 24 person party size.

Powerboat Day Trip Regulation

Some correspondents felt that day-use by powerboats had little effect on the environment or on other users. As a result, they believed day-use by powerboats should not be regulated.

Comment 405-49. One-day powerboat use has no real effect on the river. (Correspondent 1719)

Comment 405-50. Please consider a large number of powerboat day permits where no camping or beach is required. (Correspondent 2460)

Comment 405-51. Why the cap of 10 powerboats Monday through Thursday when the weekend numbers are 20? I would be greatly aggravated if I was the 11th boat to reach Cache Cr. and be told that the day was done because 10 boats were already in the canyon. Day use should not be capped at all. (Correspondent 569)

Forest Service Response: Day-use by powerboats has less effect on campsite resources than overnight use by powerboats or floaters but cannot remain unlimited. Information is inconclusive in regard to the effect of boat wakes on Snake River shorelines (reference Appendix E). Wakes caused by powerboats do have an effect on other river users, especially when powerboats or floatboats are tied to a rocky shoreline. Repeated trips by powerboats running rapids or running back and forth on the river to fishing locations increases the number of encounters with other parties which adds to overall congestion, noise, and effects from boat wakes. All of these effects were considered when determining launch allocation numbers for the wild and scenic sections of the river respectively, hours of operation for launch sites and, in some cases, hours of daily operation for powerboats. Details of this analysis can be found in Chapter IV.

Salmon River Use Code 406

Many comments expressed concern about what effect Snake River management guidelines would have on Lower Salmon River floaters. Examples are included below:

Comment 406-1. It is ludicrous to draft a management plan for the Snake that does not address floaters entering from the Salmon. (Correspondent 1160)

Comment 406-2. Large numbers of jet boats, in combination with jet skis, may create a situation from the mouth of the Salmon River to Heller Bar whereby floaters of the lower Salmon begin to disembark at Eagle Cr. to avoid the motors and congestion. This could result in a perceived need to improve the Eagle Cr. Road, and/or create a hazard there. (Correspondent 1196)

Comment 406-3. We annually float the Lower Salmon River and have a jet boat from Clarkston deliver a boat motor to us at Geneva Bar to help us get through Snake Lake. (Correspondent 1803)

Comment 406-4. There is currently no limit on the number of float craft per party on the Lower Salmon and many parties exceed the eight-craft limit specified in the preferred alternative. Consequently if this becomes a plan decision, exceptions would have to be made for Lower Salmon boats or BLM would have to amend the Lower Salmon Plan to incorporate the same limits. This would involve further long-term public involvement with results that still may not mesh with this proposal. There are currently three commercial outfitters who operate "row your own" trips on the Lower Salmon (one with inflatable kayaks and two with small rafts. All of these are longstanding, good operators and all use more than eight boats on every trip. We understand the rational for wanting to limit boats per party in order to relieve congestion below the mouth of the Salmon, however, there may be other ways to accomplish the same results without finite limits. For example, "rafting up" of boats in the same party when they arrive at the Snake may work. (Correspondent 2221)

Comment 406-5. The party size limit on the Lower Salmon is 30. There is no reason to reduce that limit. Therefore, if lower party size limits were instituted on the Snake, an exception would have to be made for Lower Salmon boaters. Lowering the party size limits on the Lower Salmon would require another amendment to the management plan, and would receive little to no support. We see no reason to attempt such a change as there are no social or environmental reasons to do so. (Correspondent 2221)

Forest Service Response: The Forest Service has coordinated this planning effort with the BLM, Cottonwood Resource Area, which manages the Lower Salmon River in order to resolve any issues that may affect Lower Salmon River users. More detail on effects to Lower Salmon users and management of their access into the Snake River corridor can be found in Chapters II and IV.

Access to Private Land

Concern was expressed that the rights of access for private landowners be guaranteed.

Comment 406-6. Lower Salmon River landowners and permittees must also have access privileges. One trip per day during the control season seems reasonable. (Correspondent 2221)

Comment 406-7. However, some exceptions should be made for Lower Salmon landowners who use power boats from the Snake to access their private property. This includes three commercial outfitters who have lodges on private property on the Lower Salmon and must have the capability to operate their respective businesses. (Correspondent 2221)

Forest Service Response: Private landowners on the Lower Salmon River would continue to have access to their inholdings under Alternative G. See Chapters II and IV for additional information.

Displacement of Snake River Users to the Lower Salmon

There were some responses that expressed concern that any change in Snake River management could displace use to other rivers, particularly the Lower Salmon River. The following are examples of these comments:

Comment 406-8. Week-on, Week-off for power and float boats. We believe this will result in a displacement of both power and float boats to the Lower Salmon River during the week when they will not be allowed on the dam to the Kirkwood section of the Snake. This will result in further management controls and restrictions on the Lower Salmon, as well as added congestion on the already crowded section below the mouth of the Salmon. (Correspondent 2221)

Comment 406-9 . I feel very strongly that a user plan needs to be implemented on the lower Salmon River. The restricted use on the Snake will push people, both rafters and powerboaters, to the nearby lower Salmon. (Correspondent 2312)

Comment 406-10. If the powerboats are eliminated from the Snake it would only be a short time before the Salmon would be powerboat free. (Correspondent 2391)

Comment 406-11. I ask that you pay very close attention to how what you decide and do affects your wonderful neighbor, the Lower Salmon River. (Correspondent 2505)

Comment 406-12. Is there any way to allow limited jet boat use on the Snake River while denying them access to the Salmon River (ie. jetboats are not allowed to go up the Salmon when they reach the confluence of the two rivers)? (Correspondent 2519)

Comment 406-13. Powerboats should be banned from entering the Salmon. (Correspondent 2653)

Comment 406-14. My primary objection to this Alternative E is that I believe it will unreasonably accelerate river use on rivers, particularly the Lower Salmon. I believe that the Lower Salmon and other nearby rivers (Grande Ronde, Owyhee, John Day) should not suffer the consequences of the effort to clean up the mess created by too many years of Hells Canyon mismanagement. (Correspondent 2793)

Comment 406-15. Proposed changes to the management plan for Hells Canyon do not address their impact on the Salmon River. The BLM does not have a good management plan that is capable of dealing with increased usage of the Lower Salmon when power boat use is to be reduced on the Snake. The Salmon River must be protected. The DEIS fails to address this issue, one that I consider

to be critical. It would not be in the nations interest to address the problems of Hells Canyon by dumping those problems into the adjoining river canyon. (Correspondent 2810)

Forest Service Response: A detailed discussion of effects associated with user displacement, including displacement of Snake River users to the Lower Salmon River, can be found in Chapter IV.

Comment 406-16. As both float and powerboats are displaced from the Snake during restrictive times, the obvious closest alternative would be the Salmon. This in turn will necessitate management review and changes to be made to deal with the forced use increase in BLM areas. (Correspondent 973)

Comment 406-17. We would oppose float launches being restricted to every other week because it would force all the rafters on the Salmon River to crowd into those time slots and double the competition for campsites. (Correspondent 2499)

Comment 406-18. Your preferred Alternative E disproportionately displaced private and commercial floatboaters compared to the private and commercial powerboaters (Table II-6). Alternative E would displace 47 percent of the private floatboaters (Chapter II-52) from the current Forest Plan management direction. Implementation of Alternative E would only serve to displace more floatboaters and create a greater inequity between these user groups. (Correspondent 2801)

Forest Service Response: Under Alternative G, the existing float allocation system of five launches per day would be retained. This should virtually eliminate the potential for displacement of float use to the Lower Salmon, the Scenic Snake River, or other rivers in the region. Displacement of powerboat use to the Lower Salmon should be minimal due to the increased level of skill required to run the Salmon River as compared to the Snake River, and the limitation on Snake River powerboat use that would be in effect to the mouth of the Salmon.

Comment 406-19. Pages II-55 though II-58. The DEIS fails to recognize that Alternative C and E also result in high displacement. (Correspondent 1198)

Forest Service Response: This comment was considered in the FEIS during review of levels of displacement caused by the various alternatives. Displacement in these charts was based upon the ability to gain access to the different sections of the river when use was distributed over an entire summer season. It was not based upon displacement associated with the time frame within that use season when river users could gain access to the river. Appendix I can be used for a partial comparison of use levels by alternative in regard to potential for displacement among alternatives, but does not consider the displacement caused by loss of experience for floaters in alternatives with higher levels of use.

Party Size Code 407

Many correspondents offered suggestions as to appropriate party size in terms of the number of people and number of rivercraft. Examples of comments are included below:

Comment 407-1. If the boat length is restricted, the number of passengers should be left up to the Coast Guard. (Correspondent 970)

Comment 407-2. The Forest Service needs to take a long look at their tendency to "over-manage." For example, the proposed limit on the number of passengers allowed on a commercial jetboat trip.

If the boat length is restricted, the number of passengers should be left up to the Coast Guard. (Correspondent 2110)

Comment 407-3. A maximum party size of 20 persons for all activities except commercial powerboat day use. (Correspondent 1190)

Comment 407-4. The Forest Service shouldn't get into the business of boating regulations that should be left up to the US Coast Guard. (Correspondent 157)

Forest Service Response: The Coast Guard would continue to determine passenger limits on commercial vessels based on their seating arrangement guidelines. An exception would be overnight commercial powerboat trips that are using river campsites which would be limited to a maximum party size of 24 including guides, the same party size limit that applies to all river users.

Comment 407-5. There is currently no limit on the number of float craft per party on the Lower Salmon and many parties exceed the eight-craft limit specified in the preferred alternative. Consequently if this becomes a plan decision, exceptions would have to be made for Lower Salmon boats or BLM would have to amend the Lower Salmon Plan to incorporate the same limits. (Correspondent 2221)

Comment 407-6. Several outfitters and many private users (especially kayak parties) believes that the safe use of personal watercraft greatly enhances a guest's experience on the river. By imposing an 8 boat limit this discourages and negates an established use. (Correspondent 973)

Comment 407-7. Limit of two power boats per permit while non-motorized permit holders could have one float craft per person. (Correspondent 2276)

Comment 407-8. The 8 boat limit assures that social encounters on the river would remain basically constant. (Correspondent 2325)

Comment 407-9. Rules of floatboat operation - 10 craft/party limit and 30 person group size (if Alternative B is selected or used to shape the EIS final decision. (Correspondent 2383)

Comment 407-10. Rules of floatboat operation - 8 craft/party limit and 25 person group size (if Alternative E is selected or used to shape the EIS final decision). (Correspondent 2383)

Forest Service Response: FEIS preferred Alternative G places a limit of eight craft per party on all float parties year-round. This number is currently twice the average number of craft per party. The purpose of this limitation is to resolve issues associated with on-river congestion between user groups.

Comment 407-11. The final plan should contain these provisions: Continuation of current controls for private and commercial floatboat use. A limit of six float craft per trip excluding inflatable kayaks. (Correspondent 1118)

Comment 407-12. 8 Craft Limit per Float Party. I support this number of craft for a float group of 20 or 25 total people. It is important to restrict the total number of craft in a party. River congestion and visual crowding will result if the current trend toward 1 craft/party member continues. The Rogue River in Oregon is a prime example of the need for this limitation. (Correspondent 2324)

Comment 407-13. 8 Craft limit per float party. I support this number of craft for a float group of 20 or 25 total people. It is important to restrict the total number of craft in a party due to the current trend

for each member of some groups to operate their own craft. Such large numbers of craft in a party cause much river congestion and visual crowding. (Correspondent 2325)

Comment 407-14. Craft limit I can support an 8 craft limit for a float group of 20-25 people. I think this should be increased to 10 if a party size of 30 is established. (Correspondent 2328)

Comment 407-15. 8 Craft Limit Per Party. I would support a limit of 10 craft per party. I understand the concerns but support the private floaters concerns for flexibility in this regulation. (Correspondent 2329)

Comment 407-16. Private and commercial float parties should be limited to no more than 10 craft per party on both the wild and scenic sections. (Correspondent 1190)

Comment 407-17. Limit float craft to 10 per float party. (Correspondent 2331)

Forest Service Response: Alternative G provides for eight craft per party with a maximum party size of 24 including guides if it is a commercial trip. This is twice the existing average number of boats per party. This limit addresses the social issues of on-river encounters between groups in a backcountry setting and reduces potential conflicts with other users at launch/takeout ramps as well as on the river.

Comment 407-18. I would support limiting the size of rafting parties. Smaller groups of rafts allow powerboats greater ease of passage. It would also lessen tensions when waiting for rafts to negotiate a rapid. (Correspondent 761)

Comment 407-19. A maximum of 8 floatcraft per private party is extremely arbitrary and totally unnecessary, especially without powerboats on the river. Many more private floaters are enjoying kayaks, canoes, inflatable kayaks, 2 person paddle rafts and one person catarafts. These smaller floatcraft usually require support rafts. NWRA [Northwest Rafters Association] has not been able to locate any logical reason for limiting the number of floatcraft per private party nor are we aware of any other river that has such restrictions. Private floaters that use smaller craft should not be restricted from that experience or be forced to float with a smaller group unless some overwhelming safety consideration can be positively identified and demonstrated. (Correspondent 2236)

Forest Service Response: The current trend in floating appears to be going toward more types of one and two person floatcraft. The issue is not driven by safety concerns but social concerns. Increased numbers of watercraft within a restricted river corridor leads to visual crowding where a party can not be out of sight of other floaters from other parties. A continual line of floating watercraft can affect the scenery ORV from the perspective of trail users on trails paralleling the river. It can add to congestion on narrow sections of the river between floaters and powerboaters. Large numbers of floatcraft per party can also result in congestion at rapids that must be scouted, launch/take out ramps, and at interpretive sites. This can lead to user conflict or affect the quality of the backcountry experience. Alternative G would not restrict floaters from using this type of equipment but it would limit the size of their group to minimize their effects on other users.

Comment 407-20. I don't believe it's fair for rafters to have up to 30 rafts per launch. (Correspondent 1091)

Forest Service Response: Under Alternative G, floaters would only be allowed to have a maximum of eight floatcraft per launch. Fairness and equity were important issues brought to us by the public during scoping. While this would not achieve total equity between numbers of floatcraft per launch

compared to the one craft per launch for a powerboat, these are two entirely different activities. If both types of watercraft traveled at the speed of the river current, then equal numbers of boats per permit would be easier to achieve.

The equity issue is resolved by implementing a system of lower numbers of powerboaters to account for their mobility and their potential to affect the experience of float users with noise, boat wakes, and multiple encounters. These limits on the number of craft per permit best meet objectives of achieving a backcountry experience for both users and protect and enhance ORV's.

Comment 407-21. Maximum of 8 floatcraft per party be eliminated on private parties. (Correspondent 2321)

Forest Service Response: This would not meet the public's desire for a plan that is as fair as possible to all users. Commercial and private parties should have the same limitations in order to minimize social impacts to other users and enhance the backcountry experience.

Comment 407-22. After the river went down to a level in which we could operate through the big rapids, all of our one day raft permits were filled during the 1993 season. They were limited to 16 to 17 passengers not the 30 as the permit allows. The permit also only allows us to run two rafts, 16 to 17 people is all we feel can be put in two rafts safely. Through July, August and first week in September about half of the people who wanted to participate in a one day rafting adventure were able to be accommodated. The rest were told "sorry we are full." Meanwhile many overnight permits are far from being full. I hate to say it, but many people who wanted to experience white water rafting in Hells Canyon were told, "sorry we are full". Lets not forget that a good many available private float permits were not used either during July and August. Isn't Hells Canyon administered by the Forest Service for the public to enjoy as a recreation area not for a minority user group? (Correspondent 1194)

Forest Service Response: While a market can be developed to generate a demand for many types of trips within Hells Canyon, the intent of the wild river designation is to provide opportunities to experience a "vestige of primitive America" in a backcountry setting. On a regional perspective, the opportunity to market or participate in one-day float trips is available on many other rivers.

One-day trips represent an opportunity and are commercially marketed as a relatively inexpensive, short-term experience for the participant whose primary goal is experiencing the excitement of whitewater rapids. If this were not the case, then commercial, one-day float trips could be successful without the marketing focus on running the biggest rapids on the river. The primary management emphasis in the wild section should be to provide the opportunity for a backcountry experience and that the whitewater challenges are a secondary attribute which adds to the quality of that experience.

One-day floats on the Snake River are only viable if they have jetboat support. The feasibility of running a trip can be affected by fluctuating water levels in the upper river corridor which can make it impractical to run a jetback because river flows may not be favorable to safely navigate the larger rapids. When jetbacks do occur, encounters increase not only from the jetboat traffic, but also from the floatboats used as they travel over a longer distance of river past other parties in order to maximize the whitewater experience by running all the major rapids in a single day. This increases the number of encounters with other users who are traveling on the river at a slower pace whose goal may be to maximize their backcountry experience. The requirement of jetboat support for these trips and the distance the floatboats travel in a single day has led to an associated increase in jetboat traffic and number of encounters. The ripple effect of this activity would be an increased potential for user conflict.

Under Alternative G, one-day floats could continue for both private and commercial floaters but only on a limited basis as part of the existing allocation of five float launches per day. This still lets the private or commercial user determine the overall trip length but does not mandate a minimum trip length or require an outfitter to market a trip which encourages an increased rate of encounters and associated river congestion/crowding.

The two temporary use permits that specifically allow one-day commercial float trips would not be re-issued upon expiration at the end of 1994. Issuance of these permits for temporary use has always been done on a yearly basis and re-issuance is discretionary within the authority of the Area Ranger, with no guarantee of future use.

Comment 407-23. Allow say two special permits to each user group, private powerboat and float, that would allow them to have a higher number of people in a party in any section of the river corridor. (Correspondent 361)

Comment 407-24. Leave rafting parties at 30 people per party. (Correspondent 1162)

Comment 407-25. A maximum party size of 20 persons for all activities except commercial powerboat day use. (Correspondent 1190)

Comment 407-26. There should be a maximum groups size of 20 people for all river user groups. (Correspondent 2238)

Comment 407-27. All permits would be limited to 30 people with a limit of two power boats per permit while non- motorized permit holders could have one float craft per person. (Correspondent 2276)

Comment 407-28. The traditional commercial party size on most Idaho rivers including the Snake, has been 30 (inclusive of guides). Commercial trip quality (raft size, guest/guide ratio, camp-setup crew and raft), pricing and guide employment is currently based on this party size. If 20 is indeed the cutoff for acceptability, then all of the above can be adjusted, but all will be altered and the public will be impacted by these changes. Besides the obvious, fewer users accommodated and fewer guides employed, quality will either come down, price will increase or some combination of the two will result. From a business point of view, 25 is the number that minimizes the impact on cost increase/quality decrease necessity and guide employment loss, as well as economic impact on trip profitability (see Appendix B - prepared by Jerry Hughes, Hughes River Expeditions). I, therefore, would like to see the party size either stay at 30 or decrease to 25 until a study is done to determine the optimal party size based on benefit vs impact of varying party sizes on the resource and social environment, the user demand, and the quality, price and viability of the outfitting services. (Correspondent 2324)

Comment 407-29. I object to the 20 person group size for commercial float outfitters. Your proposed Alternative E will significantly limit my options as a permittee trying to run a viable business on Snake/Hells Canyon without significant price increases to the public, or without reducing the quality of our trips. Our clients expect and shop for a quality river, camping, and outdoor experience. Cost is also a consideration. Given the standards of good service that our guests expect, your 20 person groups size would limit my business to 14-15 guests maximum per launch. I assume this will force me to either make a significant price increase, or cut back on the quality of my service by carrying more guests per raft or by not having a supply pontoon accompany the trips.

A 25 person maximum works much better for my business and for other float outfitter businesses, and I believe the physical and social impacts of such 25 person groups would not significantly exceed the impacts of the proposed 20 person groups, especially with the same 8 craft limitation of the DEIS proposal.

With a 20 person group, we would run 4 rafts and 4 inflatable kayaks on a trips to conform to the 8 craft limitation. With a 25 person group, we would run 5 rafts and 3 inflatable kayaks. The difference in craft configuration would be of little consequence. However, the increase from 20 to 25 people is of considerable economic consequence to my business.

With a 20 person party size, I can book the following maximum group: (assuming a full trip)

1 supply pontoon

1 guide and 1 camp helper

3 guest rafts (oar and/or paddle)

3 guides and 12-15 guests (4 guest + 1 guide/oar raft)

(6 guest + 1 guide/paddle raft)

4 inflatable kayaks (optional craft not used in the large rapids)

total craft = 8

total people = 20 (5 crew + 12-15 guests)

Max. total gross (@1993 rates for a 4 Day Trip)

= \$11,190 (assuming average 5% youth and/or group discounts) (15 guests X \$746/person = \$11,190)

Crew employed = 4 guides + 1 camp helper

With a 25 person party, I can book the following maximum group: (assuming a full trip)

1 supply pontoon

1 guide + 1 camp helper

4 rafts (oar and/or paddle)

4 guides + 16-19 guests

3 inflatable kayaks (optional craft not used in the large rapids.)

total craft = 8

total people = 25 (6 crew and 16-19 guests)

Max total gross + \$14,174 (@1993 rates for 4 Day

Trip assuming average 5% youth and/or group discounts) (19 guests X \$746/person = \$14,174

crew employed = 5 guides + 1 camp helper

The outfitted public expects quality service on river trips. The numbers of crew per boat (4 guests + 1 guide/oar raft and 6 guests + guide/paddle raft) are the standards that my business uses, and that many outfitters use. To outfit the style of trip my guest want, it is necessary to use a supply raft or pontoon to carry camp, kitchen, duffle, beverages, etc. The 25 person group size gives me much more flexibility on how to arrange and plan trips than does the DEIS proposal of 20 person group. Not all outfitter groups will be full, but it is very important economically to outfit several groups that would number in the 18-19 guest range each season. As you can see, by making a small adjustment in groups size, you make an incredible difference in two economic categories - gross receipts for the permittee, and 1 guide job. At this time, I often hire 6 guides + 1 camp helper on our normal trips.

(In 1993, I employed 6 guides on 9 regulated season trips. Your 20 guest proposal would unemploy 2 guides on each of those trips.) The adjustment I suggest to a 25 person group size displaces only 1 guide instead of 2, and that is of major importance to me and my guide staff. Also, the gross receipts difference is very significant for a small business. The increased gross on the 25 person trips allows us to maintain our basic rate structure and trip quality without major pricing increases, and therefore makes our business much more economically viable. Successful outfitting businesses make for good service to the public, and unsuccessful businesses make for marginal trips.

In 1993 my business on the Snake will gross approximately \$225,000 during the regulated season on 19 trips. Under your proposal in Alternative E, based on a 7.5 weeks motorless season, we would see our gross receipts reduced about 25% even if we booked each trips entirely full. (In 1993, we have

outfitted a blend of 3, 4, and 5 Day Trips. I would assume that in the future under Alternative E that we would outfit primarily 4 Day Trips with few 3 and 5 day trips blended in.)

1994 estimates with 20 and 25 person groups. (I am assuming that we are able to book each trip full. This certainly may not happen, especially during the shoulder seasons of early summer and early fall.) 20 persons/15 guests X 15 launches (\$11,190 X 15) = \$167,850. This is only 75% of our 1993 gross 1993 receipts during the control season. 25 persons/19 guests X 15 launches (\$14,174 X 15) = \$212,610. This is 94.5% of our 1993 gross receipts during the control season. Practically identical to our 1993 business on the Snake.

I believe that the social impacts in camp and on the river would be basically unchanged with a party size increase from 20 to 25 people/trip. Also, I don't think there will be any significant difference in physical impact on campsites. The 8 boat limit assures that social encounters on the river would remain basically constant. Other users would simply see one more regular raft instead of an inflatable kayak. (Correspondent 2325)

Comment 407-30. Maximum party size. The proposed limit of 20 per float party is simply too restrictive. I feel strongly that most outfitters can operate quality, viable trips with a maximum of 25 per party. I would like some flexibility, however. There should be an opportunity for each outfitter to run the occasional large trip. I would like the option of 3 trips per season of up to 30 per party. I understand the social and environmental impacts of this regulation and feel that this level of use will work. (Correspondent 2329)

Comment 407-31. Retain 30 person group size since fewer float parties (5 daily launches for extended day trips under Alternative B) will be on the river as compared to Alternative E where up to 7 float parties can launch daily. (Correspondent 2331)

Comment 407-32. Limiting party size is not objective. Groups can split or regroup. Limiting total number at campsites protects the environment, which should be the objective. Limiting party size is unnecessary impact on our social lives. (Correspondent 2468)

Comment 407-33. Group size limit for commercial float parties needs to be clarified. Does the size limit apply to guests only, or is the limit for guests plus guides? Most outfitters practice and promote low-impact camping techniques and education. At current levels of commercial float use, it may be practical to allow outfitters to take up to 20 guests, plus guides. (Correspondent 2501)

Comment 407-34. Quotas for jetboat and floatboat launches should be equal in terms of the number of people on each vessel. (Correspondent 2646)

Comment 407-35. I would like to see the number of people per craft clearly addressed. (Correspondent 2802)

Forest Service Response: In Alternative G, maximum party size for all groups except commercial powerboat day-use would be 24 people including guides, year-round. This would include groups of private powerboaters who want to camp together. There would be no exceptions for larger party sizes for private, commercial, or administrative trips year-round.

Comment 407-36. I totally disagree with the number's of jet boats that you're proposing. There are two things wrong with your assumptions. First, while raft trips are allowed eight rafts per trip, seldom do launches actually have that number of boats. Second, there are fewer people per raft (sometimes only two) than there are per jet boat (which often carry a dozen people or more!) The impact on the

canyon needs to be based on the number of people using the canyon, not the number of boats. (Correspondent 2304)

Forest Service Response: Party size is an important factor in resource protection, but your assumptions on average party size are incorrect. To support your assumptions, you would have to include passengers on commercial powerboats. Throughout the majority of the length of the canyon, these passengers seldom exit the boats except at hardened sites with developed facilities, reducing their overall impact to canyon resources. The average number of people per private powerboat trip is less than the average for a private float trip.

While present averages indicate less than eight floatboats are used per trip and average number of people per trip is much less than 24, float use could grow toward these limits. Without this change, the existing limits would be even higher, up to 30 people and 30 boats per launch.

Numbers of floatboats does need to be managed. The number of boats directly relates to social issues including the number of on-river encounters between groups and congestion at launch/takeout facilities and other locations on the river.

Party sizes for all users would be limited to a maximum of 24 people with the exception of individual commercial powerboats that are on day trips only or overnight at Copper Creek. Passenger limitations on these boats would be regulated by the Coast Guard based on seating configuration.

Comment 407-37. I do agree that a 20-person limit is far too restrictive. Again, I would ask what environmental evidence would support the need to restrict the party size to such a small number. I would support a 25 person limit, but would prefer the existing 30-person limit remain in force. (Correspondent 2328)

Comment 407-38. If the group does not exceed other density limits, the social relationship among users is not Forest Service concern. (Correspondent 2468)

Forest Service Response: The Wild and Scenic Rivers Act directs the Forest Service to protect and enhance ORV's within the river corridor. Multi-day groups have the potential to create greater impacts on resources over time than day-users. But more importantly, larger groups have a greater potential to affect the social experience of other users. Larger parties generally use more boats, increasing congestion at launch ramps and interpretive sites as well as and on-river encounters with other users. This can adversely effect the recreation experience of other users. The size of their group can lead to campsite competition for larger campsites.

Campsite Management Code 408

Trip Duration for Floaters

Comment 408-1. I think allowing longer stays during floats (5 days) should be tried initially. (Correspondent 2282)

Comment 408-2. Length of Trip. When full utilization of the 7 proposed launches during the motorless week occurs on a regular basis, campsite availability will become a problem. You must plan that some groups will want 5, 6, and 7 day trips between Hells Canyon Cr. and Pittsburg Landing (groups interested in fishing, side-hiking, and simply enjoying a non-motorized river environment). When such long 5-7 day trips are followed by standard 3 and 4 day float groups there will be insufficient camps

for all the float parties. I anticipate that the motorless Snake will be so popular with float groups that this campsite availability problem will occur quickly. This problem occurs on the Middle Fork of the Salmon right now. On the Middle Fork there are insufficient campsites in the lower canyon to accommodate all parties in mid-summer (prime time). This occurs because many private floaters elect to take 7 or 8 day trips. By taking such a long trip, they compete for campsites the final night of their 7 or 8 day trip with float groups who started a full day or two days behind them. On the Middle Fork, the normal outfitted trip length is 5 or 6 Days. This same problem will occur on the Snake where standard 3 and 4 day trip users will run into 5, 6, and 7 day trip parties in an area with limited numbers of campsites. Also, people are rational creatures, and private floaters can only be expected to take advantage of a campsite reservation system if they can. If commercial parties are making 3 or 4 day trips (which they do), private floaters will quickly (as they do on the Middle Fork today) elect to take 5 day or longer trips. This technique allows them to compete for campsites with groups who will launch a day or two or more after their launch -i.e.- these groups will be able to reserve any camp they want if they run a short first day. This is not fair, and it will lead to campsite congestion downstream in the Wild Section. I suggest limiting trip length to a maximum of 5 days/4 nights or 4 days/3 night between Hells Canyon Cr. and Pittsburg Landing during the motorless weeks of the regulated season or during the heart of the regulated season (late June to mid-August). This trip length regulation will keep float traffic moving uniformly through the Wild River corridor, and will eliminate many congestion and campsite availability problems. If floaters want to run a longer trip they can simply extend into the Scenic Section of the Snake or float the Snake during the unregulated season (both these options give floaters an available extended river trip opportunity). (Correspondent 2325)

Comment 408-3. All permit holders in the Hells Canyon Dam to Kirkwood Creek reach could stay at least seven days. (Correspondent 2276)

Comment 408-4. The permits issued on specific days during a non-motorized or motorized week should be for a specific amount of nights in the wild section between Hells Canyon Dam and Kirkwood; i.e., the Thursday permit would be a 6-night permit, Friday 5-night, etc. (Correspondent 2276)

Comment 408-5. The length of stay suggestion of maximum of 5 nights for all users is fair. This eliminates the problem that occurs on the Middle Fork of the Salmon where private party users reserve the best camps by extending their trip to 6 nights. (Correspondent 2793)

Comment 408-6. Limit length (# of days) of trip, campsite stay limits, etc. throughout the NRA, both Wild & Scenic. (Correspondent 2383)

Comment 408-7. 4 day - 3 night maximum stay limit above Pittsburg and maximum 2 nights stay in any one camp during regulated season for all users. (Correspondent 2382)

Forest Service Response: The concept of limiting the duration of a trip in specific circumstances was carried forward into Alternative G for full analysis. The total trip length for float trips within the wild river during any of the days in the motorless period will be limited to four days and three nights per trip. This is the current average trip length for wild river float trips. This use would be managed at the launch site as part of the condition of the trip permit. Float trips that would be off the river at Pittsburg or below Pittsburg by Sunday night would be exempt from this requirement.

The average trip length would be monitored on a yearly basis for both powerboaters and floaters in this section of river. The duration of all trips in the wild river could be further limited if monitoring indicated this would resolve any user conflict issues. The following types of steps could be taken if monitoring indicated that the recreation experience was being compromised:

- Monitor private powerboat stay lengths and reduce the number of daily launches based on guidelines in Appendix J only if necessary.
- Reduce stay lengths in specific campsites.
- Reduce campsite stay limits for all campsites.
- Place a maximum time limit of five days on a float trip between Hells Canyon Dam and Pittsburg.
- Do not re-issue the first vacant float or powerboat launch.
- Elimination of the crossover between private and commercial use allocations.

Drop Camps

Some correspondents expressed the desire to see drop camps included in any use allocation of the Snake River. Others felt that drop camps should be eliminated from the river corridor to avoid conflict over campsites. Still other comments felt that if drop camps were allowed they should be included in a campsite reservation system.

Comment 408-8. Drop Camp Users. Equality among river corridor users needs to be put in place - drop camp users need to have camp reservations and stay length requirements the same as all other river corridor users. (Correspondent 2342)

Comment 408-9. Drop Camp Users. In this proposal, this would work because of the reduction on the number of people allowed per day to launch into the river corridor. However, this writer feels a camp reservation system would help relieve conflicts on the river corridor and achieve more ORVs of a river trip into Hells Canyon. (Correspondent 2342)

Comment 408-10. Drop Camp Users. This proposed use brings equality to all river users. It does create a management and communication hurdle that will need to be addressed by the Forest Service in this District. (Correspondent 2342)

Comment 408-11. Drop Camp Users. This section of Alt B gives drop camp users the ability to be an equal participant in the camp reservation system. This proposal will work equally as well as the stay requirements for other river corridor users. Environmentally, it will spread out the river use to more potential users. (Correspondent 2342)

Comment 408-12. Drop Camp Users. This use should be allowed, but a campsite reservation system must be required. Maybe some type of permit for use similar to watercraft. (Correspondent 2342)

Comment 408-13. I would also like to see assigned camping including that for 'drop camp' users. (Correspondent 2409)

Comment 408-14. Drop Camp Users: Oppose self-issued permits. They are not used and are unenforceable. I have personally witnessed non-use. Reservations for campgrounds should be required for all sections of the river. (Correspondent 2790)

Forest Service Response: Alternative G would only allow drop camps in the secondary season. There would not be a campsite reservation system.

Several comments expressed the opinion that drop camps should not be allowed for exclusive use by one party. However they may have confused drop camps with campsite reservations since the comments seemed to indicate that it would be OK for these groups to share campsites. They felt that all campsites should be available for shared use by groups if necessary and more sites developed if there were a lack of campsites to accommodate all users.

Comment 408-15. Don't allow drop camps. Campsites can be shared without problems. People need to learn to co-exist. More campsites could be developed in other locations if the Forest Service will do it! (Correspondent 1089)

Comment 408-16. Drop camps should not be allowed. There's no reason groups should not be able to share campsites. If more sites are needed, there are several locations where additional campsites could be developed. (Correspondent 1087)

Comment 408-17. No drop camps. It's unnecessary. River users can get along, in fact, it's conducive to good human relations to get acquainted with other groups of users and share experiences. If lack of campsites really is the problem, there are sites where additional campsites could be developed if the Forest Service will do it. (Correspondent 1041)

Comment 408-18. No drop camps. We have shared campsites with floater and with other boaters with absolutely no problem. (Correspondent 1065)

Forest Service Response: The term "drop camp" refers to situations where one or more people are transported to a campsite, usually by powerboat. They and their gear are "dropped off" usually for a multi-day stay. The powerboat and driver do not stay with the group but function primarily as a taxi service at the beginning and end of the trip.

In Alternative G, drop camps are not allowed during the primary season but are allowed during the secondary season. Since drop camps involve transportation by powerboat, each camp would require a powerboat launch on the day the camp was set up and the day it was taken down. In order to fit within the daily launch allocation, these trips would have to be assigned to either the commercial or private powerboat daily allocation.

The recreation management emphasis for the Snake River focuses primarily on recreation opportunities for floaters and powerboaters with some associated trail use. Camping is one of the associated activities for some, but not all people. Since management of the river would set limits on boater access, it is unfair to provide camping opportunities at the expense of boating opportunities. If drop camps have an allocation above the existing number of powerboat launches, their transportation to and from camp increases the number of encounters with other users and decreases the number of camps available. If they are included in the allocation for private powerboaters they decrease the number of opportunities for powerboaters to launch trips. If they are included in the commercial powerboat allocation, they reduce the number of camps available for powerboaters and floaters. In view of these types of effects, drop camps should be confined to the secondary season to coincide with the greater demand for hunting and fishing camps and reduced float traffic.

Comment 408-19. I don't think drop camp numbers should count against the private powerboat use. Nor in the commercial boat use. They should have say one per day allowable. No caps or averages. The way to handle that is by reservation. (Correspondent 361)

Forest Service Response: Drop camp numbers should not count against private or commercial powerboat use. However, a separate allocation for this use should not be allowed since this would add powerboat traffic and drop camp use would have an effect on a boater's camping opportunity. In Alternative G drop camps are only allowed during the secondary season.

Powerboat and Floater Impacts

Comment 408-20. Commercial powerboat users simply do not impact the canyon as much as commercial rafters do (private powerboaters tend to use beaches more than commercial powerboaters but both private and commercial rafters use the beaches and campsites heavily). Stricter rules for camp usage and perhaps some more campsites would help minimize the degradation of the existing canyon campsites by boaters of all types. (Correspondent 761)

Comment 408-21. The floaters have indicated that since they are limited that the powerboaters should also be limited. If we review the reasons that floaters are limited one of the major concerns is the impact at camp sites and launch and take out areas. These do not even justify limitations on powerboats, very few powerboaters camp in the canyon and when they do there is often only 4 to 6 persons at a campsite as opposed to 10 to 30 with a float trip. By the DEIS own admission, studies in the canyon concerning environmental impact by powerboat use is almost nonexistent. (Correspondent 1171)

Forest Service Response: Commercial powerboats have different impacts than private powerboaters and floaters that camp. Because of their mobility and the overall distance they travel, they have a potentially greater number of encounters per day with other groups while on the river. The size of the wakes created by larger tour boats has added to user conflict by affecting both floaters and other powerboaters, especially with those whose boats are tied along rocky shorelines when the large tour boats pass.

Since the construction of some of the newer toilet facilities at places like Dug Bar and Pittsburg Landing, large tour boats stop to at these facilities and have increase impacts on those sites in regard to operation and maintenance expenses. By historically relying on pit toilets for stops along the way in lieu of installing onboard human waste carryout systems, they have heavily impacted some beach areas such as China Bar.

Many private powerboaters do camp in the canyon. They have the mobility to travel over great distances, increasing the number of encounters with other floaters and powerboaters. With the current level of unlimited powerboat access there is a potential for an increased level of user conflict not only between floaters and powerboaters, but between powerboaters. Alternative G sets limits for powerboat use that would protect and enhance ORV's and manage use at a level that would reduce the potential for conflict and site impacts.

User education will address the rules necessary to minimize site degradation. Developing additional campsites in the river corridor would meet the objective of the law to "protect and enhance" the river's many ORV's but would lead to additional impacts to the shoreline resources.

Comment 408-22. If certain areas are allowed to be impacted, it appears that larger areas will remain unimpacted. For the most part, float boaters appear to impact the campsites the least as they are limited to the quantity they can carry. (Correspondent 2364)

Forest Service Response: Focusing use on the existing river campsites would leave a greater land base with minimum impacts caused by recreationists. However, floaters do not necessarily have less of an impact on a campsite than a powerboat party. Float parties have longer trip lengths than powerboaters resulting in more overnight camps along the river. The average party size for float parties is much higher than overnight powerboat party size, increasing the potential for campsite impacts. While commercial powerboat day trips average more passengers than overnight float trips, the majority of their stops are at hardened locations such as administrative and developed recreation sites for the purpose of interpretation or to use toilet facilities.

Identify River Campsites

Comment 408-23. Campsites should be marked either for floaters or powerboaters then they all could be used without crowding on certain areas. (Correspondent 1143)

Comment 408-24. Set aside several camps for rafters between Pittsburg Landing and Dug Bar (heavy metal signage in concrete). (Correspondent 2437)

Forest Service Response: Under Alternative G, all campsites would be available on a first-come, first-served basis. Marking of campsites using signs or some other type of visual method would add to the number of structures which is not an objective when managing for a "vestige of primitive America" in the wild river corridor. The intent is to manage the entire river corridor in a method which enhances the scenery ORV.

Campsite Designation

Comment 408-25. Designate Steep Creek, Pine Bar and Meyers Creek, jetboat only camps. Allow floaters to use on a one night basis if camps are unoccupied after 4:00 p.m. (Correspondent 2382)

Forest Service Response: Information is available in the Snake River Guide about the suitability of camps based on the physical characteristics of the shoreline. Since many camps, especially those with sand beaches are desired by both powerboaters and floaters, access to all camps should be available for both user groups. Alternative G allows for camping on a first-come, first-served basis for all river users.

Comment 408-26. If I receive a permit through a lottery system I should be guaranteed a place to camp. I should not be turned away by people who didn't even have to apply. (Correspondent 2301)

Forest Service Response: The lottery system only applies to the initial allocation of private float launches in the wild river. Under Alternative G, the lottery system would continue to operate. In addition, all commercial and private powerboaters and all commercial floaters would be required to obtain a launch reservation prior to entering the river corridor during the primary season. These groups would also have a limited allocation. Commercial floaters have always been on a limited allocation. This would be a new requirement for all powerboaters. Campsites would remain on a first-come, first-serve basis. Competition for campsites should be reduced substantially due to reduced numbers of powerboat launches at peak periods of use from the current situation.

Comment 408-27. No powerboat camping Kirkwood to Pitts on motorless week and include camps in this section in campsite reservation system. (Correspondent 2331)

Comment 408-28. I feel there should be no powerboat camping between Pittsburg Landing and Kirkwood during the motorless weeks. The camps from Pitts. Landing to Kirkwood are very important to float groups. Both Kirkwood camps and Cat Gulch are regularly used by float groups at this time (my trips try to get one or the other of these camps every trip.) Corral Cr. and Fish Trap Bar are occasionally used by float groups. Adding these camps into the float reservation system will help allow for rest and rotation of campsites if necessary, and most importantly, it will assure that float groups have sufficient campsites during the motorless weeks. Powerboaters can use this section of the river for camping during the motors only week, and they can conveniently camp below Pittsburg Landing on the motorless week due to their great mobility. On the motorless week, camping should be exclusively for float groups from Hells Canyon Cr. to Pittsburg Landing. (Correspondent 2325)

Forest Service Response: Alternative G would provide for no powerboat camping between Kirkwood and Pittsburg during the motorless periods between Wild Sheep Rapid and Kirkwood. It would not be limited to accommodate non-motorized camping, but because of the number of powerboat launches allowed, the relatively short river distance, and the limited number of campsites. When planning river access, average stay lengths for powerboaters became an important consideration when making determinations on whether to allow day use or overnight use.

Alternative G does not implement a campsite reservation system in any section of the river.

Clarification of Alternative E

Comment 408-29. Although the Preferred Alternative states that during the alternating weeks, each week is for "exclusive" motorized or non-motorized use, it also implies that each user group can remain on the river between the dam and Kirkwood into the next week. Under "stay lengths" (DEIS at II-33) it allocates 2 nights for float, and 4 for jets. However, it does not clearly stipulate that this stay length is for campsites. The implication is that it is a stay within the wild river section. (Correspondent 1196)

Forest Service Response: The intent in Alternative E was that each user group would vacate that section of the river on the last day of their exclusive use week. The stay length of two nights for float and four nights for powerboats applied to campsites only. These topics have been revised in the FEIS in order to resolve this confusion. Thank you for bringing this to our attention.

Campsite Stay Limits

Several comments indicated that stay limits on individual campsites needed to be established in order to assure adequate availability of camps for river users through a constant rotation of campsites by users.

Comment 408-30. I feel that campsite stay restrictions, during the control period only, are justified, so that one group cannot tie up a desirable site for an extended period of time. (Correspondent 2358)

Comment 408-31. Below the dam, river side camping in excess of one night in the same areas should be prohibited (for both jet and float boat users). (Correspondent 2646)

Forest Service Response: People need some flexibility in their trip to allow them to explore the canyon, make adjustments due to inclement weather, etc. Generally a two night per camp stay limit is appropriate for the wild river. With the use levels proposed in Alternative G, and the average trip length projections based on historic use, campsites should be available for all river users at any one time. Some camps that are in high demand or have resource concerns may be restricted to one night on a case-by-case basis. There are additional steps that can be taken to adjust use if monitoring indicates that the objectives of this alternative are not being met.

Comment 408-32. Campsite Stay Lengths. Due to the increase in float launches from 5 launches/day to 7 launches/day under Alternative E, I suggest limiting campsite stays to 1 night in all camps during the "motorless" weeks of the Regulated Season. This will greatly help the uniform movement of float parties through the canyon. With all 7 launches taken daily, there are barely enough camps in some sections of the Canyon to accommodate people traveling at a standard 3 or 4 day trip pace. The 2 night recommendation of the LAC task force assumed 5 launches/day rather than 7 launches/day. (Correspondent 2324)

Comment 408-33. Limit length of stay in each campsite (2 nights max on wild river with several 1 night camps, i.e. Granite, Oregon Hole, Saddle, Kirkwood, etc.) (Correspondent 2331)

Comment 408-34. Overnight camping by powerboaters to one night and two nights for floaters. (Correspondent 147)

Comment 408-35. One night campsite stays on motorless weeks during prime season (mid June through mid August) to keep float traffic evenly flowing through wild section. (Correspondent 2331)

Comment 408-36. Camping Reservations, Stay Lengths, Restrictions. With the increase in float launches per day, I support the limit of one night stay at each camp. This is necessary to promote a smooth flow of traffic. Along with this, the length of trip during the "motorless" week needs to be a maximum of 5 days and 4 nights above Pittsburg Landing. Longer trips must then continue on through the Scenic Section. The other issue is campsite use between Kirkwood and Pittsburg. During the "motorless" week, there needs to be no powerboat camping in this area. There are just not enough camps and with the jetboats greater mobility, they should stay below Pittsburg. (Correspondent 2329)

Comment 408-37. Stay lengths should be 2 nights during the regulated season on the wild stretch and 4 nights on the scenic, and 6 nights on both during the unregulated season. (Correspondent 2438)

Comment 408-38. Campsite stay lengths, length of trips, campsite reservations and powerboat camping from Pittsburg Landing to Kirkwood during the motorless week. On all these point I agree with Hughes comments. (Correspondent 2328)

Forest Service Response: Due to the management goals set for the wild river in Alternative G, stay lengths greater than two nights per campsite were not considered and were not within the historic average trip length for powerboaters who usually stay at one camp for the duration of a trip. Alternative G would implement a maximum stay limit of two nights per campsite and maintain the existing situation of five launches per day for multi-day float launches. If monitoring indicates campsite competition is occurring or average stay length is increasing, additional steps could include limiting total trip duration, reducing the campsite stay length, reducing the number of launches based on average stay length, and as a final measure, implementing a campsite reservation system.

During the non-motorized periods there is a need to keep float traffic moving uniformly downstream to avoid bottlenecks, visual congestion between different groups, and competition for campsites. This comment was carried forward into Alternative G and fully analyzed in development of the campsite stay limits.

Based on management goals in Alternative G, stay lengths at campsites in the scenic section may be up to four days and three nights during the primary season. During the secondary season stay lengths increase to 14 days and 13 nights in the entire river corridor.

Comment 408-39. Forest Service should limit and enforce campsites to a 5-night per campsite stay. (Correspondent 157)

Comment 408-40. I think the stay lengths are fine. (Correspondent 361)

Comment 408-41. 5 nights per camp is high impact. (Correspondent 2802)

Forest Service Response: The current stay length is five nights per campsite. Based on historic use concerning length of trips for powerboaters and floaters, this stay length is significantly higher than

the average stay length per campsite. The reduction in stay length in Alternative G is to accommodate existing stay length trends, relieve campsite competition, and manage the canyon for specific recreation experiences based upon wild or scenic classification.

Comment 408-42. I use the River corridor as much outside the control period as within it. I have seen no need for a stay restriction on any of the campsites outside the control period, with the possible exceptions of Granite Creek and Saddle Creek. (Correspondent 2358)

Comment 408-43. There should be no restriction on length of time camping, except on a 2-week basis to eliminate the "squatters." (Correspondent 2401)

Comment 408-44. Don't try to regulate length of stay for campsites except the few that are already for safety reasons. (Correspondent 2356)

Comment 408-45. The limited number of camping sites will automatically limit the number of boaters camping above Pittsburg Landing. (Correspondent 2442)

Forest Service Response: Implementing stay lengths on campsites year-round is necessary to assure a constant turnover of campsites so they are available for different groups to use. Stay lengths outside of the primary season are 14 days, 13 nights per camp site. This is identical to the stay length established for the surrounding National Forests. Stay lengths of 14 days are standard on many National Forests and are established as a tool to manage individuals who attempt to establish long-term residences on National Forest lands.

Comment 408-46. Limit campsite occupancy to no more than one party. (Correspondent 2501)

Forest Service Response: Alternative G limits all overnight stays to a maximum party size of 24. Based on past experience, camps are generally occupied by only one party. However, there needs to be some flexibility to provide for emergencies such as adverse weather that may force a group off of the river early into an occupied camp. Conditions of permits would allow only one group per campsite to reduce user conflict and resource concerns but enforcement of this rule would consider any extenuating circumstances. As a courtesy, any group that finds themselves in an adverse situation would be encouraged to contact the party occupying the site to explain their situation. Their group's behavior in camp should consider the prior presence of the other group.

Comment 408-47. Please don't limit floaters overnight camping to 2 nights while jet boaters get 4 nights. It is not fair and floaters should have the option to stay at a campsite if they wish to avoid packing and unpacking issues. Correspondent 1121)

Comment 408-48. Stay Length. This section of the alternative makes the stay length equal for all river users. Good proposal, because it does not show any preferential treatment but still allows a river corridor user a one night lay over. Environmental and economic impacts should see no significant change on this choice of stay length. (Correspondent 2342)

Comment 408-49. Stay Length. This section of Alternative C makes the stay length equal to all river corridor users. Compared to the same proposal in Alternative B, it increases the stay length. A compromise could be reached between these two proposals to satisfy all river corridor users in a fair manner. (Correspondent 2342)

Comment 408-50. Stay Length. This proposal would be fair enough if only campsite reservations were required for all river users. If you are going to control launch reservations, what are you going to do with the people once they enter the river corridor? To make the whole system work, you need to have launch reservations for all river users, campsite reservations for all river users and stay length requirements spelled out before launch occurs to offer an ORV to one's trip into HCNRA. (Correspondent 2342)

Comment 408-51. Stay length should be the same regardless of how one manages to get to a campsite. Two days is good. (Correspondent 2808)

Forest Service Response: It would be fair to make the stay lengths the same for all users.

Comment 408-52. Opportunities should remain to camp outside designated campsites and stay length should be adjusted according to the popularity of the site. This would encourage camping at less popular sites and help spread the environmental impact over a larger area, thus reducing it's effects. Landing areas at some of the more remote camp sites should be improved to encourage their use by powerboat parties. Perhaps the stay length at these sites could also be increased to encourage their use by groups who wished to remain at one camp during their stay. Drop camps, backpackers and horse packers need to be included in the system during the regulated season. (Correspondent 1190)

Comment 408-53. I also suggest that there should be campsites available for more than one or two nights. (Correspondent 128)

Comment 408-54. Stay Length. The time frame indicated could be modified to Wild R-3 nights U-7 nights and leave the scenic submission the same. (Correspondent 2342)

Comment 408-55. I also suggest that there should be campsites available for more than one or two nights. (Correspondent 116)

Comment 408-56. A suitable alternative would be to identify certain popular campsites where stays would be limited to one or two nights; others could be occupied for three or four nights. Having varied stay limits would encourage parties to use less popular sites. (Correspondent 1198)

Comment 408-57. Reconsider the two day stay limit on campsites; replace the limit with a more flexible system. This impacts powerboaters who generally set up one campsite and then recreate up and down the river. Moving a powerboat campsite makes little sense; the number of campsites occupied remains the same and there is no change in campsite availability. ...identify the choicer, more popular sites to be occupied for three or four night; having varied stay times would encourage the user to occupy the less popular sites. (Correspondent 880)

Comment 408-58. The two day stay limit should be replaced with a more flexible system. (Correspondent 1198)

Comment 408-59. The Forest Service should reconsider the two day stay limit on campsites and have it replaced with a more flexible system. The two night limit has less impact on the floaters who usually change their campsites daily as they progress down river. Moving a powerboat party from one site to another makes little sense. The number of campsites occupied is the same and there is no change in campsite availability. More fuel is consumed, more trips are made on the river, parties are inconvenienced needlessly, their activities disturbed and a campsite still occupied each night. A suitable alternative would be to identify certain popular campsites where stays would be limited to one or two

nights; others could be occupied for three or four nights. Having varied stay limits would encourage parties to use less popular sites. (Correspondent 876)

Comment 408-60. I support B, however only with the following changes. First, change the two day stay limit on campgrounds. Moving a powerboat party from one site to another is pointless because there is no change in the number of campsites available, fuel is consumed needlessly, traffic increases on the river, and it would be a time consuming inconvenience. (Correspondent 1071)

Forest Service Response: Based on the best available use information for private powerboat stay lengths in the wild river from 1981-1991, and accounting for the potential increased demand for a limited launch opportunity, the average stay length in the wild river is projected to be three days. This would involve a need for an overnight camp for two nights. Because powerboaters would have a limited opportunity for launches, the requirement to move camp would accommodate the average stay length and at the same time, encourage a regular turnover of different campsites for use by other powerboaters and floaters. Powerboaters could stay in the wild river corridor longer but would have the inconvenience of moving their camp to another site. Campsites are a limited recreation resource within the canyon, especially those sites that still have beaches.

Under Alternative G, site specific campsites could have additional restrictions such as one day stay lengths based upon such factors as user demand or resource impacts. Several camps have been managed this way for many years such as the Granite Creek campsites and Saddle Creek.

The argument that fuel would be consumed needlessly is unfounded. Powerboaters normally locate their campsite, set up, and then travel up and down the river ranging over many miles for fishing. During this time they have ample opportunity to locate vacant campsites. The main impact to moving a camp is inconvenience.

Comment 408-61. Power boaters should be required to stay at one site instead of two or three, unless they sleep on the boat. (Correspondent 1143)

Forest Service Response: Powerboaters should have the flexibility to move their camp if they choose. Alternative G provides for stay lengths at campsites so all campsites will turnover on a regular basis to make sites more available for river users.

Comment 408-62. The increased launches for jet boats on weekends will begin on Friday, the same day that float trips leaving the river at either Dug Bar or Heller Bar (which launched at Hells Canyon Creek during the non-motorized week) will be in the scenic section. This could create a campsite shortage situation on Friday and Saturday nights, when upwards of 40-60 jet boats could be present, as well as jet skis, and floaters coming in from the lower Salmon R. It will also create more impacts to biological resources in the Scenic Section, which the DEIS states (at I-3) is the "most biologically sensitive." (Correspondent 1196)

Forest Service Response: The scenic designation of a river allows for a higher level of use than a wild river. The intent is to manage the two sections of the river to provide a different level of recreation experience. One trade-off for a non-motorized experience in the wild river is a higher level of use as float parties proceed into the scenic river. Floaters will have personal choices to make in determining the type of experience they desire and the length of trip and timing of a trip that will best achieve their goals.

Alternative G provides a level of use in the scenic river which considers the higher level of one day private powerboat trips, fewer float trips continuing below Pittsburg Landing, and probable levels of campsite competition.

Comment 408-63. Only allowing float parties 2 nights camping forces them to push thru the upper portion; therefore, restricting their ability to take side trips at the various points of interest. (Correspondent 2402)

Comment 408-64. The number of nights allowed on the wild river section should be 3, not 2. (Correspondent 2856)

Comment 408-65. Jet boats would be allowed to remain in the wild river section for four nights, floaters for only two nights. (Correspondent 2789)

Comment 408-66. Length of Stay - Two nights above Kirkwood is overly restrictive for fishing/camping parties. Our groups go to lower Hells Canyon for the excellent smallmouth bass fishing above Johnson Bar. By having a 2-night limit, a party needs to cover 27 miles to get below Kirkwood. I would rather see that consideration be given to 4 nights. (Correspondent 2409)

Comment 408-67. The plan restricts floaters to 2 nights on the wild river, while jet boats get four night. This is both illogical (jet boats move faster than floaters!) and absurd. (Correspondent 2787)

Comment 408-68. The proposal additionally discriminates against float craft on the river. Nights allowed on the river are inordinately tilted toward the jetboater, leaving just 2 allowed nights compared to the jetboats 4 nights. (Correspondent 2425)

Comment 408-69. While we generally support Alternative F on many points, we feel that the length of stay in the wild section is too short at two nights. It should be three. (Correspondent 2841)

Comment 408-70. Why are floaters restricted to 2 nights on the wild section but powerboaters get 4 nights? This section is confusing and makes us suspicious of this alternative. Are floaters getting as many "uses" (launches, campsites, camp nights) of the river as powerboaters? They should. (Correspondent 2894)

Comment 408-71. Allowing motorized to remain 4 nights while floaters only get two is also unfair. (Correspondent 2695)

Comment 408-72. Alternative E gives preference by allowing motorized craft to stay twice as long as floaters. (Correspondent 2506)

Comment 408-73. I would ask, however, that you ensure that non-motorized craft are excluded from the river an equal amount of time to float craft. Allowing jetboats to remain in the wild river section for 4 nights would appear unbalanced in favor of jet boats. (Correspondent 2422)

Comment 408-74. Stay Length. The number of days in the Wild sections of the river corridor need to be increased to 3 nights to accommodate a layover day and people wishing to fish the upper section of the river between HC Dam and Rush Creek Rapids. (Correspondent 2342)

Forest Service Response: The two night stay refers to the length of stay per campsite, not the duration of the entire trip. The confusion has been resolved in Alternative G by providing for a maximum two night stay limit for all users in the wild river corridor.

Campsite Reservations

There were a number of correspondents that discussed the pros and cons of whether or not a campsite reservation system should or should not be implemented. Some individuals did not want additional regulation placed on their trip. Others wanted reservations so they would be assured of a campsite at different points in their trip. Still other comments dealt with the need to maintain flexibility for users or to allow river users to camp outside of designated campsites. There was also some concern about how other river corridor users such as drop camps and trail users would fit within a campsite reservation system.

Comment 408-75. Assigning campsites will never work. There are presently 58 (more or less) campsites between Hells Canyon Dam and Pittsburg and I have never seen more than a dozen of them occupied in what has been literally hundreds of trips. (Correspondent 1782)

Comment 408-76. Campground reservations requirements for groups regiments trips and makes it more difficult for less frequent users of the river and tends to make the trip much less enjoyable. If there is a need to close some campsites because of over use, do it, but don't regiment usage of the river. (Correspondent 2402)

Comment 408-77. Camping should not be restricted to designated locations only as some of the powerboaters camp in their boat and only need a place to tie up along the rivers bank. (Correspondent 437)

Comment 408-78. Campsite reservations I think is not a need. (Correspondent 361)

Comment 408-79. Don't institute campground reservations. You won't need to with the option E since you're decreasing the volume significantly. (Correspondent 1121)

Comment 408-80. I see no need to institute a further layer of order and bureaucracy by requiring reservations. I prefer to float with "river-time" and camp where and when I prefer. In the 13 years I have been floating this section the only problems I have had with campsite availability has been in the last few years because of increased power boat use. This past summer in one three mile section of river below Johnson Bar I counted 17 power boats camped or traveling on the river. We were able to find a good camp but there were four other float parties that had to go further down the river to make camp. I have appreciated the flexibility of make camp if the weather was inclement and the only problems I have had with accessibility was due to unrestricted power boat use. (Correspondent 2808)

Comment 408-81. I would not like to see a campsite reservation system except as a very last resort. (Correspondent 2505)

Comment 408-82. I would oppose camp reservations. On occasion, weather and unforeseen emergencies would create safety issues if campsites were assigned. (Correspondent 2353)

Comment 408-83. The campsite reservation system has been tried in the past and failed. We are opposed, but do have great concern about conflicts it would create if put in place. There is too many people into the canyon from too many different directions. Maybe some new campsite could be made and/or unused designated campsite improved. (Correspondent 1194)

Comment 408-84. The campsite reservation system in Alternative B seems like a problem. People would need to be hired, costing the people more money. Campsites should be used on a first come first serve basis. In order to camp at more obscure locations, will mean developing more campsites and disturbing the landscape. Why should floaters be assured access to enough campsites to meet

their needs? The floaters aren't any better than anyone else. They should be treated equal to powerboaters. (Correspondent 127)

Comment 408-85. I would like to see the management plan take a "wait and see" attitude towards campsite reservation. If floaters, jet boaters and drop camp users all used the lottery system to obtain permits, I don't think we would have the pressure on campsites which I observed this year. Part of the wild river experience is to be able to explore new camp areas and be spontaneous as to how far you will travel each day. If the decision is made to have camp site reservations I would like to see it done in such a way that the first groups of the day doesn't get to pick all the best camps. The other point I would like to make about camp site allocation is matching the camp to the size of the group. Last year we floated by a camp of two people that on three days in a row jumped ahead of us and occupied prime camps that could easily hold 30 people. So by matrixing the camps as to quality and size a fair system can be devised. (Correspondent 2827)

Forest Service Response: Now is not the time to initiate a campsite reservation system. Monitoring needs to occur upon implementation of a river plan that limits jetboat traffic to see if the limits reduce campsite competition to acceptable levels. A campsite reservation system does not provide for much flexibility in altering a trip schedule due to inclement weather, to explore the canyon, or lay over an extra day at a campsite. Some boaters who have never been on the river before can have difficulty in locating their camps, creating the potential for conflict with campers at other reserved sites. It is an additional expense to operate and involves an increased level of user education. Use should be managed at the portals as much as possible so when people get on the river, they have a greater sense of freedom to set their own time schedule and choose camps based upon personal preferences.

Comment 408-86. I believe that powerboats must be restricted, as floaters are, for the following reasons. First, the campsites that are available between the Hells Canyon Dam and Kirkwood Historic Ranch are limited. On high demand days it is next to impossible for a float party to camp at some of the nicer camps because powerboats often have greater flexibility in obtaining these sites earlier in the day than people who are floating. (Correspondent 2806)

Comment 408-87. All overnight campsite reservations should be made in advance and rafters should be able to secure campsites in advance since jetboaters can take all sites early with their high speeds. (Correspondent 2464)

Comment 408-88. I would, however, like to see some method of issuing campsite permits to jetboaters and floaters on an equal basis. Unpowered floaters can't rush downstream to find a campsite, as powerboaters can. It would be nice to know if the site you want will be open, especially if you float into early evening. (Correspondent 923)

Comment 408-89. If possible I would like to see some kind of reservation system implemented for campsites in the wild section. Jet boats from Pittsburg Landing and Heller Bar drop off a sleeping bag at the best camp spots then leave, leaving only leftovers for floaters. (Correspondent 2537)

Comment 408-90. Having camp sign-ups so power boaters don't set up a campsite, leaving it for days without using it. (Correspondent 2792)

Comment 408-91. Campsites at Kirkwood and from there to Pittsburg should be included in the reservation system for floaters during the non-motorized week. Many floaters, especially those launching late in the week, will want and need to camp at or below Kirkwood. If the reservation system for floaters is not extended to include this portion of the river, floaters will rarely, if ever, find a campsite not occupied by a powerboat. Effectively, without the reservation system, floaters will never be able

to camp in this section. This would be neither appropriate or equitable. Powerboaters are able to camp at or below Pittsburg and still travel to Kirkwood during the non-motorized week. For the same reasons, drop camps should not be permitted during the non-motorized week. (Correspondent 2236)

Forest Service Response: A launch reservation system for powerboats in the wild river in Alternative G would eliminate peak use days and create a lower level of powerboat use. This should reduce competition for campsites between users. However, campsites would still be managed on a first-come, first-served basis.

Comment 408-92. Although it will be a nightmare at first, assigning campsites for powerboats and floaters makes good sense. (Correspondent 426)

Comment 408-93. Campsites are the limiting factor for the management of Hells Canyon. Campsites have shown great increases in use during the 13 years that I have used the canyon. Please develop a carrying capacity for the river based on PAOTs and maximum numbers use levels for all users combined and a lot and assign campsites from both ends of the canyon. (Correspondent 2385)

Comment 408-94. Campsite Reservations: Wild: Concur with recommendations of [Alternative] C. Scenic should be required. Reservations for campgrounds should be required for all sections of the river. (Correspondent 2790)

Comment 408-95. Campsite reservations system should be extended to Pittsburg. (Correspondent 2321)

Comment 408-96. It would seem consistent with management of the area that the Forest Service would want to assign beaches. That could be done very easily when users enter the recreational area. (Correspondent 2339)

Comment 408-97. Have the camp sites permitted, assigned and enforced. (Correspondent 1162)

Comment 408-98. I favor campsite reservations and the number of permits not exceeding the number of campsites. (Correspondent 2834)

Comment 408-99. The campsite reservation system recommended in Alternative B should be implemented. (Correspondent 1198)

Comment 408-100. I fully support campsite reservations from and including Fish Trap Bar upriver. (Correspondent 2311)

Comment 408-101. I particularly like the campground reservation system like the Middle Fork. (Correspondent 2305)

Comment 408-102. Establish authorized campgrounds and try to control poisonous plants in these campgrounds. This will make for a better journey for children. (Correspondent 2464)

Comment 408-103. I like the idea of some permanent camp set up so that these areas can be better managed without the entire river shore becoming abused. (Correspondent 2802)

Comment 408-104. I would require campsite registration and a 2 night limit for all users down to Pittsburg. (Correspondent 2826)

Comment 408-105. Incorporate provision for camp use and conduct as delineated by LAC. (Correspondent 1118)

Comment 408-106. Campsites. Extend the allowable time to three nights in the wild section and have a reservation system for both floaters and jet boats. A reservation system will provide surety and eliminate conflicts. The trip will be much more enjoyable for floaters because they will not feel the need to scramble to get a campsite. Having experienced this system on the Middle Fork, I know that it works and it enhances the experience. (Correspondent 2237)

Forest Service Response: A three night stay length per campsite in the wild river is too long due to the lack of available campsites in some stretches of the wild river (especially from Granite Creek Rapid to Johnson Bar). A campsite reservation system does not provide for much flexibility in altering a trip schedule due to inclement weather, to explore the canyon, or lay over an extra day at a campsite. Also, some boaters who have never been on the river before can have difficulty in locating their camps, creating the potential for conflict with campers at other reserved sites.

Comment 408-107. I feel that the campsite reservation system recommended in Plan B should be adopted. However any reservation system should be user-friendly. (Correspondent 1184)

Comment 408-108. I would support Alternative B with the following modifications: the campsite reservation system listed in plan B should be adopted and flexible enough to be user-friendly. Users of the canyon should be allowed to provide input in the development of a reservation plan. (Correspondent 203)

Comment 408-109. I also think that campsite reservation systems recommended is something that is needed. Just make as simple as possible. (Correspondent 1183)

Forest Service Response: Campsite reservations are not needed at this time. With reduced numbers of powerboats during peak use periods, a first step is to monitor overall use under the new management plan and determine if the adjustment to use has resolved campsite competition. If a reservation system must be adopted in the future, users would be consulted to make sure the system was as user friendly as possible.

Comment 408-110. I feel that the campsite reservation system recommended in plan B should be adopted. Users should be consulted during its development. The opportunity to camp at more obscure locations should not be taken away; don't confine use to designated sites only. (Correspondent 970)

Comment 408-111. I also feel that the campsite reservation system be made user-friendly. Users should be consulted during its development. The opportunity to camp at more obscure locations should not be eliminated. Floaters should be assured access to enough campsites to meet their needs. (Correspondent 1076)

Forest Service Response: Under Alternative G all river users would be able to choose where they want to camp on a first-come, first-served basis. Based on historic patterns of use, shoreline topography, and limits on numbers of all river users, the most popular sites would continue to be those locations which have been used consistently over the years. With use focused on these sites, potential for impacts to new sites should be reduced, although river users would still have the opportunity to use less popular dispersed camping sites.

Comment 408-112. Camp reservations for all river corridor users is a must, to help equalize the pressure on campsites and to reduce conflicts between river users as in the present first-come-first-serve system. This needs to be tied to launch reservations for all river craft users and to stay length. Put all three factors together you will have a workable plan. (Correspondent 2342)

Comment 408-113. Campsite Reservations. To make any management plan work in the Hells Canyon because of the increased exposure and use, this proposed requirement of no reservations for campsites is only bound to increase visitor conflicts and erode the ORV of the intended use. Campsite reservations should be required for all river corridor users. (Correspondent 2342)

Comment 408-114. Campsite Reservations. To make the equal opportunity for ORV of the river corridor and reducing visitor conflicts in Hells Canyon. This proposed use is a must for all river users in the controlled season. (Correspondent 2342)

Comment 408-115. Campsite availability is a very real and severe problem, especially for floaters. With the anticipated increase in use on the Scenic Section, and especially below the mouth of the Salmon River, this competition for campsites is going to become even more intense. A campsite reservation system for all users should be implemented now, before this problem gets worse than it is. People coming down the Salmon River would be required to participate in this system or pass through without camping. The above campsite reservation system is the much preferred and highly recommended course. If this is not adopted, the next best route would be to follow the LAC recommendation that a reservation system would be required when 90% of campsites are occupied on 50% of the weekends. This should be monitored specifically in July and August and specifically below the mouth of the Salmon River. It may be necessary to require a campsite reservation system below the Salmon River mouth to reduce conflicts in that area before a system would be required above. (Correspondent 2236)

Comment 408-116. Pages Iv-21 through 23. Competition for campsites can be alleviated simply by implementing a campsite reservation system. It serves no purpose to separate alternatives because of a factor so easily mitigated. Due to their limited mobility, floaters must be given priority in securing campsites. (Correspondent 1198)

Comment 408-117. A first step would be to institute an efficient campground reservation system for the different users. We have seen such a program successfully in operation for many years on the Middle Fork of the Salmon River in central Idaho. Competition among the river users to reach the prime camping spots first, a practice which detracts from the overall back country experience, could be avoided. (Correspondent 2217)

Comment 408-118. In my experience on the river, the major source of conflict (particularly in the last couple of years as use rises) has been over selection of a campsite, not primarily between social values of different use groups. Segregation is not the solution to user conflicts; campground reservations are. (Correspondent 2311)

Forest Service Response: Alternative G would not implement a campsite reservation system. Instead, monitoring would be used to determine if additional steps would be necessary to resolve campsite competition. A reservation system would be considered if other steps taken did not adequately resolve the issue.

Comment 408-119. I think camp reservations work well to relieve tension between multiple users on the river. It is a system that seems to have proven itself on the Middle Fork. (Correspondent 2802)

Forest Service Response: There are pros and cons to campsite reservations. Reserved camps can cause problems for users who have never been on the river and they may set up at the wrong camp by accident. Boaters do not have the option of laying over for an extra day in case of inclement weather, etc. This can create stressful situations for groups. The system on the Middle Fork is not comparable because it involves management of downstream traffic only with user groups traveling at about the same rate of speed.

Comment 408-120. Page IV-25. The Alliance [Hells Canyon Alliance] seriously questions the conclusion in the first paragraph under Alternative B, Hells Canyon Dam to Kirkwood. While use may increase within the limits, it will never reach the potential because of personal preferences of the people involved. The modifications proposed by the Alliance would resolve the only serious problems with this alternative. Predictions of conflict are unfounded if campsites are reserved, thus removing the primary source of conflict. (Correspondent 1198)

Forest Service Response: A maximum limitation in this situation represents a standard that is not to be exceeded rather than a goal to strive to achieve. The limit may never be reached on a sustained level over a period of time. However, continued growth in boating related recreation, which has been a nationwide trend for many years, increases that potential. As a result, maximum limitations could easily be attained on any given day or over a period of consecutive days based upon "personal preferences" and Snake River historic use patterns.

A campsite reservation system would probably not resolve the majority of user conflict. It would only resolve the issue of where people camp, not their interaction while traveling on the river or the effect of river traffic traveling past their campsite. These issues deal with encounters with other groups. With the larger number of boats allowed on the river in Alternative B and the effect of their accumulative numbers over a period of several days, the potential rate of encounters between groups in Alternative B is much greater than existing use.

Comment 408-121. A campsite reservation system making users accountable for how they leave the campsite. (Correspondent 2882)

Comment 408-122. Campsite Reservations. I strongly support a campsite reservation system for both the "motorless" and "motors only" weeks. Only with a campsite reservation system will all users be accountable for how they leave a camp. Without a campsite reservation system, it will be impossible to enforce low impact camping regulations in Hells Canyon. The campsite reservation system for float groups should be extended to camps from Kirkwood to Pittsburg Landing during the "motorless" week. These camps are needed to accommodate float groups during the "motorless" week. (Correspondent 2324)

Comment 408-123. Campsite Reservations. This proposed change is long overdue. Other river management plans have incorporated this into their plan, i.e., The Middle Fork of the Salmon River and the Selway River, and have successfully used them for years. This proposal will need to be monitored and enforced by the Forest Service if it is going to be successful. With controlled stay length days and camp reservations, the impact of the campgrounds should be lessened because it will allow campers more time to police their campsites as to the established standards set forth by the Forest Service. (Correspondent 2342)

Comment 408-124. I also support a campsite reservation system so all river users are accountable for how they leave a campsite. (Correspondent 2776)

Comment 408-125. These unwieldy numbers of users most certainly are increasing the human impact on the river. Reducing the number of total users will reduce the impact. Maybe you could implement a sign-up system of the campsites so that users would be held accountable for the state in which they leave their campsite. (Correspondent 2239)

Comment 408-126. Sites should not be confined by designated areas only, but strictly enforced rules should be placed on littering and improper and disrespectful use of the sites. (Correspondent 128)

Comment 408-127. If you are setting up any type of camp or making fires you should register with the Forest Service the day of launch. This will make it possible to hold messy campers liable. (Correspondent 2464)

Comment 408-128. Sites should not be confined by designated areas only, but strictly enforced rules should be placed on littering and improper and disrespectful use of the sites. (Correspondent 116)

Forest Service Response: Campsite accountability is a function of a river user's basic land ethics and is an attribute that must be developed prior to the river trip through user education. Most people who have the knowledge of good land ethics and understand the need for compliance with low impact camping would perform accordingly with an emphasis on protecting the resource to the best of their ability throughout the river trip.

In the context stated in the above comments, accountability is more a component of the possibility of a group being subject to a law enforcement action if a campsite is not left in a satisfactory condition. While a reservation system would narrow the possibilities of determining the guilty parties, it would not provide proof positive that the last group who had a reservation for the site was the responsible party. Other river users as well as hikers and horse packers would also have access to river campsites and the site may go for a period of time with no reservation assignment before the problem is discovered. The problem may also not be discovered or reported for a period of time even if occupied by other groups.

An emphasis on user education would go much further in long term protection of the river's resources when compared to the expense and loss of spontaneity for users while on the river if a campsite reservation program is in place. Alternative G focuses on managing users at the portals and allowing them the maximum freedom possible within appropriate land ethic standards and social standards once they get on the river. The possibility of a mandatory campsite reservation program in the future that would result if monitoring indicated a general lack of compliance with low impact camping practices could serve as a valuable incentive for voluntary compliance.

Comment 408-129. Fall hunting camps should be registered and monitored to assure the proper ethical camping procedures. (Correspondent 2810)

Forest Service Response: All camps, including drop camps in the secondary season when hunting takes place, are now required to have a self-issued permit for entry into the area. Monitoring is performed by the River Ranger at these sites to make sure that these camps are using low impact camping practices. This would continue under Alternative G.

Permits for Trail Users

Comment 408-130. In addition to prohibiting motorized traffic above Kirkwood Creek, the number of float parties, pack-in parties and hiking groups should be controlled to be consistent with the available campsites in the wilderness portion of the national recreation area. Excessive traffic damages riparian

areas because everyone is looking for an untrammelled campsite. This causes a gradual and persistent enlargement of trafficked areas. (Correspondent 2869)

Comment 408-131. Backpackers and Horsepackers: Self issue permits required. (Correspondent 1190)

Comment 408-132. I would like to see permit use for foot, horse, mule and floating devices. This would require registration and control. Of course, a fee would be required by users. (Correspondent 2534)

Comment 408-133. In that regard, the Draft EIS should not ignore the other uses of the canyon that affect the river. For example, decisions on the use of campgrounds along the river by float boaters and power boaters should not be made in isolation from hikers and riders who traverse the canyon to reach the river on the many trails. (Correspondent 2217)

Comment 408-134. Require camping permits for all users (horsepackers, backpackers, boaters) year-round in the wild section and during the control season in the Scenic section. (Correspondent 2501)

Forest Service Response: There is a need to manage foot and horse traffic so all users have specific guidelines in the river corridor to minimize their impact. Alternative G would require permits for all users of the river corridor on a year-round basis including aircraft landing at airstrips within the river corridor. Some of these would be self-issued permits. All use levels would be monitored to determine their effect on ORV's.

**Boat Size
Code 409**

There was public interest in limiting the size of jetboats, especially in regard to the effects of wakes caused by larger boats. The following are examples of these comments:

Comment 409-1 . Restrict the length to maybe 35 or 37 feet, one deck boats. (Correspondent 1041)

Comment 409-2 . Commercial powerboat use is a concern. I think those enormous boats (like Beamer's) definitely erode the shore. I would like to see the size of the boat restricted to about 35 feet in length. (Correspondent 1065)

Comment 409-3 . Power boat size be limited to 25 feet from Kirkwood to the Dam. (Correspondent 1078)

Comment 409-4 . Same problem with double decker jet boats and navigational markers (wild portion only). The task force alternative prohibits them, and I assume from your silence on the issue that your alternative would allow them. Why? They intrude unnecessarily into the canyon and detract from the recreation experience you say you are trying to provide. The huge single level tourist boats are bad enough; how does turning the canyon into a freeway meet anyone's objectives? (Correspondent 1085)

Comment 409-5 . If controls are instituted then I feel the most important one should be limiting the size of jetboats. The large jetboats raise havoc with the shore line. (Correspondent 1137)

Comment 409-6 . Placing the proposed limit of 44 feet in length, we support. (Correspondent 1194)

Comment 409-7 . One incorrect item was noted on page 1-3, 4th paragraph under "Allocate Powerboat Use Levels." The U.S. Coast Guard does not have additional requirements for rivercraft over 44 feet in length. We do, however, have additional requirements for inspected vessels over 26 feet, 39.6 feet and 65 feet in length. These are primarily related to safety and stability requirements for a vessel. (Correspondent 2227)

Comment 409-8 . I would personally like to see a complete stop to all river navigation of boats above 22' in length. (Correspondent 2256)

Comment 409-9 . Without some control on the larger commercial tour boats, there will some day be no beaches of sand left on the river. (Correspondent 2256)

Comment 409-10. I see a need also for the larger commercial jetboats, because many people use them on vacations, etc. (Correspondent 2403)

Forest Service Response: The DEIS used the LAC recommendation of 44 feet as the maximum size (length) which at that time was thought to be the standard for vessel length where additional requirements were imposed by the Coast Guard for inspected (commercial) vessels. Alternative G uses current Coast Guard standards and places a maximum size of 39.6 feet on all boats operating on the Snake River. Any boats larger than 39.6 feet in length currently in operation would be "grandparented" and allowed to continue operation for the life of the boat. These requirements would accommodate all existing commercial tour boats and is consistent with current Coast Guard standards. Only single deck boats without flying bridges would be allowed. Engine covers are normally elevated several feet above the passenger deck of the boat and seating for drivers and/or passengers in this area would also be allowed.

In addition to this requirement, there would be limits on numbers of all powerboats entering the river corridor during the primary season and a method in place to expand these limits if growth occurs in the secondary season. This would address and partially resolve some of the issues concerning encounters with both large and small powerboats and reduce the effect of boat wakes on shorelines even though the effect of these wakes on beaches is negligible compared to clear water flows from upstream dams.

We expect the size (length) of private, individual, and family-owned powerboats to continue to be primarily controlled by market conditions, i.e., the initial expense of purchasing a jetboat. This factor and associated operating expenses should result in a continued trend in private powerboat size of 25' in length or less.

Length of High Use Season Code 410

Many correspondents commented on the length of the high use season. Some disagreed with expanding the season based on monitoring results. Some felt the season should be longer than proposed in the DEIS. Examples of these comments follow:

Comment 410-1 . I find disturbing the idea of the expansion of the regulated season based on monitoring of numbers from the un-regulated season. (Correspondent 361)

Comment 410-2 . Alternative E has criteria to extend the control period in the spring or fall for the Wild and Scenic segments, which I believe are much too low. This would be very unacceptable because

it limits use during steelhead fishing and big game hunting seasons. During this time float traffic is almost non-existent. (Correspondent 1071)

Comment 410-3 . Criteria defined in Alternative E to extend the control period in the spring or the fall for both the wild and scenic river segments are set much too low. With present fall use, the control season would be extended almost immediately. This is totally unacceptable because it would limit use during the steelhead and the big game seasons. During this period float use is minimal to non-existent, except for a few chukar hunters and the short burst of use artificially created by the end of control period restrictions. (Correspondent 2110)

Comment 410-4 . I support your monitoring of the unregulated season in order to begin management once certain periods of use exceed acceptable levels. The Forest Service should view the unregulated season in "blocks" of time such as early fall, late fall, winter, early spring for such purposes. For example, it will become necessary to regulate early fall and late spring well before regulation is necessary during winter. Low impact camping, etc. rules designed to protect the area must be enforced during the unregulated season just as they will be during the regulated season. (Correspondent 2324)

Forest Service Response: The development of use limitations for all river users was to assure that the ORV's in the river corridor were protected and enhanced as required by the Wild and Scenic Rivers Act. Expansion of the primary season would be dependent upon whether or not these use levels were occurring on a sustained basis outside of the primary season. Monitoring would occur to determine the extent of any similar use patterns. In Alternative G, expansion would occur in weekly increments, no more than one week (7 days) per year at a time on either side of the primary season and only after monitoring in two out of three years indicated that use trends had become similar to the primary season.

Comment 410-5 . The start of the regulated season should be advanced to at least the 1st of May. My point, of course, is that by beginning the regulated period as late as the end of May, you make it impossible for a hiker to plan a trip that comes during the optimum climate time and avoids the intrusive racket of power boat motors and airplanes. (Correspondent 2341)

Comment 410-6 . I feel you should continue to limit daily access to the river May 15 through September 15 by all groups as you have in the past to protect the river. (Correspondent 2353)

Comment 410-7 . If a new regulated season is established, run it thru September 30, not the 10th as proposed. There were not enough campsites to accommodate the multitude I witnessed on the river September 18-20 of this year. (Correspondent 2409)

Forest Service Response: Alternative G follows the recommendations of the LAC planning process in setting the primary season from the Friday before Memorial Day through September 10th. Any change in this season would be due to expansion of the primary season as a result of monitoring and follow specific guidelines.

Comment 410-8 . The seasonal caps for both floaters and powerboaters should be lifted. If daily limits are acceptable, seasonal caps serve no purpose and could give reason for conflict in the future. (Correspondent 1095)

Comment 410-9 . While being supportive of Alternative B I feel there should be changes like lifting the seasonal caps for users, it serves no purpose if daily limits are acceptable. The original limits of

acceptable change version of this alternative provided a trigger point at which use limits would be considered but these items are missing in the DEIS. (Correspondent 1113)

Comment 410-10. The seasonal cap should be lifted because if the daily limits are acceptable, the seasonal cap serves no purpose and may give additional reason for conflict in the future. (Correspondent 1129)

Comment 410-11. Please do away with seasonal caps on boats and floaters. There are businesses that depend on the river and the area benefits from tourists like my California family and others. (Correspondent 1145)

Forest Service Response: Seasonal use limits would not be used under Alternative G and use would be managed by daily launch limits for all river users. The seasonal cap on powerboats developed during the LAC planning process was not used to arrive at the figure of six private powerboats per day in the wild river under Alternative G, but it was used as supporting rationale since it represented a more conservative recommendation on numbers.

Comment 410-12. The Forest Service must prepare for driftboaters, rafters and kayakers to use the river at some maximum capacity, commensurate with space and carrying facilities over the longest possible time period - certainly beyond Sept. 10. (Correspondent 2390)

Comment 410-13. We support regulating numbers of both floaters and powerboats-- as we see the protection of the canyon, the river and the native inhabitants as the primary importance. It seems that upper limits should be set for all seasons (not just the high use season) to prepare for the future and possible overuse in off-seasons. (Correspondent 2894)

Comment 410-14. I believe the permit system for launches should be kept similar to what it is now. And if overcrowding and overuse is shown to be occurring outside of high-use season, that too should be controlled. (Correspondent 2695)

Comment 410-15. Page II-21. This language appears for every alternative and would probably be workable if it was handled just as written, basing expansion on an average of the entire unregulated season. We understand, however, that the Forest Service intends to manage this on a week by week basis. There is always a "spurt" of use at the end of a control period. As the Forest Service modifies the season, the "spurt" will move. (Correspondent 1198)

Comment 410-16. Any caps/use restrictions, etc., should apply year round. If the restricted season is defined as the low use season, it should be all the easier to stay within restrictions. My experience is that use increases in those "low use" seasons. The laws are not part year or seasonal. (Correspondent 2345)

Forest Service Response: Alternative G would monitor total river use (floaters and powerboats combined) in the secondary season to determine if combined use levels were similar to those taking place in the primary season. If this were the case, the primary season would be extended in weekly increments at a maximum rate of one week per year after monitoring in two out of three years indicated these levels of use were occurring.

There would probably be a point in time at which this use would taper off substantially when weather or river conditions were not as favorable for floating, reducing the overall use of the river.

Comment 410-17. I don't see a need for any limits on boating use outside the high use season. (Correspondent 2505)

Forest Service Response: Under Alternative G, limits on boating would not occur in the secondary season unless monitoring indicated the total level of boating use was similar to the limits established for the primary season in the different sections of river.

Hunting/Fishing Code 411

Some comments expressed concern that use limitations would unnecessarily restrict river access for fishing and hunting.

Comment 411-1 . When the northwest fishing gets built back up and salmon and steelhead number get built back up, with limited launches a lot of individuals would be denied access to this fishing.

Comment 411-2 . Alternative E severely impacts hunting and fishing access. (Correspondent 306)

Comment 411-3 . An "every other week" scenario would cut my steelhead fishing in half or even less. (Correspondent 420)

Comment 411-4 . I fail to see the justification for limiting day access for the area from Cache Creek to Pittsburg during May and June when some of the best smallmouth bass fishing is happening in the canyon. (Correspondent 569)

Comment 411-5 . After years of many agencies working to bring spring Chinook back in catchable numbers, it confuses me that another agency would limit or restrict access so the public could not fish effectively, as the river is large and wide boat access is the logical way to harvest these fish. The angling public should be given as good an opportunity to fish for and catch these fish. (Correspondent 569)

Comment 411-6 . Alternative E would completely destroy any fishing that I like to do during the high use period. It is totally unacceptable to any working person. (Correspondent 643)

Comment 411-7 . Alternative E will eliminate my opportunities to continue to use 4 fisheries that I have enjoyed for over 15 years. (Correspondent 686)

Comment 411-8 . The best fishing in the HCNRA is found above Pittsburg Landing in the wild section of the Snake. (Correspondent 686)

Comment 411-9 . I also think to limit the jetboaters use of the river during steelhead fishing is totally unnecessary. The weather and water is too cold for very many floaters during that time. (Correspondent 786)

Comment 411-10. Criteria defined in Alternative E to extend the control period in the spring or the fall for both the wild and scenic river segments are set much too low. With present fall use, the control season would be extended almost immediately. This is totally unacceptable because it would limit use during the steelhead and the big game season. (Correspondent 876)

Comment 411-11. I would like to see the Forest Service add additional launches in the future for any consumptive salmon fishing seasons above Wild Sheep Rapids. The taxpayers are investing a large

amount of money to produce this fishery. It would be ironic if, after such an investment, fishermen were denied access to the fish. (Correspondent 943)

Comment 411-12. One of the goals of the millions of dollars being spent on hatchery programs is to get fishable numbers of chinook back to Idaho. Fish arrive during the control period in June and early July. It will be virtually impossible under Alternative E for sportsmen to harvest a significant number of salmon. (Correspondent 970)

Comment 411-13. We feel that hunting activities should also be included into the management planning. (Correspondent 1055)

Comment 411-14. Before your next ten year review comes up there will be hatchery identifiable spring chinook in catchable numbers at the terminal area of Hells Canyon Dam. IDF&G [Idaho Department of Fish and Game] asked sport anglers to wait until hatchery fish were available to keep the state's hands clean in the endangered species arena even though springs are outside the group anyway. After years of many agencies working to bring these fish back in catchable numbers it confuses me that another agency would limit or restrict access so the public could not fish effectively. As the river is large and wide boat access is the logical way to harvest these fish. The area at the dam and down stream to Wild Sheep is not a destination but a terminal area for launching. White water rafters are not interested in fishing as much as they are in running white water, thereby there should be few conflicts. I simply feel that the angling public should be given as good an opportunity to fish for and catch these fish. (Correspondent 1111)

Comment 411-15. It is also my understanding that the best fishing is farther upstream toward the dam for those who love fishing, and any shortening of the available channel for powerboating would adversely affect such fishing opportunity. (Correspondent 1832)

Comment 411-16. I am concerned about your plans to manage the Snake River and not allow jet boats access to be able to fish for sturgeon/steelhead. I want to be able to continue to enjoy this activity in the future as I have in years past. (Correspondent 2500)

Comment 411-17. Please consider the river as one for all sportsmen and sportswomen of a large area of Idaho, Washington and Oregon. (Correspondent 706)

Comment 411-18. Alternative E with its every-other-week system for float and power access in the wild river segment during the control period halves the potential access for sportsmen, unless they have access to both types of craft. This major reduction in access has significant impacts on sportsmen, particularly the majority who rely on powered craft. (Correspondent 2110)

Comment 411-19. Alternative E cuts access opportunities in the scenic river which, in turn, cut into the sturgeon and bass fishing opportunities during the control period. (Correspondent 2110)

Forest Service Response: Alternative G does place limits on all types of watercraft but with no intent to deny access for fishing and hunting opportunities. The goal of the Forest Service in administering the Wild and Scenic Rivers Act is to protect and enhance the ORV's which caused the river to be designated. This includes the fisheries ORV as well as the recreation ORV. With limits on numbers of users, the quality of recreational fishing should be enhanced. Fisheries, which focuses on population diversity, abundance of species and their habitat, must be protected and enhanced and would qualify as an ORV regardless of the recreational fishing potential. Sport fishing is a component of the recreation ORV which becomes an added benefit only if fish populations are healthy.

Comment 411-20. Take into account the large number of recreationists who launch at the dam with small boats for fishing and have no intention of going below Wild Sheep Rapids. Counting these boaters against the powerboat allocation makes no sense. (Correspondent 943)

Comment 411-21. The Forest Service needs to recognize the large number of recreationists who launch at Hells Canyon Dam with small boats, solely for fishing. They have no intention of going below Wild Sheep Rapids. Counting these boats against the powerboat allocation makes no sense. (Correspondent 880)

Comment 411-22. Private Powerboat Use: Consider allowing additional powerboat launches above Wild Sheep Rapids if a consumptive salmon fishing season is initiated in the future. (Correspondent 1190)

Comment 411-23. With many anadromous fishing areas geographically unfit for boat fishing opportunities, this area of Hells Canyon becomes more valuable for salmon fishing than for any other single use during the control period. I want to make clear that ISSU [Idaho Salmon and Steelhead Unlimited] is not pro-boat over bank fishing or vice-versa. ISSU is pro-salmon and steelhead fishing and many times because of physical handicaps such as age, disabilities, etc., boat angling is the only way many anglers can participate. Also, because of the large expanse of river water in this area, boat fishing techniques may be the only method that will allow anglers to catch chinook. (Correspondent 2338)

Comment 411-24. My point here is that relatively few river users have a significant interest in this area of the HCNRA. To most, it is much like going to your favorite place near your home town, "you have to drive through town" just to reach it. It's boring! And so it is with the area between the Dam and Wild Sheep to most present-day river users, boring! However, that will not be the case when harvestable numbers of salmon are present in this area. (Correspondent 2338)

Forest Service Response: The Snake River fishery is identified as an ORV that must be protected and enhanced. Part of the the recreation ORV includes recreational fishing. However, neither of these attributes requires that a certain amount of access is necessary to harvest the sport fishery. While not as desirable as fishing from a boat, Alternative G does not restrict fishing where the river is accessible from the shoreline.

There is an intrinsic value in a productive fishery, regardless of the harvest level or potential of that fishery for sport fishing. Limits on access during the primary season are based upon a variety of reasons and are described in Chapters II and IV. The limitations imposed on access for powerboating and floating limit the access for fishing opportunity but improve the quality of the fishing experience for those individuals who do have access to the fishery, thereby enhancing the quality of the fishing recreation experience.

Hiking/Horseback Riding Code 412

Comment 412-1 . The horseback campers and the backpackers needs should also be taken into consideration. (Correspondent 2021)

Comment 412-2 . I think that the opportunity to hike in the canyon should not be effected by the new regulations. I am not sure how this can be accommodated. The most basic way to experience the wilds of the canyon is on foot. Since the trail on the Idaho side is not contiguous from the dam, some provision needs to be installed in your new management plan to address this issue. (Correspondent 2238)

Comment 412-3. Alternative E does not limit backpacker or horsepacker use (only self-issued permits are proposed), the therefore the same demand/use inconsistency discussed in item No. 1 applies (Historical regulated use Vs. Historical unregulated use.) (Correspondent 2840)

Forest Service Response: Alternative G provides for more specific guidelines to address use of the river corridor by all trail users and coordination of their management with river users. Detailed information can be found in Chapters II and IV.

Personal Motorized Watercraft Code 413

Comments Opposing Use of Personal Motorized Watercraft

Most of the comments regarding the use of personal motorized watercraft support banning them from all sections of the Wild and Scenic Snake River. Following are representative samples of comments from people opposing their use.

Comment 413-1. Your alternative allows jet skis (personal motorized watercraft). Of all the things on the Snake River that irritate floatboaters and powerboaters alike, jet skis are at the top. Jet ski operators have no regard for any recreation experience other than their own, and ruin the trip of all others on the river. Jet ski operators look for the same recreation experience on the Snake River as they do at the hydroplane races in the Tri-Cities. They are a detriment to what everyone else enjoys on the river. Get rid of them. I might also note that the task force alternative did recommend banning jet skis. (Correspondent 1085)

Comment 413-2. The DEIS reaches beyond the intent of the HCNRA legislation in the preferred alternative to allow the use of personal motorized watercraft. These vehicles did not exist at the time I assisted with the creation of the NRA, nor do I believe they are compatible with the other uses of the river. They should continue to be excluded. Otherwise the NRA will slip further away from the reason for which it was designated. (Correspondent 2217)

Comment 413-3. Personal motorized watercraft are prohibited on the Lower Salmon below the mouth of Hammer Creek. We believe that extending the use of such craft to the mouth of the Salmon would encourage illicit use on the Lower Salmon and would also add to an already congested condition on the Snake below the mouth of the Salmon. We would prefer to see the existing situation maintained. (Correspondent 2221)

Comment 413-4. There is little information offered in the DEIS to support allowing personal watercraft use on the lower one mile of the Snake River below Cache Creek as proposed in the Management Direction Common to All Action Alternatives. Allowing this type of watercraft on a very small stretch of the river inside OR after an extended period of closure does not make sense to us. While there may be some expressed demand for such use, any change from the established administrative closure needs to be adequately justified. Should the Forest provide convincing rationale for an adjustment to the current deadline our agency will consider, in conjunction with Idaho boating authorities, an amendment to this rule. (Correspondent 2226)

Comment 413-5. The use of jet skis in the canyon which is so ridiculous it hardly deserves comment. You may as well open the trail system to dirt bikes. (Correspondent 2301)

Comment 413-6. No PMW (jetski type craft) should be allowed on the W&S Snake River during either the regulated or unregulated seasons. These craft have extremely high impacts on the resource and other users with their noise, odor, wake, and mobility resulting in multiple, (even continuous, should

they so choose) contact. They dominate an area of the river as they play in and out of a rapid and circle other craft. While their impact is at least as high as the powerboat, the PMW benefits only one user. The impact/user is therefore significantly higher than that of the usual private powerboat and all commercial powerboats. There is, in addition, no sufficient historic use for PMW to be considered a traditional use of the area. By allowing PMW to travel upstream to mouth of the Salmon River, you create a huge dilemma for management of the Lower Salmon Canyon. PMW will travel up the Scenic Snake and into the Lower Salmon Canyon. No responsible river user supports the use of PMW on backcountry rivers. The State of Oregon has banned PMW on their backcountry rivers. (Correspondent 2324)

Comment 413-7. Jet skis or other PMW's (personal motorized watercraft) are the most obtrusive, obnoxious, rude and environmentally irresponsible sort of river use that is possible. For one person to have "fun" at the expense of so many others is the ultimate in narcissistic resource abuse. No responsible user supports the use of jet skis on backcountry rivers. The State of Oregon has recognized this fact in a law that prohibits their use. I oppose this sort of use in any way, shape or form on the Snake River. (Correspondent 2328)

Comment 413-8. ICL [Idaho Conservation League] categorically opposes any and all jet skis anywhere within the Snake River Wild and Scenic River. Given that the planning team doesn't equitably address the conflicts that already exist between floaters and motorized recreationists, why on earth are they setting up more conflicts between intrusive noise makers on jet skis and the appreciators of the Hells Canyon quiet? Jet skis have no historical claim to a wild and scenic river already beyond recreational carrying capacity. No jet skis. (Correspondent 2336)

Comment 413-9. Jet ski use of the river should be studied before permission is granted to allow their use on the lower river. Do these devices affect fish populations adversely? Are they disruptive for other human users of the river? Would their continued use pose an enforcement problem for the Forest Service? (Correspondent 2524)

Comment 413-10. Kick jetskis off the river entirely. The noise and impact are not acceptable in this magnificent canyon. People who drive these water-propelled crotch rockets are frequently inconsiderate, drunk, and reckless. Ban 'em. (Correspondent 2637)

Comment 413-11. Due to the small size and basic design of jetskis, they have the potential of doing even more pervasive damage to the already stressed landing sites. (Correspondent 2672)

Forest Service Response: Forest Plan Amendment 5 permanently closed the wild section to personal motorized watercraft (reference the analysis file). The proposal considered in the DEIS preferred Alternative E would only affect the scenic river from Cache Creek to the mouth of the Salmon River. The FEIS preferred Alternative G proposes prohibiting the recreational and administrative use of personal motorized watercraft in the scenic section, which is clearly the preference of most of the respondents.

Comments In Favor of Allowing Personal Motorized Watercraft

Supporters of personal motorized watercraft questioned whether the Forest Service can prohibit use of the personal craft while allowing access to other motorized craft. Following are representative comments expressing those views.

Comment 413-12. I believe that 12 personal watercraft should be allowed each day between Pittsburg and the north boundary. These are legitimate motorized craft that provide their users with a great deal of challenge and enjoyment. (Correspondent 260)

Forest Service Response: The use of personal motorized watercraft in the FEIS preferred Alternative G is prohibited in the entire scenic section, consistent with Oregon Administrative Rule 250-21-040.

Comment 413-13. Kawasaki strongly urges the Forest Service to reconsider its arbitrary proposal to prohibit personal watercraft from areas of the river that remain open to other motorized vessels. The Forest Service has failed to show that personal watercraft have uniquely different and significant impacts on such areas. Without such factual support, these discriminatory prohibitions simply cannot be defended. (Correspondent 2346)

Comment 413-14. The DEIS provides no factual support for the proposed prohibition of personal watercraft. The DEIS indicates that the Forest Service is proposing to prohibit motorized personal watercraft from the wild segment of the river, and under some alternatives the scenic segment, in response to a need (1) to enhance the diverse recreational users' experience and safety; and (2) to protect the fisheries and wildlife from the "more mobile" motorized personal watercraft. Id. at I-4. The DEIS does not provide factual support for either of these perceived "needs." (Correspondent 2346)

Forest Service Response: The wild section is and has been closed to personal motorized watercraft since the approval of Forest Plan Amendment 5. In the decision memo for Forest Plan Amendment 5, the responsible official chose not to permanently ban personal motorized watercraft from the scenic section in implementing the valid craft definitions until further study was completed. In that decision notice, the responsible official chose to keep the scenic section closed to personal motorized watercraft pursuant to a yearlong closure through 36 CFR 250.50, Order 208.

Comment 413-15. The final recreation management plan should treat all Class A Motorboat users, including personal watercraft users, equally. (Correspondent 2346)

Comment 413-16. The Forest Service should consider alternatives which grant personal watercraft users equal treatment. The Forest Service purports to base its proposed action -- including the proposed prohibitions on personal watercraft use -- on the recommendations of the Hells Canyon LAC Planning Task Force. The September 1991 Task Force report does not, however, recommend personal watercraft specific use restrictions. Instead, the Task Force majority suggested limitations on a wider range of vessels and water activities, including the use of "waterskis, air boats, motorized surfboards, hovercraft, winged watercraft, any powerboats not equipped with a water-cooled exhaust, amphibious craft, mini-submarines, [and] powerboats under 12 feet in length" in addition to personal watercraft. Task Force Report at 40. One of the paramount goals of the final recreation management plan should be to recognize the need for equitable treatment of river users. In fact, a full 89% of visitors surveyed in the Visitor Use Study favored or would accept the principle that "when regulations are needed, apply them equally to all river users" as an appropriate guideline for management of river resources. Visitor Use Study at 14. As noted in the Task Force Report, "Task Force members were well aware of potential conflicts between user groups and recognized the importance of applying regulations equitably, a management guideline which was also strongly supported in the Visitor Use Study." Task Force Report at 30. In keeping with these recommendations and acknowledgements by the Task Force, Alt E, the preferred alternative, should be revised to provide equal treatment of all Class A Motorboat users, including personal watercraft users. Thus, to the extent that the final recreation management plan imposes restrictions or conditions on small motorized vessels, or motorized vessels in general, with respect to discrete portions of the river (such as wild or rapids areas), those restrictions or conditions should be cast in generic terms, by reference to the affected Coast Guard vessel Class(es), rather than by an under-inclusive reference to any particular vessel type(s) within any Class, such as personal watercraft. (Correspondent 2346)

Forest Service Response: The commenter appears to be unaware of the intent of Forest Plan Amendment 5 which enacted the valid, non-valid craft definitions from the LAC planning process recommendations (reference page 40 of the LAC report), except for where the responsible official chose not to permanently ban personal motorized watercraft from the scenic section until further study was completed. In that decision notice, the responsible official chose to keep the scenic section closed to personal motorized watercraft pursuant to a yearlong closure through 36 CFR 250.50, Order 208.

The LAC planning process identified the importance of applying regulations equitably, as this is also recognized as a significant issue in Chapter I, but with the intent on equitable use between "valid craft" as defined in the LAC recommendations.

Comment 413-17. The Visitor Use Study shows far more complaints about jetboats and "floaters" than personal watercraft. The purported need to prohibit personal watercraft in order to enhance the recreational experiences and safety of diverse users apparently is based upon visitor input. The DEIS reports that the decision to impose disparate restrictions on personal watercraft responded to a 1989 Visitor Use Study in which 77% of visitors surveyed "favored or would accept" eliminating personal watercraft from the river. *Id.* But the actual results of the Study do not provide factual support for this broadly expressed preference. First of all, the survey actually asked visitors whether motorized recreation should be restricted to historic types of motorized activities, i.e., powerboating and jetboating. See Hells Canyon Visitor Profile and Recreational Use Study (July 1989) at 15. It noted, by way of illustration and explanation, that this would eliminate not only "jet skis," but also hover craft and waterskiing. Moreover, an even higher percentage of those responding, 81.5%, favored or would accept establishing reasonable noise levels for motorized craft generally. *Id.* The Visitor Use Study in fact shows that personal watercraft were the source of very few visitor complaints, while complaints about other motorized vessels were considerably more frequent. More specifically, of those Survey respondents who felt the river was crowded during their visit, only 2.1% of respondents attributed crowded conditions to the perception that there were "many jetskis" on the river. Indeed, the same percentage complained about "large powerboats." *Id.* A far greater percentage of visitors (45.7%) attributed the crowded conditions to "many jetboats." *Id.* A substantial percentage (34%) also attributed crowding to "many floaters." *Id.* Likewise, only 0.9% of visitors responding felt that "jetski" users negatively affected their trip. In contrast, "rude jetboaters" and "boat wakes" accounted for 25.6% and 23.3% of visitor complaints, respectively. *Id.* at 9. Despite the survey results, the Forest Service has chosen not to prohibit use of jetboats, floatboats, or other motorized boats in any area of Snake River. Rather, under the preferred Alt E, motorboats, other than personal watercraft, would be able to traverse the entire river on alternate weeks during the regulated season, and would enjoy unlimited use of the entire river during the unregulated season. The actual results of the Visitor Use Survey simply do not support the proposed complete prohibition of personal watercraft from areas of the river which would remain readily available to other similar motorized vessels. (Correspondent 2346)

Forest Service Response: The primary reason the visitor use study showed more complaints between the two existing types of users is that personal motorized watercraft have been prohibited from the river corridor for some time. Thus, it was not an objective of the Visitor Use Study to explore such conflict, except as noted on page 33 of the study where it questioned users on restricting non-historic crafts.

All of the action alternatives prescribe use levels, including a permanent ban on powerboats in the wild section as noted in Alternative F, to achieve the legislated direction provided through the HCNRA Act and the Wild and Scenic Rivers Act. In particular, the action alternatives strive to achieve the ROS characteristics presented in Tables III-1 and III-2 while maintaining and protecting the ORV's.

Comment 413-18. There is no showing that personal watercraft have greater impact on fisheries or wildlife than other motorized vessels. The DEIS cites absolutely no factual support for the contention that due to their "mobility," personal watercraft endanger fisheries and wildlife in ways different from other motorized vessels. The DEIS contains analyses of the environmental consequences of each of the alternatives on both wildlife and fisheries. See DEIS at IV-55 to IV-67. Neither environmental analysis considers the effect of personal watercraft use, as opposed to use of motorized vessels generally, on fish or wildlife in the Snake River. The DEIS fails to show, or even suggest, that personal watercraft pose a unique risk to wildlife resources because of their mobility. On the other hand, it specifically recognizes that "the mobility of motorized and non-motorized watercraft" can impact large areas of the river. *Id.* at IV-56. Indeed, the mobility of some personal watercraft may make them safer than other vessels because the river can more easily maneuver the craft to avoid harm, either to wildlife or to other users. The Forest Service should abandon its position that personal watercraft deserve disparate treatment because of their mobility given the absence of any factual support for this conclusion. (Correspondent 2346)

Forest Service Response: Adequate data is lacking to distinguish a noticeable difference in environmental consequences over and above the use of powerboats. The Forest Service has the delegated authority and responsibility to maintain and enhance the rivers ORV's, including fisheries and wildlife, and be conservative in providing rationale for establishing appropriate use levels and in defining valid and non-valid craft for the river.

Valid and non-valid rivercraft definitions have been enacted through Forest Plan Amendment 5, as noted above. Beyond the intent of the legislative direction noted above, additional rationale for not allowing personal motorized watercraft in the FEIS preferred Alternative G is based on maintaining consistency with Oregon Administrative Rule 250-21-040 which prohibits personal motorized watercraft on the Snake River.

Comment 413-19. It is unlawful for the Forest Service to regulate based on the type of rivercraft (personal motorized watercraft). See Section I.C. *supra*. (Correspondent 1198)

Comment 413-20. The Forest Service must recognize that use of personal watercraft is a valid use of the area. The statute which designated the Snake River area as a NRA also supports the proposition that the Forest Service should adopt management approaches which do not include the exclusion of certain vessels from all or some segments of the river. The law directs the Forest Service to adopt: Such rules and regulations ... [as are necessary] for the control of the use and number of motorized and non-motorized river craft: Provided, that the use of such craft is hereby recognized as a valid use of the Snake River within the Recreation Area. HCNRA Act, 16 U.S.C. 460gg-7(d). Given this explicit statutory mandate, the Forest Service should reconsider and revise its proposal to prohibit the use of personal watercraft in some or all portions of the W&S Snake River. (Correspondent 2346)

Forest Service Response: The wild section is and has been closed to personal motorized watercraft since the approval of Forest Plan Amendment 5. In the decision memo for Forest Plan Amendment 5, which implemented valid, non-valid watercraft definitions, the responsible official chose not to permanently ban personal motorized watercraft from the scenic section in implementing the valid craft definitions until further study was completed. In that decision notice, the responsible official chose to keep the scenic section closed to personal motorized watercraft pursuant to a yearlong closure through 36 CFR 251.50a, Order 208.

Further, the permanent closure for the scenic section, proposed in FEIS preferred Alternative G, would be in compliance with Oregon Administrative Rule 250-21-040.

Comment 413-21. During the regulated season, specified numbers of private motorized vessels other than personal watercraft would be allowed access to all parts of the river on an alternating weekly schedule. This disparate treatment of personal watercraft as compared to all other motorized vessels is arbitrary and without any factual basis and is thus indefensible. (Correspondent 2346)

Comment 413-22. As a federal agency subject to the Administrative Procedure Act, the Forest Service cannot impose arbitrary or discriminatory restrictions on personal watercraft use in the Snake River area. The law requires that any regulatory measures adopted be rational and justified by the administrative record assembled by the agency. In other words, the agency must engage in "reasoned decision making," which requires a "rational connection between the facts found and the choice made." *Burlington Truck Lines v. United States*, 371 U.S. 156, 168 (1962). A federal agency's failure to adhere to these requirements of law leaves the resulting regulation vulnerable to legal challenge. For example, in *PWIA v. Department of Commerce*, Civil Action No. 93-1381 SSH (D.D.C. Aug. 24, 1993), the U.S. District Court for the District of Columbia recently invalidated regulations issued by the National Oceanic and Atmospheric Administration ("NOAA") which purported to restrict personal watercraft use in the Monterey Bay National Marine Sanctuary in California, while leaving all other vessel types almost entirely unregulated. The court explained the legal basis for its decision as follows: Plaintiffs contend that the regulations treat personal watercraft (which are narrowly defined) differently from all other vessels, and that this disparate treatment is arbitrary and unsupported by the factual record. The Court agrees. An agency may not arbitrarily distinguish between similar activities or persons; distinctions between such activities must have a basis in the administrative record and the agency must provide a reasoned explanation for such distinctions. Slip. Op. at 2-3. For the reasons set forth herein, PWIA submits that the Forest Service similarly has failed to justify the disparate restrictions on personal watercraft use proposed in the Snake River DEIS. (Correspondent 2346)

Forest Service Response: The proposal to prohibit personal motorized watercraft in the scenic section is not arbitrary. The LAC planning process recommended their prohibition, and Forest Plan Amendment 5 enacted that recommendation (except for the scenic section). Throughout this EIS process, users have clearly indicated a preference for banning these craft. It is within the authority of the Forest Service based on the legislated direction from the HCNRA Act and Wild and Scenic Rivers Act, within the authority of 36 CFR 251.50a, and would be in compliance with Oregon Administrative Rule 250-21-040.

Regional Versus National Use Code 415

Comment 415-1. Congress provided for powerboat use in Hells Canyon, but I am convinced that Congress certainly did not intend for an NRA and famous National Wild and Scenic River to become the exclusive domain of local western Idaho and eastern Oregon powerboaters. (Respondent 2325)

Comment 415-2. The whole area is a national resource and the decisions should not be made solely on regional considerations. (Respondent 2816)

Comment 415-3. Protect and preserve the Hells Canyon for future generations -- not some Mercury dealer in Lewiston! (Correspondent 2615)

Comment 415-4. Hells Canyon is a national resource and should be managed as such. I suspect that the powerboaters are like a lobby: they are local and quite vocal. Nonetheless the Forest Service has an obligation to all the citizenry, and to the kind of wilderness experiences that are almost extinct in the US and which Hells Canyon affords to those who float. (Correspondent 2463)

Comment 415-5. I think that it is very important that the HCNRA be managed as a national rather than a regional resource. Too many Hells Canyon decisions of the past have been politically biased locally. (Correspondent 2793)

Comment 415-6. We are not exactly sure whether such coexistence [powerboats and floatcraft] is mandated by law, exists because of local tradition, is a political and/or economic compromise, or is merely a matter of convenience or inertia. Regardless, we feel that the Hells Canyon area is a national resource of unique and irreplaceable beauty and must therefore be managed as a national resource for all the people of the nation and the "desired future condition" of this resource should be determined in this light without any preconditions established by local convention. (Correspondent 2831)

Comment 415-7. Enlightened management of this treasure must surely recognize that continued pollution of the canyon (noise, petroleum odor, trash) by powerboats and jetskis is not only inevitable, but frankly selfish, since it is only local residents who use the canyon in this way. People from Texas and the rest of the country do not come to Hells Canyon for powerboating. I wonder if there is any other river of such pristine and natural beauty subject to such a lack of local care of such a treasure. (Correspondent 2873)

Comment 415-8. Hells Canyon must be managed as a national resource rather than a regional political power play. To do this requires professional management that has no vested interests in economic profiteering such as the local owners/operators of powerboat/jetboat companies have. (Correspondent 2880)

Comment 415-9. I think it's pretty bad when the local people who live near this resource and spend all their money locally are not considered when it comes time to take surveys about over-crowded river use. (Correspondent 825)

Comment 415-10. We strongly oppose any further restrictions on our Hell Canyon Recreation Area. It is ours to enjoy and further encroachment is not in the best interest of Idahoans. (Correspondent 1718)

Comment 415-11. I think you should listen to the local people, not someone who uses the river once in a while. (Correspondent 2124)

Forest Service Response: As indicated in the content analysis section at the beginning of this appendix, the interest in the Hells Canyon NRA and the Wild and Scenic Snake River corridor is local, regional, and national. The Forest Service is mandated by various rules and regulations to consider the wants and needs of all citizens. An ID team of Forest Service specialists has spent a considerable amount of time developing and analyzing resolution of the significant issues (including a wide range of opinions from a wide range of interest groups) to determine how to best meet those wants and needs.

Access for Handicapped or Elderly Code 416

Many respondents voiced concern about prohibiting or eliminating access for those less-than-physically-able to access the canyon as a rafter or hiker.

Expected Experience

Comment 416-1. We hope these jetboat tours will be available to future retirees, as this is the only way we oldsters can enjoy this tremendous scenic adventure. (Correspondent 44)

Comment 416-2. Some people are simply not able to withstand the rigors of a raft trip on this river. We should consider the senior citizens and our younger generation. (Correspondent 2354)

Comment 416-3. In some cases, my guests cannot raft through Hells Canyon because of their age or physical condition and the jet boat is the only way they would be able to see this beautiful territory. (Correspondent 397)

Comment 416-4. The commercial boat traffic, while it needs to be monitored, provides an opportunity for people of less affluence a chance to enjoy the river's magnificence. People with physical handicaps can also enjoy the boat experience. (Correspondent 1104)

Comment 416-5. A goodly number of my guests are from the East Coast and other distant areas. These people come to Lewiston for the specific purpose of taking a jet boat trip up the Snake River. Most are older retired people who couldn't tolerate physically the smaller boats or a float trip. They need the convenience of a jet boat with restrooms on board. (Correspondent 1146)

Comment 416-6. Older people like myself can still enjoy the beauty of this wonderful canyon if we can powerboat, but we can't raft any more; it hurts too much. (Correspondent 1824)

Comment 416-7. As a senior citizen and being raised in the suburbs of Los Angeles, we considered the boat ride as the highlight of our vacation. Citizens like myself may not be able to see and participate in the fantastic experience. (Correspondent 1830)

Comment 416-8. For persons with limitations that do not allow them to handle a canoe or kayak, a raft will do the job as well as a jet boat. (Correspondent 2854)

Forest Service Response: Although Alternative G does not provide unlimited access for everyone, it does allow access for all types of users, and in numbers that will realistically provide an opportunity for most people to enjoy the corridor, including the adventuresome physically-challenged.

Comment 416-9. It is possible and I have done it numerous times, to treat handicapped (physically challenged) folks to a quality wilderness experience. And it was done without resorting to motorized craft and chain saws. If there is true desire and freedom from instant gratification demands, paraplegics and even quadriplegics can participate in a meaningful way in wild river adventures, assisted by qualified outfitter or volunteer personnel. If the Forest Service is seriously interested in such access for physically-challenged people, don't build more paved roads and wheelchair ramps. That makes the wilderness experience more like a trip to Disneyland. One way to foster access without paving is to give launch and more accessible camp site preferences to parties properly equipped to handle the handicapped and with such people in their group. (Correspondent 2869)

Forest Service Response: The improvements at Hells Canyon Creek, Pittsburg Landing, Cache Creek, and Dug Bar were developed for accessibility pursuant to the Americans With Disabilities Act (ADA). People with disabilities have been visiting the Snake River by floatcraft and powerboat for many years without a demonstrated need for camp site preferences in order to enjoy the corridor.

Discrimination - Physically Disabled and Elderly

Comment 416-10. Alt E discriminates against many of the elderly, the physically challenged, those that have time limitations, or the very young. The Forest Service should ensure unrestricted access to all Americans, not simply those who are physically capable of engaging in whitewater rafting. (Correspondent 970)

Comment 416-11. The U. S. Forest Service should consider traditional uses of the river and to the extent possible ensure unrestricted access, without discrimination, to all of the public in accordance with the Americans With Disabilities Act. (Correspondent 1170)

Comment 416-12. Alt E discriminates against my elderly parents and grand kids. The Forest Service should ensure unrestricted access to all AMERICANS, not just the physically fit. (Correspondent 1809)

Comment 416-13. Alternative E, Item #5 discriminates against anyone that is physically handicapped. Isn't this in violation of state and federal law? (Correspondent 2055)

Forest Service Response: Many of the people commenting about discrimination were under the misconception that powerboat use, especially the popular commercial day-use trips, would be eliminated under Alternative E and some of the other alternatives. None of the alternatives eliminate powerboat use. Each of the alternatives propose use levels designed to protect and enhance the ORV's of the corridor and provide for varying levels of motorized and non-motorized use. Alternative G in the FEIS allows for shared use and minimizes the impact to powerboat use by scheduling the non-motorized periods during historically low powerboat use periods.

Comment 416-14. I do not support Alternative E as proposed to be implemented by the Forest Service. Alternative E is overly restrictive to floaters and power boaters. It is based on the premise that user groups cannot get along. It is anti-tourist. It discriminates against reasonable access by the elderly and physically disabled. (Correspondent 1154)

Comment 416-15. By placing more restrictions on the river, we create a place that only the rich and physically abled people can enjoy. (Correspondent 1080)

Comment 416-16. Most people are not able to take a float trip through the Canyon because better health and physical condition is required, more disposable income is required, and a much longer time is required for a float trip. For these reasons alone, the time allotted for float boaters and power boaters should not be equal. (Correspondent 1054)

Comment 416-17. With many anadromous fishing areas geographically unfit for boat fishing opportunities, this area of Hells Canyon becomes more valuable for salmon fishing than for any other single use during the control period. I want to make clear that ISSU [Idaho Steelhead and Salmon Unlimited] is not pro-boat over bank fishing or vice-versa. ISSU is pro- salmon and steelhead fishing and many times because of physical handicaps such as age, disabilities, etc., boat angling is the only way many anglers can participate. Also, because of the large expanse of river water in this area, boat fishing techniques may be the only method that will allow anglers to catch chinook. (Correspondent 2338)

Comment 416-18. Alternative B of the Hells Canyon Alliance will protect the canyon's resources. The largest number of recreationists and the handicapped will benefit. (Correspondent 250)

Comment 416-19. Prefer Alternative A with unlimited power boat use. A few of the respondents commented that they saw no need to remove the navigational markers. They advocate shared use. Some stated that it is a recreation area, not a wilderness. Some felt a change would affect the local economy. Others were concerned about reducing access opportunities for handicapped and elderly. (Correspondent 1836)

Comment 416-20. I would also like to see jetboat use terminated. Jetboats waste fuel, and while they may provide access conveniently, or to the elderly, access should be difficult. In any case, absolutely

no numerical preference should be given to jetboats. There should be no more permitted jetboat days, than float trip days. (Correspondent 2892)

Forest Service Response: The Forest Service is required to manage the area within the guidelines of law including the ADA. All alternatives provide for access to the river using modes of travel which have been used for many years including commercial services for tourists. Both elderly and physically-challenged individuals visit the river on a regular basis and use both power and float craft for access. Alternative G would maintain the ability of both elderly and physically challenged individuals to access the river using their choice of float or power craft and travel with either a private or commercial group.

Conflicts Between User Groups Code 417

Comments in this section described cases where conflicts between motorized and non-motorized users had an effect on the user groups experience on their river trip. Examples of comments are included below:

Speed Limits and Boat Wakes

Comment 417-1 . I believe that powerboats on the river should be subject to a speed limit of 5 mph, to reduce pollution from the noise and the disturbance from the wash. (Correspondent 2486)

Comment 417-2 . Perhaps a speed limit, no wake zones (at least near kayakers and rafters who are at their mercy) or limiting the number of powerboaters to allow each the benefits of their pleasures. (Correspondent 2483)

Comment 417-3 . The worst jet boats on the river were the ones driven by the Forest Service. The private boaters blaze by at a high speed, which creates the minimal wake. The big commercial tour boats are extremely courteous, slowing way down to nearly a wakeless speed when river conditions allow it. But every day, twice a day (or so it seemed) the big green USFS barge would plow by, making no effort to distance itself, or to do any thing to lessen the wake. The boat was at that critical speed where it wallowed in the water creating the largest possible waves. (Correspondent 2411)

Comment 417-4 . Many powerboaters are very courteous about their wakes. However, many others are incredibly rude and dangerous with wakes. Powerboat wakes routinely crash rafts and dories against the bank in camps. (Correspondent 2324)

Comment 417-5 . During our June 2 trip, there were numerous occasions when jetboats failed to slow down when approaching floatboats moored at rocky landings. These occurred at Oregon Hole, Kirkwood, Pittsburg, at the fuel tank landing, Tryon Creek, and the Mountain Chief Mine landing. The damage to our boats was fortunately only cosmetic, due to the fact that we were able to stabilize them as the jetboats passed. (Correspondent 2455)

Comment 417-6 . On June 13 a private jetboat with no visible number or identifying mark came up Cottonwood rapid at a high rate of speed. It purposely swerved close to our moored dories. We were unable to reach them before the jetboat wake mashed the boats into the rocks. Damage was limited to gouges on the sterns, but one boat developed a slow leak immediately after the incident. (Correspondent 2455)

Comment 417-7 . Perhaps the most profoundly illustrative experience during our June 2 trip occurred when we were moored at the Pittsburg fuel tank landing having lunch. The Forest Service jetboat suddenly approached from upriver at a high rate of speed. It slowed down, but too late. It cast a heavy wake that knocked our wooden dories against the rocks. In defense of the driver, he couldn't see us until he was almost upon us. At that point someone else in the FS boat quickly shouted for him to slow down. This incident illustrates that no matter how courteous or cautious a jet boat operator intends to be, impacts and conflicts are unavoidable. (Correspondent 2455)

Forest Service Response: The wake of jetboats is related to many factors including the direction of travel (upstream or downstream), the speed the boat is traveling, the hull design, the displacement of the vessel (based on weight of the boat and load) and the experience of the boat operator. With this many variables, user education rather than speed limits will continue to be the best way to address this issue over the long term.

On a river such as the Snake, there is a certain amount of assumed risk when either motorized or non-motorized watercraft are taken on a river where few sand beaches remain. Damage may occur as a result of a jetboat passing by or if the wind is blowing if a boat is tied to a rocky shoreline. An improved boater education program would be used to influence powerboaters to exercise diligence in reducing their wake when they encounter other groups on the river and along the shoreline. Impacts associated with this problem will be monitored through exit interviews with river users.

However, there is some responsibility on the part of boaters to implement measures to protect their equipment when they knowingly take it on a river with rocky shorelines and where motorized use is allowed by law. Just as private enterprise has developed methods to resolve the solid human waste carryout issue, private enterprise or individual boaters can solve the issue of developing equipment or methods to protect boats moored to the shoreline. Additional education of floaters would teach them the skills and methods to protect their boats against the effects of wakes using the same techniques used by powerboaters to moor their boats on the Snake River to avoid the effects of fluctuating water levels. While these methods take additional time and are a minor inconvenience, failure to take necessary precautions is not an excuse for damaged equipment.

Specific areas where congestion occurs need special consideration for users. Alternative G addresses wakes at areas of congestion such as launch/takeout ramps and dock areas and requires boaters to take steps to minimize their wake at these locations.

Comment 417-8 . From the noise and wake standpoint it is our observation that the large commercial boats have no more impact on the resource than the average private boat. The number of people who can enjoy the resource per commercial boat is many times greater than on a private. We haven't made a scientific study, but it seems to be at least a factor of 10. (Correspondent 2307)

Forest Service Response: Due to their size and displacement, and depending on their load, commercial tour boats can potentially throw a much larger wake. Also, while the decibel level may be within appropriate legal ranges with two or three engines per commercial boat, the overall volume of sound is much greater and can be heard from a greater distance. While there is no conclusive evidence their wake creates irreversible impacts to resources, the larger wake from a commercial jetboat can have a greater effect on both motorized and non-motorized users, especially on boats tied to rocky shorelines.

Comment 417-9 . Powerboats must meet strict but not prohibitive requirements before being allowed on the river: i.e., emission control, noise control, gas and oil leaks. (Correspondent 2350)

Forest Service Response: Noise standards as required by the states would be monitored and only vessels with muffler systems would be issued permits. Part of this would involve user education which is more thoroughly addressed in Appendix L. There are now inexpensive, petroleum-absorbent products on the market to manage gas and oil use inside the bilge and during fueling. Information on these products, education to encourage use, and distribution of these materials will be addressed through user education and is discussed further in Appendix L.

Comment 417-25. While rafting on the Snake, we were not only subjected to noise and huge wakes but were photographed and looked upon as out of touch from reality by those sightseeing from the powerboats. (Correspondent 2839)

Forest Service Response: The Snake River is open space within the public domain. It is within the legal rights of all visitors to photograph scenery and activities that are taking place at all locations in open view within the river corridor.

Comment 417-26. Jet boat noise and fuel pollution degrade the river ecosystem as well as the river experience. (Correspondent 2548)

Comment 417-27. Their sickening exhaust and the churned up water in their wake leave those of us seeking quiet refuge in nature feeling invaded if not enraged. I favor banning all powerboats from the Snake River. (Correspondent 2898)

Comment 417-28. The current level of motorized traffic though it moves the most people through this area in the shortest time greatly compromises the natural and scenic setting by invading this pristine area with loud and obnoxious noise, beach eroding wakes and clouds of exhaust. (Correspondent 1173)

Forest Service Response: The level of powerboat use in Alternative G is in compliance with the Clean Air Act as described in Chapter IV. Forest Service regulations at 36 CFR 261.13 (f) provide for penalties for use of vehicles off roads if they are "creating excessive or unusual smoke." This regulation would be applicable to boats since a vehicle is described as "any device in, upon, or by which any person or property is or may be transported, including any frame, chassis, or body of any motor vehicle, except devices used exclusively upon stationary rails or tracks."

Mitigation for fuel spills including those caused as a result of boat sinkings would be coordinated with the EPA and state water quality agencies. The potential effect of fuel spills on water quality is described in the discussion of the fisheries ORV in Chapter IV. For illegal discharge of fuel and oil from an engine bilge compartment, Forest Service regulations at 36 CFR 261.11 (c) provide for penalties for "Placing in or near a stream, lake, or other water any substance which does or may pollute a stream, lake, or other water."

Elimination of outboard kickers on floatcraft will help resolve both exhaust and fuel spill problems since they are not fully contained within a sealed bilge.

Suggestions for Improving Perceived Conflicts

A mixed message was received from respondents who discussed whether or not there is a conflict between the various groups of users recreating in the corridor. Respondents offered suggestions for improving perceived conflicts between user groups.

Comment 417-29. If floaters have complained that powerboaters "disturbed" them, then discover the culprits and penalize them severely. Our driver was extremely courteous of every boat or floaters along the way. (Correspondent 922)

Comment 417-30. If there are problems, the solution lies in better education of all user groups and particularly the individuals involved. If this fails and the problems continue to occur, then prompt and decisive enforcement action with the specific individuals involved should be taken. (Correspondent 1190)

Comment 417-31. A new culture is developing on the river, whereby outfitters and other river dwellers are learning to appreciate the need for cooperation. Evolution of this new code of conduct may solve previous conflicts and improve safety on the waterway without the negative repercussions of launch limitations that priority use plans would have. (Correspondent 972)

Comment 417-32. Indeed, Mr. Cole concluded that user conflicts can be resolved through means short of segregating river uses or limiting numbers. Id., at 13. The Forest Service has entirely failed to explain how conditions are different from those existing at the time of Mr. Cole's observations, and why stringent restrictions on boating are now needed to prevent conflicts that its own personnel have characterized as "sporadic." For the Forest Service to conclude from the Idaho Study that increased use is leading to user conflicts and is making visits to the area less enjoyable is unreasonable and unfair. The study did not so find, and its conclusions are not sufficiently reliable to warrant wholesale changes to the management of the area. (Correspondent 1198)

Comment 417-33. The Forest Service rationale limiting boating activities action is based solely on the University of Idaho's Hells Canyon Visitor Profile and Recreation Use Study (1989) ("Idaho Study"). Reliance on the Idaho Study to conclude that user conflicts warrant management changes is inappropriate. The study's results belie the conclusion that use levels are negatively impacting visitors' experiences. Its analysis lacks sufficient probative value to justify such drastic changes in the management of Hells Canyon. Moreover, the fact that numerous powerboaters and floaters are able to join together in an Alliance to advocate for shared use refutes assertions that these user groups are incompatible. (Correspondent 1198)

Comment 417-34. The positive outcome of the study is especially impressive when we examine its numerous shortcomings. The results may have been skewed because of sampling methods. Floaters made up a disproportionately large part of the study sample, 57%, while they actually represent about 32% of the river users. The study failed properly to sample the largest single visitor population in the canyon, commercial powerboat customers. (Correspondent 1198)

Forest Service Response: Thank you for the suggestions.

There is a recognized need to provide education regarding river etiquette and other user education to people who share the river. Appendix L in the FEIS outlines a user education program.

Many sources besides the University of Idaho's visitor use study were used in developing use levels (including an open EIS process to encourage participation) designed to provide opportunities for various types of visitors while protecting and enhancing the remarkable features that attract people to the corridor.

Little or No Conflict Between River Users

The following representative sample of comments recognize little or no conflict occurring between user groups.

Appendix K

Comment 417-35. It [Alternative E] is overly restrictive and based on the false belief that powerboaters and floaters cannot and do not get along. (Correspondent 1)

Comment 417-36. I have made many trips into Hells Canyon - both on rafts and jetboats. We have come across other jetboats and other rafters. None of these encounters have detracted from the trips in any way, and in fact I think they have enhanced them. (Correspondent 71)

Comment 417-37. Powerboaters and floaters have been successfully sharing this river for years and can continue to do so, if they just treat each other with a little respect. (Correspondent 93)

Comment 417-38. In my experience floaters and powerboaters get along well. We have towed out thankful floaters fighting the lower canyon's winds and helped them find open campsites. (Correspondent 101)

Comment 417-39. Powerboaters and floaters do get along very well and are very courteous to each other on the river with the exception of an occasional confrontation. (Correspondent 203)

Comment 417-40. Conflicts between floaters and powerboaters is the exception and not the rule. (Correspondent 331)

Comment 417-41. The only 'real conflict' between powerboaters and floaters is when there are too many powerboats, which is caused by no set maximum. (Correspondent 426)

Comment 417-42. I have been going up this river in a jet boat for 15 years. The rafters and boaters haven't had trouble that I could see. Everyone is considerate of each other. (Correspondent 479)

Comment 417-43. I am totally opposed to Alternative E. In order for the Forest Service ID team to have selected this as its preferred alternative, the team had to accept the premise that floaters and powerboaters are incompatible. This is completely untrue. For the most part, powerboaters and floaters get along very well together. If it were not for a radical minority repeatedly declaring the incompatibility of the two uses, the problem would be so unimportant that it would have received little attention. Some conflict will always exist but it has nothing to do with one's mode of transportation. (Correspondent 501)

Comment 417-44. We have seen the cooperation between the groups (on the river) and see no conflict. (Correspondent 582)

Comment 417-45. I don't understand the idea jetboats and floaters can't get along, we have had many enjoyable times sharing camp sites with other groups, I think everyone is in the canyon for the same reasons. (Correspondent 786)

Comment 417-46. Most powerboaters and floaters are courteous to each other and cooperate in sharing the river. There is a small, radical minority who want to exclude all powerboaters from the wild section of the river. To give in to this minority would be unfair to all responsible users of the river. (Correspondent 880)

Comment 417-47. As floatboat users of this area, we rely on the commercial powerboats for shuttle service on weekend trips during the regulated seasons. In the past we have not encountered problems with the motorized boaters. We do feel the permit process should apply to both float craft and motorized craft in a fair and equitable manner. (Correspondent 1004)

Comment 417-48. I've been in Hells Canyon since the early 1980's. In that time I have seen a constant increase in positive interaction between motorized and non-motorized craft operators. I have also

seen a vast improvement in environmental awareness by all users. This is due to an increase in education of all users provided by the combined efforts of the Forestry and the LAC. Camp sites are cleaner than they were ten years ago when I floated a "clean up the canyon" trip with an Idaho senator, a forester, and a small group of guides and outfitters. There is a sense of respect among jetters and floaters now that was absent in my early years of guiding. Even so, Hells Canyon cannot be protected under current guidelines. There must be limitations set on all users. (Correspondent 1088)

Comment 417-49. I have not once had a problem with a boater-private or commercial. I have had difficulties with commercial floaters. Some of them are elitist snobs that seem to feel they are the only ones who should be on the river. (Correspondent 1105)

Comment 417-50. As a powerboater that has used the river frequently for several years I have never encountered any problem with rafters sharing the same water or campground. In fact it has always been delightful sharing the same campsite with a rafting party. We have made several new friends. (Correspondent 1112)

Comment 417-51. I have utilized both rafts and power boats in trips to Hells Canyon and in my opinion, both should be able to coexist and utilize this great resource. (Correspondent 1114)

Comment 417-52. I was concerned by media reports that floaters and boaters were in conflict and I expected confrontation on my first trips up the river. I am relieved to find out that those stories were inflated and in reality every boater and floater I've talked with were amiable. (Correspondent 1808)

Comment 417-53. One of the reasons stated for making Alternative E the preferred alternative is the "elimination of social conflict brought about by the inability of powerboaters and floaters to agree on levels of combined use to achieve the desired recreation experience of both user groups at the same time." The assertion that floaters and powerboaters were unable to reach a consensus to use levels is flatly untrue. Representatives of floaters and powerboaters participating in the LAC process generally were able to arrive at a consensus. The fact that two (of the 22) LAC participants filed a "minority report" calling for lower levels of powerboating shows only the refusal to cooperate and compromise on the part of two individuals with extreme views. More importantly, those two individuals represented conservation groups, not boaters. (Correspondent 2110)

Comment 417-54. I for one do not have a problem with powerboat traffic during my float trips. In fact, it is something of a comfort to know that if we have some sort of medical or other emergency we have a resource for fast evacuation. (We usually have a number of small children with us.) (Correspondent 2356)

Comment 417-55. Jetboats and rafters can coexist. As a rafter for 13 years in Hells Canyon, I believe that experiences are based on EXPECTATIONS. When I raft Hells Canyon, I expect to see and interact with jetboats and am therefore not upset with jetboat encounters. (Correspondent 2385)

Comment 417-56. What I actually found was not at all what I expected. I had heard the canyon was trashed---not so. It was overused by powerboats. I saw more floatcraft than jetboats and more commercial floaters and powerboats than private powerboats. I also heard there would be cattle and domestic sheep busy destroying the landscape everywhere you looked--I never saw one. I had heard there would be conflicts and confrontations between floaters and powerboaters, anger and hostility would abound---sorry, everyone got along very well. In fact, floaters and powerboaters actually waved and talked to each other. I expected to see a cross between Disneyland and Bosnia but I actually saw a spectacular primitive area where uses and users blended well and all enjoyed the natural resources. (Correspondent 2410)

Comment 417-57. Our pilot stopped for every single group of floaters (and there were many) who approached. He even delivered a much needed part to a party of stranded floaters. His acceptance by the floaters seemed extremely friendly. And our boatload of jetters felt it was most compatible to stop for the floaters. (Correspondent 2416)

Comment 417-58. The operator of our tour boat was a man named Butch. He practiced what I will call the "courtesy of the river". This consisted of the following: 1. When there were persons on rafts or in kayaks, who were floating through or near a rapid, Butch would wait until they were well clear of that rapid before proceeding through with the jet boat. 2. He gave floating craft the "right of way", when they were in or near a rapid. 3. When other powered boats were in a rapid, he would wait until they were clear of the rapid before starting through it. 4. When passing rafts or kayaks proceeding down the river or tied up to the shore, he would slow the the boat to a "no wake" speed until we were past them. 5. He aided a party of four, whose boat had drifted off during the night, due to a rise in the river level, by transporting one of the stranded persons to their boat which was beached downstream. 6. I noticed another powerboat towing a disabled powerboat to a landing. (Correspondent 2446)

Forest Service Response: Conflict between uses is relatively minor in light of the overall number of users. But the fact remains, some users feel there is an inherent incompatibility between the uses, as noted throughout the public participation process of this EIS. As pointed out in some of the above responses, there is probably no way to completely eliminate conflict when people of various views and values are expected to share a fairly limited resource. However, it is obvious that most users who know what to expect while traveling on the river, are cooperative and courteous with other groups they encounter.

Some of the comments state or infer that Alternative E was selected based primarily upon the Forest Service's concern for conflict between floaters and powerboaters; such an assumption is erroneous. The Forest Service ID team included the information from the University of Idaho's visitor profile and recreation use study to develop and analyze alternatives, but it was just one of many sources used during the planning process.

The preferred Alternative G provides for a mix of motorized and non-motorized use with both groups expected to share, in a responsible manner, the marvels of the river which brought them together. The formulation of Alternative G was, in part, in response to the support of users who are comfortable with a combination of motorized and non-motorized use.

Conflicts Do Exist Between River Users

Far fewer comments were received from people who felt there was a problem of incompatibility between users. Some of the comments in this section are more about expected experience than actual conflict, but they are included here to display the differences in people's perceptions and expectations. The following comments are a representative sample.

Comment 417-59. Alt E speaks much of the social conflicts between users and the need to reduce encounters between different groups. Yet in the planning for alternating weeks of float/powerboat use, the plan increases the number of float launches per day at Hells Canyon Dam. In my experience as a floater, the two most noticeable encounters are those between float groups and those between floater and powerboat. (Correspondent 1190)

Comment 417-60. Since the social conflict originates predominantly from motorized use, it would seem that limiting jet boats would be more viable. (Correspondent 1196)

Comment 417-61. The noise and wakes created by these jet boats totally detracts from the natural beauty of the "wild and scenic" sections of these rivers for those of us who enjoy the solitude of such places. (Correspondent 2241)

Comment 417-62. I would hate to see its tranquility and beauty marred by a procession of jet boats. While motorized pleasure craft may be great fun for the individuals operating them, they are disruptive nuisance to the rest of us, who visit this area for a more unspoiled recreational opportunity. (Correspondent 2247)

Comment 417-63. We were almost capsized several times by jet boats, and the drivers of these motorized boats do not seem to have any regard for those of use who want to enjoy nature in all its quiet splendor, the way it should be enjoyed. (Correspondent 2248)

Comment 417-64. The area is uniquely suited for both jet boats and float boats but they really are not very compatible. The quiet slow solitude of floating the canyons is very much marred by the noise and speed of jetboats. Conversely, a flotilla of rafts in the rapids must upset the boater who wants to continue his fast and exciting pace up or down river. So, it seems to keeps them apart is an excellent solution. (Correspondent 2251)

Comment 417-65. Unfortunately one of my more vivid memories is of seeing something of beauty in perfect natural serenity and having a loud jet boat come flying down the river. What a way to wreck a near perfect memory, jet boats don't belong in such a beautiful natural setting. (Correspondent 2252)

Comment 417-66. The power boats that we saw on our trip were loud, smelly, created quite a wake and probably polluting the water with gasoline and oil. (Correspondent 2255)

Comment 417-67. What has developed over the years is that the dominance, noise and pollution of powerboaters in Hells Canyon have negatively impacted that setting for those who use the river and canyon in other ways. (Correspondent 2258)

Comment 417-68. Although we feel strongly that noisy, polluting powerboats have absolutely no place in areas like Snake River/Hells Canyon, current legislation seems to allow it. (Correspondent 2259)

Comment 417-69. I must be honest with you when I tell you that the seeing of just one power boat on each of my last two trips took away that feeling of solitude that we all were enjoying so much. (Correspondent 2264)

Comment 417-70. I cannot begin to support the world of jet boats with their excessive noise, frequent promenades up and down the canyon, malodorous exhaust, unpleasant wakes and occasional marginal/bad attitudes of their users-owners. (Correspondent 2265)

Comment 417-71. On a recent river trip, I was amazed and deeply disturbed by the incessant intrusions of noise, rough wakes and smells into what should have been a real chance to relax and contemplate a wilderness. The jetboats were everywhere, every day. (Correspondent 2269)

Comment 417-72. It also is a most beautiful area but towards the end of the run we encountered numerous power boats racing up and down the River. The magic was gone and we felt that we were back to the noise and pollution of the LA Freeways. (Correspondent 2292)

Comment 417-73. I also feel this imbalance is getting worse. Powerboat use of the entire river (including the Lower Salmon) seems to be increasing tremendously in the last 2-3 years, largely, it

seems, as a result of population increases in the Lewiston/Clarkston area. Congestion, frustration, and tension between users has increased, not only from increases in sheer numbers but also due to an alarming decrease (in my opinion) in the quality of boaters of both types. (Correspondent 2313)

Comment 417-74. Last summer I went on a beautiful 4-day hike along the Snake River and have since interested many friends in visiting the Snake River. I would not recommend it, however, if I thought they would have to experience the noise and odor of power boats. (Correspondent 2317)

Comment 417-75. On weekends, holidays, and many weekdays, powerboats currently so dominate Hells Canyon that other non-motorized users can enjoy the resource only if they are willing to accept the dominating presence of unlimited jetboats. (More than one river guest has likened floating Hells Canyon on a busy weekend to backpacking along a freeway.) (Correspondent 2324)

Comment 417-76. The regulation and elimination of powerboats on many Western rivers has been done because powerboats are so intrusive on all other users and harmful to the environment of an area with their noise, wake, odor, passing other users up and down stream several times daily, etc. Powerboats greatly detract from floaters', hikers', and horsemen's ability to enjoy a backcountry environment and have a relatively heavy impact on the resource. (Correspondent 2324)

Comment 417-77. Regardless of which alternative is selected for the final EIS, the entire river corridor should be managed throughout the year (both wild and scenic) with the understanding that the conflicts that occur on the wild river also occur on the scenic river, and that conflicts that occur during the control season also occur in the non-regulated season. (Correspondent 2331)

Comment 417-78. There will always be a conflict between power Vs non-power equipment. We live in a power age and no government agency can resolve this issue. However we are amused at the non power users who leave their computers and cellular phones to drive their all power equipped 4 X 4's to the trailhead and then look down on chainsaws and motor boats from then on. (Correspondent 2335)

Comment 417-79. We take the more moderate approach that any mechanical equipment that adds to the comfort and safety of the recreationer is permissible within reasonable limits as long as it does not significantly impact others who are enjoying the same area. We realized we will always have the backpacker who is up on Hat Point and is annoyed at the hum of a jet boat down on the river. This conflict is normal and will never be resolved. (Correspondent 2335)

Comment 417-80. The entire river corridor should be managed throughout the year (both Wild and Scenic), with the understanding that the conflicts that occur on the Wild River also occur on the Scenic River, and that conflicts that occur during the control season also occur in the non-regulated season. (Correspondent 2383)

Comment 417-81. There was one problem, however, at Hells Canyon that the rafters do not face in most of the streams I mentioned, and that is the jetboats and powerboats. It is difficult to fish when it is unpleasant to smell the odors and deal with the wakes which they create. (Correspondent 2432)

Comment 417-82. As a private powerboater who only comes to Hells Canyon once or twice a year it would be nice to have launch free of rafters at the Hells Canyon launch site. To have the river only powerboats would be nice. I have rafted and powerboated in Hells Canyon for 13 years. Negative encounters with rafters were far more often than with powerboaters. (Correspondent 2435)

Comment 417-83. It was nigh to impossible to find a campsite in the area from the confluence with the Main Salmon because the people with motors had claimed them. The noise and sight intrusion was so significant that I vowed never to return. (Correspondent 2440)

Comment 417-84. Return to a river of peace and quiet. A place where solitude dominates rather than the objectionable roar of jet boats with the over bearing smell and "slicks" of fuel. (Correspondent 2444)

Comment 417-85. It seems to us that jetboaters pursue an entirely different experience on the Snake Wild and Scenic River than most floaters. There is an inherent incompatibility between these activities, whose obvious conflicts can never be completely resolved even under the most imaginative management scheme. However, impacts could be significantly reduced by (finally) enacting and enforcing reasonable regulations. (Correspondent 2455)

Comment 417-86. The same day, a Beamer's touring jet carrying a large number of passengers was maneuvered within 20 feet in front of 2 dories in moving water so passengers could take photos. This was extremely annoying to both the guides and the passengers of the dories who were suddenly placed on exhibition. The guides were forced to anticipate the movements and further intentions of the large jetboat. (Correspondent 2455)

Comment 417-87. While we were on the water near Pittsburg, one private jetboat sped by us at full throttle, within about ten feet of two of our dories' oars, its passengers whooping and waving. (Correspondent 2455)

Comment 417-88. In the lower section, the jet boat traffic was constant and many of the boat drivers were down-right rude. On other rivers on which rafts and jet boats share the same water, jet boat drivers slow when passing rafts and are careful not to get in the way of rafts coming downstream through rapids. The attitude on the Snake in the Hells Canyon was much different. On several occasions, boats came at us at full speed, swerving off at the last moment. On more than one occasion, I was forced to take an undesirable, and thus a more dangerous route, through a rapid that I was running. (Correspondent 2552)

Forest Service Response: It is assumed impossible to eliminate all dissension between river uses, and many of the people who commented agree that there will always be some conflict. What can happen is a reduction in the number and intensity of disagreements by providing river users with an education on the proper river etiquette and reduced use levels as in FEIS preferred Alternative G. Appendix L in the FEIS proposes a user education program.

Comment 417-89. The goal of the "preferred proposal" is to separate two fractions that may not seem to be able to get along, and to reduce the human impact in Hells Canyon. In reality, however, this will be driving a wedge between jetters and floaters, and at least doubling the human impact in Hells Canyon. (Correspondent 1088)

Comment 417-90. I believe that the personal and economic agendas of the anti-boaters are largely self serving and not in the best interest of the majority. Monopolization of the boat loading ramps, flagrant displays of nudity (including at crowded public areas), reckless behavior in negotiating rapids include some of the behavior I witness from rafting parties both private and commercial. (Correspondent 1114)

Comment 417-91. If there are no conflicts with the majority of the river users, why can't we leave things as they are? (Correspondent 287)

Forest Service Response: With the mix between motorized and non-motorized river users established by the HCNRA Act, there are a variety of expectations which visitors seek when taking a trip on the Snake River. The inability to achieve their desired experience on a nationally recognized river has been extremely frustrating for some users and can generate controversy and conflict concerning

the appropriateness of different types of use within a Wild and Scenic River corridor. There are many different people with different values who come to the river with a perception of how the river should be managed to meet their expectations. These interests are regional and national in scope. Alternative G would manage the river to provide a wide variety of recreation experience opportunities in order to meet the needs of as many visitors as possible while resolving the majority of issues that generate user conflict.

Noise Code 419

Many comments were received concerning the effects of motorized noise on recreation experiences. Following are examples of those comments.

Comment 419-1. After days of peace and quiet on the Salmon, it is harshly disturbing to join the Snake where the canyon walls echo the sharp growl of jet boats. (Correspondent 2898)

Comment 419-2. I am aghast that so little noise-free space has been provided for people who are willing to take the time to float the river, quietly savoring its majesty. (Correspondent 2481)

Comment 419-3. It seems that the jetboat tourist and the jetboat industry are being considered much more by the Forest Service than those of us who go to the mountains and the rivers for peace and quiet! We would like to see more "quiet time" on the scenic section of the river. Please consider the quiet majority that go into Nature for Solitude and peace of mind. (Correspondent 2662)

Comment 419-4. Jet boats and jet skis are loud, obnoxious. (Correspondent 2562)

Comment 419-5. Jet boats cause considerable noise and pollution as well. (Correspondent 2795)

Comment 419-6. On a warm Saturday in early May, I hiked upstream from Dug Bar, and hoped to enjoy a day of quiet solitude. By late afternoon I had counted more than one hundred boats going past. It was virtually continuous motor noise for over ten hours. This is not what the wild and scenic legislation was trying to preserve, and your draft plan for management totally fails to address this issue. (Correspondent 2540)

Comment 419-7. The Forest Service alternative would allow jetboats to dominate the most scenic sections of the river ecosystem, creating loud, noisy, motorized recreation. This area deserves to be reserved for quiet, less disruptive recreational activity. (Correspondent 2727)

Comment 419-8. The battery system in jetboats allows them to use radios, stereos, and other music or sound devices. Use of these should be expressly prohibited at all times. (Correspondent 1196)

Comment 419-9. The jet boats' arrival ended the "wilderness" experience and made the last days of our trip just another trip on any of a thousand busy waterways or streets in America. (Correspondent 2619)

Comment 419-10. From the VUS [Visitor Use Survey], 86% of the respondents indicated that it was important to enjoy peace and quiet on the river. Removing powerboats from the wild section would ensure this. It would also provide for auditory solitude for those in the nearby wilderness areas. (Correspondent 2512)

Comment 419-11. Hearing jet skis and jet boats in the wilderness - it's simply horrifying. (Correspondent 2606)

Comment 419-12. I strongly support S1/2. My reason for so doing is that I feel it is necessary to preserve solitude in nature when possible. The use of motor craft on rivers is extremely disruptive of peace and quiet. Individuals that use non-motorized craft do not interfere with the recreation of others while the converse is not true. (Correspondent 2620)

Comment 419-13. Jetboats are noisy and annoying and should not be allowed on the wild and scenic section of the river. Phase them out over a reasonable time period. (Correspondent 2729)

Comment 419-14. Jetboats should be allowed only in the lower river and should be limited year-round. Jetboats disturb people. (Correspondent 2673)

Comment 419-15. No one should be subjected to the noise of an internal combustion engine in one of the most beautiful and inspiring canyons in the world. (Correspondent 2696)

Comment 419-16. The solitude of the area must be preserved. In an increasingly more crowded and noisy world, human beings must have a quiet place to rejuvenate. This is not only an environmental/ecological issue, but, also an issue of peace in our modern, technologic society. Please limit motorized vehicle use. (Correspondent 2603)

Comment 419-17. We should all have the opportunity to see such a unique national resource. Part of experiencing this for some will be the ability to enjoy the serenity of such a wilderness area without having to experience the somewhat rude and overpowering roar of power boats. (Correspondent 2817)

Comment 419-18. In order to make the wild area truly wild, we believe you should choose Alternative D. Motorized boats disrupt both the wildlife and humans who want to enjoy the peace and tranquility of this lovely area. (Correspondent 2837)

Comment 419-19. This sort of noise-oriented, resource-consumptive management of a national treasure is an anathema to those of us who worked hard to protect Hells Canyon twenty years ago. (Correspondent 2636)

Comment 419-20. A few years ago I participated in a five day guided float trip on the Snake and Salmon Rivers. The Hells Canyon section was indeed a wonder to behold. However, I can still vividly recall both the jarring sight and sound of jet boats as they attacked the peace and tranquility we had been enjoying. I was shocked in my naivete to see them on the river. I am not an active environmentalist, but on a few rare occasions that I choose to "go into the wilds" that is what I expect--going into the wilds, so to speak. This ugly assault on that beautiful environment was truly an eye-opener to me. (Correspondent 2690)

Comment 419-21. Even when I have been there in the middle of the "high" season in the summer, the number of non-motorized boats has not been offensive. On the other hand, the loud noise of the motorized boating has been an offensive invasion into the pristine and semi-primitive area, one that is particularly felt in the wilder parts of the river between Hells Canyon and Kirkwood. (Correspondent 1046)

Comment 419-22. In my remarks, I have assumed that a high level of artificial noise is incompatible with Wild River and Wilderness management. That is the main objection to power boats (aside from the effects of their wakes on the beaches and river ecology). For the same reason, I believe that continuation of power boat and aircraft travel on the Wild segment of the Snake is incompatible with the established land uses there. (Correspondent 2341)

Comment 419-23. It was rather a shock to have that serenity pierced with the roar and huge wake of huge jet boats. I realize they have rights too but certainly would limit their use. (Correspondent 1136)

Comment 419-24. The Forest Service must manage and limit numbers of powerboats in Hells Canyon to protect and save the resource for the public - both now and in future generations. Otherwise, only those people who tolerate the incongruity of motors and noise in an otherwise pristine area will be able to enjoy it. (Correspondent 2328)

Forest Service Response: The effects of motorized noise on an individuals recreation experience can be a negative aspect if that individual is expecting solitude or the quiet setting typically associated with solitude. Motorized use of the Wild and Scenic Snake River is valid as stated in the HCNRA Act.

Alternative G reduces powerboat use to numbers that should partially mitigate noise concerns and proposes monitoring to ensure compliance with decibel limits established in Forest Plan Amendment 5. The Forest Service will continue to provide technical support to the Welded Aluminum Jetboat Manufacturer's Association on making further improvements on managing sound produced by jetboats (reference analysis file for noise study). The states of Idaho and Oregon have decibel laws with specific limitations on noise levels but these can only be enforced by County Sheriffs in both states. Alternative G provides for cooperation with the states to monitor decibel levels at portals to determine the rate of compliance.

Alternative G further proposes an active user education program that seeks to gain a sensitivity to the noise issue.

For those individuals seeking a true non-motorized recreation experience, there are other rivers available for those types of experiences as listed under Appendix H.

Many comments were received regarding decibel levels of jetboats on the river. Examples are included below.

Comment 419-25. As for "jetboats", however many, I think that noise should be regulated to the equivalent of laws relating to motor vehicles. (Correspondent 2474)

Comment 419-26. I support a decibel limit on all powerboats in the canyon. (Correspondent 2772)

Comment 419-27. In addition, all powered craft should be required to remain within prescribed decibel levels. (Correspondent 2495)

Comment 419-28. Jetboat companies like Hewescraft are voluntarily adopting new sound reductions to quiet their impact. This newly applied technology can help us all share the canyon in peace. (Correspondent 250)

Comment 419-29. Noise level limits should be prescribed. 36 CFR s 3.7 relates to noise abatement, and decibel limits at specific distances. Compliance with noise level limits, based on the best available technology, should be a preliminary condition before obtaining a permit for commercial or private jetboat use. (Correspondent 1196)

Comment 419-30. Please recognize that noise is a pollution. Every person has limits beyond which volume, frequency and duration of sound become an irritant. I reach my limit pretty quickly when I'm in a wild area. It doesn't take many jet boats or aircraft to have an impact on my experience. The technology exists to make any boat on the river run as quiet as a new Cadillac; and it can be done

without bubbling anything into the river. This should be a standard requirement for any motorboat using a wild and scenic river. (Correspondent 2849)

Comment 419-31. Rules of powerboat operation - strict decibel limitations (loud craft have no place in Hells Canyon). (Correspondent 2383)

Forest Service Response: Idaho and Oregon have statutes that require stationary tests as prescribed by Society of Automotive Engineers (reference analysis file). Generally, the states and Society of Automotive Engineers are reluctant to develop decibel limits for rivers because individual river characteristics (i.e., width, depth, speed, seasonal fluctuations, rapids, etc.) vary considerably and could result in unreliable compliance and enforcement.

The FEIS preferred Alternative G proposes to cooperate with the appropriate county, state, and federal agencies in monitoring compliance with stationary decibel limits and the valid craft requirements of Forest Plan Amendment 5.

Reference Appendix D for further discussion.

Comment 419-32. Many user conflicts are due to noise from powerboats (DEIS, P. 1-13). The DEIS skirts this issue by stating that noise control is outside the jurisdiction of the USFS and that enforcement of noise levels is the responsibility of state and county government (DEIS Appendix D-4). While noise control may be outside the jurisdiction of the USFS, NEPA clearly requires analysis of such issues (40 CFR 1502.14(c)). It is unrealistic for the USFS to expect states and counties to monitor and enforce noise levels in remote areas such as the HCNRA. Noise control equipment for powerboats is readily available and performs satisfactorily. IRU recommends establishment of a user-group task force to develop decibel level standards for the HCNRA. Make compliance with these standards a requisite for obtaining a powerboat launch permit. Phase in the program over 2-4 years. (Correspondent 2501)

Forest Service Response: The effects of motorized sounds on recreation experiences and wildlife is addressed in Chapter IV under the Scenic, Recreation, and Wildlife ORV's. Reference the previous response for further discussion on noise control.

Comment 419-33. How about restricting these sight-seeing boats to electric power? Could that be possible? (Correspondent 2503)

Forest Service Response: It is unlikely that feasible technology exists that would provide adequate power to navigate upstream, particularly through the rapids.

Comment 419-34. Noise raises blood pressure and increases tension. Two problems we go to the wilderness to relieve. (Correspondent 2461)

Forest Service Response: The Wild and Scenic Snake River is not designated wilderness. Motorized watercraft are considered to be a valid use of the Wild and Scenic Snake River pursuant to the HCNRA Act. FEIS preferred Alternative G proposes non-motorized periods for those individuals that would prefer a more solitude experience.

Comment 419-35. Section 7(3) of the NRA Act was intended to protect the natural integrity and ecological viability of the air space in and around Hells Canyon itself. This would strongly encourage the elimination or reasonable reduction of noise pollution. (Correspondent 1196)

Forest Service Response: All of the alternatives proposed in the FEIS are in compliance with the Clean Air Act and objectives of Section 7 (3) as presented in Chapter IV, "Potential Conflicts With Plans and Policies of Other Jurisdictions." The results of the welded aluminum boat noise measurements was completed in July 1993. The study presented a guide to quieting boats which are listed in Appendix D, under "Sound Generated by Motorized Watercraft".

The Forest Service will continue to support the jetboat manufacturing industry in establishing and implementing industry wide standards for noise abatement in newly constructed boats and modifications to existing boats following the guidelines developed during the testing program.

Implementing more refined decibel limits specific to the Wild and Scenic Snake River corridor would be conducted pursuant to the public land use regulations standards and guidelines for "Use of Motorized and Non-motorized Rivercraft", once final.

Comment 419-36. Page III-2. Most visitors would not include sound as a component of scenery. The statement about sound -- "makes this a value not to be intruded upon"-- seems more editorial than a description of the present situation. The DEIS fails to recognize that background noise at the major rapids is much higher than that produced by modern powerboats. (Correspondent 1198)

Forest Service Response: This analysis is based on recent research into visitor perceptions as it relates to scenery. In an outdoor recreation setting in a remote area, one of the attractions would be the opportunity to hear natural sound, including background noise at major rapids while viewing the natural feature producing the sound. Preliminary research suggests that this opportunity enhances the quality of the recreational experience in an outdoor setting.

Noise From Kickers

Some correspondents described negative effects of small kicker motors on floatcraft. Others were in favor of their use as a convenience. Examples are included below.

Comment 419-37. I strongly feel there should be no motorized uses of any kind from Hells Canyon Cr. to Kirkwood during the motorless week. Such a motorless corridor is the key characteristic that floaters are willing to give so much up for in supporting Alternative E and the alternating weeks. There should be no compromise to allow motorized uses between Hells Canyon Cr. and Kirkwood during the motorless week. (Correspondent 2325)

Comment 419-38. Underscore the importance of having no motorized use during the motorless week if this plan is to work. If motors are allowed in, the benefit of separating the two user groups is eliminated and floaters would be the group to suffer the most. (Correspondent 2328)

Comment 419-39. Floaters who use no motors should continue to have unlimited access to the river. The USFS alternative for float craft appears to be reasonable and adequate. (Correspondent 2853)

Comment 419-40. I support banning outboards on rafts and jetbacks during the "motorless" week. My guests will truly value a motorless river experience. (Correspondent 2324)

Comment 419-41. I assume that all floaters will be required to remove their outboard motors thus turning them back into float boats instead of powerboats. (Correspondent 1171)

Forest Service Response: Alternative G would not allow floaters to use outboard kickers or any type of motorized equipment in the wild river from Hells Canyon Dam to Pittsburg year-round. An exception would be Hells Canyon Creek Recreation Site where motorized equipment could be used to inflate floatcraft. Since many floaters have indicated the noise caused by powerboats are an intrusion on their wild river experience, it is unfair for a float party to detract from the backcountry experience of other float parties in the wild river by using an outboard motor to traverse the river corridor. Even during periods of time when powerboats were allowed, the use of kickers would decrease the total amount of time available for other floaters to experience a non-motorized setting.

The outboard serves as a convenience only and other than convenience, does not add to the quality of the float experience. Rafts with motors add to the rate of encounters between groups by allowing the boat equipped with a motor to travel at rate of speed faster than the normal river current. It also aids in the practice of "camp running", allowing some groups an unfair advantage in obtaining prime river campsites.

Comment 419-42. Let us have kicker motors for our gear rafts. (These things are too heavy without motors). (Correspondent 1162)

Comment 419-43. Motors would be permitted on float craft in the Hells Canyon Dam to Kirkwood reach but actual operation would be limited to downstream propulsion below Kirkwood. (Correspondent 2276)

Forest Service Response: Kickers are not a necessity, but a convenience for floaters. Gear rafts are commonly used on rivers that traverse designated wilderness in other areas where motors are not allowed and floaters have adapted to this requirement. Motors are often used to run a quick trip on a short time schedule, increasing encounters with other groups by both their physical presence and associated noise. They are also used to assist in "camp running", to avoid rowing in quieter stretches of the river or to replace rowing on windy days. The noise produced by outboards could affect the quality of the backcountry experience for many floaters and many river users that are in camp including powerboaters, hikers and horsepackers.

It would not be fair to manage numbers of powerboats to enhance the backcountry experience of all users in the wild river but still allow floaters discretionary use of motors on float craft.

The scenic river would remain open to the use of outboards on rafts downstream from the boat ramp at Pittsburg Landing, and Lower Salmon floaters entering the Snake River would not be affected. For float trips originating in the wild river and continuing through into the scenic river, an option would be to have an outboard delivered by vehicle at the Pittsburg Landing ramp or by powerboat downstream from the Pittsburg ramp to assist them for the remainder of their trip.

**Aviation
Code 450**

Comments in this section addressed levels of airstrip management, the effects of airplane use on other users, safety, and emergency concerns.

Comment 450-1. Aircraft use must be regulated and restricted. Restrictions on their use of landing strips is essential to the preservation of both the resource and social environment of Hells Canyon (the Middle Fork of the Salmon is a prime example of unregulated use of air strips impacting a wilderness area). (Correspondent 2324)

Forest Service Response: The FEIS preferred Alternative G proposes management of the airstrips as displayed in Chapter II.

Comment 450-2. A sentence on I-3 is most puzzling. "The underlying need is to manage aviation use to protect and enhance the outstandingly remarkable recreation value of the river corridor..." So far, so good. But then comes, "...by providing additional access for aviators." (!?!). Perhaps the writer confuses enhanced access with enhanced recreation value. These are two quite distinct aims, and they are potentially at cross purposes. Time and again we have seen enhanced access cause the deterioration of recreation value. I would also submit that for every angler who prizes aerial access, there is one or more who resent the intrusion of aircraft over a fishing stream. (Correspondent 2341)

Forest Service Response: The FEIS preferred Alternative G proposes to keep the Sluice Creek airstrip closed during the primary season to ensure appropriate use and access within the wild section to meet the desired ROS characteristics identified in Chapter III.

Comment 450-3. AOPA [Aircraft Owners and Pilots Association] believes that once an alternative is selected, the Forest Service should obtain Federal Aviation Administration (FAA) approval to classify all airports on the Snake River as "public use" airports. (Correspondent 2243)

Comment 450-4. In addition, we recognize the physical limitations of the airstrips in the Snake River corridor and encourage the Forest Service to cooperate in a training program to educate pilots about these limitations and in the necessary procedures to operate at these airstrips. We also request that the Forest Service obtain a FAA airspace analysis for each of these airports. (Correspondent 2222)

Forest Service Response: The airstrips currently open and proposed for opening are classified as "public use" airstrips by the FAA. These airstrips are not currently published on aviation charts and the Forest Service has no plans at this time to request publication of these strips. The Forest Service would gladly cooperate with aviation associations in any proposed training programs.

Comment 450-5. Obtain FAA airspace approval for all their airports on the Snake River. The airports should be classified as "Public Use". (Correspondent 2225)

Comment 450-6. Provide the basic airport data to the FAA, Oregon State Aeronautics, the Idaho Division of Aeronautics, and the various private companies that publish airport directories. The airport information should be made available to pilots through the various directories and aeronautical charts. This is very critical if Alternative E is selected, since many of the aviation visitors are from out of area, and need to be informed of the allowed use periods. (Correspondent 2225)

Comment 450-7. Additionally, all airport information, complete with any and all restrictions to use, should be supplied to all organizations which publish airport charts so that users of these valuable facilities will be aware of their obligations and any restrictions at the facilities in question. (Correspondent 2243)

Forest Service Response: Airspace analysis and airstrip data has been compiled for these strips and is on file with the FAA with the Airport Division in Seattle, Washington. Organizations interested in publishing this information may request it from the FAA.

Comment 450-8. Close all strips except one on the entire river corridor. Suggest strip on the Oregon side due to fly in hunters. Improve and lengthen the strip picked for the plane parking and safety. All other strips to be leveled, seeded to grass and to be left as an emergency strip only. All emergency strips- Only can be used by the NRA in helicopter use for Fire control only. (Correspondent 2334)

Forest Service Response: The FEIS preferred Alternative G does not propose this level of airstrip management. Use of airstrips is intermittent and occurs primarily in the spring and fall seasons. Alternative G proposes self-issued permits at airstrips to monitor use with established thresholds, in addition to proposing monitoring of overflights by HCNRA personnel at major portals.

Comment 450-9. Aircraft Use - Using Big Bar and/or Sluice Creek will increase "drop camping" especially during chukar hunting and steelhead fishing seasons. (Correspondent 2409)

Forest Service Response: Under the FEIS preferred Alternative G, drop camps are prohibited during the primary season for river and upland users. Drop camps would be permitted during the secondary use season.

Comment 450-10. No private or commercial float plan landings on the entire river corridor throughout the entire year. Reason: High risk to all river users for an accident. Noise to hikers and impact to wildlife unacceptable. (Correspondent 2342)

Comment 450-11. Aircraft use should be permitted as proposed in this section, but a reservation system needs to be established to help control the number of aircraft so the river corridor will not be over flown with private planes as it recently has been with private powercraft. No permits required in emergencies. (Correspondent 2342)

Comment 450-12. Aircraft use should be permitted, but only in emergencies and by the use of a permitted reservation system to help control the number of aircrafts. This will enable the river corridor not to be overflown with private aircraft as it recently has occurred with unpermitted private powerboats. (Correspondent 2342)

Forest Service Response: Reference the FEIS preferred Alternative G description in Chapter II for a full discussion of proposed aircraft regulations.

Comment 450-13. Big Bar and Sluice Creek airstrips should be closed to all normal uses, that being the sole workable way to protect the values for which this area was protected by Congress. The lower river airstrips (Cache Creek, Dug Bar, etc.) could easily be kept open as proposed in your Alternative E. There is no reasonable recreational need to keep six airstrips open in a corridor as small as this one. Four ought to suffice. (Correspondent 2466)

Comment 450-14. Aircraft landings should be restricted to portal airstrips only, and the number of landings per day should be restricted. Regulating this use should be based on a desired future condition and what may occur, not what may or may not "need" to be regulated in the future. (Correspondent 1196)

Forest Service Response: The FEIS preferred Alternative G proposes use for private aircraft only on designated airstrips. Adequate information to establish use levels was lacking so monitoring, using self-issued permits at airstrips, and monitoring of overflights as presented in Appendix J, has been proposed. Once the monitoring threshold in Chapter II is reached, use levels of the private aviators would be set in place.

Comment 450-15. Aircraft use of the canyon is minimal and extremely low during the "regulated season". Local pilots prefer the cooler weather of spring and fall to fly in Hells Canyon. (Correspondent 1067)

Forest Service Response: Although there is a lack of good data on airstrip use, this is a common message heard through the public scoping and DEIS comment period.

Comment 450-16. Allow continued use of the existing airstrips as necessary for safety as well as continuation of an established use. (Correspondent 1087)

Forest Service Response: Reference the full description of the FEIS preferred Alternative G in Chapter II.

Comment 450-17. The aircraft noise factor impacts all river and land users and impacts the natural setting for wildlife. (Correspondent 2334)

Forest Service Response: Potential impacts of aircraft noise at airstrips is addressed in the wildlife and recreation sections of Chapter IV.

Comment 450-18. Although each of these approaches would provide a unique blend of motorized and non-motorized recreational opportunities in the wild and scenic sections of the river corridor, Oregon Aero-nautics does not foresee the need to regulate the use of these back country airstrips. As identified in the DEIS use levels of airstrips along the river could be expected to remain relatively low and stable because of the necessary skills required to fly and land within the river corridor. The required monitoring to assure the level of use in the wild and scenic section would appear to be difficult and expensive to accomplish. Likewise, the benefit from closing the airstrips during the non-motorized weeks would not appear to justify the amount of time and money it would take to notify pilots of the closure schedule and to enforce the proposed regulation. (Correspondent 2222)

Forest Service Response: The monitoring proposed in Chapter II for airstrip use is designed to require minimal cost. The alternative week closing of the wild section airstrips is not brought forward in the FEIS preferred Alternative G. Alternative G proposes allowing Big Bar to be open year-round and keeping Sluice Creek closed during the primary season.

Comment 450-19. Except for emergencies, aircraft should land only at designated public landing sites. (Correspondent 1081)

Forest Service Response: This is a design component of the FEIS preferred Alternative G.

Comment 450-20. Finally on aircraft, I would hope that the landing of float planes on the wild and scenic segments be eliminated altogether, not just during the regulated season. (Correspondent 2341)

Forest Service Response: This is proposed in the FEIS preferred Alternative G.

Comment 450-21. I would like to voice my support of the re-opening of the airstrips at Sluice Creek and Cache Creek as well as the continued access to Dug Bar, Big Bar, and Pittsburg Landing. I disagree that Commercial Aviation in the canyon should be discouraged or listed in the appendix as "not to be addressed" as they are Part 135 Air Taxi operators who are affected by excluding commercial aviation from the canyon. I am considering applying for a permit to offer Helicopter tours of the Snake River with Snake River Adventures of Lewiston. I have flown the canyon for several years now and I think that you could offer reasonably priced aerial tours with the tour boats and still not adversely affect the enjoyment of the river by float boat operators. This is being done in the Grand Canyon and I feel that it could be done here too. I would strongly urge you to consider that both Private and Commercial Aviation should have a place in the canyon. (Correspondent 1110)

Forest Service Response: The FEIS preferred Alternative G proposes prohibiting commercial aircraft operations and landings at designated airstrips and prohibiting the issuance of special use permits for outfitted aircraft operations at established airstrips. To meet the desired ROS characteristics in Chapter III and DFC's in Chapter I, it would be inappropriate to expand the commercial opportunities for aircraft use in the river and would not meet the intent of the Wild and Scenic Rivers Act and the HCNRA Act.

The issue of overflights is not analyzed in this EIS as stated in Appendix D. The overflight issue will be analyzed as part of the CMP adjustment strategy with the cooperation of the FAA.

Comment 450-22. The Sluice Creek airstrip is a most desirable recreation point. It could also be used more easily as a fall-back site if weather prevents use of other areas, such as the Idaho primitive areas, if the non-motorized alternating weeks during the summer were not in effect. (Correspondent 1166)

Comment 450-23. I believe Alternative B is the best choice. Speaking on behalf of Idaho and regional aviators, I believe this choice provides enough safeguards for other users without undue restrictions. I don't believe many aircraft use the river during the "regulated season". Although the other alternatives purport to minimize impacts from aviation during this season, aircraft usage at these times is too low to warrant the restrictions proposed in A, D, E and F. Moreover, keeping Cache Creek, Big Bar, and Sluice Creek airports open would serve to disperse already sparse aircraft activity. (Correspondent 1081)

Forest Service Response: The FEIS preferred Alternative G proposes Sluice Creek be closed to recreational use during the primary use season. This is based on the reported low use during the summer season by many of the aviators and with the intent to ensure that the wild river is being managed to achieve the desired ROS setting during the primary season.

Comment 450-24. I believe aircraft usage is too low to warrant restrictions. Their usage should be monitored and tabulated over a three-year period. If such study shows an emerging problem, education should be the first choice to correct the situation. (Correspondent 1081)

Forest Service Response: The FEIS preferred Alternative G proposes minimal restrictions on private aircraft use of designated airstrips. Alternative G emphasizes monitoring through self-issued permits and user education at the airstrips.

Comment 450-25. I don't think the few airports detract anything from the outdoor experiences this great country offers. I feel they are an important part of the history of this country and have a valid role in the present day use of the country. I feel these airports should continue to be available full time to the segment of the public that accesses these areas by flying. (Correspondent 2373)

Forest Service Response: Although the FEIS preferred Alternative G proposes to open Sluice Creek on a temporary basis and Cache Creek permanently to private aircraft, many individuals are concerned about future growth of private aviation and the impact it may have on the river corridor.

Comment 450-26. I favor proposal B for the following reasons. It would allow access to the Sluice Creek airstrip, which is the most desirable airstrip to use on the river. The uphill slope to the south provides the greatest safety advantage by increasing take-off performance with the downhill run to the north and providing shorter stopping ability if there is a slight tailwind on landing to the south. (Correspondent 1166)

Forest Service Response: Sluice Creek is proposed to be open during the secondary use season under the FEIS preferred Alternative G.

Comment 450-27. I offer my support and recommend that Alternative B be adopted as being the most practical and representing the majority of aviation interested people. (Correspondent 1047)

Forest Service Response: Thank you for your comment.

Comment 450-28. The Scenic River Concept should be maintained not a wilderness-type concept, with the 1/2 mile corridor kept intact. Keep all aircraft landing fields open for public. (Correspondent 2401)

Comment 450-29. I urge that the use by private planes of the strips at Sluice and Cache Creek be eliminated from the plan. I assume you feel constrained here by the fact of "established use"? But more fundamental is the question of "appropriate use." That is, what recreation activities are appropriate along a Wild River with Wilderness? I believe that the landing and take-off of airplanes is not. (Correspondent 2341)

Forest Service Response: The Wild and Scenic Snake River corridor is not designated wilderness. The airstrips proposed for use are located within the river corridor. In striving to better achieve the desired ROS characteristics for the wild river, the FEIS preferred Alternative G proposes the Sluice Creek airstrip remain closed during the primary use season, but open during the secondary use season.

Comment 450-30. Low level scenic flights should be eliminated. (Correspondent 2843)

Comment 450-31. Overflights by aircraft during non-motorized weeks cannot be controlled which negates the effect of prohibiting them to land. (Correspondent 2196)

Comment 450-32. I would also like to see regulations included in this management plan to control overflights. While no scenic flight services are currently operating in the canyon, that I know of, the potential is there, and such services will eventually exist. Grand Canyon's experience should be a warning of what Hells Canyon may someday experience. (Correspondent 2324)

Forest Service Response: The issue of overflights is not analyzed in this EIS, as noted in Appendix D. Overflights will be considered as part of the CMP adjustment strategy in coordination with the FAA.

Comment 450-33. It's difficult for me to understand why the solitude of floaters and boaters is any more important than the solitude of flyers. When I started flying to Sluice Creek in 1966, there were no floaters and only a few power boats. Now, that was solitude! Please keep in mind that small aircraft is relatively quiet. The maximum noise level is during ascent which only lasts approximately 15 seconds. There is no noise on descent. Over the last 10 years, private aircraft has lost over 80% of backcountry flying. I hope that you will help us regain our enjoyment of the backcountry experience. The use of the airstrip would be minimal from

the Portland area. Only 5% of aircraft is able to use the Sluice Creek airstrip. There are small airstrips on the John Day River and Deschutes River, and I haven't seen any aircraft on them this summer. (Correspondent 2828)

Forest Service Response: Thank you for your comments. They have been considered in the development of the FEIS preferred Alternative G.

Comment 450-34. Leave the existing airstrips for planned as well as emergency use. (Correspondent 1065)

Forest Service Response: Reference Chapter II for a full discussion of the FEIS preferred Alternative G aviation proposals.

Comment 450-35. Reduce private aircraft landings in the NRA. It seems to me that they provide the greatest impact in terms of noise per number of people served. The middle benches are part of the overall recreation area and aircraft does impact the solitude of the back and horse packers in that area, even if the aircraft land down near the river. (Correspondent 2307)

Comment 450-36. The DEIS also fails to regulate aircraft use based on a "lack of data." Aircraft flights over, in, and landings in Hells Canyon contribute cumulatively to creation of a noisy, crowded, motorized atmosphere. (Correspondent 1196)

Comment 450-37. You should not open or upgrade in any way airstrips in the wild section --- A substandard airstrip is as effective in limiting use and encounters as are regulations. Opening additional strips when there are identified problems with levels of encounters seems counter productive - follows laws/guidelines/manual rather than bowing to special interest groups with \$. (Correspondent 2345)

Comment 450-38. Most of the alternatives open two airstrips to private aircraft. As we oppose more motorized recreation in the areas, we oppose opening more ways to get into the canyon by motor. This will also only increase the crowds in the river corridor. (Correspondent 2894)

Forest Service Response: A common theme by many of the aviators is the downward trend in private aviation use at backcountry airstrips, in conjunction with the aviation use periods of the canyon generally being the spring and fall. The FEIS preferred Alternative G proposes to prohibit commercial aviation use of designated airstrips, a primary season closure on Sluice Creek airstrip, and monitoring use levels to determine if objectives are being met.

The issue of overflights will be analyzed in the CMP adjustment strategy in cooperation with the FAA.

Comment 450-39. Private and commercial helicopters can use the one improved strip. (Correspondent 2334)

Forest Service Response: Commercial aircraft, both fixed and rotary wing, are prohibited from using designated airstrips under the FEIS preferred Alternative G with the exception of incidental use as addressed in Chapter II. Private use of rotary wing aircraft would be allowed at designated airstrips.

Comment 450-40. The Idaho Division of Aeronautics can support either Alternative C or the preferred Alternative E. Alternative C is the least restrictive to aircraft users. However, it does not resolve the conflict between rafters and aircraft. This could be an issue that would result in allocations for aircraft use. Alternative E would have the effect of allowing a 50% aircraft use during the use season in the wild section only. This would apply to only two airport; Big Bar and Sluice Creek. (Correspondent 225)

Forest Service Response: Thank you for your comment.

Comment 450-41. The existing airstrips are necessary from a safety standpoint as well as a practical access for an established group of canyon users. (Correspondent 1089)

Comment 450-42. The existing airstrips are necessary from a safety standpoint as well as access for an established group of users. Let them continue to be used. Surely the noise cannot ruin a river visit any more than the other signs of human habitation that have existed there for over a hundred years. (Correspondent 1041)

Forest Service Response: Reference Chapter II for a description of the FEIS preferred Alternative G aviation proposals.

Comment 450-43. The idea of self-registration of aircraft at public airports is a satisfactory proposal, and would enable the USFS to verify the low level of aircraft usage. Also, this will help the USFS and prudent aviation organizations to conduct aviation user education. (Correspondent 1081)

Forest Service Response: Thank you for your comment.

Comment 450-44. The proposal to limit aircraft landings in the upper (wild) river to that same pattern of alternating weeks is probably completely unworkable. There will be a real problem in notifying pilots of this restriction. (Correspondent 2466)

Forest Service Response: This proposal was not carried forward in the FEIS preferred Alternative G. Reference Chapter II for a discussion of the attributes of Alternative G.

Comment 450-45. This access point -Sluice Creek- would allow Oregon fishing and bird hunting license holders to use this side of the river. (Correspondent 1166)

Comment 450-46. This aircraft access point -Sluice Creek- would allow reasonable hiking opportunities in the canyon. (Correspondent 1166)

Forest Service Response: That was the intent of the proposed action. Although the FEIS preferred Alternative G proposes to only allow private aircraft use of Sluice Creek in the secondary use season, it will accommodate the majority of the desired hunting and fishing opportunities.

Comment 450-47. Using all strips puts a high degree of risk to the safety of boaters, floaters and hikers. (Correspondent 2334)

Forest Service Response: The FEIS preferred Alternative G minimizes those risks by prohibiting float plane landings on the river year-round. The prohibition of commercial aviation use of airstrips (except for incidental use as addressed in Chapter II) would serve to minimize use of airstrips.

Comment 450-48. We believe a reasonable course would be to open the airports as public-use with no restrictions. A public-use airport is an airport that is open to the public without prior permission and without restrictions within the physical capacities of the available facilities. The complexities of restricting the use of a designated public use airport, as proposed in Alternatives B, C and E will be cumbersome and probably

ineffective. If significant restrictions are imposed to regulate the use of these airports, we recommend that the airstrips not be designated as public-use airports but rather opened as private-use airports with a reservation system to regulate access. (Correspondent 2222)

Forest Service Response: The FEIS preferred Alternative G does not propose alternating use schedules (beyond the primary use season closure of Sluice Creek), thus would not require any types of reservations. Self-issued permits at the designated airstrips would be required.

Cultural/Historical Code 460

Comments in this section included several cultural resource topics; decreased access to sites, effects of increased visitation, protection of petroglyphs and future status of existing human made structures. Following are examples.

Comment 460-1. Alternative E decreases access to cultural resources in the canyon. (Correspondent 44)

Comment 460-2. Alternative E will result in decreased access to the cultural and historical resources in Hells Canyon. (Correspondent 1076)

Comment 460-3. Alternative E will result in decreased access to the cultural and historical resources in Hells Canyon. The many tourists who happen to visit the area on the wrong week will be denied the opportunity to view this part of our cultural heritage. (Correspondent 970)

Comment 460-4. The restrictions in Alternative E will limit the cultural and historical uses of the river. (Correspondent 127)

Comment 460-5. The unnecessary restrictions in Alternative E will result in decreased access to the cultural and historical resources in Hells Canyon. The best way for people to understand, appreciate, and ultimately help protect the rich Native American heritage of Hells Canyon is for people to see the resources first-hand. Such opportunities will be lost for many visitors if the Forest Service implements the motorized-/non-motorized alternating weeks. The many tourists who happen to visit the area on the wrong week will be denied the opportunity to view this part of our cultural heritage. (Correspondent 2110)

Forest Service Response: Human use has had the greatest impact to both prehistoric and historic sites within Hells Canyon, particularly those sites located in the Snake River Wild and Scenic corridor. Any alternative which reduced overall use within the corridor would decrease the potential for human related impacts to heritage resources.

Comment 460-6. Regardless of which alternative in the proposed management plan you choose, the sites will receive greater visitation. (Correspondent 2399)

Comment 460-7. The unique features of the canyon must be preserved. I read with great concern a report of vandalism at the site of the Pittsburg Landing petroglyphs. The impact of improvements such as the paved road to Pittsburg Landing are not compatible with a wilderness. (Correspondent 2488)

Forest Service Response: The long-term trend in visitor use to Hells Canyon will be toward greater numbers of people. Increased use, especially at sites like Pittsburg Landing would have occurred regardless of improvements. The current level of development at Pittsburg Landing is designed to accommodate existing and future use, while reducing resource impacts. The developments associated with the Pittsburg petroglyph

site were designed to both reduce impacts to the petroglyphs and to increase public awareness as to value and sensitivity of the resource.

Comment 460-8. Finding that Traditional Native American use of the area is not an outstandingly remarkable value is inappropriate. (Correspondent 1196)

Forest Service Response: Traditional use sites are those locations for which a continuous record of use exists from the historic past to the present. No documentation of traditional use by Native American groups exists for Hells Canyon. When contacted regarding traditional use sites in the canyon, the Nez Perce were unwilling to reveal information regarding traditional use sites.

Comment 460-9. We believe that the best protection for these [petroglyphs] at Pittsburg is to have trails and information and Forest Service presence. Keeping quiet about them will not protect them over the long haul. Education is the best policy. (Correspondent 2237)

Forest Service Response: Past experience at other rock art sites in Region 6 has demonstrated that active interpretation results in both an increased public awareness and decreased vandalism.

Comment 460-10. The desecration of some of the petroglyphs at Pittsburg Landing occurred only after the Forest Service provided a new road for easy access for recreational users. Obviously, the Tribe is opposed to further human encroachment on these significant areas because of this increased risk to our cultural resources. Requiring users to utilize foot power, horses or float boats in this area would be improvement over the FS's preferred alternative which increases numbers that would have access via motorized vehicles, vessels and airplanes. (By the way, it is interesting that the DEIS describes one of the possible problems with increased recreation activity is "artifact collection" (Page IV-DEIS). In our view there is no other term to use to describe this activity but artifact theft.) (Correspondent 2337)

Comment 460-11. I am particularly concerned with the statement in your summary paper that reads "rich archaeological resources would be enjoyed by visitors and studied by researchers". Unfortunately, archaeological resources, rock art sites in particular, that are enjoyed by visitors are frequently damaged by those visitors and no longer suitable for study by researchers. (Correspondent 2399)

Comment 460-12. Pages IV-68 to 69. The assertion that increased use will result in more risk to cultural sites is merely speculation. The greatest damage to Hells Canyons cultural resources took place in the 1970's when there were relatively few people on the river. Despite increased use in past years, damage to cultural sites has not increased in Hells Canyon. Cultural sites are at far more risk in the winter, when use is low, than in the summers. (Correspondent 1198)

Forest Service Response: The HCPC and the Nez Perce Tribe have both claimed that vandalism can be attributed directly to the recent developments. HCPC has maintained that historically, the petroglyphs were inaccessible and received very little visitation. Forest Service managers familiar with the Pittsburg Landing area estimate that since the late 1970's, the site has received between three and five thousand visitors per year. The majority of these visitors have accessed the petroglyph site via the river trail. However, numerous visitors also utilized the pre-existing Circle C Ranch road which passed immediately adjacent to the petroglyphs. While use numbers can not be accurately documented, use can be demonstrated by past aerial photography and historic site data. The 1978 site form for the petroglyphs discusses intensive use as indicated by trampling of vegetation within the rock art site and numerous "vandal scratches and marks on the boulders." Low elevation aerial photography (1982) clearly shows a well developed trail system leading both from the river and the old road. Further, these photos indicate that the historic road leading to the site was at least as well developed as most other roads in the Pittsburg Landing area.

As for evidence for past acts of vandalism or damage, the above mentioned 1978 site form is quite telling as it references "numerous vandal scratches and other marks...". In reality, the type of damage which the site sustained in 1993 are really no different than that which has occurred historically.

Comment 460-13. Rock art sites are highly visible and they are among the program in place to educate these visitors as to the deleterious effects their actions can have on a rock art site, whether it be brochures, signs, or part of hand-out literature. (Correspondent 2399)

Comment 460-14. Your plan must include a research program to study the Pittsburg Landing rock art site and others in the canyon. This plan must be funded and functioning concurrent with the implementation of the management plan. It cannot be pushed off on existing Forest Service archaeologists nor can it be successfully completed by bringing in teams of volunteers. You need to employ (contract) rock art conservators, specialists in rock art dating, and other rock art researchers, before you have lost opportunity. (Correspondent 2399)

Forest Service Response: There are currently over one hundred and seventy five recorded rock art sites in Hells Canyon, all of which were fully documented between 1987 and 1989. Of the 175+ rock art sites, only one, the Pittsburg petroglyph site is actively interpreted. It is also the subject of an intensive monitoring program. As part of the adjustment for the CMP, a cultural resource management plan will be developed. This management plan will identify and set research priorities for all sites in Hells Canyon. The Pittsburg petroglyph site will be a high priority among the various rock art sites.

Comment 460-15. Your past recreational developments catering to RV's and jet boaters have severely impacted native American cultural sites. These impacts must be mitigated and prevented in the future. (Correspondent 2585)

Forest Service Response: Cultural resource surveys conducted in 1978 along the Wild and Scenic River corridor indicated that majority of prehistoric sites showing evidence of site theft were impacted prior to the creation of the HCNRA. Subsequent investigations have revealed no significant increase in site theft activities since the creation of the HCNRA.

Comment 460-16. The building of roads within just a few feet of Native American petroglyphs is a disgrace. (Correspondent 2730)

Forest Service Response: Low elevation aerial photography (1982) clearly shows a well developed trail system leading both from the river and the old road. Further, these photos indicate that the historic road leading to the site was at least as well developed as most other roads in the Pittsburg Landing area. The new road follows the course of the existing road.

Comment 460-17. We were at Pittsburg Landing to inspect the small, rare field of petroglyphs there, which must be protected if the proposed camp site is established there. (Correspondent 2887)

Forest Service Response: The Pittsburg petroglyph site is one of the most intensively monitored sites in Hells Canyon. It will continue to be monitored on a very frequent but random basis. Other protective measures are in place as well.

Comment 460-18. Leave the buildings of historic interest, for example the silos at Kirkwood Ranch, intact. (Correspondent 880)

Comment 460-19. I see no reason to remove the metal shed at Pittsburg. It hurts nothing, is used by recreationists and provides habitat for innumerable bats. The silos at the Kirkwood Ranch are an important part of that site's cultural history. (Correspondent 970)

Comment 460-20. Do not remove the silos at the Kirkwood Ranch because they are a vital part of the historic ranch. Not to mention that they date back to the Jordon Era. (Correspondent 1071)

Comment 460-21. Erasing any and all traces of human activity and along with it historical landmarks and channel markers for safety is ludicrous. It is pondering to a group of individuals who generally are new to the local area and to the historical way of life that has been envied by people from urban areas. Now they would lock it up and return it to some mythical vision of the past. (Correspondent 1182)

Comment 460-22. The metal barn at Pittsburg and the silos at Kirkwood should not be removed as they are historic in nature and were there before the Wilderness Act. (Correspondent 1060)

Comment 460-23. I see no reason to remove the metal shed at Pittsburg or the metal silos at Kirkwood. All are features of the ranching history of the canyon and serve as habitat for bats and other small creatures. Removal would be costly from both the actual time and labor involved and also from the associated studies which would be necessary due to displacement of the bats. (Correspondent 1190)

Comment 460-24. The metal shed and silo at Kirkwood should be left alone. What do they hurt. These are part of the past, better known as historical sites, not all of these sites have to be scenic. People come from all over the world to see this kind of stuff. (Correspondent 1194)

Comment 460-25. The navigational markers are a historic and cultural resource and should be treated as such. (Correspondent 957)

Comment 460-26. The removal of many of the historic buildings in this area is now made ironic in the current push to "preserve" the history, such as at Kirkwood. (Correspondent 1781)

Comment 460-27. The silos at the Kirkwood ranch should remain, along with all of the other existing structures built by modern man in the canyon. (Correspondent 430)

Comment 460-28. We have also offered several times to paint the building [the metal shed at Pittsburg] so that it would more conform to the natural landscape. The offer still goes. (Correspondent 944)

Comment 460-29. I see no reason to remove the metal shed at Pittsburg. It hurts nothing, is used by recreationists and provides habitat for innumerable bats. The silos at the Kirkwood Ranch are an important part of that site's cultural history and date back to the Jordan Era. One contains names written by the Jordan children. It seems incredible that their removal be considered in light of their cultural significance. (Correspondent 2110)

Forest Service Response: The metal shed located across from Pittsburg Landing is not a historic structure. As such it is not eligible to the National Register of Historic places and does not merit protection as a heritage resource.

The metal silos located on Kirkwood Bar are historic structures. Section 106 of the National Historic Preservation Act of 1966, as amended 1988, provides a process by which historic structures can be removed. Under this process, eligible properties can be dismantled once they have been fully documented. Historic documentation is rigorous, and must follow the guidelines of the Historic American Buildings Survey.

The navigational markers have been replaced on numerous occasions. As such, they are not historic structures and do not warrant protection as heritage resources.

Resources (General Comments)
Code 500

Correspondents in this section focused on the protection of the canyon's natural resources as the most important consideration for this planning process. Examples are:

Comment 500-1. Other restrictions on jetboat use and operation must be implemented based on their effects on fish and wildlife. (Further discussion on salmon impacts is included in this critique.) (Correspondent 1196)

Comment 500-2. Ecologically, I think the licensed excursion power boaters do the most good for the public with the least damage to the ecology and should not be restricted except perhaps by time of day for departure. (Correspondent 2021)

Forest Service Response: The planning team discussed implementing a period of use restrictions for boat operation on the river. However, monitoring at launch sites shows that boats often do not enter the river until after 8:00 am. This provides wildlife a relatively undisturbed time period within and along the river. The Forest Service is cooperating with state and federal agencies to monitor powerboat decibel levels and ensure that they meet the "valid motorized craft" definition in the Forest Plan Amendment 5. Refer to the comments and responses on noise in the appendix for further discussion.

Comment 500-3. Recognition of the cumulative impacts of auto, ORV, aircraft, and jetboat motorized use throughout the canyon. This motorization is increasing use, and will increase demands for more use and facilities. Overall motorized access must be limited so as to protect the natural and cultural features of the NRA, and its silence and seclusion. (Correspondent 1196)

Forest Service Response: Cumulative impacts are analyzed and disclosed in Chapter IV. The CMP adjustment strategy will analyze the overall effects of motorized use in the HCNRA. Should this analysis indicate use levels within the river corridor are impeding the objective of protection and enhancing the river's ORV's, the use levels would be adjusted appropriately.

Comment 500-4. While the DEIS insinuates that resources damage might take place, it fails to document any real damage or even a threat of damage. (Correspondent 2219)

Forest Service Response: Damage is documented in monitoring reports of campsites, cultural resource reports, and river rangers' daily logs.

Comment 500-5. I would strongly support that professional management is enforced in an attempt to keep this region as clean as possible from all the debris that the power boating does create. (Correspondent 2302)

Forest Service Response: River rangers and recreationists all work to remove the litter left behind by the various user groups. Alternative G would implement a user education program as outlined in Appendix L which should result in more cooperation in maintaining clean campsites.

Comment 500-6. Protection of the resource cannot be done on an "every other week and during the regulated season only" basis. They must be dealt with daily, year around. (Correspondent 2324)

Forest Service Response: The Forest Service's goal is to protect the resources. Alternative G proposes use levels designed to protect and enhance the river's ORV's, year-round. Monitoring of those use levels and campsite conditions would provide information to indicate when change would become necessary.

Comment 500-7. That environmental protection and resource preservation be the highest priority in the management of the SCENIC as well as the wild section of the river and of its surrounding canyon lands. (Correspondent 2324)

Forest Service Response: Wild and scenic river classifications receive the same level of protection for resources (vegetation, wildlife, soils, etc.). Recreational opportunities do differ between the wild portion and scenic portion. Reference the ROS charts in Chapter III for further discussion of management objectives.

Comment 500-8. The environmental impact of each user craft should, therefore, be weighed against the user benefit it provides. Regulation and allocation of these user "groups" and their crafts should be designed with this impact/benefit relationship in mind. (Correspondent 2324)

Comment 500-9. It became obvious very quickly that floaters have a greater impact on the environment than do powerboaters. They spent less time in their craft and more time on shore causing greater impact to the weeds, flowers, insects and wildlife. (Correspondent 2410)

Forest Service Response: At this time there is no systematic way to measure the effects of different user groups in the river corridor. Monitoring of campsites does provide some measure of vegetation loss or soil erosion. Although floaters usually take longer trips and do more overnight camping, there is no feasible way to determine how the most significant impacts occur. An active education program (reference Appendix L) has been developed which would protect and enhance the fragile canyon plants.

Comment 500-10. The particular impacts of each user group must be dealt with additionally and individually (hikers with human waste carryout, horsepackers with excrement, tethering, and trail degradation, rafters with campground degradation, aircraft users with noise and wreckage pollution, and powerboaters with noise, fuel and wreckage pollution, wake problems, multiple contact impacts). (Correspondent 2324)

Forest Service Response: See response above. Impacts are dealt with cumulatively.

Comment 500-11. The LAC task force did not address a number of other concerns which if both float and powerboaters are to co-exist on the Snake River, must be addressed. Rules of the road such as decibel levels, wake management, number of daily trips up and down the river by each boat, fuel spills, hours of operation for jet boats, retrieval of sunken boats and mitigation for fuel spills and sinkings, campsite reservations, etc. If a shared resource approach is used care must be taken to assure that rules to protect the environment are imposed and enforced consistently on all users - motor and float. (Correspondent 2328)

Forest Service Response: Protection of the environment is consistent for all user groups. Decibel levels are established by the states of Idaho and Oregon (reference the noise section of this appendix for further discussion), wake management is the responsibility of the operator, fuel spills and sinkings are addressed in the hazardous material regulations for the Forest. Number of daily trips and campsite reservations are dealt with differently through the alternatives.

Comment 500-12. There are many plants, including roots and berries, located in the HCNRA, which have traditionally been used by the Nez Perce for subsistence and for medicinal purposes. Increased access to these traditional gathering areas will have negative effects on the availability to tribal members of these important foods and medicines. We again oppose the objective of providing additional roads and opening more airstrips so that more recreational users may have access. (Correspondent 2337)

Forest Service Response: No additional roads are proposed in this EIS. No negative effect to native vegetation is anticipated with the opening of the Sluice Creek and Cache Creek airstrips. The education program outlined in Appendix L would inform users of the unique values of the river corridor, enhancing the protection of the river's ORV's.

Comment 500-13. The plan's narrow scope also fails to adequately protect certain outstandingly remarkable values. Specifically, fisheries, vegetation, ecology, scenery, and history and culture are impacted by recreational activities such as motorized vehicle access and parking facilities at ancient petroglyph sites. They are also impacted by the widespread and un-analyzed livestock grazing that takes place along the river. By excluding actions other than on-water recreation from its management direction, the plan fails to adequately protect river values. (Correspondent 2340)

Forest Service Response: The direct, indirect, and cumulative environmental consequences of the recreational activities are disclosed in Chapter IV. Actions other than on-water recreation are addressed in stay lengths, waste carryout, and fuel wood requirements. Decisions and effects of construction and access are addressed in site-specific environmental analyses such as the Pittsburg Landing development, site plans for the administrative or recreation facilities, or as part of the ongoing annual monitoring as addressed in Appendix J. Effects of livestock grazing is addressed in AMP's, in addition to ongoing consultation for the endangered salmon with NMFS.

Comment 500-14. Page I-3. It is stated that the Scenic section is "the most biologically sensitive area for fish and wildlife resources within the river corridor." However, under the preferred alternative (Alternative E) most of the recreational use, specifically powerboating, will be concentrated within the Scenic section. Displaced motorboats which once use the Wild section of the river will now inundate the Scenic section. Because the Scenic section has a greater habitat diversity than the Wild section, the transfer of recreational use from the Wild to the Scenic section will negatively effect more habitat and species. A new recreational vehicle, the jet ski, will also be introduced to the Scenic section of the river without completely understanding its effect on riverine ecology. The environmental impacts of high recreational use levels on the Scenic section of the river, and access trails and roads leading to the river will disturb wildlife and critical habitat necessary for their survival. (Correspondent 2343)

Forest Service Response: Within the scenic section there are limits on float and motorized boat use. All of the action alternatives would result in less impacts to all resources than is occurring under current management. Personal motorized watercraft is proposed to be excluded from the scenic river corridor in Alternative G. Recreational use does disturb wildlife and alters habitat. However, the levels proposed in this analysis are not determined to be detrimental as disclosed in Chapter IV.

Comment 500-15. The "preferred alternative" makes no mention of limiting jet skis, wildlife restoration and maintenance, eliminating cattle feedlots, conducting research in wildlife restoration, and quiet recreation emphasis. (Correspondent 2372)

Forest Service Response: A variety of alternatives were developed to address personal motorized watercraft use and quiet recreation opportunities at differing use levels as disclosed in Chapter IV. The restoration of wildlife and elimination of cattle allotments are outside the scope of this analysis. Maintaining and enhancing wildlife and habitat is integral throughout all action alternatives through the management requirements for those alternatives.

Comment 500-16. Protect the shores and slopes from any use that will start the soil moving downward. Grazing, biking, any undue pressure on the vegetation must be prescribed by your plan. Concentrations of humans or livestock anywhere near the shore must be eliminated. (Correspondent 2421)

Forest Service Response: Monitoring of soil compaction and erosion is ongoing. The primary factor in loss of sediment is river peak flows. If unacceptable soil loss is indicated by monitoring, areas would be closed and rehabilitated. The education program addressed in Appendix L should have a positive effect in minimizing user impacts.

Comment 500-17. The DEIS mentions that in some proposals the tin shed at Pittsburg landing will be removed. Why? It's part of the old ranch and canyon history. It certainly doesn't distract from the view that one gets when approaching Pittsburg. The real eyesore is the new fueling facility on the riverbank. Most everyone thinks that it's some sort of water or sewage treatment facility. That system and its location creates an environmental hazard to the river also. (Correspondent 2465)

Forest Service Response: The shed does not meet the visual quality objective for a scenic river setting and was constructed after the establishment of the HCNRA in 1975. The decision to install the fueling station is addressed in the Pittsburg Recreation Plan and is not dealt with in this analysis.

Comment 500-18. If the present direction is continued I am afraid that not only will there be irreversible damage that will not only destroy much of the recreational value but also there is clearly the potential for many species to become endangered under the Forest Service stewardship. (Correspondent 2579)

Forest Service Response: All action alternatives propose new management direction. The Forest Service does not anticipate additional species to be listed as endangered as a result of Alternative G. Alternative G will protect and enhance the river's ORV's..

Comment 500-19. My recent camping trip alerted me to the destructive activities of motorized boats and jet skis. They disrupt not only all the plants and animals in the water, but also those along the shore and even flying above the area. (Correspondent 2783)

Forest Service Response: Presence of recreationists, regardless of how they access this area often has some effect on these resources. Effects are temporary and not determined to be detrimental as discussed in Chapter IV.

Comment 500-20. Page IV-71. To say that effects on PETS plants would directly relate to the level of use permitted by each alternative is a gross over simplification of the situation. The difference in impacts to PETS plants among all of the alternatives is probably insignificant. The best way to protect vulnerable populations of these plants is fencing and visitor education.

Forest Service Response: Differing use levels does effect the potential for disturbance to PETS plants. However, the Forest Service believes through appropriate ongoing inventory of PETS locations and user education that the potential for disturbance can be mitigated.

Comment 500-21. The plan state in Chapter IV, pages 70-71, that high levels of recreational use of the river corridor could directly and/or indirectly have adverse effects on special status plant species. Furthermore, on page 71, the plan continues that "increases in recreationists at Pittsburg Landing may result in increased impacts to some populations of *Mirabilis macfarlanei*, MacFarlanes's Four-O'Clock." However, late in the draft,

on page IV-100, is a paragraph which asserts that "no adverse effect on this species is anticipated in any alternative." The apparent contradiction is confusing to this reviewer and should be resolved.

We are concerned with the protection of populations of *Mirabilis macfarlanei* from increased vehicular traffic, such as may occur at Pittsburg Landing. Consequently, we strongly support alternatives which minimize vehicle impacts (i.e. Alternatives E and F). (Correspondent 2229)

Forest Service Response:

The effects discussion you refer to on pages 70-71 of the DEIS describe the potential environmental consequences that may occur from the implementation of alternatives. The Forest Service has the responsibility to protect and enhance the river's vegetation/botanical, ORV and has additional responsibilities under the Endangered Species Act. Mitigation measures for MacFarlanes's Four-O'Clock are addressed in Chapter II.

**Wildlife
Code 510**

Many correspondents felt wildlife was not a high priority in the DEIS and in particular, concern for the effect of domestic sheep on bighorn sheep was not addressed. Comments were also received regarding wildlife habitat conditions and the effects of human sound and presence on wildlife.

Comment 510-1. To emphasize the lack of concern for wildlife within the DEIS, on Page IV-55 it is stated that the environmental consequences of recreational use on wildlife is not considered a significant issue. This statement conflicts with the directive (desired future condition) of the DEIS to protect the area so that visitors can observe wildlife species within their natural habitat, i.e., peregrine falcons, bald eagles, and bighorn sheep (reference page I-8). Also, the lack of protection for wildlife violates mandates with the HCNRA Act, Sec. 7 (4) "protection and maintenance of fish and wildlife habitat" (A-3) (our underline), and the Wild and Scenic Rivers Act, Sec. 1 (b) "...selected rivers...possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural or other similar values, shall be preserved in benefit and enjoyment of present and future generations" (B-1) (our underline). (Correspondent 2343)

Forest Service Response: Wildlife was not identified as a concern during the public scoping period nor was it considered a management concern, and is therefore not considered a significant issue at this time. Should new information become available we would adjust the management to further protect wildlife and/or habitat. FEIS preferred Alternative G would decrease recreational use within the corridor and no decrease in wildlife viewing opportunities are anticipated.

Comment 510-2. Eliminate predator control immediately. (Correspondent 2528)

Forest Service Response: Predator control is addressed in the Predator Control Environmental Analysis (conducted by Animal and Plant Health Inspection Service, May 1993) and is outside the scope of this analysis.

Comment 510-3. I found little information on bighorn sheep as noted in the Forest EIS. Domestic sheep spread disease to wild sheep. This is another reason to eliminate sheep at least in the corridor although you can make no economic case for the taxpayer to continued grazing. What plans are there to enhance big horn sheep? (Correspondent 2506)

Comment 510-4. Remove all domestic sheep from any allotment where they could conceivably contact wild sheep. Contact with domestic sheep is very detrimental to bighorn sheep. (Correspondent 2509)

Comment 510-5. There appears to be a link between sheep diseases and Dall sheep deaths. Elimination or minimizing contact between the two would enhance watchable wildlife along the river corridor. (Correspondent 2512)

Comment 510-6. Domestic sheep are hurting our chances of successfully restoring the bighorn sheep into its historic range. (Correspondent 2541)

Comment 510-7. Allow the bighorns to return! (Correspondent 2547)

Comment 510-8. Work to restore bighorn herds. (Correspondent 2600)

Comment 510-9. Your plan should certainly give first priority to the restoration of the bighorn sheep population. (Correspondent 2695)

Comment 510-10. II-Alternative E includes no plan for restoring bighorn sheep herds. (Correspondent 2789)

Forest Service Response: Effects of domestic sheep grazing on bighorn sheep herds is outside the scope of this analysis and are addressed in the Domestic Sheep/Bighorn Sheep Compatibility Environmental Assessment, February 1994. A final decision is pending for summer of 1994.

Restoration of bighorn sheep was not identified as a need in this recreation management plan and is currently being analyzed as previously addressed. Supplemental bighorn sheep transplants were completed this year. There are also ongoing habitat enhancement projects in drainages adjacent to the Snake River canyon.

Comment 510-11. Both the Mac Farlane's four-o'clock and peregrine falcon are doing well and not threatened by river use. It is unlikely that peregrines are affected by river activities; that species' habitat includes high-rise buildings in major urban areas. (Correspondent 1198)

Forest Service Response: River use is not considered to have detrimental impacts on peregrine falcons as their primary habitat lies outside of the wild and scenic river corridor. Peregrines are sighted within the corridor foraging or migrating with the seasons either elevationally or latitudinally. Peregrine falcons are making a comeback. However, eggshell thinning and low reproductive success is still a problem within this recovery zone. This may be due to residual pesticides in the environment or within prey species, especially those that winter in Mexico and Central America. Use of high-rise buildings in urban areas presents dangers not found in the river canyon. Specifically collisions with windows and being shot and killed.

Comment 510-12. I am disappointed by the low priority placed on wildlife preservation. (Correspondent 2562)

Forest Service Response: Protection of the wildlife ORV receives the same priority as all resources in the canyon. The Forest Service anticipates benefits to wildlife with the management of recreationists as proposed in preferred Alternative G and disclosed in Chapter IV.

Comment 510-13. A survey of all predators and their prey species should be undertaken to see if populations of mountain lion, bobcat, bear, wolf are at historic levels, and steps taken to recover their populations. (Correspondent 2654)

Forest Service Response: The proposed alternatives are not expected to significantly impact populations (see Chapter IV). State wildlife managers determine the population levels for mountain lion, bobcat, and bear.

At this time the historic population level of wolves is unknown. Habitat within the wild and scenic river corridor is limited for this species.

Comment 510-14. Jetboats have a negative impact on fish and wildlife. (Correspondent 2700)

Forest Service Response: Motorized craft may have some impact but the Forest Service does not have adequate information to support that it is detrimental to wildlife populations as addressed in Chapter IV.

Comment 510-15. Research should be done to determine the impact of both the jet boats and the floaters on the wildlife of the river. (Correspondent 2753)

Forest Service Response: Research is not proposed at this time. Research conducted on other rivers was used to determine impacts and is addressed in Chapter IV.

Comment 510-16. Page IV-58. The statement, "truly wild areas and the species that require such habitat may no longer exist within Hells Canyon" is entirely unfounded. (Correspondent 1198)

Forest Service Response: Home range size of wide-ranging species were overlaid on trail density maps and recreation use areas within the canyon to calculate the amount of undeveloped habitat. All home range for wide-ranging predators has received some recreational development.

Comment 510-17. The canyon needs to be looked at as a whole. The deer herd that existed 25 years ago is but a remnant. Predators abound with no controls. (Correspondent 2465)

Forest Service Response: The HCNRA will be addressed as a whole during the CMP adjustment strategy. ODF&W surveys for mule deer in 1970 was 3,790 deer observed in the Wallowa District. The number of mule deer observed in 1992 was 3,495. Predator control is allowed within the canyon (reference Predator Control EA, May 1993).

Comment 510-18. Page II-5, Management Direction Common to all Action Alternatives - The proposed plan should ensure compatibility with hunting, fishing, and wildlife observation. (Correspondent 2230)

Forest Service Response: State fish and game agencies have received and commented on the DEIS. The preferred alternative does not deter them from meeting their management objectives.

Comment 510-19. Domestic grazing adversely impacts elk on the Oregon side of the river as noted in the Forest EIS. To then report that the space and forage competition is "not well understood," is all the more reason for eliminating "sacred" cows in the river corridor until we know more about relationships. (Correspondent 2506)

Forest Service Response: Grazing of domestic livestock within the river corridor is addressed in the AMP's and is an acceptable use as per the Wallowa-Whitman Forest Plan, CMP, and the legislated direction from the HCNRA Act and the Wild and Scenic Rivers Act.

Comment 510-20. There is virtually no discussion, of potential impacts to wildlife from jet boat noise, either in terms of identifying an ongoing impact, or potential new impacts as a result of implementing this action. (Correspondent 1196)

Forest Service Response: Page IV-55 of the DEIS addresses this. A literature review of the effects of noise on wildlife was inconclusive regarding impacts to wildlife. All action alternatives would result in less use and noise than is currently being experienced. New technology continues to decrease the level of noise generated by engines and boat hulls. Should new research indicate detrimental impacts on on wildlife from recreational activities in the corridor, the management actions would be adjusted to ensure the protection and enhancement of the wildlife ORV.

Comment 510-21. As long as boats' engines are left running, wildlife seems to accept them as a non-threatening part of the environment. However, if the engines are shut down or the boat pulls into the bank, wildlife becomes alert and will move away. (Correspondent 1198)

Forest Service Response: Thank you for your comment.

Comment 510-22. Page IV-56. It is unlikely that any significant displacement of wildlife is taking place or would take place under Alternative B. (Correspondent 1198)

Forest Service Response: Page IV-56 addresses effects of Alternative B. No displacement monitoring of wildlife in the river corridor has been done.

Comment 510-23. In order to make the wild area truly wild, we believe you should choose Alternative D. Motorized boats disrupts both the wildlife and humans who want to enjoy the peace and tranquility of this lovely area. (Correspondent 2837)

Forest Service Response: In general, wildlife will move away from humans regardless of how they access the area. Hikers, horsepackers, floaters, or powerboaters illicit an avoidance response which is variable depending on species, individuals, habituation, season, etc.

Alternative G provides for a non-motorized period on a portion of the wild river for people who seek a motor-free type of experience.

Comment 510-24. On my second trip down the Snake, one of my traveling companions related that her parents had gone down the river twenty years earlier and had been envious that she too, would see so much wildlife. In our six days on the river we saw little wildlife, but the assault of several jet boats per hour at mid-day, small aircraft taking off and landing at Big Bar and Sluice Creek, and livestock grazing go far in explaining why there aren't many wild animals. Isn't there enough to the West outside of this unique canyon for these other activities??? (Correspondent 2741)

Forest Service Response: Numbers of wildlife sighted is dependent to a large degree on the time of year. Wildlife numbers along the river are generally lower during the summer due to high temperatures, but also fluctuate based on available forage and the presence of prey species. Because wildlife activity is low at mid-day, when human activity is most evident, relatively few individual creatures are impacted. Livestock grazing can alter species composition but does not exclude wildlife use. Livestock issues are being reviewed through the Bighorn/Domestic Sheep Environment Assessment and the CMP adjustment strategy.

Comment 510-25. The summary DEIS mentions the importance of protecting wetlands, threatened and endangered salmon, endangered plants, etc., and motorized use seems incompatible with these goals. (Correspondent 2894)

Comment 510-26. I favor excluding jetboats from the Snake Wild and Scenic River. In addition to aesthetic complaints which are in themselves extremely valid, I cite environmental degradation and harmfulness to wildlife. (Correspondent 2859)

Comment 510-27. I could not believe it when I read that jet boats are to completely dominate the scenic section and that jet boats are to receive even more launches than floaters in the wild section; this is exactly opposite of the kind of management strategy needed. The use of jet boats should be severely restricted in order to reduce short line impacts, noise pollution and wildlife habitat destruction. (Correspondent 2522)

Forest Service Response: Data to support hypotheses that wildlife are being harmed by jetboats is unavailable. New data or knowledge would be incorporated into management of the river as it becomes available.

Fisheries and Riparian Code 520

Effects of Jetboats on Snake River Salmon

Many correspondents felt jetboats were being unfairly blamed for current problems with salmon. They cite other factors they believe affect the fish more. On the other hand, there were those who felt jetboats did have a negative effect on the struggling salmon species. Examples of both points of view are included below.

Comment 520-1. It has not been shown where boats--or animals grazing on the hill sides--are the reason the fish are struggling to survive. Dams, water fluctuation, commercial fishing, etc. are the reasons we have a fish problem! (Correspondent 1041)

Comment 520-2. For the past 20 years droughts, rising ocean temperatures, large increase in seals and sea lions, commercial fishing in ocean, commercial netting in Columbia River and dams are the primary causes of salmon decline, but not powerboats on the Snake River. Yet the statement would like me to believe this is a real concern.

Comment 520-3. Get in a wetsuit and lie on that river's bottom and then tell me jetboats have no impact on fish. (Correspondent 2668)

Comment 520-4. While the affect of jetboats on the fall chinook salmon is unclear, I'd say the fish lose in this situation. (Correspondent 2674)

Comment 520-5. The jetboats destroy habitat. (Correspondent 2675)

Comment 520-6. In regard to fisheries we feel that jetboats have no impact on the fishery. The culprits are dams, below and above the canyon. This year there were some tremendous fluctuations of river levels in a 24-hour period. (Correspondent 2465)

Comment 520-7. The dams and continually changing river flows that do the major portion of the damage--not to mention fishing in the lower regions of the river complex. Do not include boat use as a way to support a reason to protect the salmon--it's not the boats that stop the fish migration. (Correspondent 1065)

Appendix K

Comment 520-8. Don't use boat use as a reason that the salmon runs are diminishing. Place the blame where it belongs-- with the dams, commercial fishing, etc. (Correspondent 1087)

Comment 520-9. Don't list boat use as having an adverse affect on the migration of the salmon. It has not been shown that boat disturbance is the cause for the fish problem. Nor is it caused by the grazing animals on the mountains above the river. Dams, commercial fishing, etc. are the cause of the lack of fish. (Correspondent 1089)

Comment 520-10. Even if scientific inquiry into the effects of boating on fisheries on the Snake River had been conducted, it would likely find that fish are not adversely affected by any activities in Hells Canyon. Although sockeye are listed as endangered, the 16 miles of the journey through the HCNRA are unlikely to be significant to their survival. Hells Canyon is not spawning habitat or an area where they feed or are reared. (Correspondent 1198)

Comment 520-11. If the Forest Service concludes that boating may affect fisheries, it would conduct studies similar to those being performed for the Rogue. (Correspondent 1198)

Comment 520-12. I have floated and jetboated the Snake for 20 years. I cannot see the damage the jetboats are being held responsible for. I don't see them being solely responsible for erosion on the banks of the river. (Correspondent 2354)

Comment 520-13. It seems to us a great shame to allow your beautiful resource to be polluted and ruined by jet and power boats. (Correspondent 2263)

Comment 520-14. Moreover, these are fish that have endured urban areas, pollution, ocean going vessels, dams, miles of nets and predators; it is unlikely that boating activity within the HCNRA, no different than boating activity immediately downstream, will have any impact whatsoever. (Correspondent 1198)

Forest Service Response: Chapter IV of the FEIS and the associated biological assessment address potential impacts to salmon from powerboats. The biological assessment concluded there would be no effect to migrating sockeye as a result of the proposed action. Additional studies, beyond the monitoring recommended in Appendix J, are not warranted at this time. Effects from dams, beyond the discussion of cumulative effects, is outside the scope of this analysis.

Comment 520-15. In May, 1993, Dale Johnson, a fisheries biologist for the BLM who oversees fisheries programs on the Rogue River in Oregon, submitted an expert declaration under oath, in litigation over uses of the Rogue. Mr. Johnson testified that there is no scientific evidence that motorized tour boats "significantly disrupt fish habitat or decrease the number and productivity of spawning habitat..." Johnson Declaration, at 4. More importantly, he also concluded that there is no evidence even to suggest that any boating activity on the Rogue has led to a decline in wild salmon runs, or to an absence of fingerlings or spawning redds. A report prepared by the Oregon Department of Fish and Wildlife, that was not included in the DEIS analysis, echoes Mr. Johnson's conclusions. After an exhaustive review of existing literature, that report found, "No documented evidence exists on any river in North America that jet boat traffic has caused a decline in fish runs." Similarly, Judge Redden of the Federal District Court in Portland, Oregon, recently reviewed evidence presented both by powerboaters and environmentalists purporting to advocate for the protection of Rogue River fisheries. Judge Redden concluded that "there is ...a lack of scientific evidence connecting jet boats to irreparable harm to fish." *ONRC v. U.S. Bureau of Land Management*, Case No. 93-482, Opinion on Motion for Injunction, at 10 (June 22, 1993).

The only study that has suggested a correlation between boating activities and injury to salmon fisheries is a New Zealand study, which is cited in the DEIS bibliography and, apparently, was relied upon by the Forest Service in preparing the DEIS. That study was conducted in a laboratory, not in the field, and its conclusions

were "worst case estimates" rather than findings of actual mortality. Mr. Johnson, the BLM's fisheries expert, stated that the New Zealand study "has not received good peer review by fishery scientists" and has been criticized by American scientists. Johnson Declaration, at 7. The New Zealand study is inadequate to support imposing limitations on boating to protect fish. No credible evidence supports the DEIS' conclusions that floatcraft and powerboats disturb spawning salmon. DEIS, at IV-60 to IV-61. (Correspondent 1198)

Forest Service Response: Thank you for bringing Mr. Johnson's comments to our attention. Mr. Johnson's statement, along with other available scientific and commercial information was used in the analysis of the FEIS.

Comment 520-16. In my estimation there are not enough rapids left to replenish the oxygen contents needed to support the river ecosystem and that powerboat traffic replenishes a great deal of the life giving oxygen that is depleted by the dams upstream from Hells Canyon. (Correspondent 1171)

Forest Service Response: The dams actually increase the amount of dissolved gases as they release water through their spill way. Excessive dissolved gases may cause a significant impact to fish if levels become excessive.

Comment 520-17. It has yet to be found whether disturbances on the water - affect the spawning of anadromous fish. However, our position is that jet boat activity does have harmful effects on these fish and their habitat. The USFS substantiates our concern over jet boat activity, citing studies which point to the hazards associated with surface water disturbance. Yet in their DEIS - the water and those species that depend on it for survival are not adequately protected from the noise, vibration, and spillage from motorized boats. In fact, the preferred alternatives creates one of the higher risks of jeopardy to fall chinook salmon. (Correspondent 2337)

Comment 520-18. Not even to mention the adverse effects of motorized craft on migrating fish as well as eggs in the redds. (Correspondent 2851)

Comment 520-19. Motorized use has serious impacts as well on the endangered salmon stocks, making such use completely inappropriate except possibly in the lower reaches past Pittsburg Landing, and for limited sight-seeing use. (Correspondent 2852)

Comment 520-20. Motorized traffic through Hells Canyon has become excessive, yet the impacts on fish, wildlife solitude, water quality, noise impacts on bird populations are inadequately addressed. Restriction on jetboat use should begin as soon as possible, with the goal of eliminating their use upriver of the Salmon River confluence. (Correspondent 2654)

Forest Service Response: Available scientific evidence does not demonstrate any direct effect to fish or habitats from jetboats or float boats. The potential, but undetermined, effects to fall chinook salmon in the Hells Canyon reach of the Snake River are discussed in the FEIS and associated biological assessment. The protective measures proposed in the FEIS are adequate to mitigate any potential adverse affect to fall chinook from the proposed action.

Comment 520-21. The DEIS attempts to eliminate disturbance from boats passing over areas of activity by establishing "....no-entry zones....for know fall chinook redd sites." (DEIS at II-6). The effectiveness of this policy is doubtful, and probably does not qualify for appropriate mitigation under ESA once jeopardy is established. All fall chinook redd sites cannot be identified, and in fact establishment of some will have been prevented. Moreover, the DEIS proposes no guarantee of enforcement to ensure that the no-entry zones are secure. Regardless, this policy does not take into account the full range of potential impacts from jet boats

to salmon, only those affecting redds and eggs. Spawning behavior could extend outside of redd areas. Moreover, the river provides habitat for hatched fry before their departure to the ocean. The vibration from engines and exhaust reverberating through sound-conducting water may affect fry, and disrupt spawning behavior even outside of cordoned areas where spawning occurs. The magnitude of impacts to salmon from jetboats is not reviewed in detail.

HCPC has located 2 studies that have investigated the effects of jet pump propelled boats on salmon. A lab test conducted in New Zealand concluded that pressure waves created by jetboats in shallow water were capable of killing 20-40 percent of salmon eggs incubating in the streambed. The Alaska Cooperative Fishery Research study has found that jet boats affect eggs in redds by causing a 2-part pressure wave that moves the gravel and the eggs in a redd. The inconsistent hydraulic action occurring regularly from jet boats passing redd sites day after day, creating subsurface agitation reverberating from cliff walls, and sedimentation, creates subsurface agitation reverberating from cliff walls and sedimentation, creates an unpredictable and unfriendly environment for the fish. We strongly recommend that an alternative that will guarantee "no effect" be promulgated and adopted. We also strongly recommend legally-required consultation with the National Marine Fisheries Service to fully examine and determine jet boat impacts to listed salmonids in combination with other cumulative impacts that have led to 99.5 percent extinction in the area. We urge the recollection of the bighorn/domestic sheep situation wherein an activity that was for many years strongly suspected to be environmentally damaging was nonetheless continued until it was proven beyond a shadow of a doubt to be damaging. (Correspondent 1196)

Forest Service Response: The proposed mitigation establishing no-entry zones has been changed in the FEIS for several reasons: 1) the policy would be administratively difficult to enforce, 2) there is no documented evidence that actual disturbance of redds occurs from jetboats or float boats, and 3) other commenters pointed out that marking the redds may just cause more disturbance by attracting people to those areas and may even result in "sabotage" to the species. NMFS has been consulted regarding the proposed mitigation as required by the ESA. It is possible that not all fall chinook redds are identified, but the number surveyed is very close to the number known to migrate up through the dams. There is not a lack of spawning area in the Hells Canyon reach of the river. The analysis of effects to chinook salmon are fully discussed in the FEIS.

The two studies mentioned were used in considering the effects to salmon in the Hells Canyon reach. It is difficult to apply the findings of these studies specifically to the situation in the Hells Canyon reach. The conclusions drawn from the studies are presumptuous and inaccurate. One must be cautious and use a great deal of judgement in applying the results of these studies to situations as different in scope from those found in the Hells Canyon reach.

Comment 520-22. Endangered fall Chinook salmon are not given adequate protection from jetboat disturbance. (Correspondent 2452)

Comment 520-23. Shouldn't jetboats and skis be restricted during the fall Chinook run? (Correspondent 2459)

Comment 520-24. The "preferred alternative" referred to in the statement is not acceptable in that motorized boats disturb the native fish, especially fall Chinook salmon. (Correspondent 2476)

Comment 520-25. The DEIS should address the environmental impact of the effects of jet boats on fall chinook. (Correspondent 2520)

Comment 520-26. What will jet boats do to the fall chinook salmon runs? (Correspondent 2530)

Comment 520-27. Fall chinook salmon runs should be protected from jet boat and jet ski disturbance. Recreational use of HCNRA should not be the paramount intent of USFS management. Too bad the salmon can't speak for themselves. Do they indicate the health of this ecosystem? (Correspondent 2853)

Comment 520-28. Fall chinook salmon need protection from jet-boat- churned water--the Preferred Alternative doesn't offer the salmon safety. (Correspondent 2543)

Comment 520-29. I wonder about the effects of jet boats on already threatened fish runs and the riparian ecology. (Correspondent 2540)

Comment 520-30. It is rather incomprehensible to us living in central Idaho to understand how the Forest Service in Oregon could propose to continue to allow jet boats, jet skis, new campgrounds, and feedlots along the anadromous Snake River, while here in upper Salmon River country, all activities are being closely scrutinized, regulated, and often, ceased, in order to protect Snake River chinook salmon. Jet skis particularly pose a threat to fish since these irritating noisy toys can be used in shallow water. (Correspondent 2557)

Comment 520-31. Motorized recreational and commercial use of the river should be curtailed entirely during times when it would endanger fish runs or anything else. (Correspondent 2842)

Forest Service Response: The potential for jetboats to disturb fall chinook or their redds is very low. The protection measures proposed in the FEIS are sufficient to mitigate any potential adverse affects to fall chinook from the actions proposed in the preferred alternative. An assessment of the affects to fall chinook salmon is presented in the FEIS and the accompanying biological assessment.

Comment 520-32. Jet boats and jet skis must have a far greater impact on the riparian zone than non-motorized craft. (Correspondent 2562)

Comment 520-33. Jetboats have an impact on spawning gravel and the endangered chinook should be given more protection from jetboat disturbance. (Correspondent 2652)

Comment 520-34. As I also was raised in a commercial fishing family I am deeply concerned about the disappearance of the salmon. In just one generation I have seen that my father was able to support his family, but my brother has given up salmon fishing altogether. Jet boat and livestock damage to rivers and streams must be stopped to ensure that all species may survive. (Correspondent 2690)

Forest Service Response: The protection measures proposed in the FEIS are sufficient to mitigate any potential adverse affects to fall chinook from the actions proposed in preferred Alternative G. Livestock issues are outside the scope of this analysis as discussed in Appendix D.

Comment 520-35. The decision to cater to jetboats and recreation over preservation of the Chinook salmon is unacceptable. Also livestock impacts to salmon are not addressed in the DEIS. (Correspondent 2711)

Forest Service Response: Effects to chinook salmon are addressed in the FEIS. Recreation use as proposed in preferred Alternative G would not significantly affect chinook salmon or their habitat. Livestock issues are outside the scope of this analysis as discussed in Appendix D.

Comment 520-36. Jet boats wash out beaches, disturb bighorns and migrating fish. (Correspondent 2745)

Comment 520-37. Jet boats cause unnatural wave action against the banks of the river and can be harmful to salmon. (Correspondent 2688)

Forest Service Response: There is no available information showing that wave action from jetboats causes beaches to wash out or disturb salmon. Refer to Appendix E for discussion on boat wakes.

Comment 520-38. The one aspect which detracted from my complete enjoyment was the presence of fast, loud jetboats storming up and down this beautiful stretch of river. While visitor perceptions, as well as safety issues, are very important considerations, my greatest concern is the negative ecological impacts that these jet boats may be having on the river system. Of utmost importance is the issue of whether or not jet boats may be harming listed wild salmon populations in the Snake River. A General Accounting Office (GAO) report from July 1992 stated that "certain stocks of wild salmon are reaching critically low levels, particularly those stocks whose spawning areas are far upstream on the Snake River."

And from the same report, "fisheries experts believe that wild salmon provide the genetic diversity necessary for maintaining salmon runs in the Columbia River Basin and that loss of genetic diversity may lead to a reduction in overall production and greater vulnerability of salmon to environmental change and disease." Clearly, the Snake River salmon species are of great importance to the overall health of salmon in the region.

While grazing, logging, mining, and hydropower development are the primary concerns when discussing salmon recovery, jet boats must also be considered for their direct and indirect impacts to threatened/endangered salmon species. Spawning adults can be directly affected if their normal reproductive behavior is significantly altered and they either spawn less effectively or fail to spawn. Developing eggs and larvae are directly affected if their normal development is altered and mortality is increased through injury or immediate death.

There have only been two studies to date that address the direct impacts to spawning redds when jet boats pass directly over them. The first of these was conducted by Sutherland and Ogle in New Zealand in the early 1970's and was primarily a lab study. The conclusion of this study was that pressure waves created by jet boats in shallow water were capable of killing significant proportions (20-40%) of salmon eggs incubating in the stream bed.

The Alaska Cooperative Fishery Research Unit is conducting a study in American Creek in Katmai National Park and Preserve that is similar to the New Zealand one except that it is using field tests with artificial redds. The study is still going on but the preliminary results seem to concur with the New Zealand study. When jet boats pass over salmon redds, they create a two part pressure wave: the first is a downward or positive pressure and the second is an upward or negative pressure. The downward pressure doesn't seem to cause any gravel or water movement but the upward pressure creates turbulence and probably causes gravel movement which could lead to embryo mortality.

The preliminary findings of the Alaska study were that observation after two passes of a jet boat showed no signs of embryo mortality. However, two passes over six consecutive days (a more realistic treatment that addresses cumulative impacts) resulted in high mortality (75-100%) in shallow water (13-21 cm). Another important observation is that the pressure waves did not lessen "with depth over the range of water and gravel depths typically used by spawning sockeye salmon." Another area of concern which could be indirectly affecting spawning salmon and which you have only cursorily addressed is the possible effects of jet boat wakes on sand bar erosion. As was stated in the proposal for the Alaska study, "sedimentation and bank erosion...tend to occur over protracted periods." As such, it would seem that your three day study is quite inadequate. And in fact, the hydrologists who conducted the study have recommended a further two year study.

But even so, the study did conclude that "movement of sand occurs with a jet boat wake." And at both experiment locations there were net decreases of sand by the end of the day: 3.2 inches at Salt Creek Bar and 6 inches at Fish Trap Bar. It is also very important to note that the places where jet boat wakes seem to have the most impact on erosion also seem to be ideal places for salmon spawning areas. According to the jet wake study, "sand and gravel bars provide the most easily erodible source of sediment" [the Snake River DEIS states that "fall chinook redds are found primarily on lateral gravels bars" (IV-60)]. And in water depths of 3-6 inches, "one wake can erode from 0.25 to 1.0 inch." Even just looking at the results of this preliminary study we see that the possibility that jet boats are altering salmon spawning habitat definitely exists.

Another important conclusion from this study was that the hydrologists were unable to determine where this eroded sand deposits: "it may be deposited elsewhere on the bar (e.g., eddy current moves sand upstream on bar) or it may be transported downstream." This is important because increases in fine sediment loads in stream channels can negatively affect salmonid spawning areas. Salmon need sediment for spawning, rearing young, and providing food, but when fine sediment particles are deposited in the streambed, the result can be reduced redd permeability which can "cause higher egg-to-fry mortality" (Platts, et al, EPA Report, 1979, p.1).

Salmon are rather particular about their spawning sites. As was stated in a report put out in 1979 by the Environmental Protection Agency, salmon seem to select these sites through "ocular selection of desirable sediment size classes, a feel for the required surface water velocities to drive the needed subsurface flows for the embryos and alevins, and a strong homing instinct that places them in an area in which their young have a good chance to survive." And we really have no idea about the impact that jet boats may be having on these desired conditions.

Even the Draft Snake River Salmon Recovery Plan Recommendations states that "jetboat traffic in the summer and autumn can disrupt spawning and rearing, as well as damage redds or cause siltation at redds due to stirred-up sediment." It goes on to state that "the USFWS, USFS, BLM, IDFG, and ODFW should take any necessary steps in cooperation with fishing and boating organizations to protect populations of salmon and fall chinook from significant human impacts during critical spawning and early rearing life stages." Indeed, there seems to be a lot of attention being given to jet boat impacts. The Alaska study is still going on and there is also a study in progress on the Wild and Scenic section of the Rogue River which includes an examination of jet boat impacts on erosion, as well as a safety study and a social attitude study. These were determined to be areas of concern for the public since private recreation activities are not regulated in the Hellgate Recreation section. And finally, the Oregon Department of Fish and Wildlife has proposed a study to determine whether or not juvenile salmonids are stranded and killed during passage of a motorized boat.

When all this scientific information is considered, it would seem that there is concrete concern about jet boat impacts on salmon. And because chinook and sockeye salmon species, which use the Snake River for spawning, rearing or as a corridor, are protected under the Endangered Species Act, this concern must be addressed. It states in the Draft Environmental Impact Statement: "considering the extremely low numbers of salmon found within the wild and scenic corridor, the magnitude of some negative effects could be very high and potentially contribute cumulatively to an irretrievable loss of the resource. Greatest concern lies in the potential for a jet boat to significantly disturb, or possibly destroy an existing fall chinook redd with jet out-wash" (IV-61).

The mitigation measures suggested in the DEIS include "boaters education and establishment of no-entry zones where known fall chinook redds exist" (IV-61). Will this really adequately protect these rare species of salmon that have had to overcome many human-made obstacles just to get to this part of the Snake in order to spawn? What will boater education include and how will no-entry zones be enforced? The recovery plans for the Florida Manatee include a "Boaters Guide to Manatees," boat speed zones, no entry sanctuaries, reserves, etc., but it emphasizes that enforcement is critical. Does the Forest Service at Wallowa-Whitman really have the means for such enforcement? And what about the juvenile salmonids who use the Snake as

rearing habitat? Does our need to roar up and down a river really outweigh a species' attempt just to survive? I hope not.

Finally, and of the utmost importance, even with all the uncertainties and questions involved in this issue, the Endangered Species Act (ESA) still clearly demands a precautionary approach to listed species protection. An approach which says that any act which might harm a listed species or its critical habitat needs to be closely examined for its necessity and for alternatives. As was stated in the case *North Slope Borough v. Andrus* (1980), the ESA "mandates affirmative preservation of endangered life."

Since human actions have so clearly been the cause of wild salmon species decline, isn't it time we put the consideration of salmon first when discussing the questionable necessity of having jet boats on the Snake River. I can think of many mainly aesthetic reasons why I believe jet boats should be removed from the Wild and Scenic stretch of the Snake River, but the reason of harm to salmon is one which the law demands us to consider. (Correspondent 2899)

Forest Service Response: An assessment of the effects to fisheries from jetboats is presented in the FEIS and the accompanying biological assessment. This assessment addresses effects to migration, spawning, and egg development. The studies of jetboat effects on salmon you refer to were considered in the assessment. Certain attributes of the studies are difficult to apply to the situation in the Snake River. For example, the study done by Reynolds in Alaska, looked at spawning habitat for sockeye, which is very different from fall chinook spawning habitat. The biological assessment discusses the portions of these studies which were usable in conclusions for the specific situation on the Snake River. Further, the study did not find conclusively, that there was any direct mortality to eggs from jetboats, but may be attributable to mechanical damage to the redd from the jetboat. The investigation is continuing. Encounters of jetboats to redds has not been documented in the Hells Canyon reach of the Snake River.

As you stated, the study conducted in 1993 is preliminary. None of the results are conclusive and therefore were not presented in the DEIS. One of the preliminary results showed a net increase in sediment being deposited. The study did not show where sediment which moved was deposited. To conclude that this sediment is deposited in spawning areas is very presumptuous. A great deal of caution and judgement must be used in interpreting these preliminary findings. The Forest Service recognizes the need for further investigation.

Comments concerning the Draft Snake River Salmon Recovery Plan Recommendations and proposals by ODF&W are outside the scope of this analysis. The recovery plan has been peer reviewed and a great many comments provided to that document.

The protection measures proposed for the FEIS are sufficient to protect all fisheries resources from the preferred alternative. The content of the education program is presented in Appendix L. The Forest Service intends to work with other agencies involved in fisheries management in the development of an education program. The proposed no-entry zone mitigation has been revised in the FEIS. The FEIS proposed mitigation would address actual site specific need for such mitigation measures. The Forest would enforce to the best extent practical, all mitigation measures.

The preferred alternative would be implemented after consultation with NMFS, in compliance with ESA direction, which would ensure no adverse impacts to listed salmon species occurs.

Comment 520-39. It is documented that powerboats and floatcraft with "kickers" do effect spawning salmon during courtship rituals, redd building, and salmon embryos (IV-60- 61), so any salmon present in a possible spawning area that is not protected in a no-entry zone might be discouraged from nesting there. If this happens, good salmon habitat will not be protected, because powerboats and floatcraft, with a smaller affect coming from other recreators, livestock, and wild animals that may use the gravel bar, drive the salmon away.

From personal experience, gravel bars are good places to go ashore and take a break from the river. The greater use of these areas could harm the salmon and constitute a "taking" which the above mentioned acts protect against. (Correspondent 2376)

Forest Service Response: The "documentation" which you refer to is part of a list of assumptions used in the analysis of effects. The potential effects to spawning areas are fully addressed in the analysis of the FEIS.

Comment 520-40. Alternative E allows moderate potential to adversely affect fall chinook by boat traffic during the unregulated season. Such deterioration as compared with Alternative C is unacceptable. (Correspondent 2506)

Forest Service Response: Any potential effects addressed in the FEIS are sufficiently mitigated to protect fall chinook. Deterioration of the resource has not been shown.

Comment 520-41. More studies should be done to determine the effect of boats on spawning activity. (Correspondent 2512)

Forest Service Response: Currently studies regarding effects to salmon from jetboats are being conducted in Alaska. The Forest Service has not shown a need to initiate additional studies.

Comment 520-42. The raft season does not extend far into the fall and is not as big a threat to fall chinook. (Correspondent 2675)

Forest Service Response: Effects from rafting are considered in the FEIS. Season of raft use on the river is taken into consideration in this analysis.

Comment 520-43. With the serious declines in the wild salmon and steelhead fisheries, you must remove, not increase motorized use on any part of the river. (Correspondent 2695)

Comment 520-44. Preservation by definition is what the scenic river designation is all about; to continue to allow livestock access, jetboats (and skis) without appropriate limitations, no restoration programs, and inadequate salmon protection is totally unacceptable to one concerned about protection for this unique area. (Correspondent 2780)

Forest Service Response: The FEIS analyzes the effects of jetboats to salmon. There is no need for limiting use for fisheries resource protection, beyond the limitations in the preferred alternative in the FEIS. Livestock issues, and restoration programs are outside the scope of this analysis as addressed in Appendix D.

Comment 520-45. The Forest Service alternative is clearly supporting the jet boats, commercial and private. I can't believe the Forest Service is allowing jet boats on the wild and scenic section of the river. There is nothing wild or scenic about a jet boat roaring up and down the river. Of the two different types of craft using the river, the float craft does not pollute, does not make noise, is not eroding the river banks, and is not tearing up spawning beds. (Correspondent 2687)

Forest Service Response: The use of jetboats in the HCNRA is a valid use of the designated wild and scenic river. The effects to water quality and fisheries is analyzed in the FEIS.

Comment 520-46. Your proposal also extends and increases jetboat use in fragile waters, disturbing salmon spawning beds. Additional powerboat traffic will be too disruptive too these spawning fish. Their use also significantly increases bank erosion which is already so compromised by cattle activities. Heavy jetboat traffic is not prudent in waters where the surrounds are so fragile. Why are we allowing noisy, damaging, mechanized powerboats? (Correspondent 2425)

Forest Service Response: The preferred alternative in the FEIS would limit the use of jetboats on the river. Effects to spawning fish are addressed in the FEIS and found to be insignificant.

Proposed Monitoring

Several correspondents questioned the adequacy of Forest Service proposed monitoring plans. Examples are as follows.

Comment 520-47. The Wallowa-Whitman National Forest lacks experts qualified to perform this kind of study and certainly can't get it done for \$10,000 over a two-year period. (Correspondent 1198)

Forest Service Response: In combination with ongoing and existing information the Forest Service has the expertise to determine the results of the proposed monitoring. The need to complete a study within the two year time frame is to be able to come to a cursory determination in order to provide immediate protection of threatened fish if it is determined that an actual impact exists. Additional monitoring and information needs may arise as results of initial monitoring. The proposed monitoring plan has been refined and is presented in Appendix J.

Comment 520-48. The fishery monitoring activities proposed in the DEIS are the responsibility of the state fish and game agencies. The Idaho Department of Fish and Game has ongoing monitoring of fish populations to determine impacts incidental harvest might have on naturally produced steelhead and salmon. We also monitor sturgeon populations within Idaho to determine the impacts of fishing pressure. This data is available to the Forest Service upon request. We suggest the Forest Service restrict its monitoring activities to those that are habitat related. (Correspondent 2230)

Forest Service Response: The Forest Service recognizes the responsibility of the state fish and game agencies, but must also monitor and assess impacts related to Forest Service authorized projects to listed species according to the requirements of the ESA to assess State and private actions as cumulative effects to listed species (ESA Sec 7 d). The Forest Service wishes to work together with state agencies and not duplicate monitoring efforts. A Forest Service fisheries biologist would contact the IDF&G office for the monitoring information offered.

Comment 520-49. Repeatedly mentioned in the DEIS is that not much is known about the cumulative and long-term effects recreational use has had and is having on salmon (IV-59), yet the DEIS tries to make an assessment of the effects on the salmon (IV-67). To me this seems quite contradictory. One solution is the proposed monitoring of the salmon as mentioned on page II-8. There are inherent problems with this proposal though. First, the monitoring only lasts two years. Other monitoring proposals occur every year without any limit imposed on them. These include other threatened and endangered species like the bald eagle, peregrine falcon, and the MacFarlane's four-o'clock. Also, the effects of returning salmon that hatched during the study would not be seen in the period of study since salmon spend 3 or more years out at sea before they make their return run. Second, the proposed monitoring only studies the impacts of motorized and non-motorized watercraft. Other impacts could come from on shore fisher's, livestock, campers, hikers, outfitters, or animals walking on or disturbing salmon redds. The growing population of the non-native American shad may also compete with the salmon and should be included. And third, influences from outside the wild and scenic

corridor are not considered. The HCNRA Act specifically states in section 7 (3) that ecosystems are to be preserved. The river corridor is not an isolated ecosystem and the effects outside the corridor that are part of and directly or indirectly affect the salmon ecosystem must be monitored also. These effects may include water quality, water temperature, and sediment influx. (Correspondent 2376)

Forest Service Response: Even though information may be lacking, an attempt must be made to analyze effects based on the best available information. Additional monitoring for potential impacts to fall chinook salmon may become apparent once initial monitoring begins. The monitoring proposed in the EIS is not dependent upon making observations of returning salmon. It would be a matter of observing behavior of the salmon during spawning activity. The monitoring proposal presented in Appendix J is specific to Alternative G. Influences both inside and outside the HCNRA are considered in the affected environment section of the FEIS.

Existing and Future Salmon Fishery

Several correspondents pointed out that an important salmon fishery existed and that taxpayer money has been invested for its improvement. Their concerns focused on the Forest Service limiting access to fishing.

Comment 520-50. Alternative E approaches salmon as if they will never be harvested. One of the goals of the millions of dollars being spent on hatchery programs is to get fishable numbers of chinook back to Idaho. Hatchery smolts are being adipose clipped so that sportsmen can identify hatchery fish for consumption. Virtually all spring chinook that move up the Snake above the Salmon River confluence are harvestable fish. These fish arrive during the control period in June and early July, yet access to the prime fishing waters of the upper river will be severely cut. It will be virtually impossible under Alternative E for sportsmen to harvest a significant number of these magnificent fish. (Correspondent 2110)

Forest Service Response: The number of permitted launches from Hells Canyon dam would allow fishermen to catch fish as permitted by the state.

Comment 520-51. I would like to see the Forest Service add additional launches in the future for any consumptive salmon fishing seasons above Wild Sheep Rapids. The taxpayers are investing a large amount of money to produce this fishery. It would be ironic if, after such an investment, fishermen were denied access to the fish. Also, the Forest Service should take into account the large number of recreationists who launch at the dam with small boats for fishing and have no intention to going below Wild Sheep Rapids. Counting these boaters against the powerboat allocation makes no sense. (Correspondent 2110)

Comment 520-52. ISSU [Idaho Steelhead and Salmon Unlimited] is confident that because of salmon recovery measures being implemented in the mainstem Snake and Columbia Rivers harvestable surpluses of spring chinook salmon will be returning to the upper reaches of the HCNRA in the near future. Because of these efforts, the area between Hells Canyon Dam and Wild Sheep Rapids holds great promise as a boat and bank angling area for eastern Oregon and Idaho salmon anglers. These are anglers who have been waiting since the 1970's for a chance to once again fish their own home waters for salmon. (Correspondent 2338)

Comment 520-53. None of the alternatives, including E (the preferred alternative), encompasses adequate measures to provide for an anadromous salmon sport fishery between Hells Canyon Dam and Wild Sheep Rapids. During the public comment period prior to the DEIS, ISSU recommended this area be excluded from a permit requirement in order to allow for a chinook salmon fishery on hatchery spring chinook returning to the base of Hells Canyon Dam. (Correspondent 2338)

Forest Service Response: The importance of the upper wild river and its fishing potential has been recognized but it is more important to manage the wild river corridor to protect and enhance the identified ORV's. The planning team did not develop an alternative to specifically emphasize access for fishing in this portion of the river.

Comment 520-54. Page I-8, Desired Future Condition by River Segment: The Entire length of the Snake River downstream from Hells Canyon Dam offers outstanding fishing opportunity for white sturgeon, rainbow trout, smallmouth bass and channel catfish. In addition, the river corridor offers excellent opportunity for upland bird hunting and wildlife viewing. The DEIS should reflect those values for all river sections. (Correspondent 2230)

Forest Service Response: DFC's by river segment were dropped from further consideration after the DEIS.

Comment 520-55. I'm assuming you are aware that most of the HCNRA is not designated as critical habitat for either spring or summer chinook. Consequently, under the Endangered Species Act taking of the species is not an issue. Spring chinook smolts are released annually below Hells Canyon Dam as part of Idaho Power Company's FERC mitigation agreement. Idaho's salmon and steelhead anglers are both appreciative and protective of Idaho Power's mitigation obligations -- we hope that you will not attempt to negate these mitigation contracts by precluding angler boating access. (Correspondent 2338)

Forest Service Response: The area within Hells Canyon is within the designated critical habitat (Fed. Register Dec. 28, 1993). The designation does not distinguish between hatchery and native chinook in the Hells Canyon reach of the Snake River. Taking of chinook salmon is an issue under the ESA and can be done with a permit from NMFS. The IDF&G would need to consult with NMFS before opening season on chinook salmon.

Comment 520-56. Salmon fishing was never intended to be a resource on the Snake River and should not be considered until it becomes a reality. (Correspondent 2401)

Forest Service Response: The Snake River has previously been open to sport salmon fishing. Idaho Department of Fish and Game intends to manage the hatchery fishery in the Snake River for sport fishing. It is appropriate to consider this action in the EIS.

Consultation with the NMFS

Comment 520-57. You must formally consult with NMFS and solicit a biological opinion as to the impact of the plan and activities authorized under it. That consultation must take place before any of those activities go forward. (Correspondent 2340)

Forest Service Response: The Forest Service is proceeding with consultation with the NMFS.

The Endangered Species Act

Several correspondents were concerned that Forest Service plans would not fully consider federally listed species. Examples follow.

Comment 520-58. Federal agency actions should be considered in the same EIS if "when viewed with other proposed actions [they] have cumulatively significant impacts...." 40 CFR 1508.25(2). The major indicators of cumulative impacts in the Snake W&SR corridor are the federally listed threatened and endangered Salmon

species which use the river and its numerous tributaries to spawn. For example, in relation to powerboat impacts to salmon, the DEIS provides "considering the extremely low numbers of salmon found within the W&S corridor, the magnitude of some negative effects could be very high and potentially contribute cumulatively to an irretrievable loss of the resource. Greatest concern lies in the potential for a jetboat to significantly disturb, or possibly destroy an existing fall chinook redd with jet out-wash." DEIS at IV-61. Degradation of Salmon habitat also results, however, from poor water quality due primarily to livestock grazing and irrigation within the W&SR Corridor. See DEIS at III-8 and IV-59-60. Thus, implementation of the preferred alternative in the DEIS will result in an impact to salmon "which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions" such as livestock grazing and is therefore a "cumulative impact." 40 CFR 1508.7. The DEIS, itself provides: In considering cumulative effects, particularly to salmonids, it is important to appreciate the extent these populations have been depleted. For example, current wild populations of Snake River wild spring chinook are 0.5 percent of historical levels.... As wild stocks continue to decline, it is assumed additional stresses upon individual adults within a population may contribute indirectly and/or cumulatively to reduced reproductive success, and ultimately the continued decline of these populations. DEIS at IV-61-62. The DEIS, however, contains no discussion of the cumulative impacts of livestock grazing (or for that matter most of the many other resource uses) within the W&SR corridor on listed salmon species. Indeed, the brief cumulative impact analysis provided in the document erroneously identifies only "making the area more accessible to a greater number of people" as the category of "projects" contributing to cumulative impacts in the river corridor or the Hells Canyon Wilderness. See DEIS at IV-58. (Correspondent 2344)

Forest Service Response: Although the DEIS discusses the possibility for a high magnitude negative effect, it goes on to explain that the probability for such an impact is low. The statement referred to on pg. III-8 and IV 59-60 is in reference to grazing activities and irrigation above Hells Canyon dam which is outside the wild and scenic corridor. Cumulative effects for fisheries resources are discussed on pages IV 65-66 of the DEIS. Cumulative effects are discussed in other areas of the document as well.

Comment 520-59. Studies should be conducted to better understand how our use of the river affects the various endangered or threatened salmon runs. Jet boat/jet ski activity, livestock use, permitted outfitter activity, camping-campground impacts all may have effects on salmon by adversely affecting habitat. (Correspondent 2541)

Forest Service Response: An assessment of the effects to fall chinook salmon is presented in the FEIS and the accompanying biological assessment. Studies as you suggest are expensive and difficult to achieve. The current available information regarding jetboat impacts to fisheries resources in general is sufficient to support the conclusions of the effects analysis and the biological assessment.

Comment 520-60. The DEIS allocates secondary status to the endangered Sockeye and threatened Spring, Summer and Fall Chinook species. This directly conflicts with the mandate of the ESA which requires federal agencies to afford endangered species the "highest of priorities" in their decision making. *Tennessee Valley Authority v. Hill*, 437 U.S. 153, 174 (1977). (Correspondent 2344)

Forest Service Response: The analysis in the FEIS provides highest priority for all species listed under the ESA.

Comment 520-61. The Federal ESA directs federal agencies to "insure that any action authorized, funded or carried out by such agency is not likely to jeopardize the continued existence of any endangered... or threatened species or result in the destruction...of habitat of such species...." 16 USCA 1536(2). The cumulative impact to these species which would result from the incremental impact of the preferred action in the DEIS when added to past, present, and reasonably foreseeable future grazing actions is, however, in direct

violation of this mandate. Indeed, the DEIS itself provides that jetboat impacts to fall chinook redds alone could result in a "taking" of a federally listed threatened species," DEIS, at IV-61.

The added effect of poor water quality, reduction of riparian habitat, and sedimentation of spawning grounds as a result of livestock grazing would, therefore, result in even further detrimental impacts to these fish. Moreover, in spite of the Forest Service's finding that cumulative impacts to salmon resulting from implementation of the preferred alternative could potentially contribute to the extinction of these fish. See DEIS at IV-61, the DEIS contains no discussion of the agency's efforts to consult with the NMFS regarding such impacts. The ESA mandate to consult before implementation of the preferred alternative in this case so that NMFS may determine whether implementation of the Forest Service's preferred alternative would jeopardize the salmon or adversely impact its critical habitat is indisputable. See 16 USC 1536(a)(2). If the action would jeopardize the salmon, then the Forest Service may not proceed unless NMFS can suggest an alternative that avoids such effects. 16 USC 1536(b)(3)(A). See also *Thomas v. Peterson*, 753 F.2d 754, 763 (1985). (Correspondent 2344)

Forest Service Response: Cumulative effects are analyzed in the FEIS. The issue of grazing is not cumulative to boating and is outside the scope of this analysis. The DEIS does not state that impacts "could" result in a taking, it states there is "potential" for a taking. The actual jeopardy call is the responsibility of the NMFS. The Forest Service would consult with the NMFS according to the ESA for the FEIS. Consultation would be completed before the implementation of the FEIS.

Habitat Loss

Concerns in this section focus on protecting and enhancing salmon habitat. Examples are included below.

Comment 520-62. Compliance with the NWSRA and the NRA Act demand that a "no-erosion from jetboats" policy be implemented in the NRA. (Correspondent 1196)

Forest Service Response: Neither act demands a "no-erosion from jetboats" policy. The acts stress the protection and enhancement of the river's ORV's. Refer to Appendix E for additional discussion on beach erosion.

Comment 520-63 Regulations for jetboat use should require that all jetboats slow down to 3 mph (plus the speed of the river current, if travelling downstream), and create no wake 100 yards before coming parallel to the leading edge of a beach, and should not accelerate until after passing 50 yards beyond the trailing edge of the beach. They should move to the far side of the river away from the beach. Specific beaches where these no-wake rules apply should be identified. (Correspondent 1196)

Comment 520-64. In addition, the wakes of large boats need to be controlled. (Correspondent 2474)

Comment 520-65. The unnatural wakes caused by jetboats pound the river banks and cause severe beach erosion. (Correspondent 2719)

Comment 520-66. The constant wake of jet boats has altered the shoreline and shoreline life of the river. For that reason too, we find jet boats in Hells Canyon unacceptable. (Correspondent 2845)

Comment 520-67. How about the damage to the banks and aquatic habitat from powerboats? Have studies been done of this? If not, they should be. (Correspondent 2894)

Comment 520-68. I live on the river 8 miles above Asotin. I have owned my property since 1984. And I have observed the banks and beaches being washed away from the wake of the commercial boats every trip.

Especially during the periods of high water. Some erosion is natural. But I actually watch my property wash away for the wakes caused by these tour boats. (Correspondent 2256)

Forest Service Response: There is no conclusive evidence of damage to banks and aquatic habitat as a result of jetboat use occurring in the HCNRA. The Forest Service initiated a preliminary study of erosion due to jetboat use. No-wake zones would not be required without evidence that it would prevent any resource damage.

Comment 520-69. The fry of our endangered fall chinook run lose habitat along the slower moving water edges. Loss of the riparian zone increases shoreline current speed, deprives the fish of shelter and feed. These fish are in too much trouble for your proposal to ignore their requirements if we want this species to survive. (Correspondent 2425)

Comment 520-70. Try to correct a problem in our ecosystem before we totally lose natural habitat for salmon and steelhead. (Correspondent 2687)

Comment 520-71. Enhance habitat for native wildlife and fish. (Correspondent 2509)

Comment 520-72. It is vital to the protection and enhancement of wild fall chinook salmon stocks that the riverine and beach environment be restored to a more natural condition, and native vegetation encouraged. (Correspondent 2663)

Forest Service Response: The effects analysis in the EIS and associated biological assessment address the potential for the preferred alternative to affect fall chinook. Protection measures for fall chinook are presented in the FEIS. Any enhancement measures needed with this analysis would be included. Restoration of beaches is outside the scope of this analysis as addressed in Appendix D.

Mitigation and Protective Measures for Salmon

Many correspondents shared their concerns that protective measures included in the Forest Service plan would not adequately protect salmon. Examples follow.

Comment 520-73. Fall chinook salmon should be given greater protection. Livestock impacts to salmon and aquatic life are not addressed and should be in the final. S1/2 would provide for greater protection of salmon than any of the alternatives. (Correspondent 2522)

Comment 520-74. The Preferred Alternative does not adequately protect the fall chinook run from jet boat disturbance and livestock impacts to these fish are not addressed. To date no comprehensive jet boat studies have been conducted on the Snake and I feel this is a necessary procedure to assess all potential direct and cumulative impacts on these main-channel spawners. Unlimited jet boat/ski use after September 10 is clearly a bad management decision with regard to anadromous fish concerns. (Correspondent 2523)

Forest Service Response: The protection measures proposed in the FEIS are sufficient to mitigate any potential adverse affects to fall chinook from the proposed recreation activities. An assessment of the affects to fall chinook salmon is presented in the FEIS and the accompanying biological assessment. Studies as you suggest are expensive and difficult to achieve. The current available information regarding jetboat impacts to fisheries resources in general is sufficient to support the conclusions of our effects analysis and the biological assessment.

Comment 520-75. Fall chinook salmon should be given greater protection than the Forest Service Preferred Alternative proposes. Livestock impacts to salmon and aquatic life are not addressed in the DEIS and should be in the final. HCPC's S1/2 would provide for greater protection of salmon than any of Forest Service alternatives. (Correspondent 2531)

Comment 520-76. The Forest Service must provide adequate protection of the Hells Canyon region of the Snake River to help restore both the endangered chinook salmon population and the river's ecosystem. (Correspondent 2545)

Comment 520-77. It is extremely important to eliminate threats to chinook salmon on this river.

Comment 520-78. Any alternative should give high priority to protecting salmon runs at all times. (Correspondent 2553)

Comment 520-79. Your plan should certainly give first priority to the health of the fish. (Correspondent 2695)

Comment 520-80. What is happening with the fish populations in the Snake River? I hope this serious problem is also being addressed in this management plan. (Correspondent 2792)

Comment 520-81. The Forest Service Preferred Alternative fails to adequately protect fall chinook salmon from jet boat or jet ski disturbance or livestock practices. Failure to do so assures that your decision will be appealed. (Correspondent 2557)

Comment 520-82. The Forest Service must provide adequate protection for the endangered chinook salmon and its complex ecosystem. (Correspondent 2563)

Comment 520-83. Full protection of the fall chinook salmon should be part of any Preferred Alternative. (Correspondent 2598)

Comment 520-84. There are better ways to protect fall chinook than in your PA. (Correspondent 2602)

Comment 520-85. Where are protection measures for the endangered fall chinook salmon? Jetboats and livestock severely impact this important resource. (Correspondent 2610)

Comment 520-86. The preferred alternative fails to adequately protect fall chinook salmon. (Correspondent 2647)

Comment 520-87. Fall chinook need protection. (Correspondent 2649)

Comment 520-88. Chinook salmon habitat protection must be a priority. Livestock impacts on salmon spawning grounds must be addressed. (Correspondent 2696)

Comment 520-89. The salmon need to be protected. That is where our energies should go. (Correspondent 2697)

Comment 520-90. Remove all jeopardy to Chinook salmon runs. (Correspondent 2698)

Comment 520-91. Consider the need for additional protections for the endangered fall Chinook salmon. (Correspondent 2724)

Comment 520-92. Much notice has been given over the last several years to the deplorable state of native fish runs in the Pacific Northwest. In fact, preparations have been going forward for a "Salmon Summit" to begin addressing this crisis in a comprehensive manner. As I am sure you know about these developments,

it is with surprise that I learn that the preferred alternative does so little toward protection and restoration of Snake River salmon stocks. This seems to reflect a "preferred" management method too rooted in management practices of the last decade. I urge those who designated the preferred alternative as "preferred" to overhaul their outlook toward salmon restoration now before new laws force them to do so. (Correspondent 2749)

Comment 520-93. Endangered fall chinook salmon are given inadequate protection from jet boat disturbance. Alternative E is not the most protective for salmon. Livestock impacts to salmon are not addressed. (Correspondent 2789)

Comment 520-94. Alternative E only addresses river recreation impacts to endangered salmon stocks. The preferred alternative selected has one of the higher risks of jeopardy to fall chinook salmon. (Correspondent 2789)

Comment 520-95. We respectfully request all effort be made to protect the Redds of Anadromous fish in all reaches of the Snake River Canyon of the HCNRA. (Correspondent 2844)

Comment 520-96. Better protect the very endangered salmon and general ecosystem of the area. (Correspondent 2887)

Comment 520-97. The preferred alternative is unacceptable because it does not provide enough protection for chinook salmon. You need to address the impacts of livestock on salmon, in the DEIS. (Correspondent 2447)

Comment 520-98. Protect fall chinook salmon from jetboat disturbance. (Correspondent 2737)

Comment 520-99. Why are chinook salmon being inadequately protected? Americans insist on gas powered speed at the expense of the environment in the use of said gas powered toys. The gasoline to fuel these things trashes the environment first in oil drilling, then in refining and transporting the product to the users and finally in the actual burning of the fossil fuels we get the waste products fouling the air and water and the noise fouling the solitude for others. When are we going to start paying the true price of gasoline and stop making it easy for these harmful toys to be used? Jet boats are a disturbance and the salmon need more protection from them than is provided in the current DEIS. (Correspondent 2759)

Forest Service Response: The protection measures proposed in the FEIS are sufficient to mitigate any potential adverse affects to fall chinook from the proposed recreation activities. Livestock management is outside the scope of this analysis as addressed in Appendix D.

Comment 520-100. Page II-6 The IDFG requests that the final EIS provide additional information regarding the proposed "no entry zone" for known fall chinook redds. If the intent is to restrict use over fall chinook redds, the IDFG cannot envision a manageable scheme. We further do not believe such management action would provide any benefits. (Correspondent 2264)

Forest Service Response: The FEIS provides more information regarding the proposal to mark redds for protection. The proposed mitigation would allow for the use of no-entry zones rather than requiring them for every redd. The decision regarding which redds to mark would be based on need for this protection and the judgement of a fisheries biologist. These mitigation measures will probably not be necessary, but it is important to maintain the option.

Comment 520-101. The protection of the fisheries, specifically the endangered sockeye salmon and the threatened chinook salmon, as an ORV should take precedence to all other uses. The DEIS mentions this

on page IV-100. In addition, the HCNRA Act (sec. 7 (4)) ensures the "protection and maintenance of fish and wildlife habitat," the WSRA (sec. 1 (b) and sec. 10 (a)) preserves fish and wildlife "in free-flowing condition, and that they and their immediate environments shall be protected," and also the ESA says that a listed species and/or their habitat cannot be "taken." I acknowledge the mitigation measure of no-entry zones for spawning chinook and increased awareness through education, but this seems like a curative measure rather than a preventive one. By this, I mean that once redd sites are discovered they are protected. Instead, lateral gravel bars, which are preferred redd sites (IV-60), should be protected as no-entry zones that encourages the building of redds, which then become "discovered." (Correspondent 2376)

Forest Service Response: The DEIS discussion of effects is based on speculative potential affects to spawning salmon. After further investigation and discussion with USFWS, biologists investigating habitat requirements of fall chinook, a new analysis, considering new information was presented in the FEIS. The "no-entry" zones are deemed necessary only in the most extreme cases of risk for the spawning fall chinook.

Adequacy of Scientific Data

Several correspondents expressed concern that scientific data used in analysis was inadequate. Examples are included below.

Comment 520-102. A broader problem becomes evident from the content of the DEIS in that the amount of current scientific evidence compiled is insufficient to make assumptions as to how to protect fisheries. (Correspondent 2343)

Comment 520-103. On page IV-59 it is stated that important issues such as the effects of powerboats/ floatcrafts on spawning behaviors, fuel emissions, increased fishing pressures, stream beds and water quality are all based on: "professional judgement which often can be interpreted as subjective and sometimes biased." We concur that professional judgement often has been proven to be biased, thus sufficient scientific data should be gathered to give credibility to these professional opinions (our underline). Until more scientific data is obtained, a DEIS for the Wild and Scenic Snake River should not be considered. (Correspondent 2343)

Comment 520-104. The lack of scientific data defies the NEPA process by insufficiently addressing key issues within the public scoping process and violates the Endangered Species Act by not ensuring protection for federally-listed endangered sockeye salmon and federally-listed threatened spring/summer and fall chinook. (Correspondent 2343)

Comment 520-105. I am also unaware of any conclusive studies that prove there are no harmful effects on fish when they are repeatedly exposed to a powerful engine's exhaust bubbled into the river. (Correspondent 2849)

Comment 520-106. The Forest Service must base its decision on scientific evidence, not speculation. 40.C.F.R. S 1502.24. But speculation is all that connects boating activities to declining fish runs; there is no reliable scientific evidence of such a correlation. Additional, detailed studies are needed before efforts to protect fish would be justified. Therefore, the potential for harm to fisheries must not figure in the Forest Supervisor's decision. (Correspondent 1198)

Forest Service Response: The analysis in the FEIS uses available commercial and scientific information. Effects to fish were considered with a great deal of judgement based on related evidence. Fisheries research in the Hells Canyon reach is limited. Available information from recent studies and information from biologists currently working in the river were also used. Available information is not specific to the Hells Canyon reach, but is useful in supporting parts of the analysis. A degree of professionally based judgement must be used in interpreting the information. The mitigation measures are sufficient to ensure protection of listed salmon species in the Snake River.

Restoration of Native Vegetation, Beaches, and Native Salmon Runs

Many correspondents believed that steps should be taken to restore the natural qualities of the Snake River corridor. Although restoration and recovery plans were considered out of the scope of the EIS, examples of these comments are included.

Comment 520-107. Native riparian vegetation should be restored. River beaches should be restored. (Correspondent 2555)

Comment 520-108. I would urge that restoration of river beaches and riparian areas be a key part of the future plan. (Correspondent 2604)

Comment 520-109. Require research to restore river beaches, repair rangelands, and native riparian vegetation. (Correspondent 2875)

Comment 520-110. It is important to all users that the quality of the river system is not just maintained, but restored. It is imperative the Forest Service take the initiative as stewards of our public lands to further the improvement of such lands. (Correspondent 2672)

Comment 520-111. Seek to restore lost beaches and native vegetation. This is very important to me. My greatest enjoyment is to see healthy native riparian zones which attract many birds and a healthy wildlife population. What we do to restore the fish and the river corridor will benefit generations to come. (Correspondent 2737)

Forest Service Response: Restoration efforts are outside the scope of this analysis. Alternative G proposes use levels and education programs to protect and enhance the river's ORV's. These actions would lead toward restoration of many ecosystem components. A broader analysis of ecosystem restoration will occur through the CMP adjustment strategy.

Comment 520-112. Measures should be taken to re-establish salmon and chinook salmon and to protect them from the jetboat disturbance, to the maximum degree. (Correspondent 2892)

Forest Service Response: To "re-establish" salmon is outside the scope of this analysis. The FEIS provides sufficient protective measures for chinook salmon.

Effects to Habitat from Livestock Grazing

Comment 520-113. Salmon need clean water. The final EIS should look at livestock impacts on salmon. (Correspondent 2543)

Comment 520-114. What about livestock grazing? What impact does this have on the salmon? (Correspondent 2627)

Comment 520-115. River bank restoration caused by livestock should be addressed. (Correspondent 2853)

Comment 520-116. Other shortcomings of your preferred alternative are failure to take into account the negative impacts of cattle on the river ecosystem, especially salmon, and your lack of plans for restoring beaches and rangeland. (Correspondent 2845)

Comment 520-117. You also missed proposing acceptable solutions for the livestock problems and have provided inadequate protection from jetboats and (dumb) jetski commercial interests for fall Chinook salmon. (Correspondent 2424)

Forest Service Response: Livestock grazing issues are outside the scope of this analysis as discussed in Appendix D. The protection measures presented in the FEIS are sufficient to protect fall chinook from any potential effects from jetboats. Alternative G would prohibit the use of personal motorized watercraft on the entire wild and scenic river.

Comment 520-118. Since water quality is degraded by grazing area non-point sources, it would make sense to enhance the aquatic environment by eliminating the immediate and nearby sources of pollution. (Correspondent 2512)

Forest Service Response: Water quality of the Snake River is discussed in the FEIS. Specific analysis of grazing in the HCNRA is outside the scope of this analysis (see Appendix D).

General Comments

Comment 520-119. I used water from the river to be filtered for drinking and more than once detected petroleum odors in the water. (Correspondent 2719)

Forest Service Response: The water quality in the Snake River is discussed in the FEIS. The water is known to contain several organic chemicals from agricultural uses upstream of the HCNRA and Hells Canyon dam. It is difficult to determine what the odor you detected is from. One should seriously consider potential risks before consuming the water in this river.

Comment 520-120. Page IV-62. The spring chinook start arriving in April and May, not July and August. (Correspondent 1198)

Forest Service Response: The FEIS has been changed to correct this error.

Comment 520-121. Regulation of fishing, including sturgeon fishing, is a responsibility of the respective states and need not concern the Forest Service. (Correspondent 1198)

Forest Service Response: The regulation of fishing is administered by the states. The Forest Service is concerned with regulation of fishing as it may affect the Forest Service's responsibility and intention for management of the HCNRA and responsibilities under other laws including the endangered species act.

Comment 520-122. At the same time it make me wonder if the sturgeon will be dealt the same cruel lacerations as the Manatee in Florida's waterways. (Correspondent 2264)

Forest Service Response: The situation of the Manatee is difficult to compare to the situation on the Snake River.

Domestic Grazing Code 530

Comments on domestic cattle and sheep grazing in the river corridor focused on the incompatibility and conflicts of that practice with the values of the river for scenery and wildlife. Many believed that grazing issues should have been addressed in the DEIS. Examples of these comments are included below.

Comment 530-1. As a biologist and a farmer I have slowly come to realize the error of the world increase in ruminating mammals that contribute a very high percentage of the atmosphere's methane gas which has a much higher capacity for global warming than carbon dioxide. This gives an even greater reason for curbing grazing on public lands or for converting such lands to increased grazing ability over other types of vegetation. I strongly support the concept of reduced public grazing nationwide and feel it should be banned in especially sensitive areas. A phase-out system in Hells Canyon area would be acceptable. (Correspondent 2496)

Comment 530-2. "E" does not contain any provision for eliminating or even materially reducing the impacts of livestock grazing in the watershed. (Correspondent 2643)

Comment 530-3. I also ask that your plan phases out grazing within the wilderness area. I found the trampled, overgrazed land around Dug Bar to be in conflict with the aim of preserving the land as wilderness. (Correspondent 2422)

Comment 530-4. Any plan for the river should respond to concerns about abuse of the land by livestock. Hells Canyon should be managed in a manner emphasizing wildlife, not sheep and cattle. (Correspondent 2622)

Comment 530-5. It offers no solution to problems from livestock use of the area--these problems being disease impact upon native bighorn herds and destruction of salmon habitat, overgrazing and erosion. These poor livestock practices are not adequately addressed nor is the need for restoration of adversely affected areas provided for. (Correspondent 2556)

Comment 530-6. The "preferred alternative" also does not adequately address keeping livestock away from the River so that their waste will not make its way into the river. There are simple means to water cattle without letting them near the river. (Correspondent 2476)

Comment 530-7. Grazing depletes river recreation, e.g., seeing bighorns, walking through native vegetation. The DEIS fails to reflect the "full range" of resource uses and values that could be produced if changes in livestock management were entertained in the DEIS. Minutes from LAC meetings do not ever indicate that any Task Force member, or the facilitator, felt that this recommendation was "outside the scope" of the process for determining future management of the SWSR corridor. (Correspondent 1196)

Comment 530-8. In general, Rest the West is concerned that the DEIS completely fails to address ecological degradation of livestock grazing activity within the Snake Wild and Scenic River Corridor and defies the directives of numerous environmental protection laws. (Correspondent 2344)

Comment 530-9. Livestock impacts are not adequately addressed in the Preferred Alternative. The impact of cattle and sheep needs to be addressed in the plan. Preferably, grazing should be reduced to 30-50% of current levels. (Correspondent 2592)

Comment 530-10. The DEIS does not address the issue of livestock in the river ecosystem. Nor does it address the issue of restoring the river ecosystem damaged by past abuse. The DEIS must address these issues and carefully examine the environmental consequences of the continued presence of livestock in a habitat to be preserved not only for all chinook salmon but for future generations in a wild and pristine state. (Correspondent 2624)

Comment 530-11. The final EIS must address the numerous ecological problems associated with livestock grazing in the canyon. Livestock disturb and destroy river banks and native vegetation, they contribute to total suspended solids in the river, they destroy salmon breeding habitat. Another livestock concern is the amount of waste produced by the livestock and the diseases these wastes can spread to people and animals. (Correspondent 2609)

Forest Service Response: The issues surrounding domestic livestock grazing in the river corridor were determined to be outside the scope of this EIS. The Forest Plan provides the schedule for AMP development. The issues of livestock grazing and conflicts with recreation experiences will be dealt with through the AMP environmental analysis process and the CMP adjustment process. See Appendix D for further information.

Comment 530-12. Sheep have repeatedly destroyed attempts to reintroduce bighorn mountain sheep to the canyon. Please make this reintroduction a priority, and move grazing away from the reintroduction areas. (Correspondent 2422)

Comment 530-13. The issues connected with recreational use of the river should be considered along with the use of the canyon and with wildlife and grazing issues. In particular, there needs to be a study of the current grazing allotments and the effect of sheep allotments on bighorn sheep populations through disease transmission. Congress needs to make this study a funding priority. All such issues should be considered in a more systemwide planning approach. (Correspondent 2217)

Comment 530-14. As a wild and scenic river, it seems livestock use needs to be addressed. Fish and water quality are affected by livestock grazing in the canyon. Bighorn sheep are probably contracting disease from domestic sheep. (Correspondent 2894)

Comment 530-15. During my hike April 15 to April 22, we found domestic sheep wandering in the canyon which were mingling with the wild bighorns. (Correspondent 2357)

Comment 530-16. Another recommendation I would make is to eliminate Ben Howards sheep along the river on the Idaho side. I believe this grazing allotment is not compatible with national recreation objectives and should be terminated soon for the following reasons: 1. They lost sheep that mix with the wild bighorn sheep causing disease and dying of the bighorns. 2. Last year in March and April there were several hundred strays or lost sheep from the main band. They were undesirable along the river and floating dead in the river. 3. The herders trailed the sheep on the national recreation trail from Sheep Creek to Pittsburg causing considerable damage. I personally spent several days reconstructing and maintaining the trail from Suicide Point to Kirby Creek. 4. They bedded on and near the trail causing many visitors to complain of the barnyard odor. (Correspondent 2391)

Forest Service Response: Domestic sheep compatibility with bighorn sheep is addressed in the Domestic Sheep/Bighorn Sheep EA, February, 1994.

Comment 530-17. The preferred alternative does not phase out livestock in the management area. This is a riparian area and is sensitive to livestock trampling and destruction of riverside vegetation. Livestock increase the risk of loss of salmon and break up soil along the beaches leading to excessive erosion and destruction of the river bank. I cannot see how a W&SR can be consistent with livestock grazing.

Comment 530-18. Your preferred alternative does not cover river ecosystem restoration and the limitation of livestock access in the riparian zone. There are ways to keep cattle out of the riparian zone and I urge you to do so, their destruction is too great. (Correspondent 2719)

Comment 530-19. To begin with, damage caused by domestic grazing animals to riparian areas and hillside erosion should be addressed. The five allotments that are not presently under contract should be withdrawn. On those allotments that remain, management practice should include keeping livestock out of riparian habitats by fencing and a reduction of animal impact. Reducing animal impact can be achieved in two ways, one is to run fewer animals or to possibly run the same numbers with more active management in the form of moving animals regularly. The Forest Service should take a close look at the holistic range management practices of the BLM's Allan Savory and see how they can be applied to the Hells Canyon area. (Correspondent 2377)

Forest Service Response: Although livestock management is beyond the scope of this analysis, please be aware that management plans for each allotment addresses riparian issues. Utilization standards for riparian areas are established and when reached, permittees are required to remove livestock. Sheep numbers in the corridor have decreased in the past few years, and sheep are managed in such a way that they move quickly through riparian areas and they instinctively prefer to graze at higher elevations. Sheep are not to be bedded more than one night in the same place, and are constantly moving on specified routes throughout the allotments. Ongoing grazing activities will be submitted for review to NMFS as part of the required consultation procedures for threatened salmon. Grazing operations would be adjusted depending upon the biological opinion rendered by NMFS.

Comment 530-20. Cattle grazing on the slopes and riparian areas is damaging the area and competing with wild animals. It is a minor activity, involves few people, and brings in a meager return to the US. It should be phased out in a reasonably short time. (Correspondent 2786)

Comment 530-21. We believe cattle have significant impacts on the river's riparian areas. These impacts must be studied and remedies proposed if the EIS is to be adequate. We maintain that cattle should be phased out of the river corridor and restoration work begun as soon as possible. (Correspondent 2688)

Comment 530-22. For example, livestock grazing activity in the canyon has resulted in the degradation of water quality in the main channel of the Snake River and tributary streams, the reduction in native vegetation, pounded and eroded top soil, the construction of numerous fences which impair the aesthetic attributes of the canyon walls, and the transmission of diseases from domestic sheep to bighorn sheep, killing most, if not all, of a herd located in the Seven Devils area. Further, the "Temperance Creek" and "Himmelwright" allotments both located in the Snake River corridor, are operating without EAs in violation of the NEPA and range reconnaissance and conditions surveys are hopelessly out of date for all river corridor allotments. (Correspondent 2344)

Forest Service Response: It is undocumented that livestock grazing in the corridor has resulted in degradation of the Snake River and its tributaries. The Snake River is inaccessible to livestock from the Himmelwright allotment. It is not in violation of NEPA to operate an allotment without an EA. Range reconnaissance (range monitoring) is done on a regular basis throughout the grazing season. Although some allotments have not had condition surveys on long-term plots read recently, short-term monitoring indicates Forest Plan utilization standards are being met.

Comment 530-23. We further believe livestock grazing should be eliminated from the river corridor for the following reasons: - The conflict between commercial livestock wildlife is causing health problems in the wildlife species and reducing the opportunities for recreationists to see and enjoy wildlife.

The commercial livestock allotments have been poorly managed over the years, and there is no reason to expect this situation to improve. Dozens of dead and bloated sheep have been found in the corridor. This has both health and aesthetic implications.

The natural ecosystem of the river corridor and the adjacent Wilderness has been severely impacted by commercial and Forest Service livestock grazing. (Correspondent 2642)

Forest Service Response: Domestic sheep compatibility with bighorn sheep is addressed in the Domestic Sheep/Bighorn Sheep EA, February, 1994.

Comment 530-24. I would like to voice support for S1/2 [Solitude Alternatives 1 and 2]. The fact that the solitude alternatives attempt to deal with the overgrazing problem is particularly appealing, because of the importance of riparian vegetation in maintaining the biodiversity of this special area. (Correspondent 2581)

Comment 530-25. S1&2 [Solitude Alternatives 1 and 2] phase out river corridor allotments, remove range "improvements," restore native riparian vegetation, and require beach restoration research. (Correspondent 2507)

Forest Service Response: The Solitude Alternatives 1 and 2 were considered but eliminated from detailed study. Please refer to Appendix F for and explanation of why the Forest Service did not adopt their recommendations on livestock grazing.

Soils Code 540

Correspondents concerned with soils focused on erosion of beaches in the river corridor.

Comment 540-1. Work to restore the river beaches. (Correspondent 2600)

Comment 540-2. The preferred alternative fails to provide for restoration of rangelands and beaches. (Correspondent 2647)

Comment 540-3. Require research toward restoration of river beaches. (Correspondent 2789)

Comment 540-4. We request all effort be made to protect the canyon's sandy beaches in all reaches of the canyon from river erosion, especially by motor boat wakes, also civilian vandalism and unsanitary conditions. (Correspondent 2844)

Forest Service Response: A report on beach erosion is included in the EIS in Appendix E. A study plan is proposed to assess the effects of recreation, jet boat wakes, and high and low flow water effects.

Ecosystem Management Code 560

Many correspondents commented on the need to look at river management in a broader sense instead of focusing on recreation in the corridor alone. Many stated that only a comprehensive ecosystem analysis would achieve this. Representative samples of these comments are included below.

Comment 560-1. After carefully studying the DEIS I find a total lack of consideration for biological priorities. Once again considerations are focused on environmentally destructive human uses, such as maintaining livestock grazing and allowing motorized watercraft in an otherwise tranquil setting. (Correspondent 2479)

Comment 560-2. The NEPA process is intended to help public officials make decisions that are based on full understanding of environmental consequences, and take action that protect, restore, and enhance the

environment (40 CFR 1500.1(c)). Only a comprehensive ecosystem-wide analysis and management plan, instead of a highly fragmented approach, will achieve this end. (Correspondent 2501)

Comment 560-3. TWS [The Wilderness Society] does not agree with the Forest Service decision to prepare a river management plan separate from a revision of the entire CMP. Given the agency's recent commitment to Congressman Bruce Vento to revise the CMP, the Forest Service should withdraw the Snake River DEIS and incorporate river management into the overall CMP. This approach fits better with the pledge to adopt ecosystem management. You cannot prepare a management plan for a major part of Hells Canyon ecosystem - the Snake River - without considering the surrounding environs. (Correspondent 2502)

Comment 560-4. This DEIS considers only a very narrow range of activities in a narrow geographic area. This limited scope of review is not consistent with either the current administration's or the USFS's stated policies of ecosystem/watershed management. (Correspondent 2501)

Comment 560-5. You need to address the livestock grazing (and logging) issues as well as the restoration of the ecosystem's balance (beaches, riparian areas, etc.). (This would also include addressing the fact of too much human use if that is a contributing factor.) (Correspondent 2505)

Comment 560-6. None of the alternatives offered in the EIS adequately address the management of the natural, recreational and cultural resources found in Hells Canyon. The Forest Service preferred alternative does not protect the complex natural ecosystems. There is not a plan for restoration of the already degraded ecosystem. (Correspondent 2509)

Comment 560-7. I suggest an active recovery and restoration plan and program for the Snake River and environs to secure river ecosystem recovery and restoration. (Correspondent 2510)

Comment 560-8. This plan should be a cornerstone for ecosystem management for the entire region of the Snake River. (Correspondent 2512)

Comment 560-9. A full EIS is warranted so that an analysis of livestock and forestry impacts are assessed and impacts on salmon stocks, bighorn sheep, and other wildlife are completely measured and appropriate actions taken to remedy any problems. (Correspondent 2514)

Comment 560-10. A broader ecosystem-based approach addressing the problems of livestock, salmon and human intrusion would be superior to a simple float and motorized boat plan.

Comment 560-11. The Preferred Alternative does not address the needed river ecosystem restoration. This restoration is very obvious when one takes a trip into the canyon. I feel that such a plan is vital to the health of the area. (Correspondent 2592)

Comment 560-12. The only plan that should be considered by the Forest Service is one that unequivocally protects the natural state of this area and only allows usage when it can be shown positively not to have and adverse affect on the ecological state of the area. (Correspondent 2685)

Comment 560-13. The final EIS should examine the environmental effects of all activities in the river corridor that the federal government contributes to, not just recreational use! (Correspondent 2604)

Comment 560-14. Take a holistic multi-objective approach to restoration of the Snake River ecosystem in the final EIS. (Correspondent 2613)

Comment 560-15. Recreation is not the only or even the most important reason for implementing the right plan for this magnificent river corridor. It is past time to address ecosystem restoration, salmon protection, grazing abuses, roads and other modern developments. (Correspondent 2629)

Comment 560-16. A cumulative effects analysis of the entire Hells Canyon ecosystem that places these unique parts in context with the drier open slopes should be done. This analysis would show the nesting and foraging areas for cavity excavators that may live in covered riparian areas, but hunt on the open areas. (Correspondent 2654)

Comment 560-17. The DEIS is unacceptable because the proposed management plan addresses the wild and scenic river corridor as if it were isolated, separate from the adjacent land mass that surrounds and impacts the river. Watershed condition and land use activities have a direct cause and effect impact on the river and river corridor - a matter of cumulative impact(s) which are not acknowledged or addressed in the plan/DEIS (Correspondent 2707)

Comment 560-18. It is unbelievable that the DEIS only addresses environmental effects of recreational activities in the river corridor. The final EIS should examine the environmental effects of livestock grazing and other disturbance as well. (Correspondent 2521)

Comment 560-19. The Forest Service preferred alternative proposes no plan for river ecosystem restoration. The final EIS should examine the environmental effects of all activities in the river corridor and not just recreation use. The Forest Service should seriously consider banning all livestock grazing and all logging in the HCNRA in order to restore the fragile ecosystem. These extractive activities directly conflict with the Congressionally-mandated use and goals of a NRA by destroying the very natural resources that are to be protected.

Comment 560-20. We urge you to consider restoration of the entire river ecosystem including restoring native vegetation, bighorn herds, river beaches, and removing livestock and stock installations, especially feedlots, from the banks of the Snake and its tributaries. (Correspondent 2557)

Comment 560-21. Your final EIS for these management decisions should be expanded to include all activities taking place on federal lands which have any effect on the river environment. These activities do not occur in a vacuum; livestock use and concentration, hikers, river flow levels, wake effects, artifact looting and digging, government removal of predators, destruction of riparian habitats with introduced noxious weedy species, water quality both in the river and at each side watershed and spring/seep all need to be addressed more thoroughly in keeping with the shift to ecosystem management. (Correspondent 2560)

Comment 560-22. These days, we are learning more about the intricacies of ecosystem. The river and its watershed need more consideration than the preferred alternative. Motorized use (jetboats, et al) needs to be reduced, livestock allotments curtailed, and restoration of vegetation planned and implemented. (Correspondent 2708)

Comment 560-23. The allowance of motorboat usage has already done much damage to the river yet you have no restoration plan? Please include a plan in your alternative with an emphasis on beach restoration. (Correspondent 2719)

Comment 560-24. My major concern is that you really are protecting man's impact on the river's ecosystem and are using sound judgement and science over special interest lobbying. It belongs to me too. (Correspondent 2720)

Comment 560-25. Proper management requires that all aspects of possible impact be considered and evaluated. Right now, it seems that only the recreational aspects are being considered, without considering the overall environmental affects of all activities in the canyon. (Correspondent 2732)

Comment 560-26. Please consider and realize what wild and scenic truly means. Ecosystem management is what you are supposed to be doing. (Correspondent 2734)

Comment 560-27. Please reassess your position and take a more balanced approach to putting together a management plan that will ensure the long term health of the Snake River ecological system, and provides at least equal access for all environmentally concerned citizens. (Correspondent 2750)

Comment 560-28. You really are obligated to care and restoration of the system rather than to further degradation, no matter what your rationale. Please consider further, and give most of your attention to the conclusions of ecologists. (Correspondent 2755)

Comment 560-29. We must begin restoring ecosystems while there is still something to restore. We no longer have the luxury of allowing deterioration to continue unchecked. (Correspondent 2756)

Comment 560-30. Please consider the long term health of the river and its banks as you plan its future. (Correspondent 2761)

Comment 560-31. I hope that the effects of grazing, mining, lumber and private lands on the wildlife, fish and habitat will be addressed soon. Without direction in the overall conditions of the Snake and Hells Canyon the decision about river use will be trivial. (Correspondent 2802)

Comment 560-32. If the natural values of this area are to be given anything approaching equal consideration much more attention must be given to the entire river ecosystem: its salmon, wildlife, plant communities and unique sense of remoteness. (Correspondent 2878)

Forest Service Response: The limited scope of the proposed action was purposely chosen to narrow the scope of the proposal and analysis of this EIS to concentrate planning efforts on developing a resolution to a very controversial subject—the regulation of human activities in the corridor. Other uses of the HCNRA are addressed in the CMP and Forest Plan. Chapter IV discloses the direct, indirect, and cumulative effects of the alternatives in protecting and enhancing the river's ORV's. Alternative G proposes management direction and monitoring that would provide an avenue for enhancement of the ORV's as addressed in Chapter IV. Ecosystem sustainability of the HCNRA will be analyzed through the CMP adjustment strategy begun in 1994. Overall management objectives and direction for the HCNRA will be re-evaluated to determine areas needing change. Should that analysis indicate the management direction Alternative G is inappropriate, the river's ORV's would be redefined and management direction would be adjusted.

Livestock grazing is outside the scope of this document (reference Appendix D) and is addressed in individual AMP's and AOP's. Sediment storage behind Snake River reservoirs and clear water flows alters beaches and riparian vegetation and will be addressed through the relicensing process of the Hells Canyon Dam. Logging is not permitted within the wild and scenic river corridor. Monitoring of vegetation and campsites has been ongoing and is proposed in Appendix J to assess improvements or impacts to the canyon.

Comment 560-33. The most important part of managing Hells Canyon should be maintaining a healthy ecosystem. The USFS should be addressing the management of the reservoirs and changing the releases to create the best environment for the riparian users. Is that being addressed in the management plan? (Correspondent 2791)

Forest Service Response: Through the HCNRA Act, the Forest Service is prohibited from regulating water flows from the dams. The Forest Service does cooperate with Idaho Power Company to encourage various flow patterns to facilitate primary season use. The issue of clear water flows from the dam will be reviewed as part of the relicensing process for Hells Canyon Dam.

**Pest/Vegetation, Control Noxious Weeds
Code 570**

Comment 570-1. The reintroduction of fire into the natural process within Hells Canyon should be considered as a means of controlling weed and non-native intruders. (Correspondent 2377)

Forest Service Response: This concern is outside the scope of the proposed action and purpose and need for action. An environmental assessment that would amend the Forest Plan is being conducted which would allow fire to play a more natural role in the ecosystem, including the Snake River corridor.

Comment 570-2. I see nothing concerning noxious weeds. They are taking over the beaches and shore, plus spreading downstream. Herbicides should be used where necessary for control. (Correspondent 2468)

Comment 570-3. Control the introduction and spread of noxious weeds. (Correspondent 2810)

Forest Service Response: Strategies for the treatment of noxious weeds are outlined in the Wallowa-Whitman National Forest Noxious Weed Management Plan completed in 1992. As stated in the Draft EIS; controlling the introduction and spread of noxious weeds is a management element common to all action alternatives through the tiering of Forest-wide standards and guidelines.

An inventory of noxious weed sites in the Snake River corridor was conducted in 1993.

Comment 570-4. Today there is tall rank grass that poses a fire hazard and elk and deer don't like rank grass. I understand the star thistle is getting a hold and the noxious weeds run unchecked! (Correspondent 2489)

Forest Service Response: This concern is outside the scope of the proposed action and purpose and need for action. An environmental assessment is being conducted that would allow for prescribed natural fire to play a more natural role in the ecosystem. This would benefit a number of wildlife species including deer and elk and reduce the hazard of catastrophic fire by reducing fuel levels under controlled conditions. The Noxious Weed Management Plan provides strategies for the inventory, control, and eradication of noxious weeds in the Wild and Scenic Snake River corridor.

Comment 570-5. The DEIS does not address the loss of native growth to knapweed and thistle. (Correspondent 2668)

Forest Service Response: This concern is outside the scope of the proposed action and purpose and need for action. Forest Plan standards and guidelines require the maintenance of "native and desirable introduced or historic plant and animal species..."

The CMP adjustment strategy will explore needed direction change for the CMP and would include review of ecosystem sustainability and restoration.

Economics/Social Code 600

Economic Effects to Local Businesses

Many correspondents commented on economic impacts they expected to see in their local communities. They felt that Alternative E did not consider the "ripple" effect if tourism is reduced. Examples of these comments are included below.

Comment 600-1. We spent seven nights in motels and eating all our meals in restaurants, plus gas, so there was an economic impact. (Correspondent 91)

Comment 600-2. Alternative E does not even consider the economic impact it would have. The hotels, restaurants, tackle stores, tour offices, are just some of the businesses that are dependent upon these types of opportunities. (Correspondent 116)

Comment 600-3. Alternative E does not adequately address the economic issues. (Correspondent 1)

Forest Service Response: Chapter IV in the FEIS discusses the economic impact of recreation expenditures in the section, "Environmental Consequences on the Socio-Economic Resources."

Comment 600-4. Your economic analysis fails to fully consider the impact on existing businesses and the surrounding area if access is severely curtailed. (Correspondent 668)

Comment 600-5. We feel your analysis of economics fails to consider the impact on established NRA river businesses and surrounding areas. (Correspondent 1816)

Forest Service Response: The economic effects analysis in Chapter IV has been revised to show potential economic impacts disaggregated to the three main affected areas which correspond to the three main launch sites: Lewiston/Clarkston area (Cache Creek); Riggins and adjacent areas (Pittsburg Landing); and eastern Baker County and west-central Idaho (Hells Canyon Creek Launch site).

Comment 600-6. The DEIS' approach to the economic impact is too simplistic to be meaningful. No studies have been done and the impact on outfitters who stand to lose half of their business isn't even considered. (Correspondent 920)

Comment 600-7. Your economic analysis fails to consider the impact on established NRA river businesses and the surrounding area. My concern is that the whole area, the power boats, and the floaters will suffer economically. I request that you do not limit the power boats use or do away with seasonal caps for either power boats or floaters. (Correspondent 1053)

Forest Service Response: The economic analysis utilizes the best available information in estimating the potential economic impacts of alternative implementation. Projecting what commercial operators and recreationists will do in response to the actual implementation of an alternative is difficult at best. However, the methodology and data used in the analysis provides a reasonably accurate range of economic impacts to assist management in the decision-making process. The economic impact on outfitters is addressed in Chapter IV of the FEIS.

Comment 600-8. Just about the entire population of Riggins and the surrounding area is dependent upon tourism and the trade created from the Snake River System. Our economy is very fragile. The loss of business resulting from Alternative E may very well place us on the endangered species list. (Correspondent 1017)

Comment 600-9. We have four outfitters operating out of our community, and it appears that two will be eliminated completely from Kirkwood to the Dam during the controlled season, and the remaining two will be severely restricted. Riggins depends upon the support and dollars the outfitters generate in our community. A simple one day jetboat tour of six people in Hells Canyon can generate upwards to \$1500 of tourist income to Riggins businesses, and those dollars mushroom as those businesses buy their supplies, etc. from other businesses in the area. We would not like to see this opportunity taken from Riggins, just to be allotted to larger river users located in Lewiston and the Dam. (Correspondent 2233)

Comment 600-10. They have selected a management alternative that would cripple our business. Their "preferred Alternative E" would eliminate powerboats from the Wild section of the Snake above Pittsburg Landing every other week giving the river to floaters for their exclusive use. (Correspondent 2333)

Comment 600-11. The use allocation is so low, it is unlikely that many of the businesses would survive, given their present size and levels of investment in real property and equipment. Their failure would ripple throughout the tourist and related industries, which is a heavy price to pay in a region that has been suffering for years. Before the Forest Service imposes such drastic limits, it should better understand the likely economic consequences of its actions. (Correspondent 1198)

Comment 600-12. Visitors who could not visit in your time frames would not come and the area would unnecessarily be deprived of revenues, e.g., motels, campsites, outfitters for fishing, whitewater rafting, etc. Can you defend these unnecessary economic losses? (Correspondent 1813)

Comment 600-13. Considering the new two-million dollar road and campground improvements at Pittsburg Landing, and the fact that this was public money, we want to ensure that the public will have the opportunity to utilize the facility to its fullest now and in the future. (Correspondent 1023)

Comment 600-14. The State of Idaho spends a lot of money promoting Hells Canyon. The economy of Riggins is very dependent on tourists, and my job is very dependent on the tourist. Please give us the opportunity to present the area to these guest by their choice of transportation. I therefore endorse Alternative B as recommended by the LAC task force. (Correspondent 1026)

Comment 600-15. The launch limits that are proposed in the new Management Plan for the outfitters in this area are unfair and economically devastating to us. This town [Riggins] desperately needs to have the ability to send tourists to Hells Canyon via Pittsburg Landing. We had the understanding that the improvements on the road to Pittsburg Landing and the Megabucks that were spent improving the camping area were to enhance the economic development of this area through tourism. Now it seems that we are being unfairly targeted for a reduction in tourism, which is our economic life's blood. (Correspondent 1027)

Comment 600-16. The State of Idaho spends a lot of money promoting Hells Canyon, the economy of Riggins is very dependent on tourist. My business is entirely dependent on the tourist. Riggins no longer has a lumber mill or any other source of employment for many of the local people. I employ 1 full time and 3 part time local people. We all depend on the HCNRA. (Correspondent 1016)

Comment 600-17. The Spokesman for the four Outfitters here in Riggins, informs us that Preferred Plan E will put all the outfitters here in Riggins out of business. While at the same time, Beamers Landing Jet Boating Co. in Lewiston, a vastly larger and richer company than any here in Riggins, is being granted more boater days than they actually use. In fact, the surplus boat days Beamers is given in Preferred Plan E is more than sufficient to keep all the boaters here in Riggins viable concerns. While at the same time, according to the above preferred plan E scheme, individual boaters here in Riggins are being limited to only four days a month

each! Outrageous! Four days a month will not generate enough cash to even pay the Forest Service Use Permits. (Correspondent 1020)

Comment 600-18. It would appear that alternate plans C - F have little merit. All of them in one way or another, will adversely affect the local economy, limit growth of the boat and float operators, there by driving the prices up and the services down. (Correspondent 1050)

Comment 600-19. Alternative E's management strategy has serious economic impacts, curtailing a critical element of the region's tourism industry. Alternatives C, D and F have even more impacts. With continuing curtailments in the forests products industry, tourism has become more important to the economic health of the northwest. Hells Canyon, an internationally recognized attraction, and its associated outfitting industry, provide needed diversity to the region's economic base. (Correspondent 2219)

Comment 600-20. As you know, I am sure, City of Riggins economy is now based primarily on tourism. Since the closing of our sawmill, our focus has turned from timber to the surrounding and varied recreational opportunities of the area. Hells Canyon plays a major part in this tourism development, and we are very interested in development of a plan that would provide tourist and recreational access, as well as protection for the fragile environment. (Correspondent 2233)

Forest Service Response: Alternative G in the FEIS reflects concern voiced in response to the DEIS about the impact of the alternatives on local economies. See Chapter II for a description of the preferred Alternative G, Chapter IV for a discussion of the economic impacts of the alternative, and Appendix G for a discussion of use allocation for outfitters and guides.

Comment 600-21. In looking through the DEIS it appears to us that the full economical impact of Alternative E to the surrounding area is far under estimated of actual. People who use our services are kept in the area longer, thus spending more money. Money that no longer is produced in the area from logging. We handled over 7000 people during the 93 season, times this by the average amount of money a person on vacation spends per day in the US. This is a lot of money being left in our small financially hungry, local area. To loose our one day float trips it would affect us about \$50,000.00 annually, plus not having these 500 or so people in the area another day. The jet backs if lost would hurt some estimating about \$30,000.00 annually. To a small business person this is a lot of money. (Correspondent 1194)

Forest Service Response: The economic analysis in Chapter IV of the FEIS has been revised to incorporate higher estimates of recreation expenditures than in the DEIS. The economic impact estimates in the DEIS have been disaggregated to show potential area impacts.

Comment 600-22. Lewiston's 13 jetboat manufacturers will not be put out of business by fair restrictions. Competition and market saturation undoubtedly be the only overriding business factors. (Correspondent 2393)

Forest Service Response: Jetboat manufacturers in the Lewiston/Clarkston area derive about 20 percent of annual boat sales from recreationists who use the boats on the Snake River. Some alternatives would most likely affect a certain portion of boat sales. Which manufacturers are affected and the extent to which they are affected would depend on a variety of factors, including consumer demand, existing and projected market conditions, manufacturer cash flow and debt levels, and owner goals and objectives.

Comment 600-23. Alternative E would be a threat to the basic freedoms guaranteed by the US Constitution - the right to conduct business under competition. This proposal would essentially eliminate free enterprise

in the Hells Canyon tourism industry. Any company established under the plan with majority use would dominate the market with no competition from other outfitters. (Correspondent 972)

Forest Service Response: The opportunity to operate a commercial business on National Forest is a privilege, not a right. The non-regulation of commercial powerboating since the establishment of the NRA in 1975 has allowed the existing businesses to operate in the free market economy with no restrictions. The amount of use established by the commercial powerboat businesses has been a reflection of how well each business has been able to market and sell their product (tourism) during that time period.

Impacts to Outfitter Businesses

Many comments were received regarding the loss of business to powerboat and floatboat outfitters. Included in their comments was discussion of the impacts of the proposed alternating week system and the effects of proposed Alternative E on the services they provide to visitors. Examples of these comments are included below.

Comment 600-24. The analysis of the consequences on Soci-Economic Resources completely ignores the fact that implementation of Alternatives C, D, E and F would probably put several float and powerboat outfitters out of business. Also, many commercial outfitters depend on "walk-in" business, those visitors who decide to take a boat trip on relatively short notice. Such trips cannot be re-scheduled for the weeks during which a particular type of boating would be allowed, and that business would be lost. (Correspondent 1198)

Comment 600-25. The plan does not fully consider the economic impact of the two alternatives on existing NRA businesses and other business in the area. For these reasons, I do not support Alternative E. (Correspondent 1054)

Forest Service Response: Alternatives C, D, F, and G do not restrict commercial float launch opportunities. Depending on the particular operator and the demand for boating recreation, some permittee operations, in and of themselves, may no longer be viable under certain alternatives. This does not mean that these launch opportunities are lost, as other outfitters could buy the permit of the affected outfitter. This is addressed in the socio-economic analysis section in Chapter IV of the FEIS. With respect to walk-in business, since alternative implementation will not occur until 1995, adequate time exists to publicize river use regulations so prospective recreationists can become familiar with boating opportunity schedules.

Comment 600-26. The DEIS' approach to economic impacts is too simplistic to be meaningful. Some outfitters, float and power, will not survive Alternatives C through F. (Correspondent 101)

Forest Service Response: Depending on consumer demand and marketing ability of outfitters, some alternatives may result in the sale of permits from current owners who are no longer able or willing to operate under changed conditions. Consequently, some alternatives may result in a decrease in total number of permittees as launches are consolidated under those operators who are better able to adjust to changes in marketing opportunities.

Comment 600-27. The DEIS, and in particular Alternative E, does not adequately consider the economic impacts that would result from limits on powerboating and floating. Boating is an important economic activity in our region. By cutting the season in half for the commercial operators, you will undoubtedly put the smaller operators out of business and seriously damage the larger operators. Private boaters will reconsider investing in expensive equipment they can use only 7 or 8 weeks each season. (Correspondent 501)

Comment 600-28. The DEIS does not adequately consider the economic impacts that would result from limits on both float and power boating, in particular, Alternative E. This plan would probably put several float and powerboaters out of business. The Forest Service should not simply speculate as to the economic impacts or the future of my job. (Correspondent 787)

Comment 600-29. Alternative E does not address the economic impacts fully. It is obvious that commercial operations cannot survive on half a season. It is ironic that in a time when communities are told to put more emphasis on tourism, the Forest Service prefers an alternative that eliminates many budding tourist-based businesses. (Correspondent 2218)

Comment 600-30. Outfitters cannot make a living when they can book trips for only half of the summer weeks. Walk-in business cannot be re-scheduled for the weeks during which a particular type of boating would not be allowed. (Correspondent 126)

Comment 600-31. E is far too prohibitive to commercial floaters and commercial powerboaters many would be driven out of business. (Correspondent 147)

Comment 600-32. Alternative E will strike another blow at our weak economy. Businesses can't operate very efficiently when they are only open half of the weekends. (Correspondent 250)

Comment 600-33. Alternative weeks will not work for a number of reasons. It will destroy both float and powerboat commercial business' in the Valley and surrounding areas. It would also effect the tourism business in the area. (Correspondent 361)

Comment 600-34. This program would definitely hamper our business on the river. We cannot excel in our boating industry if you cut it in half. (Correspondent 647)

Comment 600-35. Alternative E with its alternating weeks in the Wild Section will cause serious damage to the commercial operations both float and power. How can a business be expected to survive when they can only operate for half a season? (Correspondent 650)

Comment 600-36. Much of our motel business is just people stopping by and taking a powerboat tour the next day. Alternative E could cut or drop our business in half. (Correspondent 827)

Comment 600-37. Adopting Alternative E makes it a risk of "getting a spot on the river". This will keep a lot of boaters and tourists from visiting our area and have a gross economic effect not only on the boat builders but all commerce in our local area. (Correspondent 1113)

Comment 600-38. Steps need to be taken to protect this fine area for future generations to enjoy but I disagree that alternating weeks between power boat operators and float boat operators is the proper course. Limiting access on a weekly basis will make it much more difficult for both commercial power boat operators and commercial float boat operators to make a living. Both of these groups have spent a lot of time and money marketing their services and I don't think it is fair to them to limit them this way. (Correspondent 1110)

Comment 600-39. A large number of visitors to Hells Canyon must depend on the services of commercial operators to visit the canyon. This group, which lacks the knowledge and equipment to see Hells Canyon on their own, will be an increasingly large user group. Unfortunately the preferred proposal cripples that very industry. As an outfitter with an already limited season it will be impossible to survive having my trip opportunities cut by more than half. (Correspondent 1118)

Comment 600-40. In closing I would also like to say that limiting the weeks we can float will cut my wages in half. EEK!! (Correspondent 1126)

Comment 600-41. Commercial boaters who carry passengers for hire cannot operate profitably on a hit and miss basis. When the consumer is there, he, the commercial operator, must be ready to take them. (Correspondent 1814)

Forest Service Response: The alternating weeks of exclusive motorized and non-motorized use in the wild section in the DEIS preferred Alternative E was not carried forward in the FEIS preferred Alternative G. In FEIS Alternative G, the non-motorized period in the wild river would be in effect three days per week for about eight weeks during the primary season. This represents 15% of total weeks in the year. Commercial and private powerboat operators would have the opportunity to increase launches during the motorized weeks or increase use during the secondary season or some combination of the two. Commercial and private float operators would have similar opportunities.

The extent to which these strategies would mitigate reduced launch opportunities depends, in part, on the ability of the operator to adjust to changes in existing launch opportunities. The preferred Alternative G in this FEIS has been developed, in part, in response to comments about the economic impact of Alternative E. Please see Chapter II for a description of preferred Alternative G.

Comment 600-42. The economic data in the DEIS seems to be based on both assumptions and incomplete information. Guides cannot make a living working every other week--could you? What about the economic impact on jetboat builders? Where is your data about that? Lost tourism dollars from both floaters and powerboaters would be significant under Alternative E. (Correspondent 1071)

Comment 600-43. The planning team shows no evidence of practical or common sense or understanding of the needs of many of the river businesses or recreating public. Lets use commercial floaters as an example with a business season of 4 months or 16 weeks - with the alternating weekly schedule their business opportunities just dropped to 8 weeks. To carry a party of 30 people requires about 8 rafts at a cost of \$6000 each or \$56,000 - now add in a bus, camping supplies, etc., and there is an investment of perhaps \$75,000 to be recaptured in an 8-week season. It is twice as bad for the commercial boaters as the cost of new tour boats approaches \$150,000. Then there are problems with staffing for the jobs of guides - how can any business be expected to keep qualified staff when they can only apply their trade every other week? (Correspondent 1801)

Comment 600-44. Without substantial investment in a second location to operate, the alternate week schedule will make it difficult to organize and keep the high quality boatmen we have always insisted on since it will also reduce their income. The positive attraction of working with a smaller, well organized and more personal float business will be lost to the ability of the larger companies to provide steady employment. (Correspondent 1190)

Comment 600-45. The option of alternate weeks allowing powerboats on it would be very difficult for any commercial guide to be able to make a living. What is he going to do the alternate weeks during the summertime? (Correspondent 1835)

Comment 600-46. I am a single working mother, and my income depends on the jet boat business. If my company is limited to running only half of the season, my income could be cut in half, or I would lose my job completely, putting me in the welfare lines. Alternative E will affect many people the same way! (Correspondent 2046)

Comment 600-47. As a commercial rafter I face the same date situation. Because of only one-half of the summer, I'm going to have a hard time attracting employees, especially if my dates fall in the latter part of the week and the trip is shortened. More economic loss to state taxes, HCNRA, communities, and what happens to the pool dates? (Correspondent 2435)

Comment 600-48. How does Hells Canyon Adventures keep a crew together using them only one-half of the summer? Cutting this number in half is a severe economic loss to Halfway and Cambridge. (Correspondent 2435)

Comment 600-49. Another consideration should be the personal impact such an initiative would have on the families of those who work in the Hells Canyon tourism industry. Changing careers after extensive training to earn the privilege to guide and captain the boats through the powerful Snake River corridor would be a terrible hardship. (Correspondent 972)

Forest Service Response: The economic impact discussion in Chapter IV of the FEIS addresses the potential difficulty of hiring labor for commercial operations which would operate in the Wild section of the river corridor on an alternate week basis. Potential impacts on powerboat manufacturers are addressed in Chapter IV of the FEIS. The preferred Alternative G attempts to minimize these concerns. Alternating weeks of motorized and non-motorized use in the wild section has not been carried forward in the FEIS.

Comment 600-50. Proposed alternatives will reduce group size to 20, from 30. This will significantly affect our anticipated commercial revenues and ability to continue to employ some of our guides. (Correspondent 973)

Forest Service Response: Preferred Alternative G limits party size to 24. To the extent outfitters have average party sizes greater than 24, some revenue would be lost, other things equal. Outfitters may be able to mitigate reduced party size by increasing prices or increasing trips, depending on recreationist demand and operator objectives.

Comment 600-51. While Alternative E will probably add value to Snake Float Boat operations by increasing the quiet, wild nature of the river on alternating weeks, we outfitters on the Salmon will receive the brunt of the regulations. We will still have virtually the same, if not more jet boats and personal motorized watercraft and their noise and potential safety problems to deal with. (Correspondent 973)

Forest Service Response: Some relocation of jetboats from the Snake to the Salmon may occur. Preferred Alternative G provides for increased launch opportunities (compared with Alternatives C-F) in the scenic section to address anticipated demand. Because personal motorized watercraft would be prohibited on the scenic section of the Snake, there would be no conflict with them entering the Salmon.

Comment 600-52. The restrictions segregating the jet boat and rafters would make helping a guest arrange a trip a very complicated ordeal. (Correspondent 1016)

Comment 600-53. I am completely against any plan that would alternate use between floaters and jet boats because out of state and foreign tourist don't always know which days they will visit Idaho. (Correspondent 1029)

Comment 600-54. I also am concerned about all the tourists who come from everywhere to see Hells Canyon - what if they arrive during the float only week and don't have time to wait? (Correspondent 2375)

Comment 600-55. As a resident of Riggins, I am concerned by the proposal to restrict usage in Hells Canyon. I am employed as a motel manager. Many of our guest come to the area to see the Canyon. I am concerned that they will be unable to find the trip of their choice. Helping guest arrange trips could be a nightmare. Checking to see if I have rooms available and checking to see if the river is open to their choice of trip. (Correspondent 1026)

Comment 600-56. Do you think big tour groups and cruise lines will rearrange their schedules because they happen to be scheduled on a non jet boat week?

Forest Service Response: The alternating weeks of exclusive motorized and non-motorized use in the wild section as proposed in DEIS preferred Alternative E was not carried forward into the FEIS preferred Alternative G. Alternative G provides for consistent access that will minimize scheduling impacts on commercial operators.

Comment 600-57. The very fact that you have segregated the permittees based upon the size of their operation is very prejudicial. In fact such legislation will render the smaller segment of your classification ineffective, and drive them out of business. (Correspondent 1017)

Comment 600-58. The system outlined in appendix G provides assurance that the three big outfitters will get bigger and the the small ones will never be viable or competitive. Such a result would be unfair to smaller outfitters. (Correspondent 1198)

Comment 600-59. You must make allowance for even the smaller outfitters to earn a living up there. (Correspondent 1041)

Comment 600-60. Do not be so restrictive on the number of commercial trips for small outfitters--you'll bankrupt them because they simply cannot survive without an adequate number of trips. Include them in the 12 trips/day. (Correspondent 1065)

Comment 600-61. Allow commercial boats enough trips to not discriminate against the smaller outfitters who will go bankrupt if they can't operate every week. (Correspondent 1089)

Comment 600-62. Under Alternative E it is obvious that three commercial float outfitters stand to reap a profit windfall, at the expense of all other float outfitters, powerboat outfitters and private river users. (Correspondent 1138)

Comment 600-63. By implementing your suggested alternatives the only commercial Outfitters and Guides that will operate on the river will be those with the high use rating thus eliminating the small businesses and creating a pricing index so that only the very rich will be able to enjoy something that is owned by all the people. Supply and demand will dictate higher prices and price the average person out of the possibility of a experience that should be enjoyed by all not just the elite. (Correspondent 1171)

Comment 600-64. Alternative E also seeks to severely restrict or totally eliminate our powerboat business from obtaining any launch dates and generate income during the control period. Any opportunity to utilize my powerboat permit during the alternate weeks of forced shutdown in my float business would be lost. Alternative E would leave me with no allocated launches throughout the entire summer and I would end up totally dependent on pool dates or "donations" from other outfitters in order to market trips. This would severely reduce my ability to sell trips and is a totally unacceptable situation for making any investments and long term decisions. Over time, as larger outfitters with allocated dates began to use more of their own launches and began drawing more heavily from the pool, my opportunities to obtain launches would diminish even further. (Correspondent 1190)

Forest Service Response: Under Preferred Alternative G, seven outfitters would have to rely on pool dates or trades with other outfitters to obtain commercial powerboat launches. These seven outfitters ran a total of 62 boats during the 1991 primary season, or about one boat every two days for all seven outfitters. Between pool dates, trades, and donations, numerous launching opportunities exist for smaller outfitters. However, it is recognized that obtaining specific dates during the primary season may be uncertain depending on the demand for pool dates. Alternative G provides for limitations on the number and frequency of pool dates any

one outfitter would be able to obtain to help ensure an equitable distribution of pool dates. The allocation system for commercial float trips under Alternative G would be similar to the one currently being used. See Appendix G for additional discussion of launch allocations.

Comment 600-65. The reduction of float opportunities of 50% would result in a huge loss of income to our business. Although we might see some increase in the average number of guests per trip and might be able to increase prices some, the overall effect would be disastrous, particularly since we, unlike some of the other float outfitters, have to rely exclusively on the Snake River. (Correspondent 1190)

Comment 600-66. As a private rafter, I'm not only out one-half of the summer, but unless I have a launch early in the rafters week, my trip will be severely shortened. I would rather share with all users than not go at all. Again, more economic loss to the communities. (Correspondent 2435)

Comment 600-67. The expectation of a motor free experience for our clients is worth a lot! Make no mistake, under this plan the Commercial Float operators take an especially hard economic hit in terms of a direct cutback in business opportunity. The effects are especially difficult for the medium and small sized float companies. (Correspondent 2329)

Forest Service Response: Commercial and private float operations would be particularly impacted by Alternative E since virtually all commercial launches and the vast majority of private launches are out of Hells Canyon Creek launch site at Hells Canyon Dam. Concerns of commercial and private floaters have been considered in developing Alternative G, the preferred alternative identified in the FEIS.

Comment 600-68. Alternative E would change my permit and restrict my area of operation from the OR/WA state line to Rush Creek. Although I do not currently operate a lot above that area, I have run trips further upriver and may wish to do so in the future, particularly if I should purchase a larger boat. If there are available launches in that section, I don't feel it fair to restrict me or others from running a trip and letting the opportunity to service the public sit idle. This also diminishes the value of my business by reducing the ability to generate income from some types of trips. (Correspondent 1190)

Comment 600-69. Alternative E is an interesting idea; however, for the majority of float and power boat outfitted trips, it is not economically realistic. Instituting on/off weeks will place economic hardships on the smaller Hells Canyon outfitters. It would be difficult to keep a guide crew and to amortized the costs of insurance, vehicle maintenance, advertising, and new equipment on a river where commercial opportunity is dramatically reduced. Eight of the 15 Hells Canyon float trip outfitters would need to make considerable adjustments to stay in business. For the larger Hells Canyon float boat operator, there would be some adjustments also. However, seven of these operators are licensed on the Lower Salmon. It would seem logical to me that under Alternative E most of the use these operator lose in Hells Canyon would be switched to the Lower Salmon or other nearby rivers in order to keep crews busy on a weekly basis. (Correspondent 2793)

Comment 600-70. Tables 3 and 4 of your DEIS say it best: Using the current river segments in which the best whitewater experience is found) Alternative E cuts commercial float revenues in half. It also cuts recreation expenditures in half, which would have a negative impact on all of the communities which depend on the tourist trade for a large portion of their income. 49% of recreators on commercial float trips would be displaced. How could commercial outfitters survive with half of their customers, unless they doubled their prices, which would make the river highly inaccessible to the general public and further reduce customers and profit? (Correspondent 2445)

Forest Service Response: Alternative E would change the availability and distribution of launch opportunities for both commercial and private powerboaters and floaters. Alternative G emphasizes shared use for

powerboats and floatboats. Having to rely on a pool launch date does increase the degree of uncertainty of obtaining a launch on a given date.

Comment 600-71. Another important effect of Alternative E is to eliminate the possibility of using jet back services in combination with the float trips. This has been a part of our operation for some time now and if it were not something our guests wanted, we would not be doing it. A look at the growth of this type service will confirm that it is in demand by both private and commercial float parties. In terms of both service and in cost to us for alternative transportation, our business and our clients will both suffer. (Correspondent 1190)

Comment 600-72. As the former owner of Hells Canyon Adventures, I am very distressed at Alternative E destroying everything I have put together. It will eliminate the float trip returns by jetboat. Your own records show that 30% of float trips return by jetboat. The only reason that HCA doesn't do more than that is a lack of daylight hours. If I as a private or commercial rafter don't like this practice, how come it is so popular? Rafter desiring a short trip will be denied access. This is economic loss to Halfway, Cambridge, HCNRA, and HCA payroll. (Correspondent 2435)

Forest Service Response: Alternative G in the FEIS allows jetbacks to Hells Canyon Creek within a commercial powerboat operator's daily allocation of launches for about 80 of the days during the primary season. Only 24 days of the entire primary season would not allow jetbacks (during the non-motorized periods in the wild section). Jetbacks and jetouts are also allowed in the scenic section providing it is within a commercial operator's daily allocation of launches.

Comment 600-73. By eliminating jet back opportunities, Alternative E will eliminate the one-day float business, probably the fastest growing and most demanded float service currently being sought by the public. (Correspondent 1190)

Forest Service Response: Alternative G would eliminate both one-day float permits at the Dam beginning in the 1995 season. Float permittees would be allowed to use a multi-day launch date for the purpose of a one-day float providing a jetback could be secured from a commercial powerboat operator's daily allocation of launches. It would be up to the permittee to decide which type of float trip provides the greatest economic returns, and to allocate launches accordingly. One-day floats would not be permitted during the three-day non-motorized period.

Comment 600-74. Alternative week usage would severely damage my shuttle business. (Correspondent 1782)

Forest Service Response: Commercial launch opportunities are available seven days a week under Alternative G as discussed in the FEIS. Since jetbacks would not be permitted during the three-day non-motorized portion of the week, Alternative G would potentially increase the demand for shuttle services.

Comment 600-75. This system of alternating weeks would dramatically affect my business, as well as that of all float boat operators. At the same time, it will allow us to offer the kind of experience that most of our river guests are seeking. (Correspondent 2328)

Comment 600-76. Members of our family were able to see the canyon only because of a commercial operator. They, and we, certainly cannot afford the equipment it takes to get into the canyon otherwise. (Correspondent 230)

Forest Service Response: Alternative G in the FEIS provides the opportunity for commercial and private float launching seven days a week during the primary season. The alternative also provides for a non-motorized

rafting experience along a portion of the wild section for three-days a week for eight weeks during the primary season. See Chapter II for a detailed description of Alternative G.

Comment 600-77. I think that whoever makes the move to close the river, that they should pay the people that are going to lose their jobs. (Correspondent 2009)

Comment 600-78. Also, the resale value of our property will definitely be negatively affected if any potential buyer realizes that he must compete with the random visitor for access. Who will compensate us for this loss? (Correspondent 2434)

Comment 600-79. To include us in the very limited number of boat permits would fail to recognize our investment and would be a violation of the trust we had in our access to the area when we invested our moneys. (Correspondent 2434)

Forest Service Response: The opportunity to engage in commercial river operations in the wild and scenic sections of the Snake River is a privilege and not a right.

Comment 600-80. As of July 1993, we have deposits from guests for 9 different launch dates in 1994 and I sure do not want to lose this revenue that we have been working so hard to build. Your preferred plan will basically bankrupt Peer's Snake River Rafting. (Correspondent 1162)

Forest Service Response: Implementation of the selected alternative would not occur until the 1995 season. See the FEIS description of Alternative G in Chapter II which proposes continued floating access.

Comment 600-81. Cougar Country Lodge was alarmed to be named in the proposal as one of the outfitters who would not be allowed to conduct drop camps on the Snake River because it has its own lodge. The company would stand to lose a lot of steelhead/sturgeon business should it be forced out of those sites. (Correspondent 972)

Forest Service Response: All drop camps would be eliminated during the primary season under preferred Alternative G in the FEIS. Drop camps would be allowed during the secondary season.

Comment 600-82. While I believe that this plan will result in a noticeable decrease in the potential opportunity of our business there, I think we will be compensated for it by the increased quality of experience we can offer the public, and by the added stability consistent resource management should bring to our business. (Correspondent 2324)

Forest Service Response: Thank you for your comment.

Comment 600-83. The bottom line is that small boat companies such as those in Riggins need to be able legally to put a boat a day in Hells Canyon everyday. Rest assured that in the real world they will not be able to put a boat a day in Hells Canyon but they need the right to in order to stay in business because that is the real-world requirement for small boat businesses in Riggins. (Correspondent 1020)

Comment 600-84. In order for Riggins to continue to serve the public, the Riggins outfitters must have use at Pittsburg Landing. We as commercial power boaters have met and decided what we must have on terms of use on the Snake River to continue operating: One boat per day per company during the proposed controlled season from Kirkwood to Hells Canyon Dam and no use limits from Kirkwood to Lewiston. Our

current use is unlimited and we all have bought and built our business with this in mind. The limits we would be accepting in this letter would allow the Riggins Outfitters to continue to meet the increasing demands of the public to see Hells Canyon from Pittsburg Landing. (This increased demand is proven as per the Forest Service use records published in the most recent "Wild and Scenic Snake River Management Plan" graph on page 111-21. (Correspondent 1023)

Comment 600-85. Riggins tourism not only needs but may go into a tailspin unless Alternative B is accepted. It seems to be able to accommodate all types of users with minimal impact on outfitters and private users of the river, but still places limits on growth. (Correspondent 1029)

Comment 600-86. It's a great loss for us and the other two outfitters, based out of Riggins, that we cannot use Pittsburg Landing. The small business will not be able to benefit. (Correspondent 1084)

Comment 600-87. Sam Whitten's River Adventures is important to the local economy in Riggins in terms of jobs, direct expenditures and secondary expenditures. It would be disturbing if guides and operators in smaller communities such as Riggins were being asked to disproportionately curtail their use of Hells Canyon to the benefit of larger operators out of other areas such as Lewiston. (Correspondent 2348)

Forest Service Response: During the 1991 primary season, 44 commercial powerboats were launched out of Pittsburg Landing by the four Riggins-based outfitters. Based on the 1991 primary season, preferred Alternative G in the FEIS has over 140 allocated launches for the four operators launching out of Pittsburg. See Chapter II for a full description of this alternative.

Economic Impacts are not Adequately Analyzed

Comments in this section focused on the belief that the type of analysis done for the DEIS was not adequate and that important information was not available. Examples are included below.

Comment 600-88. The DEIS acknowledges (at IV-74 to IV-75) that there is no current information available on the economic impacts to jet boat manufacturers, operator revenue, and expenditures per visitor, among other things, although the DEIS recognizes the substantial economic contribution such activities generate. When such important interests are at stake, the Forest Service should not simply speculate as to the economic impacts. Those impacts should be reliably determined before adopting such restrictive limits on use as proposed in Alternatives C, D, E and F. See Section II.D., supra (discussing failure to satisfy NEPA requirements). (Correspondent 1198)

Comment 600-89. As explained in Section III.E., infra, the Forest Service has inadequate information about the economic impacts of the alternatives it is proposing. Speculation regarding those impacts cannot substitute for a reasoned choice among river management alternatives, and would render such a choice arbitrary and capricious. Therefore, the unavailable information is "important, significant, and essential" to any choice of river management plan for the HCNRA.

Because it is faced with incomplete information essential to its EIS analysis of the proposed Snake River management plan, the Forest Service must make all reasonable efforts to obtain the information. There is no reason to believe that the incomplete information cannot be obtained without exorbitant expense, or that the means to obtain are unavailable. Unless the Forest Service can show that the overall cost of obtaining the information precludes conducting the research necessary to procure it, the Forest Service should do so and then supplement the EIS as discussed above. In the unlikely event the Forest Service demonstrates prohibitive cost or an inability to obtain the information, it should modify the DEIS to include the analysis required by 40 C.F.R. S 1502.22(b). (Correspondent 1198)

Comment 600-90. The DEIS does not adequately consider the economic impacts that would result from limits on boating (float and power) and, in particular, the preferred Alternative E. Boating is an important economic resource in a region that has had its natural resource dependent economy threatened. It is clear that the area surrounding the HCNRA is becoming more dependent on tourism, however, there are no up-to-date and thorough studies of just how important a role tourism plays in the economy. The estimates included in the DEIS are little more than guesses based on information that is sketchy at best. In particular, the DEIS acknowledges (pages IV-74 to IV-75) that there is no current information available on the economic impacts to jetboat manufactures, operator revenue, and expenditures per visitor, among other things. When such important interests are at stake, the Forest Service should not simply speculate as to the economic impacts. Those impacts should be reliably determined before the Forest Service adopts such restrictive limits on use as it has proposed in Alternative E. (Correspondent 2110)

Forest Service Response: The estimated effect of alternative implementation on jetboat manufacturers in the Lewiston/Clarkston and Boise areas is included in Chapter IV of this FEIS. With respect to operator revenue, the text in the DEIS referred to TOTAL (emphasis added) economic impacts, which include the direct, indirect, and induced effects of changes in operator revenue levels. Information is available on operator revenue and was incorporated in the economic impact analysis discussed in Chapter IV. This corresponds to an estimate of direct economic impacts. Examples of the potential magnitude of indirect and induced effects are discussed using regional and state-wide information. Information on recreation and travel-related expenditures for Oregon and Idaho was used in estimating expenditures associated with river recreation use. The intent of the text in the DEIS was to show that site-specific information pertaining to certain components of total Snake River recreation-related expenditures was not available. Information specific to the Snake River regarding commercial passenger boat trip expenditures and private boating expenses was incorporated into the economic analysis discussed in Chapter IV. Additionally, information obtained from research studies for both Idaho and Oregon relating to recreation and travel-related expenditures was used as an estimate of the remaining expenditure components. The text in the FEIS has been revised to clarify these points.

Comment 600-91. Pages 88 to 91. The max flex figures on these tables are unsound. Assuming there is some flexibility, the real world flexibility is far below that shown here. Of course, as you have recognized, the real economic impacts also go far beyond those displayed on the tables. The max flex figures for Alternative E on table IV-7 and 10 have no basis whatsoever. There is no way the more than 50% cut in launch opportunities can be fully mitigated by movement to other river segments or even other rivers. (Correspondent 1198)

Forest Service Response: The maximum flexibility (max flex) scenario is used to estimate use levels under the assumption that river operators and recreationists can and will find ways to continue to use the river rather than forego the opportunity all together. This approach (along with the no flex scenario) gives a reasonably accurate range of river use levels by alternative. To further refine this range would require knowledge about operator objectives, business ability and acumen, debt levels, and marketing ability. The figures for Alternative E are based on 1991 use levels and boat use levels specified by the respective alternatives. Analysis in the FEIS incorporates more conservative assumptions about the amount of displaced use which would relocate to different river segments, and/or use the river at a different time.

Comment 600-92. Too often environmental decisions are made based on traditional economic analysis which does not account for the future value of natural resources. Increased management costs on future restoration of damaged riverine ecology due to increased jetboat use on the Scenic section must be addressed. Comparing projected lost resource costs from damaging river use or resulting restoration costs to net benefits is necessary for a complete economic analysis. Current potential net benefits from providing a recreational resource must be compared to the current and projected net benefits of preservation. (Correspondent 2343)

Forest Service Response: The decision to undertake a "complete" economic analysis is subject to its own cost-benefit calculus. The comparison of the costs of obtaining information with the benefits of such informa-

tion helps provide a general context for determining the extent and magnitude of the economic analysis. Doing a holistic economic valuation study was determined to be too costly in terms of time and resources and of marginal benefit to the management decision process given that both the natural and social values of the river ecosystem have been a primary consideration in alternative development. Additionally, sec. 1502.23 in regulations for implementing the procedural provisions of the NEPA Act states, " For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations."

Comment 600-93. I assume that your preferred alternative is so heavily weighted to favor the continued jetboat monopolies on the river because you're concerned about the economic viability of existing jetboat companies. Is that the role of the Forest Service? (Correspondent 2481)

Comment 600-94. DEIS Section III-14 analyzes economic factors. These figures do not provide a clear illustration of the situation regarding jet boat use and manufacturing. There is no evidence whatsoever that continued jet boat manufacturing businesses depend on their potential clients' use of any or all of the SWSR. None of the laws of the Forest Service must abide by stipulates that any or part of the purpose of designating the SWSR and the NRA was to support commercial businesses. The DEIS does not demonstrate hardship based on social or economic harm. There is no evidence that mental depression, or impending economic hardship on the part of individuals due to their limited use of this river will occur. When analyzing economic impacts in terms of service businesses, there should be no effect based on whether people jet boat or float the SWSR. The revenues will essentially be the same, and will only be affected by how many people are allowed to use the river based on viable regulation, not how they travel therein. (Correspondent 1196)

Comment 600-95. The plan over emphasizes economic factors. Economic benefits for whom? I doubt that the protection of over developed commercial interests was the intent of the wild and scenic Rivers Act. The river was designated "Wild and Scenic". Not Disneyland. (Correspondent 2276)

Forest Service Response: An important objective in recommending a preferred alternative is that economic impacts are minimized given that natural resource management objectives (to protect and enhance the outstandingly remarkable values associated with the river corridor) are achieved. Both private and commercial jetboat use and private and commercial floatboat use, provide substantial income not only for permittees but for area towns and communities as well. It is the goal of the Forest Service to avoid the unnecessary reduction of this income given that natural resource management objectives are met.

Additional Costs Associated with the DEIS Alternatives

Many correspondents felt that the proposed plans in the DEIS would cost more for visitors wishing to see Hells Canyon. Included in this were comments about additional costs to the government (i.e. the taxpayer) to administer the plan.

Comment 600-96. Page II-53. It is unlikely that Alternatives C through F cost less to administer when they are more restrictive than Alternatives A and B. Additional restrictions invariably result in additional management burdens. (Correspondent 1198)

Forest Service Response: The re-allocation of boat use levels would be accomplished through the permit system for both private and commercial river users. No added expense will be necessary since all three major portals (Cache Creek, Pittsburg Landing, and Hells Canyon Creek) are currently staffed throughout the primary season. The reduced administrative expenses for Alternatives C through G are primarily the result of a reduction in Forest Service river patrols (personnel and boat expenses) because of changed river use levels.

Comment 600-97. If you cut back on the number of trips or days then the boaters will simply have to charge more to make up for the lost time. Higher fees will discourage some would be visitors. (Correspondent 2045)

Comment 600-98. This would increase the cost to individuals wishing to make the run up river. The economic impact of any decision this groups makes must thoroughly be researched before set rules are put in place. (Correspondent 1817)

Forest Service Response: Between 1985 and 1991, revenue per person for commercial powerboat operations increased 55%, which is about twice the rate of inflation for the same period. The rate of increase for commercial float revenues per person was 60% for the same period. Despite these price increases, commercial powerboat passengers increased 93% and commercial float passengers increased 27% from 1985 to 1991.

Comment 600-99. We are already flooded with government regulations --how much is all this costing???? (Correspondent 457)

Comment 600-100. More work for the Forest Service is not necessary. We need to cut spending. (Correspondent 641)

Comment 600-101. The HCNRA is understaffed and underfunded and yet the ID team choose an alternative that will require more staff and more funds. (Correspondent 650)

Comment 600-102. The Forest Service is ill-prepared to provide safety services to floaters that are already provided gratis by private and commercial powerboaters; Any enhancement of service by the Forest Service would result in operating budget increases. (Correspondent 880)

Comment 600-103. IOGA [Idaho Outfitters and Guides Association] has a continuing concern that the Forest Service recreation management structure will have the budget and human resources (monitoring, enforcement, education, patrols, etc.) to implement any management direction in HCNRA. The Forest Service ability is questionable, given the track record of the Forest Service in committing past operations and maintenance budget resource to Hells Canyon. (Correspondent 1185)

Comment 600-104. With Alternative E it appears that the cost of administering the river will only increase as there will be additional patrols involved in order to maintain the varied use. In this day of decreased budgets, we feel this is a cost we cannot well afford and that by having both users allowed to be on the river at the same time as is now the case is the least expensive solution as it will take less on the ground administration. (Correspondent 2364)

Comment 600-105. Administration of Alternative E would cost time, money and energy better spent on O&M, education, planning, and monitoring. (Correspondent 2501)

Comment 600-106. The DEIS shows the management costs of Alternative E as less than the current management costs. By imposing the complicated regulations of Alternative E management, enforcement and administration costs will be forced up! With todays budget cuts, cost must be a valid consideration. (Correspondent 2829)

Forest Service Response: The intent of Alternatives E and G is to focus management on the portals and minimize on-river management (i.e., such as campsite reservations). The re-allocation of boat use levels would be accomplished through the permit system for both private and commercial river users. No added expense would be necessary since all three major launch portals (Cache Creek, Pittsburg Landing, and Hells Canyon Creek) are currently staffed throughout the primary season. Consequently, existing staff is used to provide management direction prior to users going on the river.

Correspondents in Favor of Alternative B

Several comments were received expressing support of Alternative B, the proposed action. Examples follow.

Comment 600-107. B will have the most positive effect on the businesses in the Lewis-Clark Valley. (Correspondent 669)

Comment 600-108. Alternative B will not damage the growing tourist and jet boat manufacturing industries that our valleys is so dependent upon. (Correspondent 801)

Comment 600-109. I support Alternative B since this allows the river to be open to all and will not damage the tourist and jetboat industries, an economic factor that must be considered before any final decision is made. (Correspondent 922)

Comment 600-110. Alternative B is a compromise derived from the input of those who live with and for the river system day in and day out. Our lives and the lives of our communities are dependent upon a satisfactory compromise that allows mixed use of Hells Canyon for all interests. (Correspondent 1018)

Comment 600-111. Support Alternative B. Rafting and jetboat companies need this access to continue to help this town and surrounding community to survive and even flourish in these trying economic times. Tourism is our mainstay. (Correspondent 1019)

Comment 600-112. I am in total support of Alternative B. As the number of tourist rise in Idaho they are obviously here to see the beautiful canyons that Idaho has to offer. With several outfitters here in Riggins, they are able to provide this service to the tourist as they have for many years. During the boating months my trade is primarily tourists. Why put restrictions on recreation that you can't see and enjoy. (Correspondent 1021)

Comment 600-113. Alternative B. The whole economy of the Riggins area is now (since the mill burned in 1982) dependent upon recreation and tourism. With a lot of effort and foresight, our community pulled through and looked towards tourism and our natural resources - especially the Rivers to make a living and be able to raise our families in the small town we dearly love. In short-the more the public is denied use of our Rivers and other natural resources, the more likely our whole economy will suffer and/or die. (Correspondent 1022)

Comment 600-114. We have hunted, fished and taken pictures. I feel that not only have we been entertained but certainly have added thousands of dollars to the local economies. The only feasible method of transport for these trips is by jet boat. I support Alternative B. (Correspondent 1063)

Comment 600-115. Alternative B limits the amount of trips launched by both during the regulated season on the total number not on a weekly basis. I feel that Alternative B will accomplish the same goal of better management of the river without causing a financial hardship on the commercial operators.(Correspondent 1110)

Comment 600-116. Alternative B is acceptable to us. Boaters and floaters would have equal access to the canyon, the ecosystem of the canyon would be protected, and the financial hardships to the businesses using the river would be kept to a minimum. (Correspondent 1125)

Comment 600-117. We wish to go on record as supporting Alternative B. We would like to see commercial power boats continue to access the canyon and feel that any other alternatives would severely impact the local economy. (Correspondent 1140)

Forest Service Response: Thank you for your comments.

General Economic Comments

The comments in this section included general concerns or questions. Examples are listed below.

Comment 600-118. I find the arguments for economic viability of the commercial jet boats weak and unsupported. If they get preference you totally alter what makes the Snake River worth saving. (Correspondent 2602)

Comment 600-119. The economic value of maintaining the river corridor in as pristine, quiet, and natural a state as possible is in the best interest of not only recreationists but of the region as a whole. (Correspondent 2604)

Comment 600-120. The canyon will be far more profitable if a sense of wild beauty is maintained. Besides, jetboats are a very unimaginative approach to making money off a wild river. (Correspondent 2705)

Forest Service Response: Thank you for your comment.

Comment 600-121. Under the common pool and trading for launches, there is no way I can operate a business using the common pool, cannot book in advance, have to make long distance phone calls and wait till 9:00 AM when the USFS [Forest Service] office opens for permission to see if pool is open that day. Basically I will be put out of business for three and a half months. (Correspondent 1084)

Forest Service Response: The ability to operate an economically viable business which is dependent on pool dates will vary with each outfitter. Some outfitters may choose to sell their permits, others may choose to make more use of the secondary season, others may be able to rely on the pool dates without undue inconvenience. Commercial float permittees have been operating with a pool since the late 1970's. While short-term adjustment to reliance on pool dates may be difficult, experience with commercial float operations shows that, in general, pool dates are not inconsistent with the economic viability of the outfitter. Appendix G discusses how the pools would operate.

Comment 600-122. One of the best features of the current commercial launch calendar is the fact that it rotates launch day each week. Because of this, no one or two outfitters can tie up the most marketable days and weekends and leave the others stuck with days or the week that are hard to sell. Each business has built up their own marketing strategy and for each, some days sell better than others. Alternative E would create a system which is much less fair and create artificial marketing advantages for the bigger and older companies by giving them first choice of dates. (Correspondent 1190)

Forest Service Response: The commercial allocation scheme under Alternative G in the FEIS for commercial float operators would be similar to the one now currently in use.

Comment 600-123. Our brief review of the draft statement would appear to allow for limited commercial use of the river (Alternative E, Pages II-30 through 35), where one might assume those essential services could be provided. This alternative would allow for mail delivery provided that in each contract or assignment for commercial use some provision was made for mail delivery. The difficulty with limiting commercial traffic is that it could substantially increase the cost; therefore some provision should address this concern.

Forest Service Response: Preferred Alternative G allows for the continuation of mail delivery under the existing contract.

Comment 600-124. The impact of increasing populations and rapid growth of western Idaho, demands that we protect our quality of life. It is possible to both promote recreation and preserve our wild ecosystems. The preferred alternative does not do both. (Correspondent 2711)

Forest Service Response: Thank you for your comment.

Comment 600-125. As a professional rural economic development specialist, I believe that the best way to create long-term, sustainable employment and income opportunity is to protect an area's environmental values to the fullest extent possible and create unique niche markets around those values. And the more unique the scenic resource, the more it is in the area's best economic interest to manage the resource for broad ecosystem protection and low impact recreation. (Correspondent 2604)

Forest Service Response: Thank you for your comment.

Comment 600-126. We have already witnessed at least six float boat outfitters selling their businesses in Hells Canyon over the past decade (Bob Sevy, Joe Tonsmeire, Dave Mills, etc.) as a result of the negative impact caused by jet boats. If the situation continues I would certainly sell my business as well, leaving the public who seeks to commune with nature (rather than rudely speed past its wonders) without our services. (Correspondent 2328)

Forest Service Response: Thank you for your comment.

Safety Code 630

Comments 630-1. Given the clear directive of the NRA Act, the issue of public safety, and the danger inherent in jetboat use mixed with non-motorized use, site-specific regulations must be promulgated. (Correspondent 1196)

Forest Service Response: Draft regulations pursuant to Section 10 of the HCNRA Act are currently under consideration. It is anticipated these will be completed in July 1994. This EIS proposes additional direction to ensure recreation experiences compatible with the enabling legislation.

Comment 630-2. In placing restrictions on the Snake River for powerboats it is a very easy solution. The Snake River is already limited to 19 permits. Those commercial permits require Coast Guard licensing as well as numerous other criteria before an outfitter or guide may operate a watercraft upon it. For safety those same criteria could be implemented to the public and licenses to drive a car, motorcycle and any other motorized vehicle as well as a pilots license to fly any aircraft. Why not watercraft? This would be a limiting factor to use on the Snake River. Also the Snake River itself is a limit factor in that not just anyone nor everyone has the knowledge to run a powerboat for existing conditions upon the Snake River. (Correspondent 1171)

Comment 630-3. Boating safety is an issue better left to the experts -- in this case, the Coast Guard and the state regulatory bodies governing recreational boating. The Forest Service is ill-equipped to regulate boating safety. Indeed, Congress has entrusted issues of boating safety to the Coast Guard, see 14 U.S.C. S2

**Navigational Markers
Code 631**

A number of responders expressed concern for the safety of river users if the navigational markers were removed. Others do not feel the markers are appropriate in a wild and scenic river setting and/or are not critical to river navigation for people with the skills necessary to operate on the Snake River. Some representative samples of their comments are as follows:

Comment 631-1. In the preferred alternative, safety factors are ignored by the recommendation to remove navigational markers, yet safety is used as a catch-all concept to facilitate removal of the powerboating public. (Correspondent 932)

Comment 631-2. The removal of the navigational markers creates a more unsafe environment for new boaters. (Correspondent 970)

Comment 631-3. Alt E will not make the canyon safer for boaters by removing the navigational marker above Kirkwood as they are very helpful to all power boaters. (Correspondent 1112)

Comment 631-4. The removal of navigational markers creates a more unsafe environment for new boaters. (Correspondent 126)

Comment 631-5. Navigation markers are important for beginning boaters and elimination of them will cause an unnecessary safety hazard. (Correspondent 846)

Comment 631-6. How can the Forest Service even consider removal of navigational aids that have existed in one form or another for over 100 years? (Correspondent 925)

Comment 631-7. Removal of navigational markers is similar thinking to removing warning signs on highways. (Correspondent 936)

Comment 631-8. Safety issues make removal of navigation markers in the wild section a non-negotiable issue. (Correspondent 1049)

Comment 631-9. The navigation markers are a valuable tool for those that don't use the river enough to memorize the topography of the river bottom. Many times, with the reflection of the sun on the water in the early morning, the markers have been invaluable. (Correspondent 1172)

Comment 631-10 In the preferred alternative it appears that the team used excuses to further their personal goals. Safety is used as the reason to eliminate personal watercraft but is not given any consideration when the recommendation to remove the navigational markers is offered. The navigational markers are a historic and cultural resource and should be treated as such. They are a key safety element on the river and to remove them would be akin to removing the white line the middle of the highway. (Correspondent 1801)

Comment 631-11. As a safety factor, all navigational markers should be left intact at their present locations and maintained as such. With the fluctuation of water levels, this is a must. A person drowning because of an accident involving a new river user, primarily powerboat user, would be unforgivable. (Correspondent 2342)

Comment 631-12. Navigational Markers. The only problem this could possess is a safety problem for new river corridor users, primarily powerboat users. As the flow levels change, as they do continually in the river corridor, a new river is given to the river user as a challenge. New rocks show up, gravel bars suddenly appear and once quiet and mellow rapids can turn ugly and dangerous. For this reason, I would propose to leave

(regulation of safety of navigable waters), and the Department of Transportation, 46 U.S.C. SS 4301 et seq. (regulation of recreation boating safety). (Correspondent 1198)

Forest Service Response: The Crowell decision of April 1983 specifically prohibits the Forest Service from imposing equipment and experience standards for private powerboat operators. The United States Coast Guard and the states have regulations for those purposes.

Comment 630-4. Alternative E will not make the canyon safer, contrary to what the Forest Service seems to believe. For example, the removal of the navigational markers creates a more unsafe environment for new boaters. Does the Forest Service really believe that floaters will be safer during the non-motorized week? Many HCNRA floaters have commented over the years that they feel much safer floating when powerboats are nearby in case of emergencies. How does the Forest Service intend to remove floaters from the canyon in case of an accident? If safety is a consideration for the Forest Service, Alternative E will not be the final plan. If there truly are safety concerns, education is the answer. (Correspondent 2110)

Comment 630-5. Many HCNRA floaters have commented over the years that they feel much safer floating when powerboats are nearby in case of emergencies. (Correspondent 126)

Comment 630-6. Alternating weeks will create an unsafe environment for floaters. When someone is hurt seriously, a jet boat is invariably involved in transporting that person to help. (Correspondent 426)

Comment 630-7. When having rescued floaters from certain disaster several times I found they developed a new respect for the jet boaters. (Correspondent 636)

Comment 630-8. There are no demonstrated examples that floaters would be safer during the non-motorized week. There are many more examples of powerboaters providing life-saving services to floaters than there are of powerboaters injuring floaters. (Correspondent 880)

Comment 630-9. Alt E does not provide for safety. Powerboaters on the Snake River, has been a great safety factor to rescue floaters, lifejackets, gear, paddles and floaters lives. You won't be able to get life flight in or sheriff patrol in as fast. (Correspondent 1084)

Comment 630-10. I work as a white water rafting guide and countless are the times that my clients and myself have been rescued from the never ending calamities that occur on the river. Everything from being out of beer to being upside down. But I think the most important reason for the jet boats being on the river is the safety factor. When someone gets hurt, which happens frequently, those jet boats are their only way out. (Correspondent 1126)

Comment 630-11. Provisions should be made to allow emergency power boat use from the Kirkwood Ranch to the dam. (Correspondent 2829)

Forest Service Response: Alternative G in the FEIS provides for mixed use, with only a three-day period per week scheduled for non-motorized use. Floating during the three-day, non-motorized period would provide the greater risks and challenges associated with many backcountry rivers in the Pacific Northwest. Should individuals feel they do not want that type of experience, they can request float permits during the shared use time period. On many non-motorized rivers, demand for these backcountry primitive experiences is high, indicating many float groups prefer, or tolerate, the associated risks. Alternative G in the FEIS provides opportunities for both types of floaters.

the navigational markers as they are currently in the river corridor. All it takes is one mistake by a river novice and it could be a life. It is not worth it. (Correspondent 2342)

Comment 631-13. Navigation markers are an item that could be left in place in the current locations or removed. At an information meeting in Riggins, the consensus among the powerboaters was that they had no real use for them and that they must rely on their skills as an operator due to fluctuating water levels and the markers give them a false sense of security. (Correspondent 2364)

Comment 631-14. Navigation markers should remain in the river. If the markers are removed, a boater hits, is the Forest Service and Corp of Engineers willing to risk a lawsuit? (Correspondent 361)

Comment 631-15. It would also be nice if the channel markers could be dispensed with, as they are not in keeping with the natural setting. (Correspondent 1046)

Comment 631-16. It makes good sense to remove the navigation markers. They are not always correct and can lead powerboaters to a false sense of security. (Correspondent 426)

Comment 631-17. Navigation markers should be removed from this section of the wild river for the same reason that the metal shed above Pittsburg and the metal grain silos at Kirkwood would be removed. The DEIS has several paragraphs on page IV-34 detailing why these unsightly navigation markers are, if fact, not safe for motorized users, especially during periods of low water when they are needed most, and actually lead to "an increased incidence of boats colliding with submerged rocks." To enhance the intended primitive characteristics and remoteness and to promote safety for motorized users, the navigation markers should be removed from this section of the wild river. (Correspondent 2236)

Comment 631-18. The LAC recommended the removal of all navigational markers in the entire NRA. We support this because there is no good reason for them. Most power boat people say that they are of no use. If this is true, then why continue to have them? (Correspondent 2237)

Comment 631-19. Navigation markers should be removed between Kirkwood and Pittsburg. (Correspondent 2321)

Comment 631-20. I support removal of navigational markers throughout the Wild and Scenic Snake River. The markers are totally out of place on a backcountry river. (Correspondent 2324)

Comment 631-21. I support removal of navigational markers throughout the Wild and Scenic Snake. At the very least they should be removed from Johnson Bar to Pittsburg Landing within the Wild River section. The markers are totally out of place on a backcountry river. If powerboaters need these markers to navigate the river, they likely do not have the skill and experience necessary to safely use the Snake River. (Correspondent 2325)

Forest Service Response: The Forest Service would rely on the advice of the Corps of Engineers and the U. S. Coast Guard in determining the future status of the survey (navigational) markers. If these agencies give final approval, the markers would be removed from the wild river upstream from Kirkwood Historic Ranch. Due to the importance of Kirkwood Historic Ranch as a destination, the markers would remain in the wild river corridor downstream from the Ranch.

Removal would be consistent with providing for the intent of the Wild and Scenic Rivers Act in maintaining a "vestige of primitive America" in the wild river corridor and Forest Service ROS guidelines to provide for a high degree of challenge and risk in a wild river setting.

While the concept of survey markers may have significance when related to historic navigation of deep draft vessels, the existing markers are modern structures that have no historical significance and are a visual intrusion in a wild river landscape.

Markers would remain in the scenic river under FEIS Alternative G.

Comment 631-22. In response to the proposal to remove the channel markers, I cannot in my wildest dreams imagine the Forest Service eliminating a safety precaution just to pacify some special interest group. Those channel markers were put there for safe navigation of the river. Has the Forest Service considered the publicity a fatal accident may cause if the fault can be associated with the removal of the channel markers? (Correspondent 1787)

Forest Service Response: Traveling for an outdoor recreation experience on a wild and scenic river or in any backcountry setting requires the user to assume a certain degree of risk. The survey markers presently in place do not preclude the possibility of an accident occurring and require some basic knowledge in order to even use them for navigation purposes. In a comparable urban situation, accidents still occur at intersections with stop signs, sometimes with fatalities.

Traveling in a motorized or non-motorized vehicle in a specific setting requires the operator to possess a minimum level of skill and to exercise sound judgement in order to provide for an adequate margin of safety. These requirements increase as one travels into areas where a greater reliance on skill and judgement are necessary in order to maintain an adequate margin of safety.

There have been numerous accidents on the river in areas where navigation markers are located. Their original intent was to assist navigation of the river by deeper draft vessels, not today's modern jetboats which can travel in much shallower water. The river bottom is a dynamic environment and the river channel can change subtly or dramatically with little warning.

The area of the river upstream from Sheep Creek does not have navigation markers and is regularly traversed by powerboaters based on their level of skill, familiarity with river running, and a greater assumption of risk.

Removal of any channel markers would be fully coordinated with the Army Corps of Engineers and the Coast Guard.

Powerboat Safety Code 633

The following comments express concerns for the safety of river users who feel threatened by what they see as irresponsible powerboat operations, and offer suggestions for improving relationships between users.

Comment 633-1. Speed limits should be implemented for specific locations. When navigating identified, class II or larger rapids, jetboats should be allowed to use full power both up and downstream. Otherwise, a speed limit of 20 mph should be imposed as the maximum except at other identified times or areas, such as when passing float parties or beaches, wherein a 3 mph limit should be enforced. (Correspondent 1196)

Comment 633-2. This approach [on/off strategy proposed in Alternative E] provides each user group with a period that is exclusive for their use of the river and reduces safety hazards resulting from multiple types of craft using the same waterway at the same time. (Correspondent 2250)

Comment 633-3. Also the jetboats make it unsafe for the rafters. Twice I saw rafts swamped due to the waves left by speeding jetboats. (Correspondent 2414)

Comment 633-4. Someday there is bound to be a terrible accident involving a jetboat and a raft on the rough class 4 rapids. To prevent this restricting the jetboats from this area would be best. (Correspondent 2485)

Comment 633-5. I would like to see powerboat limits on the Kirkwood or Pittsburg to Cache Creek section as well from a safety standpoint. (Correspondent 2505)

Comment 633-6. On some days private jet traffic is a constant, rather than an occasion, with little, if any, regard for the float parties on the river and their safety. These operators (primarily private) zip between float boats, endangering kayakers and swimmers in the water and creating hazardous wakes. (Correspondent 2548)

Comment 633-7. Having rafted down the Snake River amid the wakes of speeding jetboats, I know first hand how out of control the motorized craft and their occupants are. (Correspondent 2643)

Comment 633-8. Floatboaters should not have to worry about jetboats running them over. (Correspondent 2696)

Comment 633-9. The obvious danger of floaters meeting jet boats in the midst of a large rapid. (Correspondent 2778)

Comment 633-10. While I was kayaking I personally had one very frightening encounter in the rapids with a jet boat whose passengers seemed more intent on getting a picture of me in the rapids than in allowing me the space I needed to safely make it through. (Correspondent 2778)

Comment 633-11. On two rapids we had jet boats trying to maneuver by us as close as ten feet. (Correspondent 2834)

Comment 633-12. We had a near mishap when a power boat came close to a "swimmer" off our raft. It was a reminder of how dangerous the power boats are. (Correspondent 2882)

Comment 633-13. We were almost run over once by jet boats when canoeing in another part of the Snake River and the waves created by those boats were amazing to us. (Correspondent 2894)

Comment 633-14. If any boater doesn't slow down for floaters they would be off the river for a week. The floaters would be responsible for telling the Forest Service the number of the boat. (Correspondent 418)

Comment 633-15. There should always be a 5 mile speed limit for motorized boats. (Correspondent 1771)

Comment 633-16. No downstream powerboat wake and minimal upstream wake past moored craft. (Correspondent 2382)

Comment 633-17. Rules of powerboat operation - wake management (no wake when passing moored craft going downstream and minimum wake when passing moored craft going upstream). (Correspondent 2383)

Comment 633-18. Jetboats should be restricted in speed if permitted at all in the river. (Correspondent 2688)

Comment 633-19. Establish a no wake zone. (Correspondent 2773)

Comment 633-20. Please consider the no-wake zone plan. (Correspondent 634)

Comment 633-21. Establish speed limits. (Correspondent 2791)

Comment 633-22. A maximum speed limit of 5 miles per hour - a limit used on all inland waterways in the United States that are narrow. (Correspondent 2882)

Forest Service Response: The FEIS addresses these concerns, in part, by focusing on safety and river etiquette in the river user education program in Appendix L. The program establishes no-wake zones at docks and portals, and addresses the proper way to approach other river users. There are some inherent risks in combining motorized and non-motorized use, especially at some of the more hazardous rapids on the river, and all users must adhere to acceptable social behavior to lessen the risk of accidents and in order not to detract from someone else's experience.

The Forest Service does not intend to propose establishing speed limits for the river. Powerboat operators need to be allowed to use whatever speed is necessary to safely navigate their craft through rapids. Through the user education program, the Forest Service is hopeful of creating a spirit of cooperation and tolerance that will eliminate most of the inappropriate behavior described in the above comments.

Campsites (Physical) Code 635

Many correspondents were concerned with existing physical attributes of campsites and the effects of their use. Examples include picnic tables, pit toilets and surrounding vegetation. Comments focused on keeping or removing campsite facilities, and on the effects of other human traces of camping.

Comment 635-1. The level of environmental degradation is not significantly affected by the level of seasonal use. Mr. Cole's studies of campsites on the Middle Fork of the Salmon river disclosed that the first few parties that camped on a site made most of the season's impact on that site. Further use had little effect. If seasonal caps are imposed, campsite impacts caused by continued use after the cap was reached would be insignificant in light of use that would have already taken place.

Uprooted vegetation and user built trails have not been significant factors in the past and are unlikely to become such in the future. A visitor education program will go far towards mitigating these types of impacts. (Correspondent 1198)

Forest Service Response: There would be a greater emphasis on visitor education in resolving impacts to campsites. However, there is some concern that the loss of beaches from upstream sediment entrapment behind Hells Canyon Dam and fluctuating water levels would continue to cause recreational use to encroach farther upslope from the shoreline. This is in response to an effort on the part of river recreationists to accommodate camping activity, avoid daily river fluctuation extremes, and avoid continual, unnaturally high river flows over short lengths of time during certain periods of the summer. This could have a cumulative effect of increasing soil compaction and damaging riparian vegetation, particularly hackberry trees.

The study on the Middle Fork should not be used to make a direct correlation to similar effects on the Snake River. Cole's study on the Middle Fork of the Salmon is on a river system where beach sediments are constantly replenished in the absence of upstream dams, water fluctuations occur naturally due to snowpack

runoff or summer storms and vegetation types are different. The Snake River shoreline is accessible year round, creating a much longer period of potential impact to individual sites. While available information is inconclusive, this issue would receive further study through on-site monitoring of campsites as noted in Appendix J.

Comment 635-2. Page II-6. The Forest Service should coordinate with the Coast Guard in requiring all commercial powerboats to have on-board toilets. Some craft presently in use will have problems installing these facilities, especially the small fishing boats. Some of the older tour boats could also have problems retrofitting. A better choice than requiring the toilets would be to encourage their installation and list the companies with those facilities on outfitter information. Competition will soon force their adoption by all tour companies. Facilities at developed sites, such as Cache Creek, Dug Bar, Pittsburg and Kirkwood, are spaced to meet the needs of one-day tours in lieu of on-board toilets. (Correspondent 1198)

Comment 635-3. 46 CFR Part 177.30-5 contains specific requirements for toilet facilities on certificated small passenger vessels. These regulations require portable or installed toilet facilities on all certificated small passenger vessels, except those operating on short runs of approximately 30 minutes or less.

It has been our policy not to require toilet facilities on certificated small passenger vessels operating on the Snake River. The pit toilets are currently available within 30 minutes of the vessels at any point along the route allowed by their Certificate of Inspection. We consider this adequate to meet the intent of the regulations. Phasing out the pit toilets would not change our policy. If toilets are available within 30 minutes running time, then a vessel would not be required to have either an MSD or portable toilet. If not available within 30 minutes, an MSD or portable toilet would be required. (Correspondent 2227)

Forest Service Response: The Coast Guard has standards for determining the need for onboard toilet facilities on commercial certificated vessels. Their determination considers the availability of onshore facilities, the distance between the facilities and the time it takes to travel between them when determining if onshore facilities are adequate to meet needs. Their past determination has been based on the ability of passengers to use pit toilets throughout the river corridor. When a carryout waste program is fully implemented, there would not be enough approved facilities evenly distributed throughout the river corridor to meet Coast Guard standards based upon how outfitters conduct the timing of their trips.

Aside from Coast Guard standards, commercial outfitters and the Forest Service have an additional responsibility on a Congressionally-designated wild and scenic river to take an active leadership role in carryout waste management to set an example for all private boaters. In order to fulfill this obligation, all Forest Service power and float patrol vessels would go to a solid human waste carryout during the summer of 1994. Commercial outfitters who have not already converted to a solid human waste carryout program would be required by the terms of their special use permit to convert by the beginning of the primary season in 1995.

The Forest Service should acknowledge the outfitters who provide this service on a continual basis as soon as they have taken the initiative to provide leadership in this program. This customer feature would be included in descriptions of outfitter services that the Forest Service provides to the general public as soon as an outfitter has implemented the program for their business.

There are a number of reasonably priced, portable units available on the market, which some floaters and powerboaters currently use, that can be set up temporarily on shore during a trip. This would not require retrofitting of older tour boats and would also accommodate the needs of an outfitter's guests when using small fishing boats on overnight trips. These units, in conjunction with off-site disposal facilities, approved facilities at administrative and developed recreation sites, and onboard facilities on larger tour boats would resolve the human waste issue for commercial vessels. The Forest Service would encourage outfitters to have onboard facilities installed at the time of construction for all new certificated commercial vessels and to retrofit older vessels as a practical method of addressing the requirement for human waste carryout.

Picnic Tables and Pit Toilets

There were a large number of comments regarding management of picnic tables and pit toilets. Comments ranged from leaving as is, to removal, to support for a solid human waste carryout system. Examples of these comments are included below.

Comment 635-4. The removal of toilets and picnic tables would be another slap in the face for seniors and the handicapped who depend on such facilities. (Correspondent 456)

Forest Service Response: The facilities in question are not designed to accommodate physically-challenged individuals, nor does the natural terrain where they must be located provide easy access to many of these facilities. Most newly constructed or planned facilities on the river at Hells Canyon Creek, Kirkwood, Pittsburg Landing, Dug Bar, and Cache Creek, will accommodate these recreationists and will meet standards required by the ADA. Physically-challenged individuals (and all river recreationists) traveling to river campsites would be better accommodated by bringing their own portable equipment with them to meet their specific, individual needs.

Comment 635-5. I believe that the picnic tables and toilets should be left, if removed, people will do a lot more damage to the terrain. (Correspondent 157)

Comment 635-6. Do not arbitrarily remove the picnic tables and pit toilets. This action may create a greater environmental hazard than that which it advocates curing. (Correspondent 880)

Comment 635-7. Leave the existing river markers, toilets and tables. Why make a river visit more risky or conditions unsanitary when it can be avoided? Even the floaters use the tables and toilets. It's a better solution than constructing a makeshift table from available materials. And why entice visitors to use the water or nearby river bank for a toilet? (Correspondent 1041)

Comment 635-8. I see no need to primitize the camping aspects along the river. Tables are very convenient to have and removing them will not make the campsites look like wilderness in any respect. Human waste will always be a problem in the river corridor and I feel the best way to manage the problem is to direct it. While carry out is the ideal option, reality dictates that unless toilets are available waste will be scattered everywhere and not disposed of properly. (Correspondent 2808)

Comment 635-9. Also we have not had complaints from our clients about the picnic tables or pit toilets detracting from the aesthetics of the canyon. I have found that campsites where the pit toilets have been removed are extremely ill-used and disgusting sites. (Correspondent 1060)

Comment 635-10. I am strongly opposed to the removal of the picnic tables in the Wild section of the river. I find them very useful and convenient. Sitting on a rock or in the dirt to eat my meals in no way adds to my recreational experience. It is not a wilderness river, please do not try to make it one. (Correspondent 1071)

Comment 635-11. Removing the picnic tables in the wild section is unnecessary. They are used by both floaters and powerboaters and they certainly do not detract from the primitive nature of the canyon. This river is a wild and scenic river not a wilderness river; don't try to make it one. Also, removing the pit toilets may be a good idea, but is premature until adequate disposal facilities and education are provided at all portals. You may create a greater environmental problem by such action. Go slowly, and don't act until you can manage the situation. (Correspondent 2110)

Comment 635-12. Leaving picnic tables will not adversely effect the ORV and are a welcome convenience for the user. If power boats are present from Kirkwood to the dam, removal of the outhouses and picnic tables will not be enough to create a semi-primitive experience. (Correspondent 2829)

Comment 635-13. Well organized floaters do not need picnic tables, but they are a decided convenience. They could remain in Alt C. Removal of pit toilets is desirable in most campsites. Collection facilities for solid human waste should be provided at takeouts. The Forest Service should look into prohibition of the use of plastic bags for human waste. These bags are a major problem in final disposal. (Correspondent 2826)

Comment 635-14. Pit toilets, picnic tables, navigational markers, and most other man made "improvements" should be removed above Kirkwood. (Correspondent 2843)

Comment 635-15. I support removal of picnic tables from the Wild River. They are convenient, but out of place. I prefer that the Forest Service use its limited budget to enforce clean camping rules rather than maintaining picnic tables. (Correspondent 2324)

Comment 635-16. Picnic Tables - Remove them from the entire river. They have no place in a backcountry setting. (Correspondent 2328)

Comment 635-17. We urge the Forest Service to get on with the requirement that all boaters carry out human waste and have a fire pan for the 1994 season. (Correspondent 2237)

Comment 635-18. In addition I would like to see requirements for firepans and portable toilets for all users yearlong. This would include powerboaters, floatboaters, horsepackers and drop camps. (Correspondent 2426)

Comment 635-19. The sooner we move to carryout of human waste the better. The key to its success depends on private industry's ability to produce and sell a product that meets user needs. (Correspondent 2311)

Comment 635-20. IRU [Idaho Rivers United] concurs with the Common Management Direction to phase out pit toilets as dispersed campsites in the wild and scenic sections. Composting or enclosed vault toilets could remain at Kirkwood Ranch, Dug Bar, Pittsburg Landing, and Cache Creek. Initiate a solid waste carryout program immediately. (Correspondent 2501)

Forest Service Response: Due to concerns over health and archaeological issues, removal of pit toilets in the entire river corridor under Alternative G would coincide with implementation of a human waste carryout program over a relatively short period of time. Intensive user education on carryout equipment, use, disposal, and availability of off-river facilities would begin in 1994 with implementation of human solid waste carryout and removal of pit toilets in the wild river scheduled to occur at the beginning of the primary season in 1995. Implementation would occur in the scenic river at the beginning of the primary season in 1996, coinciding with removal of pit toilets in that section of the river. Carryout waste technology and portable equipment, including privacy screening and off-site disposal facilities, have sufficiently advanced to where this program has become feasible to fully implement. A more detailed discussion on implementation of this program as it pertains to all river users is addressed in Chapters II and IV.

Picnic tables would be removed in the wild river corridor (except at Kirkwood and Sheep Creek Historic Ranches) in order to manage the dispersed recreation setting throughout the river corridor as a "vestige of primitive America." While picnic tables and toilet structures may seem like minor intrusions to some, the proliferation of non-historic, human structures produces a cumulative negative impact on the landscape and makes it difficult to manage the corridor within the intent of the law and guidelines. As historic sites with specific and detailed management objectives, Kirkwood and Sheep Creek would be managed to a less primitive level of recreation experience within the wild river corridor, allowing picnic tables and toilets to remain at these locations.

Administration Code 650

Many correspondents provided comments on the ease or difficulty of administering various components of the proposed river management alternatives. Examples of these comments are included below:

Comment 650-1. Alternative B is the logical choice. Any other selection would be confusing to users and seemingly impossible to administer. (Correspondent 1067)

Comment 650-2. With Alternative E you will have to hire more people to monitor the use, more personnel to keep track of who can and cannot be on the Snake River that day. (Correspondent 1084)

Comment 650-3. Alternatives C, D, E & F will be expensive to implement and operate and the most complex to manage. (Correspondent 610)

Comment 650-4. The HCNRA is understaffed and underfunded, yet the ID team chose an alternative that will require more staff and more funds. (Correspondent 932)

Comment 650-5. Alternative B should require the least administration and cost of all the alternatives reviewed and listed to date and should provide for flexibility in visiting these river amenities and adjacent airstrips. (Correspondent 1047)

Comment 650-6. Alternative E cuts the season in half above Pittsburg Landing for both powerboaters and floaters, a step that does not appear to be justified and would require an oppressive system of regulation and enforcement. (Correspondent 2219)

Comment 650-7. The economic analysis is inaccurate. We disagree with the estimates for the cost of alternative implementation found on Page II-53. If the agency spends \$463,900.00 to implement Alternative A (No-Action), then it is only logical that any alternatives calling for increased administrative and enforcement personnel, new facilities, implementation of a campsite reservation system, and a new and extensive program for collecting and monitoring data would certainly cost more than the No-Action alt. Apparently these costs are not accounted for in your analysis. We also feel that it is inconceivable that a 1% drop in cost is a reasonable estimate for Alternative E which would include all of the above items plus an extensive regulation system that would need to be carefully administered. We also feel that the economic impact to outfitters is not adequately addressed under Alternative E which calls for alternating weeks for motorized and non-motorized craft. (Correspondent 2224)

Forest Service Response: Each alternative has an associated cost and complexity in regard to administration including user education, agency coordination, law enforcement, and personnel. The least expensive or the easiest program to implement does not necessarily mean the best management of the resources or visitors. Launch reservation systems have been in place for many years for floaters on the Snake River and these systems can easily be converted to adapt to the needs of powerboaters. The cost estimates for implementing the various alternatives have been reviewed and revised as necessary with additional rationale provided. See Chapter IV for a discussion of costs associated with implementation of alternatives.

Timing of Implementation

Comment 650-8. Prime reservation time for my business is from January through April. If a decision can't be made on the DEIS proposals by early to mid-December, I feel that implementation of launch date changes should be delayed until 1995. (Correspondent 2324)

Comment 650-9. Implementation of the River Management Plan. Because of the lateness of the process and the lead time necessary for many users to plan their trips, it will be very difficult for many of these regulations to be implemented during the 1994. I support the delay of implementation until 1995. (Correspondent 2329)

Comment 650-10. The decision to implement by 1994 should be re-evaluated. (Correspondent 1198)

Forest Service Response: The Forest Supervisor, as the responsible official, will make the final decision on timing of implementation and will take these types of comments into consideration when determining action as addressed in the Record of Decision. There is a general concern that disruption of use should be kept to a minimum and that many private and commercial floaters and powerboaters have already planned their river vacations for 1994.

Launch Reservations

Comment 650-11. Permit application and boat display of permit should be the same for powerboats and floatboats. By requiring pre-registration with a \$10 fee for a lottery for floatboaters has effectively kept use below cap numbers while on the other hand, self issue permits on site at no cost resulted in a huge increase in powerboats. An effective ploy if you want to set the stage where powerboat use dominates --- so analysis can be done from a baseline of "existing". But to meet your key indicator of user fairness and equitability powerboaters should also have to contribute their \$10 to Uncle Sam for a chance to be included in a lottery that might allow them to use the river. (Correspondent 2345)

Comment 650-12. Currently, we have to apply for permits for the coming float season during December and into January and must plan several months ahead. I feel it only fair that a powerboat operator be responsible to do the same. (Correspondent 2364)

Forest Service Response: The lottery application fee is currently, and has never been higher than, \$6.00 per applicant. Any allocation system used to manage private and commercial powerboat launches would have the goal of being fair and equitable for powerboaters and compatible with the private and commercial floater system. It would initially be designed using the float launch system as a model. However, it may not operate exactly the same since its purpose would be to serve a different user group with somewhat different objectives and must be designed to meet the needs of the majority of powerboaters to be effective.

Comment 650-13. Require powerboats entering HCNRA from down river to check in at Cache Creek. (Correspondent 2501)

Forest Service Response: Private powerboats have been required to stop at Cache Creek to obtain self-issued permits year round since 1991. Under Alternative G, year round issuance of permits at Cache Creek would continue and there would also be an accountability system for commercial powerboats entering the river corridor at Cache Creek.

Comment 650-14. It is further stated in the plan that the desired effect is "a net attrition of permits and larger, more stable businesses operating on the river." It is also stated that one main goal of the plan is "consolidation of activities of outfitters for effective administration of permits." Is this to mean that the Forest Service is deliberately trying to alter the management plan in a way which could cause failure among the small operators so as to reduce their own workload? Alternative E will certainly produce those results if implemented and for this reason I am firmly opposed to it. (Correspondent 1190)

Forest Service Response: Appendix G has been revised to describe in detail how outfitter use would be managed and allocated under Alternative G. Under Alternative E, the desired outcome was a net reduction

in outfitter businesses over time through sales of businesses or, for outfitters with more than one special use permit, consolidation of all of their activities under a single permit. This would not only simplify Forest Service administration of these permits, but also simplify record keeping required by some outfitters that must be reported to the Forest Service each year. Alternative E would not cause business failures but would limit an outfitter's ability to expand future operations unless they could acquire additional opportunities through purchase of other businesses. One of the main objectives of any of the action alternatives is to provide for limits on powerboating. Powerboat businesses would no longer have a "blue sky" or "speculative" value because each business would have specific growth limitations as a result of their historic use.

Comment 650-15. Due to the variety of issues which are of mutual interest to our agencies, I would like to suggest that the Forest Service consider establishing a coordinating committee composed of representatives from Oregon and Idaho boating agencies, local law enforcement officials, Forest Service staff, and other agency personnel at more coordinated approach to education, safety, law enforcement, guides/outfitters, and other boating-related concerns would be beneficial to all parties. (Correspondent 2226)

Comment 650-16. The states of Oregon, Idaho and Washington have recently entered into a compact for boating law enforcement on boundary waters, including the Snake River in the NRA. Although the Management Plan does not address boating law enforcement, accident reporting, and search and rescue, we believe these items should be approached in a coordinated fashion. Implementation of the Management Plan should involve both states and their respective agencies and political subdivisions. (Correspondent 2226)

Forest Service Response: The Forest Service coordinates river activities with over 40 local, county, state and federal government agencies. Coordination of river management efforts will continue to be pursued whenever possible in order to provide better public service and resource protection.

Comment 650-17. Implementing a "no-risk" policy whereby only levels of use that can be governed and monitored under the FS's enforcement capabilities should be allowed. This means guaranteeing that jetboats do not harm natural resources or endanger other recreationists, or if they do they will be restrained. If enforcement capabilities are reduced due to budget constraints or other factors, use should be reduced to appropriate, manageable levels.

Forest Service Response: We agree that we must manage the river within the yearly constraints associated with annual budgets for the river program. Alternative G provides for a level of use and access that is manageable within the higher or lower variations of the present budget allocation. A great deal of monitoring can be accomplished through analysis of use levels since permit information will be available for all users. Staff at portals can monitor visitor perceptions and staff on the river can monitor effects at campsites. The monitoring program will be based upon the minimum level necessary to provide adequate information and which can be increased if additional funding is provided on a yearly basis.

There are management actions that can be taken to mitigate reductions in budget. If budget consequences would impact natural resource ORV's where there could irretrievable effects, then the Forest Supervisor has the authority to issue closure orders that could close all or sections of the river corridor for specific time periods. These would be determined on a case by case basis.

If budget constraints would effect management of the social component of the recreation ORV, this would not be considered an irretrievable effect, although it could reduce the quality of the experience on a short term basis. In this situation, the Area Ranger has authority to take steps to reduce or mitigate this effect. For instance, vacant launches could remain unfilled, the cross over for reservations between private and commercial use could be eliminated, first-come, first-served allocations could be eliminated or all commercial permits could have a portion of their use suspended as methods to reduce overall use in the corridor.

**Law Enforcement
Code 651**

Many people commented on the enforcement of regulations and the difficulty or ease of enforcing the various components of the river management proposals.

Comment 651-1. Conduct inspection of solid waste carry-out systems and firepans.

Forest Service Response: An education program designed to improve compliance with new requirements for protecting canyon resources is addressed in Appendix L. All boaters would be checked for adequate carryout waste equipment and firepans prior to issuance of permits during the primary season. During the secondary season this would also be the policy when portals are staffed. When portals are not staffed during the secondary season, the requirement would continue to be a condition of use on the self-issued permit and on-river inspections and enforcement of these regulations would be conducted by the River Ranger.

Comment 651-2. If a commercial or private party breaks the rules, don't play games with them. Jerk their permit, fine them and don't re-issue their permit to anyone. (Correspondent 1162)

Comment 651-3. If you establish regulations you must be prepared to enforce those regulations. (Correspondent 1787)

Comment 651-4. Never in my 20 or so float trips down Hells Canyon have I encountered any sort of enforcement activity by the Forest Service. I see no mention of it in this summary. Is it addressed in the draft? If not, many of your regulations will be ignored. (Correspondent 2826)

Comment 651-5. There is a need for administration that may not be included in the proposed Alt E such as OSP, US Forest Service, Idaho Fish and Game, and ODF&W. Are you just going to ignore these needs? (Correspondent 2391)

Comment 651-6. The clearer less complicated regulations of Alternative D will be more readily understood and obeyed; resulting in a reduced need for enforcement. (Correspondent 2829)

Comment 651-7. The Forest Service alternative limiting numbers, days, and seasons of river use, in addition to negating preservation and solitude values, would result in an administrative nightmare to enforce-- resulting in endless infractions and disputes. (Correspondent 2875)

Comment 651-8. There should be a requirement for display of readily visible identification numbers as is now required for floaters. Enforcement of rules depends on identification of jetboats being operated in an unsafe manner, or contrary to rules. Existing numbers as required by state laws are difficult to read. Readily visible numbers serve as low-cost enforcement. (Correspondent 1196)

Comment 651-9. Another proposed common management action is monitoring and proper registration of powerboats on the river, both private and commercial. We support proper registration and display of identification numbers on all motorized watercraft using the river. Accordingly, the Oregon Legislature recently enacted House Bill 2821. This law (copy enclosed) requires that outfitters and guides using motorboats to carry passengers on federal navigable waters possess a Coast Guard operator's license and display a decal on each boat indicating passenger carrying capacity. The required decal is issued annually, at no cost to the outfitter/guide, and is good for the calendar year. This is intended to more readily identify commercial boats and should assist NRA staff better monitor this use. (Correspondent 2226)

Comment 651-10. Require all craft to display large identification numbers a minimum of 18" high. (Correspondent 2382)

Forest Service Response: All boats should be readily identifiable. All river users must comply with existing Forest Service, state and federal regulations concerning boat identification. There is currently a method in place to identify every trip on the river. Under Alternative G, user education will provide information on how to identify and report other watercraft for law enforcement or emergency purposes. Enforcement of regulations is included in the discussion of user education in Appendix L.

Wilderness Code 700

Many comments were received concerning the similarity between wilderness objectives and the proposed management theme of the DEIS preferred Alternative E. The following comments are representative of the comments received.

Comment 700-1. Alternative E moves the river's recreation opportunity from primitive-motorized to a more wilderness like experience; this was not the intent of Congress. (Respondent 892)

Comment 700-2. The Forest Service's efforts to prohibit access to one of the groups on alternating weeks during the control period is inconsistent with Congressional intent. If Congressional intent was to manage this corridor as wilderness, it would have been so designated. (Respondent 970)

Comment 700-3. Congressional intent is negated by making the wild river a defacto wilderness and eliminating a use recognized by Congress as valid. (Respondent 126)

Comment 700-4. I cannot find any place that Congress made the river a wilderness area. (Respondent 62)

Comment 700-5. The intent of the NRA was not wilderness. Alternative E would create a mock wilderness. (Correspondent 426)

Comment 700-6. Removal of benches, pit toilets, the silo and the metal barn are clear indications of a move towards a wilderness type of management. (Correspondent 669)

Comment 700-7. Congress intentionally left a half mile wide non-wilderness corridor along the river. If congressional intent was to manage this corridor as wilderness, it would have been so designated. (Correspondent 1095)

Comment 700-8. Trying to create a more wilderness-type experience at the expense of legitimate use groups, floaters and powerboaters, is, in my opinion, a misdirected goal of the Forest Service. Congress enacted laws protection recreation and stating that "motorized and non-motorized craft are valid" uses of both the wild and scenic sections of the river. (Correspondent 1095)

Comment 700-9. Buildings, lookouts, ranches, museums, farm equipment and even the remains of the Indian culture here all cry out against a wilderness experience. This is not a wilderness and cannot be made so. (Correspondent 1782)

Comment 700-10. Congress did not designate the river corridor as wilderness, and there is no intent to have it managed as wilderness. It is a wild river, which designation doesn't prohibit use of motorized river craft or dictate a particular type of recreation experience. (Respondent 2220)

Forest Service Response: The Wild and Scenic Snake River designation is separate from wilderness designation, as is clearly stated in the enabling legislation and the Forest Plan. A primary objective in designing the various action alternatives was in providing a recreation experience compatible with the

protection and enhancement of the river's ORV's while striving to achieve the desired ROS characteristics in Chapter III. Many of the ROS settings can be managed to a primitive setting, similar to wilderness, while also providing for shared-use between motorized and non-motorized users as is noted in Chapter III and the preferred Alternative G.

Following are representative sample of comments from people who equate the "wild" in wild and scenic with the "wild" in wilderness. As the response following the comments points out, they are not synonymous.

Comment 700-11. I think jet boats take away from the potential wilderness experience possible on the deepest canyon in North America. There is no purpose (other than recreation) for jet boats. (Unlike the Main Salmon River where jet boats service working ranches and homesteaders.) (Correspondent 2740)

Comment 700-12. I hope that a management method will be implemented that will allow people like myself to have a quiet wilderness experience in a remarkable canyon. (Correspondent 2800)

Comment 700-13. Any restrictions at all should be limited from Rush Creek to Dam. That's the only true wilderness in Hell Canyon. (Correspondent 1719)

Comment 700-14. The only bad part of the trip was the intrusion of the power boats into an area that should be preserved as a wilderness area. (Correspondent 2809)

Comment 700-15. Return this general area to a natural pristine wilderness environment. (Correspondent 2510)

Comment 700-16. I was looking forward to a river wilderness experience. The white water was fun but there was really little that I would call a wilderness experience. There were jet boats throughout the entire length of the river. (Correspondent 2552)

Comment 700-17. This river needs to be available to those who hike and float the river. Jet boats and skis create a motorized atmosphere which is abusive of wilderness values. (Correspondent 2622)

Comment 700-18. The Snake River area from Hells Canyon dam to Heller Bar should be managed to maintain a pristine environment which can provide a wilderness experience for people from all across the US. (Correspondent 2831)

Comment 700-19. Please respect the rights of US citizens to enjoy our precious little remaining wilderness unspoiled. NO MORE NOISY, POLLUTING WATER TOYS ON HELLS CANYON! (Correspondent 2855)

Comment 700-20. My husband and I are lovers of wilderness. Jet boats are incompatible with wilderness. Please ban these vehicles from the wild stretch of the river. (Correspondent 2860)

Comment 700-21. I have been shocked to learn that the U. S. Forest Service now allows jet boats in the Wilderness Section of the Snake River. How can one have a wilderness experience with such a noisy non-wilderness type of intrusion? Please keep the wilderness on the Snake River quiet and free of motors. (Correspondent 2876)

Comment 700-22. Jet boat noise and wave action are intrusive. If something isn't done to improve the situation, it would be difficult to recommend Hells Canyon to friends looking for a wilderness experience. (Correspondent 2882)

Comment 700-23. I confined my visit in 1988 to land, exploring a bit of the Hells Canyon Wilderness. My interest in travelling the river itself was dampened considerably by what I had heard about powerboat impacts.

In terms of a wilderness experience it sounded like a write off so I moved on to explore other, less impacted places. I wonder how many other potential visitors to the area never go there for the same reason. (Correspondent 2890)

Comment 700-24. We remember the jet boats and the power boats on the river and how out of character with a wilderness experience it was to see these powerboats racing up and down the river. (Correspondent 2893)

Comment 700-25. Powerboat use in Hells Canyon below Hells Canyon Dam and above Big Bar is an unbelievable intrusion on wilderness values. (Correspondent 8271)

Forest Service Response: Congress did not designate the river corridor as wilderness; it is designated wild and scenic under the Wild and Scenic Rivers Act. The alternatives proposed in the DEIS and the FEIS preferred Alternative G propose management scenarios that are within the intent of the Wild and Scenic Rivers Act to manage the river corridor to protect and enhance the ORV's identified in Chapter I. The area can be managed to provide a primitive setting, similar to wilderness, while providing for shared-use between motorized and non-motorized users as is noted in Chapter III and the preferred Alternative G.

Comment 700-26. Jetboat impacts to those seeking a primitive Hells Canyon experience should have been limited to what existed at the time the Hells Canyon Wilderness area was dedicated in 1975. The wilderness experience therein should not have been further infringed upon by unforeseen, unrestricted increases in jetboat use after it was dedicated. (Correspondent 1196)

Forest Service Response: When Congress enacted legislation to create the Hells Canyon Wilderness, it excluded the corridor, thereby making it clear that wilderness regulations are not intended to be applied. Therefore, powerboat use on the river is not prohibited under the Wilderness Act. Through the HCNRA Act, Congress stated that both motorized and non-motorized use were valid uses.

Comment 700-27. Contrary to the statement on this page, (III-2), the Wild and Scenic Snake River does not border designated wilderness on both sides along portions of its shoreline. Page IV-19. The statement in the fifth paragraph is incorrect. No part of the river frontage adjoins designated wilderness boundaries. (Correspondent 1198)

Forest Service Response: You are right. Both of the referenced paragraphs have been corrected to indicate the wilderness boundaries are adjacent to the corridor boundary and not the "shoreline" or "river frontage."

Comment 700-28 . Pg. I-13. The effects of sounds from the non-wilderness river corridor on wilderness users is irrelevant to the DEIS. There are no wilderness buffers. (Correspondent 1198)

Comment 700-29. We feel there should be no jet boat or jet ski use at any time in the stretch of the river bordered by the Hells Canyon wilderness area. Wilderness is designated by law as being free from the impact of man. This cannot be so in a canyon where the noise of jet boats reverberates from the river below. (Correspondent 2845)

Forest Service Response: The river corridor is managed to meet the guidelines of the Wild and Scenic Rivers Act, not the Wilderness Act. Chapter IV provides information concerning noise in Wilderness from river uses under potential conflicts with plans and policies of other jurisdictions. Additional information can be found in Appendix C. While no buffers from adjacent lands are provided by the Wilderness Act, there are no restrictions on monitoring of noise levels from these adjacent lands in order to identify potential sources of use conflict. Appropriate mitigation of any identified conflict could be as simple as addressing the need for better user education of wilderness users traveling near the boundary to expect sound produced from sources outside the designated wilderness.

Comment 700-30. S1 allows for a non-motorized Snake River in the upper 27 miles. This provides a wilderness experience for backpackers like myself who enjoy a more peaceful setting in which to hike. (Correspondent 2514)

Forest Service Response: Guidelines for managing wilderness values do not apply to the river corridor. Noise from the river corridor which affects users in designated wilderness is permissible based upon the no buffers provision of the Wilderness Act. Under Alternative G, a non-motorized period would provide hikers with a better opportunity for solitude within the wilderness in areas bordering the area of the river between Wild Sheep Rapid and Kirkwood on the days the non-motorized period was in effect. Trail users within the river corridor would be provided with a similar backcountry experience as floaters during this time period.

Miscellaneous Code 999

Comment 999-1. The engines of the boats should be required to run on unleaded gasoline and meet California emission standards for automobiles. After all don't the rafters have to carry their ashes and trash out of the canyon? (Correspondent 1163)

Forest Service Response: The United States Coast Guard is responsible for the establishment of standards for powerboats.

All river users are required to use firepans and to pack out all ashes, charcoal, litter, and garbage. Whatever is packed in must be packed out.

Comment 999-2. Backcountry, primitiveness, and remoteness are subjective and inexact terms at best and were not even defined in the DEIS glossary, despite the critical nature of those definitions. The terms should not be part of the Forest Service planning goals unless they are better defined. (Correspondent 1198)

Forest Service Response: In the FEIS the introduction to Chapter III describes the settings for recreational opportunities to be provided in the Wild and Scenic Snake River corridor.

Comment 999-3. Page II-9. The DEIS does not explain how the monitoring for wild and scenic rivers and recreation setting will be accomplished. Few of the key indicators listed in Chapter I were measurable and the description of the monitoring program is equally vague and subjective. To develop realistic annual costs, the Forest Service must have had some specific methods of measurement in mind. (Correspondent 1198)

Forest Service Response: The monitoring plan, Appendix J, reflects a more specific method of monitoring than was developed in the DEIS.

Comment 999-4. All users of the river that take parties up or down should be licensed. (Correspondent 2080)

Forest Service Response:

Both motorized and non-motorized commercial operators must be licensed by both the states of Oregon and Idaho. Commercial powerboat operators must also be licensed by the United States Coast Guard.

Comment 999-5. We particularly resent the restrictions on the use of ATV's on Forest Service roads. At our age we can no longer hike long distances with a pack on our back. We could enjoy large areas with our ATVs

if the roads were not closed to their use. They have far less impact on the land and they don't chew on trees when parked. We only drive on existing roads and trails and from our horse packing days we know that they have far less impact on the land than a horse. (Correspondent 2335)

Forest Service Response: ATV's are not restricted from traveling on roads in to the portals providing they meet state and federal vehicle requirements. The restriction of motorized use in the corridor is to protect and enhance ORV's and to move management of the river toward desired future conditions.

Comment 999-6. No discharge of firearms allowed in river corridor during regulated season. (Correspondent 2382)

Forest Service Response: The discharging of firearms in the corridor must be in compliance with 36 CFR 261.10(d) as addressed in Appendix F-13, Item 62.

Comment 999-7. Concessionaires is an issue raised, but not included in the detailed analysis. The issue is dismissed by referring to its inclusion in Forest Service Manual 2700 and Forest Service Handbook 2709.11. Upon reviewing both these references, we see no justification for excluding this issue in either the detailed analysis or the EIS. In addition to being an issue of National significance, concessionaires have a major impact on the Outstanding Remarkable Values which caused Congress to designate the river as wild and scenic. It is the NORS opinion that this issue should not be excluded from the Final Plan. (Correspondent 2677)

Forest Service Response: This issue is outside the scope of the purpose and need for action. All management activity proposed in the action alternatives is designed to achieve the protection and enhancement of the ORV's described in Chapter III.

Safe Fuelling of Powerboats at Launch Ramps

Comment 999-8 . Some provision needs to be made for safe and environmentally sound fueling at Pittsburg and Hells Canyon Creek. This is especially vital for the outfitters who base their operations there. (Correspondent 1198)

Forest Service Response: This needs to occur for visitor safety, protection of the resources and in particular, as a mitigation measure to address anadromous fisheries.

There are currently a variety of products available on the open market that are specifically designed for managing fuel near a water environment. Some of these materials will pick up petroleum products from the surface of the water but will not absorb water. Others are designed to prevent spills from occurring while fueling.

All boaters fueling at boat ramps or carrying extra fuel with them in their boats for fueling while on the river will be required to carry and use this equipment. This will include all powerboats operated by commercial outfitters, permittees, private powerboaters, and state and federal agencies that operate on the Snake River. This effort will be coordinated through the state licensing agencies, the Coast Guard, other federal and state agencies, and the powerboat associations. The schedule for this requirement would involve education of boaters in 1994 and full implementation in 1995.

Outfitters who operate from Pittsburg Landing or Hells Canyon Creek would have specific requirements and/or locations approved for fueling at the portals which will be included as a condition of their special use permit.

The outfitter operations at Copper Creek and Sheep Creek would be required to meet specific guidelines for transporting, fueling, and storing petroleum products at these locations that would be included as a condition of their use permits.

Additional Certification for Float Guides

Comment 999-9. Another idea I would support is increased policing and enforcement of existing navigation policies or increased certification requirements for commercial users (commercial powerboat captains must pass Coast Guard licensing, are commercial rafters also required to do this?). (Correspondent 761)

Forest Service Response: Commercial float guides must be licensed by IOGLB and take a minimum of three certification trips on the Snake River without passengers to qualify for licensing. However, you raise an important question because the certification is only required because of the class of rapids on the river, not because they are required to learn how to navigate a river where they must interact with motorized vessels.

Your comment was carried forward into the analysis. As a result, under Alternative G, the Forest Service would attempt to resolve this issue by working through the memorandum of understanding between the Forest Service and the IOGLB to implement certification standards for guides on the Snake River that include a working knowledge of rules of the road in effect on a river which has both non-motorized and motorized use. It may also be possible to work through the IOGA to incorporate this element of river guide education into the curriculum of the Professional Guide Institute. This is a positive step in resolving user conflict and would provide for customer safety. This type of certification would also be helpful for float guides who worked on other rivers where motorized uses are allowed.

Need for Continuing Research

The following four comments are from people with concerns about whether there is a need for further research prior to making decisions regarding management of the corridor.

Comment 999-10. Research the effect of jet boats on river system. (Correspondent 1613)

Comment 999-11. Shouldn't we do studies to determine if the jet boats, jet skis, and RV campers are causing damage before we allow them to continue? Correspondent 1619)

Comment 999-12. Require research to determine the effects of jet boats on the river ecosystem. (Correspondent 2789)

Comment 999-13. Commission research to determine the impacts of jet boat and other usages upon the river and develop realistic plans to repair or prevent any damage. Determine the general health of the river and endeavor to return to the state in which it was 200 years ago. Listen to seriously consider, and present to the public the views of environmentalists and concerned citizens who are probably the most aware of potential dangers and damage to the river. (Correspondent 2842)

Forest Service Response: Research is ongoing in Alaska and on the Rogue River as noted in Chapter IV. Should research indicate adverse effects on fisheries, habitat, or ecosystems, use levels would be adjusted accordingly as part of the annual monitoring and evaluation process. A study was conducted in 1993 to determine the effects of boat wakes on beaches (reference Appendix E for further discussion).

Accuracy of the Narrative Content of the DEIS

Comment 999-14. Page III-13. The historical perspective of settlement and the role of boating presented here is inadequate. (Correspondent 1198)

Comment 999-15. The limits on float use came into play years before implementation of the CMP, which came with the Crowell decision in 1983, not 1982. The limits were imposed only on the upper 16.3 miles of river from Hells Canyon Dam through Rush Creek Rapid, not the entire wild river. (Correspondent 1198)

Comment 999-16. The sentence under LAUNCH RESERVATIONS appears to have some problems. It apparently should read "launch reservations would be required for float and powerboat trips in the wild river only." (Correspondent 1198)

Forest Service Response: Thank you for your comment. These items have been revised in the FEIS.

Comment 999-17. Page III-3. We would question accuracy of the statement, "the quality of whitewater floating in the canyon surpasses all other similar experiences in the Pacific Northwest". The Middle Fork Salmon, Selway and Main Salmon Rivers all have more class IV rapids and many would rank them as the premier floating rivers in the Nation. (Correspondent 1198)

Forest Service Response: The sentence following this statement in the paragraph is important because it bases this fact on the water volume of the Snake River compared to other rivers in the Northwest. There is no larger, constant volume whitewater river with major rapids in the Northwest. The constant volume of water provides a continual opportunity for a float experience for a lengthy period of time over the course of a year. The volume of water creates a wide river channel which enhances the visual dimensions and adds to the vastness of the surrounding river canyon from the perspective of a floater.

Most of the rivers you mention do not have a long season and are dependent on snowpack to maintain the quality of the float experience which is greatly diminished in years of drought, causing a reduction in the season, or making river running more difficult because of insufficient flow. Many people would rank these rivers as "premier" based upon the fact that they require more technical proficiency or are wilderness rivers, two of which are non-motorized and one which has very limited motorized access.

University of Idaho Visitor Profile and Recreation Use Study

Comment 999-18. The University of Idaho study of river visitors found that 68 percent ranked their trip as among the best they had ever had. I do not understand why use must be reduced and all growth curtailed. (Correspondent 2219)

Comment 999-19. The University of Idaho study of the river visitors found that 68% ranked their trip as among the best they had ever had; only 1% ranked it among the worst. Something must be "going right" in Hells Canyon at present use growth levels. We do not understand why use must be reduced and all growth curtailed. (Correspondent 2220)

Forest Service Response: The information gathered for the visitor study conducted by the University of Idaho that is relevant to the primary summer season was gathered during the summer of 1988. Total river use has continued to increase since that time as a result of the growing popularity of river recreation nationwide.

The Forest Service is required under the guidelines of Wild and Scenic Rivers Act to protect and enhance the values which caused the river to be designated. These ORV's were not identified in the legislation which

set aside the area. In order to manage the ORV's, they first had to be identified. This was done by the ID planning team and included in the DEIS for public comment. One of the ORV's identified was river recreation. Use associated with protecting and enhancing the recreation ORV must be balanced with managing for protection and enhancement of all of the identified ORV's. Some of these other ORV's can be directly affected by impacts associated with recreational use. This information was not available during the University of Idaho study or during the LAC planning process. A complete description of the river's ORV's is found in Chapter III.

Our goal is developing Alternative G was to arrive at a level of management that will assure that the majority of future river users continue to consider their trip on the Snake River as among one of the best. This would not be likely to happen if recreational use on the river continues with the potential for unlimited growth that may affect all ORV's.

Comment 999-20. We call your attention to your "Visitor Use Study" regarding why visitors visit the Wild and Scenic Snake River and they responded as follows: 97% to view the scenery ; 89% to be close to nature; 71% to find some solitude; and 86% to enjoy peace and quiet. These attributes fit into the desires of most of our members as they provide for year-round non-motorized recreational experiences, especially within the wild section of the Snake River. (Correspondent 2844)

Forest Service Response: The percentages listed were developed from a survey that involved both floaters and powerboaters and represent the combined desires of both user groups. Alternative G provides a variety of recreation experience opportunities to meet the diverse recreational needs of all users in all sections of the Wild and Scenic River corridor.

Outside the Scope of the EIS

The following comments are outside the scope of the purpose and need for action of this EIS. They will be addressed under the HCNRA CMP planning process.

Comment 999-21. I am concerned about the Pine Creek which is a tributary to the Snake River. We do not want its uses frozen or the fishing halted in Pine Creek. Or mining restricted or harvesting of timber halted. (Correspondent 2285)

Comment 999-22. I hope this new EIS in no way will overflow into the area outside the Wild and Scenic Snake River corridor. I would hate to see this have any effect on the activities like timber harvest, grazing, hunting and any other recreational activity in other areas in the HCNRA. (Correspondent 2470)

Comment 999-23. I favor timber harvest only if it improves the aesthetic and natural character of the canyon (as it may be necessary to re-establish a natural underburn-type forest). (Correspondent 2472)

Comment 999-24. No logging of old-growth within the area. (Correspondent 2477)

Comment 999-25. We also favor leaving farming and ranching as it is, perhaps discouraging any further expansion or development along the river. (Correspondent 2499)

Comment 999-26. Logging of the "stringers" that form the most productive plant and wildlife habitat in the canyon should be completely stopped. (Correspondent 2654)

Comment 999-27. And what a tragedy to see you building new timber access roads and encouraging logging and huge developments within the boundaries. (Correspondent 2692)

Comment 999-28. Logging too has no place in the recreation area, even salvage. I read they are messing up the sparse forest along the road into Pittsburg Landing. What a desecration! That's the Forest Service for you. Last spring I was disappointed when I learned that I could have short-cutted through the recreation area on a new paved road, complete with camp grounds. But perhaps I would have been disappointed, under the present management. (Correspondent 2745)

Comment 999-29. No clear cutting of the canyon's timber be allowed, and all other timber harvest be phased out within five years. (Correspondent 2844)

Comment 999-30. Cut logging completely. (Correspondent 2866)

Forest Service Response: These are examples of issues that will be reviewed in the adjustment to the HCNRA CMP.

Access to Kirkwood

Comment 999-31. If access to the Historic Ranch at Kirkwood is the rationale for the use of powerboats in this stretch, it is an arbitrary one. The public demand for access to the museum at Kirkwood could just as easily be met by overland 4-wheel driver tours from Lucile to Kirkwood (it need not require the opening of this access road to the general public). There are certainly plenty of 1-day tour operators in the Grangeville to Riggins area who could easily provide such a service. Preference for powerboat access during the "motorless" week when none is given for floatboat access during the "motor" week is not justifiable. Floatboat users, both commercial and private are being asked to give up significant use opportunities in exchange for a motorless experience. Judicial compensation should dictate the extension of that experience throughout the entirety of the wild section. (While I personally oppose it, I can see the possibility of mitigating HC Adventures' business opportunity losses under Plan E, by granting them a permit from Pittsburg to Kirkwood Museum on a 2-trips/day - 1 morning and 1 afternoon - basis during the "motorless" weeks. This, in addition to the overland tours should certainly more than meet the demand.) (Correspondent 2324)

Forest Service Response: Outfitted four-wheel drive tours using the Kirkwood Road are outside the scope of and purpose and need for action for this EIS.

In Alternative G, river access for Hells Canyon Adventures has been mitigated by allowing the business a maximum of two trips per day to the top of Wild Sheep Rapid during non-motorized periods. These motorless periods would be available on Monday through Wednesday in July and August between Wild Sheep Rapid and Kirkwood Historic Ranch. During the remainder of the primary season they would be allocated a maximum of one trip per day from the Dam to Pittsburg Landing and one trip per day from the Dam to the top of Wild Sheep. They could also obtain up to a maximum of two additional launches by trade or from the common pool for trips between the Dam and the top of Wild Sheep only.

Upriver powerboat traffic would continue to have access to Kirkwood during the non-motorized periods.

Private and commercial float access will remain the same with the exception of the reduction in party size to 24, maximum boats per party limited to eight and non-renewal of the two one-day commercial float permits.

Management of the Idaho Power Company Dam

Comment 999-32. It appears this problem lies mostly with Idaho Power and I feel that they should be held more responsible for the flows from the dam and should be held accountable and work more closely with the Forest Service in what the flows are going to be and have been. (Correspondent 2364)

Comment 999-33. The W&S Snake River EIS should address the environmental impacts of the effects of dam releases on downstream resources. (Correspondent 2520)

Comment 999-34. Your DEIS makes no mention of the Hells Canyon Dam. Extreme high water erosion has washed away historic Indian relics at Camp Creek. The cut bank has exposed ancient houses in cross section. These ruins are from 5,000 to 7,000 years old. Several village sites are being destroyed along the river. Evidence shows the problem is created by dam-caused flooding. During spring run-off huge volumes of water is released from the dam. This high water is washing away the sites. The dam also filters out sediment from up-river that would otherwise be deposited along the banks. By comparing Snake River beaches with those photographs taken a decade ago, it is evident that erosion has been severe. The number and size of campsites has also been reduced. If we are to preserve threatened species in Oregon and Idaho, certainly every effort should be made to protect and preserve this wild, beautiful, scenic area. Therefore, I feel that the Idaho Power Company license should not be renewed and the dam phased out and removed. Since this area was designated "wild" under the Scenic Rivers Act, one would believe the intent was to treat this area as any other wilderness area. (Correspondent 2534)

Comment 999-35. On my first float trip, the beaches were beautiful and plentiful. Now through continued erosion, in large part due to irresponsible dam management, those once-inviting beaches are disappearing. The DEIS does not address the erosion of bars due to dams upstream. (Correspondent 2548)

Comment 999-36. The beaches back then, in 1979, were beautiful with white sand, enough room to play volleyball at five or six locations above Pittsburg Landing. Each year there is less sand at the beaches that still have any, leaving only two beaches to play volleyball. (Correspondent 2687)

Forest Service Response: Concerns about the management of the dam are outside the scope of the purpose and need for this EIS, pursuant to Section 6 of the HCNRA Act.

Comment 999-37. For the next decade, the Company [Idaho Power] will be undertaking a series of environmental studies and monitoring activities below Hells Canyon Dam, aimed at gathering information needed for future operations and relicensing efforts regarding the Hells Canyon Complex. The Company's research efforts frequently require powerboat use. Restriction in the DEIS Alternative E will decrease the actual time available to undertake many of the necessary studies in a timely manner. (Correspondent 1170)

Forest Service Response: The Forest Service intends to fully cooperate in providing access for cooperative research needs in Hells Canyon. The Area Ranger has authority to allow additional access for administrative purposes based on prior approval and a demonstrated need. During the non-motorized periods in July and August in Alternative G, administrative access to the non-motorized section of the river would be accomplished with non-motorized equipment or that timing of access would be adjusted to allow motorized use. Motorized use would only be allowed into the non-motorized section of the river during a float-only period based upon compelling circumstances and would require prior notification to users as a courtesy if time allowed.

Comment 999-38. Below Hells Canyon Dam the floaters need better access to the river and we all need more parking. (Correspondent 157)

Forest Service Response: The launch, parking, and visitor information facilities below the dam have been improved. A site plan being developed to address current and future operations and maintenance of the site is scheduled for completion in September 1994.

Comment 999-39. The campsite at Pittsburg is great. It allows those with no other access to witness first-hand the marvel of Hells Canyon. (Correspondent 1049)

Forest Service Response: Thank you.

Comment 999-40. Under Alternative D, I would only be able to visit Kirkwood Historic Ranch. In fact, I think the government's time and money would be better spent in improving access to the ranch by providing a dock and improved trails. I just do not want to lose the upper canyon experience. (Correspondent 1786)

Forest Service Response: Alternative D is not a preferred alternative in either the DEIS or the FEIS. The FEIS preferred alternative would allow access to the ranch which is being managed pursuant to a site plan and within the ROS setting guide in Table III-1.

Comment 999-41. We urge a freeze on any new development until the new CMP has been adopted. This will provide the public time for input and for the Forest Service to reconsider all plans. (Correspondent 2237)

Forest Service Response: It is unnecessary to freeze all new developments pending approval of an adjusted CMP. Concerns related to ongoing or proposed projects would be addressed in the CMP adjustment strategy. If sufficient information or research indicates a change in these projects the appropriate action would be initiated.

Facilities Development - Ongoing and Proposed

Comment 999-42. Improve the road into Dug Bar. (Correspondent 2437)

Comment 999-43. The U. S. Forest Service has elaborate plans for the development of the Pittsburg Landing. I understand that there is already 90 concrete pads installed. I am opposed to further development. (Correspondent 2458)

Comment 999-44. No new road building into the canyon. (Correspondent 2477)

Comment 999-45. Road access to the canyon's rims should be regulated even more than it currently is done. Such access will impact on the solitude to be found in such a beautiful wilderness area. (Correspondent 2491)

Comment 999-46. Eliminate roads and developments by 1995. (Correspondent 2510)

Comment 999-47. I am appalled at an RV park now under construction. (Correspondent 2619)

Comment 999-48. Please no more road improvements and developments like the absurd RV campground at Pittsburg Landing. (Correspondent 2696)

Comment 999-49. I support the council [Hells Canyon Preservation Council] with regard to curtailment of road building and developments. (Correspondent 2712)

Comment 999-50. We respectfully request that no primary roads be constructed to the river corridor. (Correspondent 2844)

Comment 999-51. Halt all "improvements" in the Pittsburg Landing and Dug Bar areas until a careful DEIS is accomplished for these particular areas including mandated citizen input. (Correspondent 2875)

Comment 999-52. Camping should remain primitive with no major new campgrounds built at Pittsburg Landing or anywhere else. (Correspondent 2884)

Comment 999-53. We've yet to talk to anyone who favored what was done at Pittsburg Landing and the road leading in (or out) as the case may be. Rumor has that it was done because of pressure from commercial outfitters who yo-yo back and forth to the dam. Designating Dug Bar as a portal is a mistake. Our observations over the years is that the location is not used much for starting or ending river trips. And not because of the road. It just doesn't lend itself to be a good terminal point. Hellers Bar would be much better. Improving the Dug Bar road would have little or no impact on the use of watercraft in the river but would introduce more vehicles, people and problems into the canyon. (Correspondent 2465)

Forest Service Response: Appendix D addresses ongoing and proposed facilities development in the HCNRA. There are currently no roads scheduled for construction to improve access to the corridor.

Comment 999-54. The best protection the wild section of the Snake has is its remoteness. By continuing to "improve" access to this tremendous section of the river we will love it to death. The improved road to Pittsburg Landing has had the biggest negative effect on the river experience as I have seen in eight years of rafting on the Snake. The easy access that is now available at Pittsburg Landing has made it possible for far too many power boats to compete for the limited space available. By placing jet boaters and drop camp users under the same lottery system a floater will help mitigate this problem of improved access. (Correspondent 2827)

Forest Service Response: Hopefully, by including powerboats in a permit system to stem unlimited use, the improvements in roads and facilities will make access easier and safer without escalating use to intolerable levels.

Comment 999-55. Regarding the trail, the lack of maintenance of it (and its general condition) have been a disgrace given the "National Recreation Area" designation. The Snake River Trail which is in the wild and scenic corridor needs to be maintained so all use is not so focused on the water. (Correspondent 2884)

Forest Service Response: The Snake River Trail is maintained annually through contracting or by using Forest Service trail crews and/or volunteers. Without specifics as to exactly what you envision as a "maintained" trail, a more concise response would be speculative.

Comment 999-56. There has been much concern expressed about the increased traffic at Pittsburg and the lack of control of vehicle dispersal. On both weekends and weekdays, vehicles can routinely be seen throughout the area on undesignated roads, and camps set up at undesignated sites. Most notable are the end of the road to the fuel tanks, and area downriver from the lower landing, just above Pleasant Valley rapid. Random ORV use and uncontrolled camping could develop into serious problems. Not only could they result in physical damage to the area, but the expectation of continued use in this manner could develop. (Correspondent 2456)

Forest Service Response: A site plan, scheduled for completion in May 1994, is being developed to address campground operations and maintenance at Pittsburg.

Proposals to Change in Status to National Park

Several respondents volunteered opinions regarding the transferral of managerial responsibilities of the Hells Canyon National Recreation Area and/or the Wild and Scenic Snake River corridor to the National Park Service. For example:

Comment 999-57. I would strongly oppose any future effort to turn the Hells Canyon recreation area into a National Park. This would ruin the canyon experience and turn it into another Yosemite or Yellowstone with their masses of visitors. The true canyon experience is marveling at the forces of nature, not going from one visitor center to another having what you are supposed to enjoy explained to you. (Correspondent 1104)

Comment 999-58. The worst thing that could happen would be to cave in to the Enterprise outfitters and turn Hells Canyon into an over-regulated national park. (Correspondent 2407)

Comment 999-59. Anything short of a professional management scheme for this national resource with limited permit requirements for all parties, rafters and powerboats alike, would force me to support creation of a National Park in Hells Canyon with Park Service management. (Correspondent 1197)

Comment 999-60. If effective management cannot be implemented by the Forest Service that better balances the use and preservation of this wonderful resource, I would be in favor of the creation of a National Park in Hells Canyon with management supplied by the Park Service. (Correspondent 2258)

Comment 999-61. It's my thought that this whole job could well be taken over by the Park Service and a National Park be established in this region. (Correspondent 2269)

Comment 999-62. I feel this area is very special and should be designated a National Park to be professionally managed by the Park Service. (Correspondent 2279)

Comment 999-63. Unless effective management in the future is taken concerning this matter, then I like thousands of others will support the creation of a national park in Hells Canyon without management by the park service. (Correspondent 2309)

Comment 999-64. I hope that ultimately a National Park in Hells Canyon, managed by the Park Service, will eventually be established. This type of professional management is necessary to preserve this spectacular national resource. (Correspondent 2310)

Comment 999-65. If the present managing agency is not able and willing to adopt and strictly enforce a progressive management plan, I would support the transfer of those duties to an agency willing to address these concerns, such as the National Park Service. (Correspondent 2323)

Forest Service Response: The special resources of the Snake River corridor are already protected and maintained under the Congressionally-designated status of the Hells Canyon National Recreation Area. Through the HCNRA Act, Congress has mandated that the natural beauty, and historical and archeological values of the Hells Canyon and the Snake River area be preserved for this and future generations. It further directs the Forest Service to enhance the recreational and ecological values, and public enjoyment of the area. The national wild and scenic rivers system further protects the river and its immediate environment through the Wild and Scenic Rivers Act.

The transfer of management of this area to the Park Service would not necessarily mean a big change in direction; Congress could enact legislation resulting in management direction very similar to the current direction. There are no guarantees of what would come out of Congress once the debate was over. The Forest Service feels the area receives adequate protection under current legislation.

Letters from Government Agencies, Public Officials, Indian Tribal Governments

Council on Environmental Quality Regulations, 40 CFR 1503.4(b), state that "all substantive comments received on the draft statement (or summaries thereof where the response has been exceptionally voluminous) should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement."

Because response to the draft statement was voluminous, summaries or representative comments have been provided in the preceding section of this appendix. Letters from governmental agencies, elected officials, and Indian tribes are included in their entirety in this portion of the appendix.

Substantive comments from these letters have been included in the preceding summary of comments and responses.

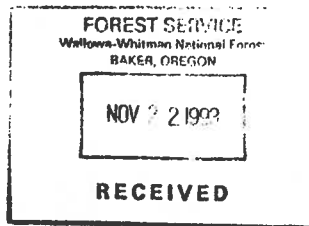
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HARLEY L. WILLIAMS
COMMISSIONER, THIRD DISTRICT
CLARKSTON, WASHINGTON

KATHIE A. DAHLIN
ADMINISTRATIVE ASSISTANT
CLERK OF THE BOARD



Wallowa-Whitman National Forest
ATTN: SNAKE RIVER ID TEAM
P.O. Box 907
Baker City, OR 97814

November 9, 1993

Dear Team Members:

I am the Recreation Services Supervisor for the City of Lewiston, Idaho, past president and current treasurer of the North Central Travel Association, member of the Idaho State Comprehensive Recreation and Tourism Plan committee, occasional member of R/ sometimes jet boat enthusiast. I have enjoyed the NRA by car, jet boat and hiking as a life long resident of the state.

Although it would be nice to keep the status quo within the limits of Acceptable Change task force. I believe that the task force reached an acceptable solution to the problem and that the Forest should proceed with implementation of Alternative "B" should it occur.

It is beyond my comprehension that alternative "E" would be chosen in light of the work done by this committee which was a fair compromise for all interest groups.

Sincerely,

Lynn E. Moss

City of Lewiston
P.O. Box 617
Lewiston, ID 83501
208-746-2313

Home 1018 Cedar Ave.
Lewiston, ID 83501
208-734-7971

er 18, 1993

ake River ID Team
a-Whitman National Forest
ox 907
City, OR 97814

eam Members:

Asotin County Board of Commissioners are opposed to alternatives C, D, E, and F of the recently released draft Environmental Impact Statement for the Snake River Management Plan.

Alternative B with modifications, as submitted by the Hells Canyon Project, is a reasonable alternative in that it allows for shared use by floaters and powerboaters in a responsible manner, while protecting the Canyon's resources. This plan will meet the needs of recreationists today and in the future.

Thank you for your consideration of our comments.

Sincerely,
ASOTIN COUNTY BOARD OF COMMISSIONERS

Harley L. Williams, Chairman

Fuller, Member

Ron Scheibe, Member



CITY OF RIGGINS

GROWING WITH IDAHO



P.O. Box 249
Riggins, Idaho 83549

Riggins is widely known as a Hells Canyon access point, and with the recent construction of the new RV CampGround at Boat Launch at Pittsburg Landing, we ask you to please give consideration to the proposal of the Riggins Jet Boat Outfit to allow one jet boat launch per outfitter per day from Kirkwood to the Dam, with unrestricted use from Pittsburg Landing to Lewiston. This would certainly help any negative impact further Hells Canyon restrictions would have on Riggins and our struggling small businesses, as well as provide the public using the RV Park access to the canyon.

Thank you for your consideration. Please support the Hells Canyon LAC Planning Task Force proposal, ALTERNATIVE 1 and the recommendations made by the Riggins JetBoat Outfitter.

Sincerely,

CITY OF RIGGINS


Ralph A. Barton,
Mayor

November 16, 1993

Richmond, Forest Supervisor
Wah-Whitman National Forest
Box 907
City, Oregon 97814

Mr. Richmond,

We are writing to you to offer our input on the proposed
Canyon Environmental Impact Statement.

We have reviewed the proposal and would like to urgently
ask your consideration and support for ALTERNATIVE B, which
has been developed and recommended by the Hells Canyon LAC
Planning Task Force. The plan was developed by a diverse group
of interested, concerned, educated users and managers of the
corridor after hundreds of hours of research. We
believe it represents the most desirable, multiple use of the
area and can be implemented to protect the river ecosystem,
without undue hardship on any one group of river users.

As you know, I am sure, City of Riggins economy is now
primarily on tourism. Since the closing of our sawmill,
the focus has turned from timber to the surrounding and varied
recreational opportunities of the area. Hells Canyon plays a
part in this tourism development, and we are very
interested in development of a plan that would provide
best and recreational access, as well as protection for the
local environment.

After review of the "preferred" alternative, it appears
it may unjustly restrict the Riggins Jet Boat Outfitters.
We have four outfitters operating out of our community, and it
seems that two will be eliminated completely from Kirkwood
to the Dam during the controlled season, and the remaining two
will be severely restricted. Riggins depends upon the support
dollars the outfitters generate in our community. A
single one day jetboat tour of six people in Hells Canyon can
generate upwards to \$1500 of tourist income to Riggins
businesses, and those dollars mushroom as those businesses buy
supplies, etc. from other businesses in the area. We
do not like to see this opportunity taken from Riggins, just to
be allotted to larger river users located in Lewiston and the

APO
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COMMITTEE
HOUSE OF REPRESENTATIVES
WASHINGTON, DC 20515-1202

NOVEMBER 20, 1993

Robert Richmond, Forest Service
Wah-Whitman National Forest
Snake River Planning Team
Box 907
City, OR 97814

Mr. Roberts:

We reviewed the DEIS for recreation management of the Wild and
Snake River and cannot support the selection of alternative
the preferred management plan.

Alternative E cuts the season in half above Pittsburgh Landing for
powerboaters and floaters, a step that does not appear to be
justified and would require an oppressive system of regulation and
management. E would allow powerboats exclusive use of the wild
about Pittsburgh Landing one week and floaters exclusive use
next. The stated reason for selecting this strategy is that
floaters and powerboaters can't get along. However, both classes
of users seem to be getting along surprisingly well under the
present levels of use.

Alternative E's management strategy has serious economic impacts,
including a critical element of the region's tourism industry.
Alternatives C, D and F have even more impacts. With continuing
impacts in the forests products industry, tourism has become
important to the economic health of the Northwest. Hells
Canyon, an internationally recognized attraction, and its
associated outfitting industry, provide needed diversity to the
region's economic base.

If the DEIS alternatives seem to rely on numerical limitations.
These are important only to the extent that they represent
limitations most visitors will find acceptable and to the extent
they define levels of use that will not unacceptably threaten
Canyon's resources. The University of Idaho study of river
users found that 68 percent ranked their trip as among the best
they had ever had. I do not understand why use must be reduced and
growth curtailed. While the DEIS insinuates that resources
might be damaged, it fails to document any real damage or
a threat of damage.

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POCATELLO, ID 83201
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Developed by a citizens task force composed of members from
Hells Canyon interests, Alternative B is workable,
modifications, and provides adequate protection to the
resources. With the changes recommended by the Hells
Alliance, it represents the best alternative by which to manage
the river.

Sincerely,


Michael D. Crapo
Member of Congress

BOB) SMITH
istrict
gon



CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
November 19, 1993

COMMITTEE ON AGRICULTURE
SUBCOMMITTEES
Department Operations and Nutrition
RANKING MEMBER
General Farm Commodities
Livestock

COMMITTEE ON
NATURAL RESOURCES
SUBCOMMITTEES
Oversight and Investigations
RANKING MEMBER
National Parks, Forests,
and Public Lands

Robert Richmond
st Supervisor
owa-Whitman National Forest
Box 907
r City, Oregon 97814

Bob:

writing today regarding the Draft Environmental Impact Statement (DEIS)
he management of the Wild & Scenic Snake River.

not support the selection of Alternative E as the preferred management
native. It is based on the proposition that floaters and powerboaters
ncompatible. There is little or no evidence included in the DEIS to
rt this claim. Both classes of boaters seem to be getting along
isingly well under the current use levels. The restrictions included in
native E are overly restrictive and would be a management nightmare. To
e the entire use patterns in the Hells Canyon Recreation Area at this
unless truly warranted by documented evidence, is unnecessary.

native E does not address the economic impacts fully. It is obvious that
rcial operations cannot survive on half a season. It is ironic that in a
when communities are told to put more emphasis on tourism, the Forest
ce prefers an alternative that eliminates many budding tourist-based
esses.

ess recognizes both motorized and nonmotorized river craft as valid uses
e entire Snake River in the Hells Canyon National Recreation Area. It
recognizes the provision of recreation opportunities for the American
e as an important objective of this National Recreation Area. Any
ement plan should capitalize on those recreational opportunities to the
t that they are compatible with the area's magnificent resources.
native B which represents the work of the LAC task force is certainly a
reasonable management plan for the river. It allows for continued,
nsible, shared use and provides adequate protection of the canyon's
rces. With the modifications recommended by the Hells Canyon Alliance,
alternative will meet the needs of the canyon and its users during the
10 years.

(BOB) SMITH
of Congress

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9/4/93 TRW



SH & GAME

1000 North Walnut
Box 25
83707-0025

August 31, 1993

River ID Team
Sawtooth-Whitman National Forest
Box 907
City, OR 97814

Hells Canyon DEIS
Wild and Scenic Snake River Recreation Management Plan

Comments on it May Concern:

Idaho Department of Fish and Game (IDFG) personnel have reviewed the Draft Environmental Impact Statement for the Wild and Scenic Snake River Recreation Management Plan. As none of the comments will impact the ability of the IDFG to manage fish and wildlife in the river corridor, we will not select a different alternative. IDFG personnel do have concerns with comments made in the DEIS that relate to management of fish and wildlife.

I-8, Desired Future Condition by River Segment:

The entire length of the Snake River downstream from Hells Canyon Dam offers outstanding fishing opportunity for white sturgeon, rainbow trout, smallmouth bass and channel catfish. In addition, the river corridor offers excellent opportunity for waterfowl and bird hunting and wildlife viewing. The DEIS should protect those values for all river sections.

II-5, Management Direction Common to all Action Alternatives

The proposed plan should ensure compatibility with hunting, fishing, and wildlife observation.

II-6

The IDFG requests that the final EIS provide additional information regarding the proposed "no entry zone" for known fall chinook redds. If the intent is to restrict use over fall chinook redds, the IDFG cannot envision a manageable scheme. We therefore do not believe such management action would provide any benefits.

Andrus / Governor
Conley / Director

Opportunity Employer



Snake River ID Team
August 31, 1993
Page 2

Table II-1

The fishery monitoring activities proposed in the DEIS are the responsibility of the state fish and game agencies. IDFG has ongoing monitoring of fish populations to determine impacts incidental harvest might have on naturally produced steelhead and salmon. We also monitor sturgeon populations within Idaho to determine the impacts of fishing pressure. If data is available to the Forest Service upon request. We suggest the Forest Service restrict its monitoring activities to those that are habitat related.

Sincerely,

Cal Groen, Chief
Natural Resources Policy Bureau

CG:WR:sr



Nez Perce

TRIBAL EXECUTIVE COMMITTEE
P.O. BOX 305 • LAPWAI, IDAHO 83540 • (208) 843-2253

TESTIMONY OF
SAMUEL N. PENNEY, CHAIRMAN
NEZ PERCE TRIBAL EXECUTIVE COMMITTEE
Before the
National Parks, Forests and Public Lands
House Subcommittee
Washington, DC
September 23, 1993

Hello. My name is Samuel Penney and I am the Chairman of the Nez Perce Tribal Executive Committee, the governing body of the Nez Perce Tribe of Idaho.

Our aboriginal area of occupancy covered some thirteen million acres of what is now southeastern Washington, northeastern Oregon and central Idaho. The Hells Canyon Recreational Area currently covers about 1.5 million acres of what used to be our Nez Perce homeland. Although our present reservation is much smaller, these ceded areas are extremely important to us for several reasons.

The Nez Perce people have always been dependent on wild game, plants and berries, and fish for subsistence. This way of life, as you can imagine, has been altered by the various forces of the modern world, including the creation of the reservation system. Although the Nez Perce was pressured into ceding much of the land base that was essential to our way of life, there were some very important rights that were specifically retained during the treaty-making process.

The right to hunt, gather, and graze on all open and unclaimed lands and the right to fish in all usual and accustomed places were two of the rights that the Nez Perce retained in the treaties with the United States. These two provisions are why the areas surrounding our present-day reservation are important. Subsequent U.S. Supreme Court decisions have upheld these reserved rights as valid and have also determined the

Tribe has the right to participate in the management of the resources of the supporting environment as well.

Another reason the Nez Perce Tribe is intent on protecting treaty-retained resources is that our people have an interdependent relationship with the natural environment and all living creatures. We were the original stewards of the land and we continue to take it very seriously. When we look to solve environmental problems we look at the entire cycle of nature, rather than separating out one portion of it or one species, or one particular use. Our interpretation of "Future Conditions" is to maintain the integrity of the ecosystem and all its creatures. There can be no price tag placed on the loss of a species or the destruction of habitat.

This outlook does not seem to be shared by the Forest Service Draft Environmental Impact Statement (DEIS) for the management of the Snake Wild and Scenic River. All impacts on the environment are measured by the type and amount of recreational use in that area. The aboriginal area, including the major portion of the Hells Canyon National Recreation Area (HCNRA), has been and is used by our people for specific and essential purposes, including worship. Sacred sites in this area, the location of which we are unwilling to reveal because of their sacredness, sites which have already been discovered have the potential to be damaged or destroyed.

The desecration of some of the petroglyphs at Pittsburg occurred only after the Forest Service provided a new road for easy access for recreational users. Obviously, the Tribe is opposed to further encroachment on these significant areas because of this increase in recreational activity. Requiring users to utilize foot power, to use float boats in this area would be improvement over the Forest Service's preferred alternative which increases numbers that would have a negative impact on the area. [By the way, it is in the DEIS that the possible problems with increased recreational activity is "artifact collection:" (Page IV-DEIS). In the DEIS there is no other term to use to describe this activity but artifact theft.

There are many plants, including roots and berries, located in the HCNRA, which have traditionally been used by the Nez Perce for subsistence and for medicinal purposes. Increased access

al gathering areas will have negative effects on the availability to members of these important foods and medicines. We again oppose the idea of providing additional roads and opening more airstrips so that recreational users may have access.

Good water quality is of fundamental importance to the health and function of any ecosystem. We believe the impacts of the proposed project on water quality has not been adequately addressed in this Final Environmental Impact Statement. Although access to and from livestock grazing and cattle or over grazing have on the water quality and riparian habitat of the Snake and Imnaha Rivers. The degradation of water quality in river systems bounded by large numbers of grazing is well-documented. This issue must be addressed in any management plan affecting this area.

Otherwise, the negative impacts on the watershed from logging activities along the Imnaha River create very serious concerns for us. Harvesting is recognized in the Act establishing the Hells Canyon National Recreation Area as a "traditional and valid use" of the national area. (89 Stat. 1117 at 1122.) How can this be, when it has been proven over and over again that land disturbing activities such as logging are detrimental to the quality of water and therefore to the wildlife that depend on that water for their survival? Further, the Forest Service has abused its authority to harvest timber in the Hells Canyon area, severely over logging some sites.

Restoration of the Snake River sockeye salmon and the fall chinook salmon will not occur without extensive measures to improve on the current practices utilized in the harvest of timber within the Imnaha watershed which is a migration corridor for these salmon.

It has yet to be found whether disturbances on the water - affect the spawning of anadromous fish. However, our position is that jet boat activity does have harmful effects on these fish and their habitat. The U.S. Forest Service substantiates our concern over jet boat activity, citing studies which point to the hazards associated with surface water disturbance. Yet in their DEIS - the water and those species that depend on it for survival are not adequately protected from the noise, vibration, and spillage from motorized boats. In fact, the preferred

alternatives creates one of the higher risks of jeopardy to fall chinook salmon.

Our way of life was to utilize the resources provided in nature and give thanks for these gifts by doing our best to not disturb the ecosystem more than what was required for subsistence. We have seen a corresponding decline in the quantity and quality of such resources and this has caused great concern. In planning for the management of recreational areas, it is essential that the destruction of any part of the ecosystem is kept to a minimum. Because of the necessity of looking at the entire system, it would be logical to have a management plan that is more comprehensive so that all values are considered.

Thank you for the opportunity to provide our comments. We are more than happy to provide our cultural expertise in the archaeological and cultural resources in the Hells Canyon area.

| < => |



House of Representatives
State of Idaho

SIRS,

I'm writing to ask you to RECONSIDER your
decision for managing Hells Canyon. The
can successfully be shared by all users, with-
out requiring weeks of exclusive use. HEAVY CONSIDER-
ation should be given to the fact that the Snake
is one of the few places (rivers) power boats
navigate. Power boats are restricted by nature
- places, all of which are open to floaters &
types of recreation. The power boats should
be able to co-exist in Hells Canyon.

Alternative B, is much more reasonable. Thank
you for your reconsideration.

If you would like to discuss this further,
please contact me.

Sincerely, Dan Marshall



OFFICE OF THE GOVERNOR

STATE CAPITOL

BOISE 83720-1000

CECIL D. ANDRUS
GOVERNOR

(208) 33

November 23, 1993

R.M. Richmond, Forest Supervisor
Wallowa-Whitman National Forest
P.O. Box 907
Baker City, OR 97814

Dear Bob:

Thank you for the opportunity to comment on the Draft
Environmental Impact Statement on the Wild and Scenic Snake River
Recreation Management Plan through the Hells Canyon National
Recreation Area.

As you know from our visit to the canyon this past summer
and from my efforts in the establishment of the NRA, I have
strong feelings for this unique back country and the problems and
challenges faced with its management. I also had the opportunity
to submit testimony before Congress this year concerning the
management of Hells Canyon NRA. My testimony stated in part:

"I believe the Forest Service needs to take a
management approach that looks at the resources in a
more connected fashion rather than one that addresses
issues separately. For example, we are currently in
the middle of an environmental impact statement process
that looks only at arranging the different recreational
uses of the Snake River. It does not take into account
how activity on the river fits into total recreational
use of the area or how it affects the resources.
Without a system-wide planning approach, the resources
of Hells Canyon will be in jeopardy."

The issues connected with recreational use of the river
should be considered along with the use of the canyon and with
wildlife and grazing issues. In particular, there needs to be a
study of the current grazing allotments and the effect of sheep
allotments on bighorn sheep populations through disease
transmission. Congress needs to make this study a funding
priority. All such issues should be considered in a more system
wide planning approach.

Richmond

November 23, 1993

that regard, the Draft EIS should not ignore the other the canyon that affect the river. For example, decisions use of campgrounds along the river by float boaters and boaters should not be made in isolation from hikers and who traverse the canyon to reach the river on the many

A first step would be to institute an efficient and reservation system for the different users. We have such a program successfully in operation for many years on the Middle Fork of the Salmon River in central Idaho. Competing the river users to reach the prime camping spots a practice which detracts from the overall back country experience, could be avoided.

An important step forward in this Draft EIS is the recognition of a limit to the use of the river by both power boaters and float boaters is necessary. Except for the no-action alternative, all the alternatives impose limits on the number of launches during the regulated season. It is not my place to say what level of use can be tolerated by the canyon, or if we have already surpassed the optimum level of use for the canyon. I believe that determination is one best made by the users and those who understand and experience the resource land. I and many float boaters have felt that regulating the float boaters and not the power boaters was not fair and contrary to the legislation creating the NRA.

The Draft EIS reaches beyond the intent of the Hells Canyon legislation in the preferred alternative to allow the use of all motorized watercraft. These vehicles did not exist at the time I assisted with the creation of the NRA, nor do I think they are compatible with the other uses of the river. They should continue to be excluded. Otherwise the NRA will slip away from the reason for which it was designated.

The proposal in the preferred alternative that has generated comment is the idea of alternative weeks set aside for exclusive use by power boaters or float boaters. I can understand the notion of providing certain times in the wild river experience portion of the Snake River during which river experience is not intruded upon by the sights and sounds of motor

I do not think the approach of alternating weeks as outlined in the Draft is workable or fair. Rather, I would like to see two separate weeks be set aside during the summer season for float boating only, and then let the lottery process sort out the users who really demand more time each year when the river is free. If there is overwhelming demand for river trips on motorized watercraft, that adjustment can be made in the future. But to divide the summer into alternating weeks at this time is unfair to the majority of users who enjoy the river on float boats and who have indicated a willingness to have a river

R.M. Richmond
Page 3
November 23, 1993

with both power boats and float boats.

Thank you for the opportunity to comment.

With best regards,

Sincerely,


Cecil D. Andrus
Governor

CDA:abc

cc: Congressman Larry LaRocco
Congressman Robert Smith
Governor Barbara Roberts
Idaho Parks and Recreation
Idaho Fish and Game



STATE OF IDAHO
OFFICE OF THE STATE TREASURER
ROOM 102 STATEHOUSE
BOISE IDAHO 83720

TICE EDWARDS
TREASURER

(208) 314 3200

MIXED USE ON THE SNAKE RIVER IN HELLS CANYON

t Supervisor
tion: Snake River Planning Team
ox 907
City, Or 97814

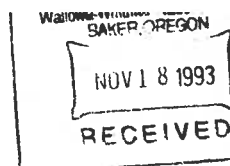
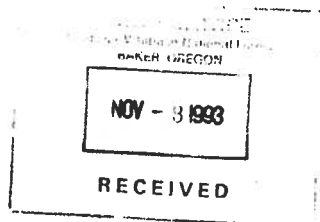
ber 3, 1993

om it may concern:

tters have asked me to comment upon their counter-proposal
by each outfitter use one power boat on the Snake River per
uring the controlled season. I support them in their counter
sal. As a personal aside, I was recently on the river and saw
animals along the bank, some with two legs and some four
d. We waved to all of them. The humans waved back and I
the animals wanted to. We saw no demonstration of fear of
nimal, they just stood and watched.

rely,

Justice Edwards
Justice Edwards
State Treasurer



November 15, 1993

R.M. Richmond, Supervisor
Wallowa-Whitman National Forest
P.O. Box 907
Baker City, OR 97814

ATTN: Snake River Planning Team

SUBJECT: Draft E.I.S.; Wild and Scenic River Recreation Management Plan

Dear Mr. Richmond:

The Idaho Division of Aeronautics staff has reviewed the subject draft E.I.S. we have the following comments:

Alternatives A, D, And F would be the least desirable to the aviation comm. These alternatives do not permit the Sluice Creek and Cache Creek Airports re-opened. Alternative D and F would also cause the existing Big Bar Airpoc closed.

Alternatives B, C, and the preferred Alternative E would all result in the reo of Sluice Creek and Cache Creek airports, with no closure of any existing a

Alternative C would control the aircraft use level with an allocation system outstanding remarkable values became impaired.

Alternative B would limit aircraft use so that 60% of the days during the us season would be free of aircraft landings in the wild section. 40% of the d would be free of landings in the scenic section during the use season.

Alternative E (preferred) would allow aircraft landings in the wild section on alternating weekly basis, coinciding with allowed powerboat use, during the season. The airports in the scenic section would be open year round.

COI

STATE OF IDAHO — TRANSPORTATION DEPARTMENT
CHMOND, SUPERVISOR
IBER 15, 1993

Three alternatives, Alternative B is the least desirable. It would limit use to a 40% level in the wild section and 60% level in the scenic section the use season. In addition, the required monitoring to assure these use would appear to be complicated and expensive.

The Division of Aeronautics can support either Alternative C or the preferred Alternative E. Alternative C is the least restrictive to aircraft users. However, it might resolve the conflict between rafters and aircraft. This could be an issue would result in allocations for aircraft use. Alternative E would have the effect of allowing a 50% aircraft use during the use season in the wild section. This would apply to only two airports; Big Bar and Sluice Creek.

Use would be concurrent with the powerboat use period, visitor conflict would be greatly reduced.

Regardless of the selected alternative, it is imperative that the Forest Service take prompt administrative action:

Obtain FAA airspace approval for all their airports on the Snake River. The airports should be classified as "Public Use"

Provide the basic airport data to the FAA, Oregon State Aeronautics, the Idaho Division of Aeronautics, and the various private companies that publish airport directories. The airport information should be made available to pilots through the various directories and aeronautical charts. This is very critical if Alternative E is selected, since many of the aviation visitors are from out of state, and need to be informed of the allowed use periods.

Finally, we thank you for the opportunity to comment on the subject E.I.S.

Sincerely,

William S. Cooper

WILLIAM S. COOPER
District Administrator

W.AH:pss/doca
Bureau
C, JM
Oregon Aeronautics
LOPA (Costello)

AIRCRAFT USE (A)

Wild - Big Bar landing strip would remain open for private aircraft use; Sluice Creek would remain closed to all aircraft use. The entire wild river corridor would remain closed to rotary aircraft except for Big Bar airstrip.

Scenic - Cache Creek would remain closed to all aircraft use; Dug Bar, Pittsburg, and Salmon Bar would remain open for private aircraft use. The scenic section would remain open to rotary aircraft, except for the Study river.

AIRCRAFT USE (B)

Wild - Landing strips at Big Bar and Sluice Creek would be open to private aircraft use. During the regulated season, use levels would be managed to 60% of the days would be free of aircraft landings.

Scenic - Landing strips at Cache Creek, Dug Bar, Pittsburg, and Salmon Bar would be open to aircraft use. Regulated season use levels would be managed so 40% of the days would be free of aircraft landings.

AIRCRAFT USE (C)

Dam to Kirkwood - Big Bar and Sluice Creek landing strips would be open to private aircraft use. When monitoring indicates use levels are impairing the ORV's, an allocation system would be implemented.

Kirkwood to Pittsburg - There are no landing strips located in this section.

Scenic - Cache Creek, Dug Bar, Pittsburg, and Salmon Bar landing strips would be open to private aircraft use. When monitoring indicates use levels are impairing the ORV's, an allocation system would be implemented.

AIRCRAFT USE (D)

Dam to Kirkwood - Big Bar and Sluice Creek landing strips would be closed to all aircraft use but would remain open for emergency use.

Kirkwood to Pittsburg - There are no landing strips located in this section.

Scenic - Cache Creek, Dug Bar, and Salmon Bar landing strips would be open to private aircraft use. When monitoring indicates use levels are impairing the ORV's, an allocation system would be implemented.

27

AIRCRAFT USE (E)

Dam to Kirkwood - In the regulated season, Big Bar and Sluice Creek landing strips would be open to private aircraft use during the regulated season and closed to all aircraft use during the non-regulated season.

Scenic - During the non-regulated season, all landing strips would be open to private aircraft use. Monitoring indicates use levels are impairing the ORV's, an allocation system would be implemented.

Kirkwood to Pittsburg - There are no landing strips located in this section.

Scenic - Cache Creek, Dug Bar, and Salmon Bar landing strips would be open to private aircraft use, year-round. When monitoring indicates use levels are impairing the ORV's, an allocation system would be implemented.

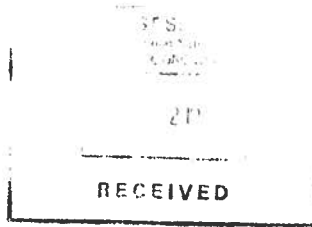
AIRCRAFT USE (F)

Dam to Kirkwood - Big Bar and Sluice Creek landing strips would be open to private aircraft use except for emergency use.

Kirkwood to Pittsburg - There are no landing strips located in this section.

Scenic - Cache Creek, Dug Bar, and Salmon Bar landing strips would be open to private aircraft. When monitoring indicates use levels are impairing the ORV's, an allocation system would be implemented.

NOTE: "USE SEASON"
IS FROM THE FRIDAY BEFORE
MEMORIAL DAY TO SEPT. 10



November 19, 1993

Idaho-Whitman National Forest
ATTN: Snake River Planning Team
PO Box 907
Pocatello, ID 83421

**Draft Environmental Impact Statement
Wild and Scenic Snake River Recreation Management Plan**

Oregon Aeronautics has reviewed the draft Environmental Impact Statement (DEIS) developed by the Forest Service for the Wild and Scenic Snake River Recreation Management Plan for the Hells Canyon National Recreation Area.

The proposed action and five alternatives respond to the need to provide additional access for aviators to utilize the recreational value of the river corridor and the corresponding need to monitor the level of use of these airstrips to protect and enhance the wildlife and recreational values. The proposed action and alternatives do not adequately respond to the need to limit the relatively low use of back country airstrips.

The proposed action and alternatives would regulate the use levels in part by:

- establishing a new regulated season from the Friday before Memorial Day through September 10;

- prohibiting private and commercial floatplane landings on the wild and scenic sections of the river during the regulated season;

- limiting recreational fixed-wing and rotary aircraft landings to designated public airstrips in the river corridor and

- requiring self-issue permits at public airstrips in the river corridor.

Alternatives A, D and F would further regulate the use by not opening the Sluice Creek and Cache Creek airstrips. Alternative D and F would also cause the existing Big Bar Airport to be closed.

Alternatives B, C, and the preferred Alternative E would result in the opening of Sluice Creek and Cache Creek airports located on the Oregon side of the Snake River and authorize landings at the Dug Bar, Pittsburg and Salmon Bar airstrips. The existing Big Bar Airport in Idaho would remain open.



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The proposed action, Alternative B, would also limit aircraft use such that during the regulated season 60 % of the days would be free of aircraft landings in the wild section of the river corridor and 40% of the days would be free of landings in the scenic section.

Alternative C, would implement an allocation system for aircraft use when monitoring methods indicate that the level of use exceeds the outstanding remarkable values (ORV).

The preferred Alternative E, would further provide exclusive motorized/ non-motorized recreation uses on an alternating weekly basis for the wild section of the river and a mix of motorized and non-motorized experiences on the remaining section of the river. Accordingly, Big Bar and Sluice Creek landing strips would be open to private aircraft during motorized-use weeks and closed to all aircraft except for emergency use during non-motorized weeks from the week before Memorial Day through September 10.

Although each of these approaches would provide a unique blend of motorized and non-motorized recreational opportunities in the wild and scenic sections of the river corridor, Oregon Aeronautics does not foresee the need to regulate the use of these back country airstrips. As identified in the DEIS use levels of airstrips along the river could be expected to remain relatively low and stable because of the necessary skills required to fly and within the river corridor. The required monitoring to assure the level of use in the wild and scenic section would appear to be difficult and expensive to accomplish. Likewise, the benefit from closing the airstrips during the non-motorized weeks would not appear to justify the amount of time and money it would take to notify pilots of the closure schedule and to enforce the proposed regulation.

We believe a reasonable course would be to open the airports as public-use with no restrictions. A public-use airport is an airport that is open to the public without prior permission and without restrictions within the physical capacities of the available facilities. The complexities of restricting the use of a designated public use airport, as proposed in Alternatives B, C, and E, will be cumbersome and probably ineffective. If significant restrictions are imposed to regulate the use of these airports, we recommend that the airstrips not be designated as public-use airports but rather opened as private-use airports with a reservation system to regulate access.

Regardless of the selected alternative, Oregon Aeronautics supports the efforts of the Forest Service to respond to the needs of the aviation community. In addition, we recognize physical limitations of the airstrips in the Snake River corridor and encourage the Forest Service to cooperate in a training program to educate pilots about these limitations and the necessary procedures to operate at these airstrips. We also request that the Forest Service obtain a FAA airspace analysis for each of these airports.

Teresa Penninger
Aviation Planner

tbp

cc: Bill Cooper, Idaho Aeronautics
Ray Costello, Aircraft Owners and Pilot Association

April 11, 1993

Richmond, Forest Supervisor
: Snake River Planning Team
Box 907
City, OR 97814

Mr. Richmond:

We have reviewed the DEIS for the Wild and Scenic Snake River Recreation Management with respect to special status plant species (i.e. rare, threatened, and endangered). The DEIS adequately addresses the protection of listed species on page IV-100; however, we have the following comments.

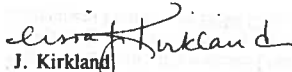
The DEIS states in Chapter IV, pages 70-71, that high levels of recreational use of the river could directly and/or indirectly have adverse effects on special status plant species. Furthermore, on page 71, the plan continues that "increases in recreationists at Pittsburgh may result in increased impact" to some populations of *Mirabilis macfarlanei*, "Pittsburgh's Four-O'Clock". However, later in the draft, on page IV-100, is a paragraph asserting that "no adverse effect on this species is anticipated in any alternative." The contradiction is confusing to this reviewer and should be resolved.

We are concerned with the protection of populations of *Mirabilis macfarlanei* from increased car traffic, such as may occur at Pittsburgh landing. Consequently, we strongly support alternatives which minimize vehicle impacts (i.e. Alternatives E and F).

We would like to compliment the draft preparers for the informative presentation of the botanical value of the Snake River canyon (pages III-10 and III-11). The discussion of the special status plants of the region was unexpected and appreciated.

Thank you for the opportunity to comment on this plan. If you have further need for information from this office, please contact me or Tom Kaye at the number below.

Sincerely,


J. Kirkland

Forest Supervisor
Department of Natural Resources
37-2346

Barbara Roberts
Governor



635 Capitol Street NW
Salem, OR 97310-0110

NOV 18 1993

NOV 16 1993

RECEIVED

Richmond

Supervisor

Walla-Whitman National Forest

SNAKE RIVER PLANNING TEAM

Box 907

City, OR 97814

Oregon

STATE

MARINE

BOARD

Supervisor Richmond:

Thank you for providing us with the Draft Environmental Impact Statement and Management Plan for the Snake Wild and Scenic River. Based on our review of this document we have the following comments to offer.

We support the closure of the entire river, from Hells Canyon Dam to the Oregon/Idaho border, to personal motorized watercraft use as proposed in Alternatives A, B, C, and F. Such a closure is consistent with Oregon Administrative Rule 250-21-040, which states:

No person shall operate a personal watercraft on the Snake River from the Washington border south to Hells Canyon Dam. Oxbow and Brownlee Reservoirs are open. The Snake River above Brownlee Reservoir is open to personal watercraft.

There is little information offered in the DEIS to support allowing personal watercraft use on the lower one mile of the Snake River below Cache Creek as proposed in the Management Direction Common to All Action Alternatives. Limiting this type of watercraft on a very small stretch of the river inside Oregon for an extended period of closure does not make sense to us. While there may be an expressed demand for such use, any change from the established administrative closure needs to be adequately justified. Should the Forest provide a convincing rationale for an adjustment to the current deadline our agency will agree, in conjunction with Idaho boating authorities, an amendment to this rule.

Our proposed common management action is monitoring and proper regulation of powerboats on the river, both private and commercial. We support registration and display of identification numbers on all motorized watercraft on the river. Accordingly, the Oregon Legislature recently enacted House Bill 2821. This law (copy enclosed) requires that outfitters and guides using motorboats and passengers on federal navigable waters possess a Coast Guard operator's license and display a decal on each boat indicating passenger carrying capacity. The license decal is issued annually, at no cost to the outfitter/guide, and is good for the next year. This is intended to more readily identify commercial boats and assist NRA staff better monitor this use. I welcome any suggestions or assistance your office may provide to help us implement this program with outfitters using the Snake River.



435 Commercial St. NE
Salem, OR 97310-0650
(503) 378-8587
FAX (503) 378-4597

The Marine Board is also very interested in boating safety and education. It calls for an active and timely education program at all portals. We have cooperative programs to provide information/education kiosks on a number of rivers in Oregon and are willing to assist NRA staff in the development of education messages and formats that can help mitigate any safety or conflict issues on Snake.

The preferred alternative, Alternative E, appears to be most acceptable to us at this time, with the exception of the provision of personal motorized watercraft in the Scenic section. The concept of alternating exclusive use periods promises to provide both float and motorized boaters with an experience more consistent with Desired Future Conditions. As you may know, a variation of the weekly alternating schedule is currently being used on the lower Deschutes River.

The states of Oregon, Idaho and Washington have recently entered into a compact for boating law enforcement on boundary waters, including the Snake River. Although the Management Plan does not address boating law enforcement, accident reporting, and search & rescue, we believe these items should be approached in a coordinated fashion. Implementation of the Management Plan should involve both states and their respective agencies and political subdivisions. A copy of the Oregon-Idaho-Washington Compact is enclosed for your information.

Due to the variety of issues which are of mutual interest to our agencies, I would like to suggest that the Forest Service consider establishing a coordinating committee composed of representatives from Oregon and Idaho boating agencies, local law enforcement officials, Forest Service staff, and other agency personnel. It is necessary to periodically review and discuss recreational boating issues. I feel a more coordinated approach to education, safety, law enforcement, guides/outfitters and other boating-related concerns would be beneficial to all parties.

Thank you again for providing us with the Draft Environmental Impact Statement. If you have any questions about these comments, please don't hesitate to call.

Sincerely,

Paul Donheffner

Paul Donheffner, Director

Encl.: Compact, HB 2821

cc: Mark Brandt, Idaho Parks & Recreation Department
Sheriff Roger Decker, Wallawa County
Captain Ted Nutting, USCG Seattle 13th District

Enrolled House Bill 2821

Enrolled and printed pursuant to House Rule 13.01 (at the request of Tillamook Guides Association)

CHAPTER

AN ACT

relating to the use of motorboats to carry passengers on state waters; creating new provisions; and amending ORS 704.020, 704.030 and 704.525.

Enacted by the People of the State of Oregon:

SECTION 1. ORS 704.020 is amended to read:

704.020. (1) Any person who acts, or who offers to act, as an outfitter and guide must first register with the board. Each registration shall be submitted annually on a form provided by the board and shall include the following information:

- a) The name, residence address, and residence telephone number of the person providing outfitting and guiding services, and all business names, addresses and telephone numbers under which outfitting and guiding services are provided.
- b) If the outfitting and guiding services are to be performed in the business name of an individual, proof of possession of a current certificate issued to the individual:
 - A) By the American Red Cross upon completion of its multimedia course; or
 - B) Upon completion of any equivalent medical or American Red Cross training course approved by the board.
- c) If the outfitting and guiding services are to be performed in the business name of a person other than an individual, the outfitter and guide must provide the names of all employees, agents or parties in interest who physically provide, or who directly assist in physically providing, outfitting and guiding services in Oregon, together with the affidavit of the outfitter and guide that each employee, agent or party in interest possesses a current certificate issued to the same by the board.

A) By the American Red Cross upon completion of its multimedia course; or

B) Upon completion of any equivalent medical or American Red Cross training course approved by the board.

d) A description of:

- A) The outfitting and guiding services, and any equipment, supplies, livestock and materials provided by the outfitter and guide;
- B) The geographic area in which the outfitter and guide provides the outfitting and guiding services, and any equipment, supplies, livestock and materials; and
- C) The experience of the outfitter and guide in providing the outfitting and guiding services, equipment, supplies, livestock and materials.

e) Proof that the outfitter and guide has liability insurance covering occurrences by the outfitter and guide, and the employees of the outfitter and guide, which result in bodily injury or property damage. Such insurance shall be not less than the following amounts:

A) \$300,000 per occurrence general liability coverage; or

(B) Bodily injury liability coverage of at least \$100,000 per person to a total of \$500,000 per occurrence, and \$10,000 property damage per occurrence.

(f) Certification by the outfitter and guide that the outfitter and guide will maintain the insurance required by paragraph (e) of this subsection continuously in full force and effect for a period of not less than one year from the date the certificate of registration described in paragraph (a) of this section is issued by the board.

(g) The affidavit of the outfitter and guide stating that for a period of not less than one year immediately prior to making the registration application the outfitter and guide and each employee who provides or assists in directly providing outfitting and guiding services:

(A) Have not been convicted of:

(i) Any violation of ORS 496.992 (2); or

(ii) Any violation of the wildlife laws which occurred while acting as an outfitter and guide which resulted in court ordered revocation of the hunting or fishing license of the outfitter or guide;

(B) Have not had an outfitting and guiding license, permit or certificate revoked by the state or by an agency of the government of the United States; and

(C) Have not been denied the right to apply for an outfitting and guiding license, permit or certificate by another state.

(3)(a) In addition to the requirements of subsection (1) of this section, a person who offers to act as an outfitter and guide using motorboats to carry passengers on state waters shall file of this state:

(A) Shall submit proof that the outfitter and guide possesses a valid United States Coast Guard vessel operator license if operating on navigable waters of the United States

(B) Shall submit proof of liability insurance; and

(C) Shall affix to each motorboat used in providing outfitting and guiding services a decal issued by the board showing the year, the passenger carrying capacity and other information as the board may prescribe.

(b) The registration and boat decal for each outfitter and guide who uses a motorboat to carry passengers on the waters of this state expire on December 31 of each calendar year.

[(2)] (3) Each annual registration shall be accompanied by a fee of \$50.

[(3)] (4) Upon the submission to the board of the appropriate filing fee in subsection (b) prescribed in this section and the registration information required by this section, the board shall issue to the applicant an Oregon Outfitter and Guide certificate of registration. The board shall require each registrant proof of compliance with the requirements of this section, which shall be submitted to the board while the registrant is engaged in providing outfitting and guiding services.

SECTION 2. ORS 704.030 is amended to read:

704.030. (1) No person shall make any false statement of material fact submitted pursuant to ORS 704.020.

(2) No outfitter and guide who uses a motorboat to carry passengers on the waters of this state shall carry passengers in excess of the passenger capacity for which the motorboat was obtained pursuant to ORS 704.020.

(3) No outfitter or guide shall use a motorboat to carry passengers on navigable waters of the United States without the license and decal required by ORS 704.020 (3).

SECTION 3. Section 4 of this Act is added to and made a part of ORS chapter 704.

SECTION 4. (1) Notwithstanding any other provision of this chapter, the registration of any outfitter and guide who uses motorboats to carry passengers on the waters of Oregon expires on December 31, 1993.

(2) In accordance with any applicable provision of ORS 183.310 to 183.580, the board shall provide for outfitter and guide registration for periods of less than one year and fees therefor, or may issue prorated refunds or may prorate the registration fee in accordance with the provisions of ORS 183.310 to 183.580.

INTERSTATE AGREEMENT

between

IDAHO DEPARTMENT OF PARKS AND RECREATION
STATE OF IDAHO

and

OREGON MARINE BOARD
STATE OF OREGON

and

WASHINGTON STATE PARKS AND RECREATION COMMISSION
STATE OF WASHINGTON

THIS AGREEMENT is made and entered into and between the Idaho Department of Parks and Recreation on behalf of the State of Idaho, the Oregon Marine Board on behalf of the State of Oregon, and the Washington State Parks and Recreation Commission on behalf of the State of Washington.

WHEREAS, the safety of waters bordering Idaho, Oregon and Washington is materially affected by the degree of compliance with state laws and local ordinances to the operation of vessels; and

WHEREAS, violation of such laws or ordinances is evidence that a violation of the conduct which is likely to endanger the safety of persons and property; and

WHEREAS, it is the policy of each of the party states to promote compliance with laws, ordinances and administrative rules and regulations relating to the operation of vessels by their operators in each of the jurisdictions where such operators operate vessels;

WHEREAS, ORS 830.080 and 830.170 authorize the Oregon State Marine Board to enter into reciprocal bilateral agreements to carry out the purposes of this agreement, and RCW 39.34 (the Interlocal Cooperation Act) authorizes Washington State Parks and Recreation Commission to enter into cooperative agreements with public agencies in order to carry out the purposes of chapter 88.01 RWC, and Section 67-705 Code, authorizes the Idaho Department of Parks and Recreation to enter into reciprocal bilateral agreements to carry out the purposes of this agreement and to provide assistance in the disposition of vessel offenses committed by residents of one (1) jurisdiction while in another jurisdiction.

NOW, THEREFORE, in consideration of the above premises, the parties agree as follows:

sequent year for any person whose registration was terminated by subsection (1) of this section.

SECTION 5. ORS 704.525 is amended to read:

704.525. (1) The board shall appoint an advisory committee to provide advice to the board on serious matters regarding the implementation of this chapter. The committee shall be composed of seven members appointed as follows:

- (a) Two members from among those individuals recommended by the Oregon Guides and Packers Association.
- (b) One member from among those individuals recommended by the McKenzie River Guides.
- (c) One member from among those individuals recommended by the Eastern Oregon Guides.
- (d) One member from among those individuals recommended by the Rogue River Outfitters.
- (e) One member from among those individuals recommended by the Deschutes River Public Outfitters.
- (f) One member from among those individuals recommended by the Rogue River Guides Association, Inc.
- (g) One member from among those individuals recommended by the Tillamook Guides Association.

(h) Three public members selected by the board.

(2) In addition to such other duties as the board may prescribe, the advisory committee shall provide advice and recommendations to the board (and to the Sixty-sixth Legislative Assembly) regarding:

- (a) Methods of improving communication between the board and the guiding and outfitting industry.
- (b) The need for competency testing of guides and outfitters.
- (c) Refinements of the definitions of guides and outfitters.
- (d) Adequacy of liability insurance coverage.
- (e) Identifying decals for motorboats used by guides in providing outfitter and guide services.
- (f) Registration reciprocity for guides conducting outfitting and guiding services on the Klamath and Columbia Rivers.

SECTION 6. Sections 1 and 2 of this Act first become operative January 1, 1994.

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Agricultural
Research
Service

National
Program
Staff

Beltsville, Maryland
20705

: 25, 1993

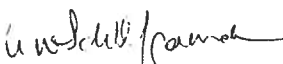
. M. Richmond
t Supervisor
Forest Service
wa-Whitman National Forest
Box 907
City, Oregon 97814

Mr. Richmond:

raft Environmental Impact Statement (DEIS) addressed to the
istrator, Agricultural Research Service, USDA, was duly received. We
looked over the document and commend your team on a thorough analysis.

ugh many of us have an interest in the issue as citizens, we believe it
t necessary or appropriate for us to comment on the DEIS as an Agency.

rely,


VAN SCHILFGAARDE
ciate Deputy Administrator
ral Resources and Systems

Aug 30 1993

WALLOWA WHITMAN NF
Box 907, City, OR 97814
FOREST SUPVR.
DEP FOR SUPVR.
ADM. OFFICER
PAO
FIRE/AVIATION
FOREST ENGR.
PLANNING
REC/LANDS/MNR
RNG/WOLF/S & W
TIMBER
PERSONNEL
CONTRACTING
BUDGET & FINANCE
BAKER RD.
EAGLE CAP RD.
HCMRA
LA GRANDE RD.
PINE DR.
UNITY RD.
WALLOWA VALLEY RD.
FILES
BULLETIN BOARD

ural
h

Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

November 19, 1993

BPA-AJP

Supervisor
Snake River Planning Team
907
ty, OR 97814

Snake River Planning Team:

The Bonneville Power Administration (BPA) has the following comments on the Draft Environmental Impact Statement (DEIS) for the Wild and Scenic Snake River Recreation Management Plan. BPA's comments address planning issues that should be considered under the mandates of the Federal Land Management Policy

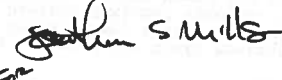
3 does not mention utility corridors. One existing utility corridor crosses the Snake River upstream from It is illustrated on the Oregon State Corridor Map found in the recently completed 1992 Western Utility (WUG) Western Regional Corridor Study. (The Wallowa-Whitman National Forest should have a copy of ; copies were sent to each forest in Region 6 several weeks ago.) The corridor crosses the proposed scenic segment between Pittsburg Landing and the northern boundary of the Hells Canyon National Recreation

this point since Section 103 and Title II of the Federal Land Management Policy Act defines rights of "principal or major use" of federal lands and requires their consideration in the Forest Service's land use process. Utility corridors do have environmental impacts that can be reduced through use of mitigation s. They are an excepted use on scenic rivers as defined by the Wild and Scenic Rivers Act. For this support the Wild and Scenic Snake River Recreation Management Plan and the DEIS preferred alternative (alternative E) which classifies the area crossed by the corridor as scenic.

Western Regional Corridor Study shows this corridor as a designated utility corridor in the Forest Plan, which could be used for transmission of power, communications, or gas and oil. This should also be mentioned IS. As a designated corridor, it may some day be considered for upgrading (higher voltage or capacity) parallel construction by another utility user. BPA currently has no long-range plans which would consider

It has not received a copy of the 1992 Western Regional Corridor Study, or if you have any questions these comments, please contact John O. Hooson of BPA's Office of Engineering, at (503) 230-3299. the WUG state coordinator for Oregon and helped complete the corridor map for Oregon.

Sincerely,


For Alexandra B. Smith
Assistant Administrator
Office of Environment

BPA's Comments on DEIS for Wild and Scenic Snake River Recreation Management Plan

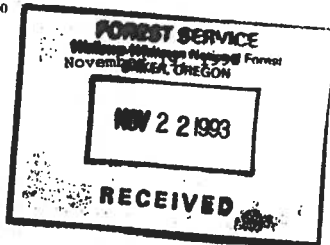
cc:
Ms. Lisa Freedman
USDA, Pacific Northwest Region
U.S. Forest Service
333 SW First Avenue
Portland, OR 97204

Mr. Dave Meyers
Idaho Power Company
P.O. Box 70
Boise, ID 83707

Mr. Howard Ferris
Pacific Power & Light Company
920 SW Sixth Avenue, Room 700
Portland, OR 97204

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Affairs
500 NE Multnomah Street, Suite 600
Portland, Oregon 97232-2036



Richmond, Forest Supervisor
Whitman National Forest
Snake River Planning Team
907
Idaho, Oregon 97814
Richmond:

The Department of the Interior has reviewed the Draft Environmental Impact Statement for the Wild and Scenic Snake River, Walla-Walla National Forest, Oregon; and Nez Perce and Payette National Forests, Idaho; Counties of and Walla in Oregon; and Counties of Nez Perce and Adams in Idaho. Following comments are provided for your use and information when preparing the final documents.

We appreciate the attention the Draft Environmental Impact Statement (DEIS) has given to the Salmon River and its users' concerns. Since the Snake and Salmon River confluence, can be considered a single ecosystem, coordination and cooperation between managing agencies is essential. A coordinated management strategy will be necessary since some of the proposals in the DEIS will require a change in the Bureau of Land Management's (BLM's) Snake River Management Plan, a change in commercial outfitter operating procedures, or modification of the proposed action described in the DEIS.

I was a member of the Limits of Acceptable Change Task Force and I agree with that group's recommendations as described in Alternative B. The deal mainly with the wild river section and have little impact on Salmon River users. The Preferred Alternative, Alternative E, would directly affect river users through limitations on party size, numbers of boats, jet ski locations, and power boat limitations.

COMMENTS

Specific comments are directed to proposed management actions in Alternative E. They are limited to those actions which would impact the Lower Snake River and its users.

SK-ON, WEEK-OFF FOR POWER AND FLOAT BOATS. We believe this will result in displacement of both power and float boats to the Lower Salmon River during the week when they will not be allowed on the dam to the Kirkwood section of the Snake. This will result in further management controls and actions on the Lower Salmon, as well as added congestion on the already crowded section below the mouth of the Salmon.

Proposed daily limits on the scenic section for power and float boats, commercial and noncommercial, will help alleviate crowding and congestion at the mouth of the Salmon and should be considered for all alternatives. However, some exceptions should be made for Lower Salmon landowners who use boats from the Snake to access their private property. This includes commercial outfitters who have lodges on private property on the Lower Salmon and must have the capability to operate their respective businesses.

2. PERSONAL MOTORIZED WATERCRAFT USE. Personal motorized watercraft are prohibited on the Lower Salmon below the mouth of Hammer Creek. We believe that extending the use of such craft to the mouth of the Salmon would encourage illicit use on the Lower Salmon and would also add to an already congested condition on the Snake below the mouth of the Salmon. We would prefer to see the existing situation maintained.

3. NUMBER OF FLOAT CRAFT. There is currently no limit on the number of craft per party on the Lower Salmon and many parties exceed the eight-boat limit specified in the preferred alternative. Consequently, if this becomes a plan decision, exceptions would have to be made for Lower Salmon boats that would have to amend the Lower Salmon Plan to incorporate the same limit.

This would involve further long-term public involvement with results that still may not mesh with this proposal. There are currently three commercial outfitters who operate "row your own" trips on the Lower Salmon (one with inflatable kayaks and two with small rafts). All of these are longstanding good operators and all use more than eight boats on every trip. We support the rationale for wanting to limit boats per party in order to relieve congestion below the mouth of the Salmon, however, there may be other ways to accomplish the same results without finite limits. For example, "rafting" of boats in the same party when they arrive at the Snake may work.

4. PARTY SIZE. The party size limit on the Lower Salmon is 30. The reason to reduce that limit. Therefore, if lower party size limits were instituted on the Snake, an exception would have to be made for Lower Salmon boaters. Lowering the party size limits on the Lower Salmon would require another amendment to the management plan, and would receive little support. We see no reason to attempt such a change as there are no scientific environmental reasons to do so.

5. GRASSING ALLOTMENT, PERMITTEE FACILITY, AND PRIVATE INHOLDING ACCESS. Refer to comment 1. Lower Salmon River landowners and permittees must have access privileges. One trip per day during the control season is reasonable.

We appreciate the opportunity to be involved in the Limits of Acceptable Change Task Force and the succeeding planning process. We also appreciate the briefing visit by the planning team and the willingness to coordinate in this important endeavor. We look forward to working even more closely as the plan evolves. Thank you for considering our comments and the needs of Lower Salmon boaters.

If you have any questions or require further explanation, please contact Charles Polityka, District Manager, Bureau of Land Management, Coeur d'Alene Office, 1808 North Third Street, Coeur d'Alene, Idaho 83814. His phone number is (208) 769-5001.

Sincerely,

Charles Polityka
Regional Environmental Officer



16711

SEP 23 1993

16711

SEP 23 1993

R. M. Richmond
United States Department of Agriculture
Forest Service
P.O. Box 907
Seaside, Oregon 97138

Re Mr. Richmond:

This letter is in response to your letter dated August 12, 1993,
a follow-up to our meeting on September 17, 1993, regarding
toilet facilities on vessels operating on the Snake River and the
Draft Environmental Impact Statement for the Hells Canyon
National Recreation Area.

The office does not wish to endorse or oppose any one of the
proposed management alternatives in the Draft Environmental
Impact Statement for the Hells Canyon National Recreation Area.
However, one incorrect item was noted on page 1-3, 4th paragraph,
where "ALLOCATE POWERBOAT USE LEVELS." The U. S. Coast Guard
does not have additional requirements for rivercraft over 44 feet
in length. We do, however, have additional requirements for
certain vessels over 26 feet, 39.6 feet and 65 feet in length.
These are primarily related to safety and stability requirements
for a vessel.

33 CFR Part 177.30-5 contains specific requirements for toilet
facilities on certificated small passenger vessels. These
regulations require portable or installed toilet facilities on
certificated small passenger vessels, except those operating
short runs of approximately 30 minutes or less. A portable
toilet requires proper disposal of sewage at a shoreside reception
facility. 33 CFR Part 159.7 contains requirements for the
installation of a Marine Sanitation Device (MSD) on vessels with
permanently installed toilets. These regulations do not allow
a vessel (certificated or non-certificated) to operate with an
unattended toilet facility unless it is equipped with a Coast
Guard approved and operable MSD.

It has been our policy not to require toilet facilities on
uncertificated small passenger vessels operating on the Snake
River. The pit toilets are currently available within 30 minutes
of these vessels at any point along the route allowed by their
Certificate of Inspection. We consider this adequate to meet the
intent of the regulations.

Phasing out the pit toilets would not change our policy.
Toilets are available within 30 minutes running time, therefore
a vessel would not be required to have either an MSD or portable
toilet. If not available within 30 minutes, an MSD or portable
toilet would be required.

I look forward to us working together in the future to resolve
this matter. If you have any additional questions, please
contact Chief Warrant Officer Maurice J. Sharpe of my staff
(503) 240-9340.

Sincerely,

J. R. LINDLEY
Lieutenant Commander, U. S.
Acting Chief, Inspection Department
By direction of the Officer
Marine Inspection

J. R. TOWNLEY, JR.
Captain, U. S. Coast Guard
Officer in Charge Marine Inspection



U.S. Department
of Transportation
Federal Aviation
Administration

Flight Standards District Office
1800 N. E 25th Avenue, Suite 15
Hillsboro, Oregon 97124

January 28, 1994

R. M. Richmond
Wallowa-Whitman National Forest
P. O. Box 907
Baker City, OR 97814

Dear Mr. Richmond:

Personnel of this office have reviewed the environmental impact study and recommendations. In addition, we have conducted an airport and airspace evaluation and have forwarded our findings to the F.A.A. Airports Division in Seattle, WA.

In answer to your questions, the standard visual flight rules (VFR) weather conditions for all aircraft are a ceiling of 1000' above ground level and a minimum visibility of three miles. In "uncontrolled airspace" these minimums are reduced to one mile visibility and operation clear of clouds. The airspace in the Hells Canyon area is "uncontrolled" until reaching 1200' above ground level, therefore, it would be legal to fly with one mile visibility, but contrary to good judgment and very dangerous due to the terrain.

Ultralight vehicles are subject to the same general operating rules as other aircraft and also to some other regulations as spelled out in FAR 103. These would include, but not be limited to: not creating a hazard to other persons or property, giving way to all other aircraft, and not operating over any congested area or any open air assembly of persons.

A "VFR" corridor is not an appropriate alternative as all operations in the canyon would be conducted under VFR rules.

To the best of our knowledge there are no commercial or sightseeing flights occurring within the canyon and no military training routes in that general area.

If the number of aircraft in the canyon were to increase substantially it could increase the chances of a mid-air collision. At present there are very few aircraft operating in the canyon and those that do require special skills and the appropriate type of aircraft for the landing strips involved. At present these strips are not suitable for the majority of general aviation aircraft.

If I can be of further assistance please feel free to call me at 1-800-847-3806.

Sincerely,

Thomas L. Jensen for
Kleth D. Crimin
Aviation Safety Inspector

2.

K-309

Appendix K



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

REPLY TO
ATTN OF:

WD-126

JAN 6 1994

R.M. Richmond, Forest Supervisor
Wallowa-Whitman National Forest
P.O. Box 907
Baker City, Oregon 97814

Re: Wild and Scenic Snake River
Hells Canyon National Recreation Area
Draft Environmental Impact Statement

Dear Mr. Richmond:

The Environmental Protection Agency (EPA) has conducted a preliminary review of the Draft Environmental Impact Statement (EIS) for the Wild and Scenic Snake River in the Hells Canyon National Recreation Area. Our abbreviated review was conducted under the National Environmental Policy Act and Section 309 of the Clean Air Act, which directs EPA to review and comment on all federal EISs.

Following our preliminary review, EPA has found no significant statutory or jurisdictional issues from its perspective. We will not be providing specific review comments at this time. Therefore, we are rating this draft EIS LO (Lack of Objections). An explanation of the EPA rating system is enclosed for your reference. This rating will be published in the Federal Register.

Thank you for the opportunity to review this draft EIS. If you have any questions regarding our review, please contact Ruth Siguenza at 206/553-2143.

Sincerely,

Daniel Skibben, for
Kathy Veit, Chief
Program Coordination Branch

Enclosure: Rating System Summary

cc: Kurt Wiedenmann, Planning Team Leader
Woody Fine, Assistant Area Ranger

JAN 10 1994

FOREST SUPERVISOR
DEP FOR SUPER
ADNL OFFICER
PAO
FIRE/INMATION
FOREST ENGR
PLANNING
REC/LANDS/ROH
RNG/WOLF/S & W
TIMBER
PERSONNEL
CONTRACTING
BUDGET & FINANCE
BAKER RD.
EAGLE CAP RD.
JACONA
LA GRANDE RD.
PINE DR.
UNITY RD.
WALLOWA VALLEY RD.
FILES
BULLETIN BOARD

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

Environmental Impact of the Action

LO - - Lack of Objections

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

EC - - Environmental Concerns

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

EO - - Environmental Objections

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

EU - - Environmentally Unsatisfactory

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

Adequacy of the Impact Statement

Category 1 - - Adequate

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

Category 2 - - Insufficient Information

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

Category 3 - - Inadequate

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

* From EPA Manual 1549 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.

0 1993

R. M. Richmond
st Supervisor
owa-Whitman
onal Forest
Box 907
r City, OR 97814-0907

Mr. Richmond:

appreciate the opportunity to comment on the draft
ronmental Impact Statement (DEIS) for Scenic Snake River
in the Hells Canyon National Recreation Area. As pointed out
your letter the U. S. Postal Service has an obligation to
s a number of customers along the river. This obligation is
gal responsibility as well as a historical precedent.

brief review of the draft statement would appear to allow for
ted commercial use of the river (Alternative E, pages II-30
ugh 35), where one might assume those essential services
d be provided. This alternative would allow for mail
very provided that in each contract or assignment for
ercial use some provision was made for mail delivery. The
iculty with limiting commercial traffic is that it could
tantly increase the cost; therefore some provision should
ess this concern.

we want to thank you for giving us the opportunity to
ond. We would appreciate receiving a copy of the final
ct or your comments of the issue raised in this letter.

erely.

ld A. Dietz
racting Officer
ern DNO, Seattle Branch

Mr. Charles Olesky

DMBradley

United States Senate

WASHINGTON, DC 20510-1203

AGRICULTURE, NUTRITION,
AND FORESTRY
ENERGY AND NATURAL
RESOURCES
SPECIAL COMMITTEE
ON AGING

October 28, 1993

Supervisor
907
City, OR 97814
Snake River Planning Team

it may concern:

you for contacting me. I appreciate hearing from you and
g of your concerns.

1865, powerboats of one kind or another have been used on
ake River. From their original use for transporting
, goods and mail, to their current recreational uses,
oats continue to play an important role in the shaping of
Hells Canyon is an area of shared use and I believe this
must continue.

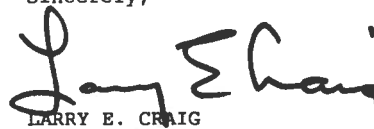
e of the increase in the number of jetboaters on the Snake
and concerns about environmental protection of the wild and
portion of the River, the Forest Service is currently
g on a comprehensive revision of the Hells Canyon National
tional Area management plan. As you likely know, public
gs are being held regarding the recreational management of
ake River. The Forest Service is considering alternatng
etween floaters and jetboaters on the wild designated
n of the River for a fourteen week period. The Forest
e will continue to gather public comment and incorporate
nformation into its final proposal, scheduled to be
hed sometime in February, 1994.

ware of the concerns jetboaters have about this proposal.
uently, I have spoken with the Wallowa-Whitman Forest
isor about this matter and have relayed the comments I have
ed similar to yours. The discussion was positive, and the
Supervisor is well informed about jetboaters' needs.
e know, I will continue to monitor this situation carefully,
g your thoughts in mind.

meantime, I strongly encourage you to either write the
Service or provide testimony at one of the agency's public
ings, expressing your concerns about this matter. The Forest
e must incorporate public comment into any decisions it
regarding this issue.

Again, thank you for contacting me. I welcome your continued
correspondence regarding this or any other matter of concern
you.

Sincerely,



LARRY E. CRAIG
U.S. Senator

LEC\ljw

United States Senate

WASHINGTON, DC 20510

November 19, 1993

Robert Richmond, Forest Supervisor
Wallawa-Whitman National Forest
ATTN: Snake River Planning Team
P.O. Box 907
Baker City, OR 97814

Dear Bob:

We have reviewed the DEIS for recreation management of the Wild and Scenic Snake River and cannot support the selection of alternative E as the preferred management plan.

Alternative E cuts the season in half above Pittsburgh Landing for both powerboaters and floaters, a step that does not appear to be justified and would require an oppressive system of regulations and enforcement. E would allow powerboats exclusive use of the wild river above Pittsburgh Landing one week and floaters exclusive use the next. The stated reason for selecting this strategy is that floaters and powerboaters can't get along. However, both classes of boaters seem to be getting along surprisingly well under the current levels of use.

Alternative E's management strategy has serious economic impacts, curtailing a critical element of the region's tourism industry. Alternatives C, D and F have even more impacts. With continuing curtailments in the forest products industry, tourism has become more important to the economic health of the Northwest. Hells Canyon, an internationally recognized attraction, and its associated outfitting industry, provide needed diversity to the region's economic base. We cannot afford the cuts associated with alternatives C through F.

Congress recognized both motorized and nonmotorized river craft as valid uses of the entire Snake River within the Hells Canyon National Recreation Area. It also recognizes the provision of recreation opportunities for the American people as an important objective of this National Recreation Area. Any management plan should capitalize on those recreation opportunities to the extent that this is compatible with stewardship of the area's magnificent resources. Congress did not designate the river corridor as wilderness, and there is no intent to have it managed as wilderness. It is a wild river, which designation doesn't prohibit use of motorized river craft or dictate a particular type of recreation experience.

All of the DEIS alternatives seem to rely on numerical limitations.

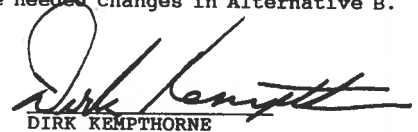
Numbers are important only to the extent that they represent conditions most visitors will find acceptable and to the extent that they define levels of use that will not unacceptably threaten the Canyon's resources. The University of Idaho study of river visitors found that 68 percent ranked their trip as among the best they had ever had; only 1 percent ranked it among the worst. Something must be "going right" in Hells Canyon at present use levels. We do not understand why use must be reduced and all growth curtailed. While the DEIS insinuates that resource damage might take place, it fails to document any real damage or even a threat of damage.

This navigable river has a tradition of use by powered craft that dates back to the 1860's. It is uniquely suitable for motorized use on a yearlong basis. Any management plan should capitalize on that unique quality and outstandingly remarkable value. This is not to say that either motorized or nonmotorized craft should be excluded. Both powerboaters and floaters can and should share this National Recreation Area.

Developed by a citizen task force composed of members from all Hells Canyon interests, Alternative B is workable, with modifications, and provides adequate protection to the area's resources. With the changes recommended by the Hells Canyon Alliance, it represents the best alternative by which to manage the river. Enclosed are the Alliance recommendations. Please carefully review those to make the needed changes in Alternative B.

Sincerely,


LARRY E. CRAIG


DIRK KEMPTHORNE


SLADE GORTON

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Appendix K