

United States
Department of
Agriculture

Forest
Service



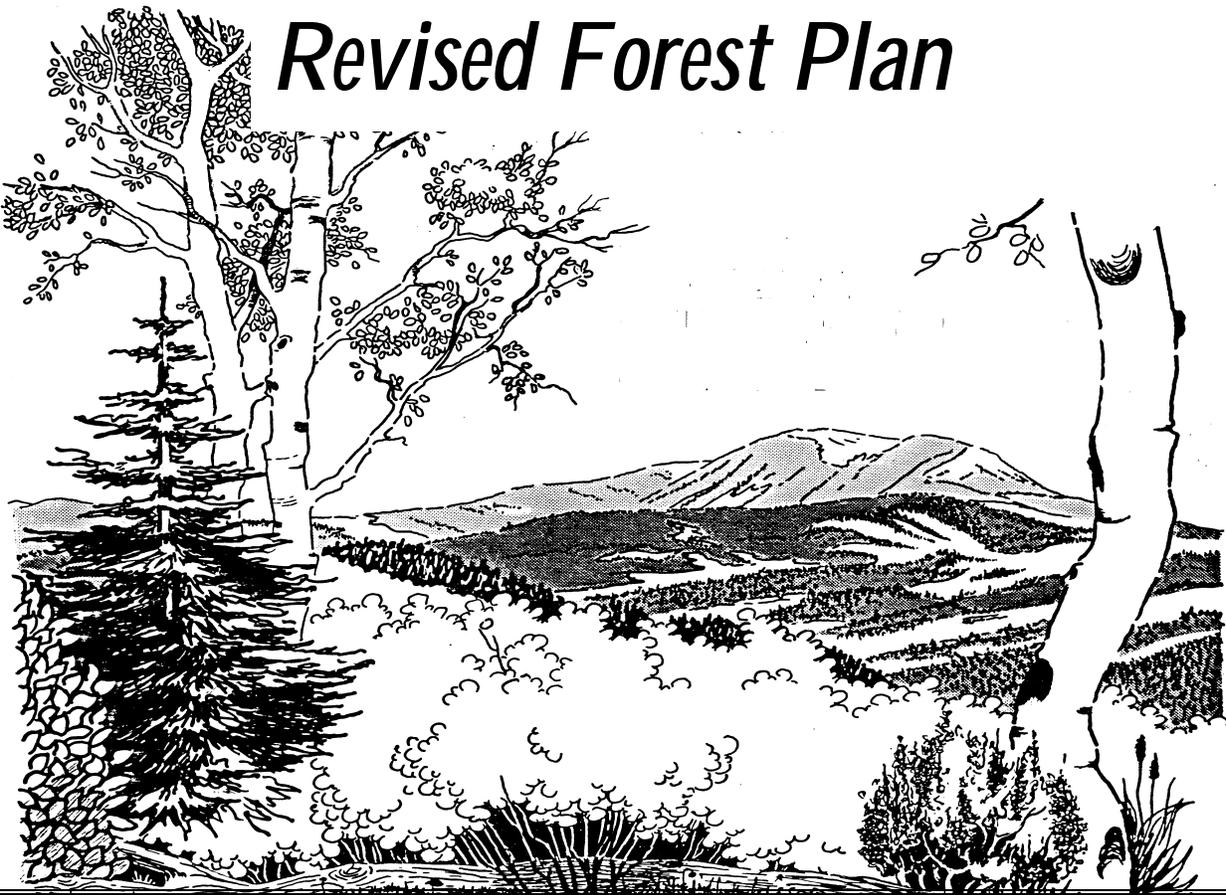
Caribou-Targhee
National
Forest

February, 2003

Final Environmental Impact Statement

For the

Caribou National Forest Revised Forest Plan



Volume III: Appendix A
Public Involvement

Caribou-Targhee NF

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Final Environmental Impact Statement

Appendix A—Public Involvement

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Public Involvement

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

Public Involvement

Initial Analysis of the Management Situation (AMS) Report

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

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

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

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

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

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

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

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

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

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

Stakeholder Briefings were held in September, 1999 and included:

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

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

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

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

December, 1999 Public Open Houses

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

Open houses were held in:

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

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

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

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

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

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

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

Build Your Own Alternative Exercise

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

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

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

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

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

November 2000 Open Houses

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

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

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

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

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

Release of the Draft EIS/Draft Revised Forest Plan

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

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

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

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

Approximately 120 people attended these meetings.

SHOSHONE-BANNOCK TRIBAL COORDINATION AND BRIEFING MEETINGS

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

OTHER INTERESTED PARTY BRIEFINGS

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

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

INTERNAL BRIEFINGS AND REVIEW

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

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

PUBLIC COMMENT RECAP ON DRAFT DEIS AND DRAFT REVISED FOREST PLAN

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

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

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

The following six topic areas surfaced during the comment period:

1. Providing recreation opportunities and access of all types is important to the public.
2. The local and national public is very interested in Roadless Area Management and wilderness recommendation on the 749,000 acres of Inventories Roadless Areas on the Caribou National Forest.
3. The public is concerned with livestock grazing on the Forest, both in terms of the effects on the resources and the local custom and culture.
4. The public is concerned with wildlife and fisheries management on the Forest.
5. The public is concerned with vegetation management on the Forest.
6. Many people are interested in the minerals program. The Forest has a unique issue of Selenium (Se) and other heavy metals leaching out of mine dumps in the phosphate patch.

Final EIS/Plan

RO Review
WO Review

August, 2002
January, 2003

Table 1. Summary Table of Public Involvement

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

Consultation with Other Agencies

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

FEDERAL AGENCIES

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

CONGRESSIONAL OFFICES (FIELD OFFICES)

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

STATE AGENCIES

Idaho Department of Parks and Recreation
Idaho Department of Environmental Quality

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

CITY/COUNTY

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

List of Recipients

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

INDIVIDUALS

Available upon request

MEDIA OUTLETS

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

ORGANIZATIONS

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

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

INDUSTRY

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

AGENCIES, AS REQUIRED BY LAW

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

Response to Public Comments

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

Organization of this Section

This section is organized into three sections:

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

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

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

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

Process Used to Analyze Public Comments

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

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

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

Roster of Public Comment Letters in Numerical Order

Letter ID	Last Name	First Name
1	Form	Letter
2	Form	Letter
3	Form	Letter
4	Form	Letter
5	Form	Letter
6	Form	Letter
7	Form	Letter
8	Form	Letter
9	Form	Letter
10	Number Not Assigned	
11	Number Not Assigned	
12	Form	Letter
13	Form	Letter
14	Form	Letter
15	Number Not Assigned	
16	Number Not Assigned	
17	Talbot	C.
18	Molire	R.
19	Walton	K.
20	Nicoll	M.
21	Bateman	M.
22	McAlexander	L.
23	Hodel	C.
24	Corrinne	J.
25	Lynch	L.
26	Bradish	E.
27	Swenson	B.
28	Smith	D.
29	Johnson	K.
30	Scott	D.
31	Arnold	T.
32	Winterfield	D.
33	Winterfield	C.
34	Hill	G.
35	Foue	W.
36	Jahsman	P.
37	Martin	A.
38	Hardy	V.
39	McIvov	K.
40	Griffith	A.
41	Willmore	J.
42	Wrona	L.
43	Turner	D.
44	Taylor	T.
45	Safford	L.
46	Hogan	R.

Letter ID	Last Name	First Name
47	Williams	N.
48	Libby	S.
49	Briggs	B.
50	Phillips	T.
51	Ursenbeck	C.
52	Talley	A.
53	Phinney	V.
54	Akers	J.
55	Simkins	J.
56	Turner	C.
57	Baird	S.
58	Meinche	D.
59	Scott	D.
60	O'Neil	F.
61	McAleese	D.
62	Christensen	R.
63	Stephens	R.
64	Dement	J.
65	Larson	N.
66	Joyce	P.
67	Larson	C.
68	Piva	L.
69	Hoffman	A.
70	Green	O.
71	Hoffman	A.
72	Howell-Angle	J.
72	Taylor	C.
73	Park	M.
74	Schmidt	E.
75	Norby	D.
76	Phinney	N.
77	Minner	L.
78	Marciuke	R.J.
79	Pink	C.
80	Bray	C.
81	Wilde	C.
82	Johnson	J.
83	Orwizk	O.
84	Manning	M.
85	Baillie	R.W.
86	Cobbley	R.
87	Bray	J.
88	Smith	R.
89	Boyd	M.
90	Kotehes	C.

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

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

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

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

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

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

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

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

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

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

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

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

Summary Responses on Public Comments

Alternatives

ALTERNATIVE 3

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

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

Forest Summary Response:

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

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

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

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

ALTERNATIVE 6

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

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

Forest Summary Response:

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

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

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

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

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

ALTERNATIVE 6

Summary Statement: *Alternative 6 is too restrictive*

Letters containing similar comments: 189, 363, 399

Forest Summary Response:

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

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

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

ALTERNATIVE 6

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

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

Forest Summary Response:

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

ALTERNATIVE 7

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

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

Forest Summary Response:

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

ALTERNATIVE 7

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

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

Forest Summary Response:

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

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

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

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

Draft Environmental Impact Statement

CUMULATIVE EFFECTS

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

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

Forest Summary Response :

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

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

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

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

NEED FOR CHANGE

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

Letters containing similar comments: 564, 575, 577

Forest Summary Response:

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

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

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

Issue 1 – Recreation, Access, and Scenery Management

Summary Statement: Prohibit all motorized use in the Forest.

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

Forest Summary Response:

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

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

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

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

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

Summary Statements:

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

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

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

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

(3) Retain the existing access to the Forest.

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

(4) Provide more overall access to the Forest.

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

Forest Summary Response :

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

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

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

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

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

Summary Statement: Better enforce travel plan regulations.

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

Forest Summary Response:

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

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

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

Summary Statement: Retain adequate access to Wenchell Dugway

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

Forest Summary Response :

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

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

SNOW SEASON ACCESS

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

(1) Prohibit snowmobiles on the Forest.

Letters containing similar comments : 411, 436, 529

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

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

(3) Maintain or provide more access for snowmobiles.

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

Forest Summary Response :

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

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

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

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

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

Summary Statements regarding access on the backside of Pebble Creek

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

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

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

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

Forest Summary Response:

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

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

MOTORIZED ACCESS

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

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

Forest Summary Response :

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

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

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

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

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

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

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

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

Letters containing similar comments: 281, 567, 571

Forest Summary Response:

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

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

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

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

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

Issue 2 – Social and Economic Environment

Summary Statement:

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

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

Forest Summary Response:

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

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

The NFMA regulations define net public benefits as:

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

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

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

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

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

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

Summary Statement:

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

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

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

Forest Summary Response:

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

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

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

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

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

Issue 3 – Ecosystem Management

Summary Statement:

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

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

Forest Summary Response:

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

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

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

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

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

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

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

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

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

Summary Statement:

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

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

Forest Summary Response:

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

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

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

Issue 4 – Livestock Grazing

Summary Statements: Eliminate livestock grazing on the Forest.

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

Stop abusive grazing practices by applying stricter standards.

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

Forest Summary Response:

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

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

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

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

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

Forest Summary Response :

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

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

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

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

Forest Summary Response:

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

Issue 5 – Mining

Summary Statement: *Eliminate all mining on the Forest.*

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

Forest Summary Response:

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

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

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

Forest Summary Response:

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

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

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

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

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

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

Summary Statement: Reclaim mined lands.

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

Forest Summary Response :

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

Issue 6 – Riparian Areas and Aquatic Biota

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

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

Forest Summary Response:

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

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

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

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

Summary Statement:

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

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

Forest Summary Response:

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

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

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

Mining

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

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

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

Total Maximum Daily Loads (TMDLs)

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

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

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

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

Issue 7 – Timber Management

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

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

Forest Summary Response :

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

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

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

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

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

Forest Summary Response :

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

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

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

Summary Statement: Prohibit clearcutting.

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

Forest Summary Response :

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

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

Summary Statement: Protect remaining Old Growth.

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

Forest Summary Response :

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

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

Issue 8 – Roadless Area Management and Recommended Wilderness

ROADLESS AREA MANAGEMENT

Summary Statements:

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

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

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

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

Forest Summary Response:

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

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

General Management

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

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

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

Timber Harvest

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

Mining

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

Livestock Grazing

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

Motorized Access

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

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

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

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

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

RECOMMENDED WILDERNESS

Summary Statements:

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

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

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

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

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

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

Forest Summary Response:

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

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

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

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

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

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

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

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

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

Issue 9 – Wildlife Habitat Management

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

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

Forest Summary Response:

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

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

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

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

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

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

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

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

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

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

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

Summary Statement: Wildlife Viability Analysis is inadequate.

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

Forest Summary Response:

Conclusion

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

Process

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

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

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

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

Letters containing similar comments: 230, 319, 337

Forest Summary Response :

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

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

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

Forest Summary Response :

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

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

Capacity

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

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

Vegetation

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

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

Wildlife

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

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

Alternative 7R and the Revised Forest Plan

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

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

- In addition, several other areas, currently non-motorized in the summer, will be preserved for primitive recreation experiences and wildlife security.
- Alternative 7 and 7R set Open Motorized Route Densities to maintain and improve wildlife habitat and to provide non-motorized experiences.
- The Plan has a guideline to restrict disturbance within one mile of known active wolverine den sites from March 1 to May 15.
- The Plan contains direction for maintenance of large blocks of security cover for wildlife in the Preuss Ridges and Caribou Range Ecological Subsections.
- One of the management emphases in the Caribou Range, Preuss Ridges, and Bear River Ecological Subsections is to maintain linkage habitat between the Caribou and the Targhee, Wasatch-Cache, and Bridger-Teton National Forests.
- Management emphasis in the Caribou Range Ecological Subsection is to retain the primitive and semi-primitive recreation opportunity and the backcountry hunting experience.

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

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

Forest Summary Response:

General

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

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

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

Prescription density limits range from 0.0 mi/mi² to 1.0 mi/mi² in this area. This low density will allow people to have a primitive, backcountry experience. It will also retain the important and valuable roadless area character (Appendix R). One of the management emphases in the Caribou Range Subsection is “Retention of primitive and semi-primitive recreation opportunities” and “wildlife security and backcountry hunting experiences.” Conversely, in areas managed with Prescription 5.2, Forested Vegetation Management, open motorized route density limits are generally set as 2.0 mi/mi².

Wildlife

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

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

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

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

Elk and other Big Game

Most of the research and studies done on open motorized route or road densities have been done on elk. Rationale for selection of specific levels of access (1.0 mi/mi² and 2.0 mi/mi²) and the effects is discussed in the Wildlife section of Appendix D.

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

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

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

Summary Statements on Canada lynx

(1) Forest Plan should incorporate guidance from LCAS.

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

(2) Forest Plan should not include LCAS guidance.

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

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

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

Forest Summary Response:

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

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

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

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

Forest Summary Response:

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

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

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

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

Letters containing similar comments : 565, 575, 577

Forest Summary Response:

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

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

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

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

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

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

Forest Summary Response:

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

Wolves

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

Wolverine

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

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

Other Resources

AIR QUALITY

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

Letters containing similar comments: 562, 577

Forest Summary Response:

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

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

ROADS

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

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

Forest Summary Response :

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

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

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

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

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

- In many areas of the Forest, it is unclear where the road ends and motorized trail begins. Much of the trail system has developed over the years from unused two-track roads. On many roads, whether it is a road or trail depends on the user's ability. Some people would drive a jeep on the same stretch of track that other people would only use an ATV or motorcycle on. This is especially true in the areas currently open to cross-country travel.
- In addition, there have been many advances in technology in the all terrain vehicle (ATV) industry. Machines are larger, wider, and much more popular. As ATVs increase in size, the distinction between them and a four-wheeled drive "vehicle" becomes less clear. According to the Idaho Department of Parks and Recreation, ATV recreation is the fastest growing OHV recreation use in Idaho and the United States. Registration figures show that Southeast Idaho's ATV registrations grew from 1,899 in 1995 to 4,444 in 2000 - an increase of 134 percent within six years (Idaho Dept. Parks and Recreation, 2001). It is not uncommon to encounter large groups of recreationists on ATVs at one time. They are also a very common method of accessing game during the hunting seasons. Even ATV organizations are concerned that some measure of control be exercised over the use of these machines in order to retain a quality motorized experience (BRC, 2002).
- Open motorized route limits were used not only for elk habitat analysis but also to address other wildlife species, watershed conditions and recreation experiences. New information provided by several groups indicates that all trails and roads, not just motorized routes, have a detrimental effect on wildlife security (Noss, 2002). Again, however, we are aware of no scientifically controlled studies to support this claim.
- Finally, recreation experience was another reason for setting the motorized route density limits and equating motorized trails with roads. While many people may disagree, forest managers believe that motorized trails affect the recreation experience similar to roads. Because Alternative 7R largely retains the current motorized road and trail network, intuitively it makes sense that roads and trails could be treated equally. For instance, in order to retain the backcountry experience of the area south of Tincup Highway on the Soda Springs Ranger District, motorized route densities were set to closely match the existing route network. Many of those access routes are currently trails so in order to maintain the experience with trails separate from roads, the Forest would have had to set separate density limits for each type of route. This would unnecessarily complicate the analysis and the public's ability to see how the changes would affect them.

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

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

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

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

Forest Summary Response :

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

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

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

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

Federal, State, local government agencies and Elected Officials

State of Idaho Department of Agriculture	Letter 148
Idaho Department of Environmental Quality	Letter 167
Idaho Department of Fish and Game	Letter 176
Idaho Department of Parks and Recreation	Letter 200
Bear Lake Regional Commission	Letter 234
State House of Representatives, Eulalie Langford	Letter 281
State of Wyoming Office of Federal Land Policy	Letter 289
United States Department of Interior	Letter 308
Wyoming Game and Fish Department	Letter 396
United States Environmental Protection Agency	Letter 573