

Chapter 6. Public Comments and Responses

CHAPTER 6. PUBLIC COMMENTS AND RESPONSES

This chapter reproduces timely comment letters received on the DEIS from Tribal, federal, state, and local agencies and officials as provided in the Forest Service NEPA Handbook 1909.15. Additional letters received late along with responses are contained in the project record.

It also categorizes timely substantive public comments received on the DEIS, followed by the Forest Service's agency response to each substantive comment, as provided by 40 CFR 1503.4.

6.1 Comments from Federal, Tribal, State, and Local Officials

Comment #409, Idaho Department of Parks & Recreation

Comment #416, Idaho Department of Fish & Game

Comment #417, Nez Perce Tribal Executive Committee

Comment #439, United States Environmental Protection Agency

409 1001



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IDAHO DEPARTMENT OF
PARKS AND RECREATION

p.o. box 83720
boise, idaho 83720-0065

(208) 334-4199

fax (208) 334-3741

tdd 1-800-377-3529

street address
5657 Warm Springs Avenue

www.parksandrecreation.idaho.gov

May 9, 2006

Cliff Dils, Interim Forest Supervisor
Payette National Forest
P.O. Box 1026
McCall, ID 83638

RE: Payette National Forest Travel Management Plan DEIS

Dear Mr. Dils:

Summer General Comments

The Idaho Department of Parks and Recreation (IDPR) staff reviewed the Payette National Forest Travel Management Plan Draft Environmental Impact Statement (DEIS). The revised travel plan will guide Payette National Forest recreation opportunities for the next 10 to 15 years.

The plan will also comply with the final rule for motorized recreation in National Forests. This rule limits off-highway vehicle (OHV) use to existing and designated roads and trails on National Forest Land.

The planning team should be congratulated for its public involvement efforts on this project. We were pleased that the interdisciplinary team held a public meeting in Boise for the DEIS. The Payette National Forest is a valuable recreation asset for both Treasure Valley and West Central Idaho residents.

We also appreciate the opportunity to be involved as an informal cooperating agency in the travel planning process. Meeting with the ID Team as well as the surrounding counties gave us better knowledge of what is actually occurring on the ground with the Payette National Forest. Likewise, we hope that you have found our input throughout the process to be valuable.

The Off-Highway Vehicle Recreation in the United States, Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE) determined that OHV recreation is growing rapidly and now numbers over 51 million Americans. It is critically important that there be adequate trails in place to meet the OHV recreationists needs for quality recreation. Clearly the existing trail infrastructure on the Payette is inadequate to meet the present and growing need (especially ATV use).

Across the range of action alternatives, the Payette National Forest (PNF) seeks to reduce maintenance costs by decommissioning roads and trails. While there are definitely some roads and trails that need to be decommissioned, as a general rule the PNF should be looking at ways to expand both motorized and non-motorized recreation opportunities in a cost-effective manner.

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return rate, there was a possibility of some bias in terms of who did the survey and who declined to return the survey.

The PNF staff needs to recognize that the public is demanding more recreation opportunities. Historically, the PNF had adequate recreation trail opportunities for both motorized and non-motorized recreationists. Motorized recreationists have been continually losing opportunities since 1978.

Our records show that in 1978, the Payette National Forest had 1,773 miles of trail open to motorbikes. In 1991, those opportunities were reduced to 970 miles. In 2005, motorbike trail opportunities totaled 642.7 miles.¹ In total, motorbike opportunities have been reduced 64% with the no-action alternative.

Non-motorized opportunities have increased slightly at the expense of motorized opportunities. Our records show in 1978, the Payette National Forest had 900 miles of non-motorized trails. In 1991, those opportunities increased to 1,042 miles. In 2005 non-motorized opportunities totaled 1,182 miles. Since 1978, non-motorized opportunities have increased 31% on the PNF with the no-action alternative.

We recognize that the PNF trail maintenance budget is inadequate to maintain its present trail system. One reason for these inadequate budgets is outrageous administrative costs. The PNF needs to significantly reduce administrative overhead. The more money that gets to the ground, the more the public will support increasing recreation budgets.

Across the range of action alternatives, the Payette National Forest (PNF) seeks to reduce maintenance costs by decommissioning roads and trails. While there are definitely some roads and trails that need to be decommissioned, as a general rule the PNF should be looking at ways to expand both motorized and non-motorized recreation opportunities in a cost-effective manner.

The PNF needs to be more aggressive in applying for IDPR grants and trail maintenance assistance to fund trail maintenance and (re) construction.

The Recreation Trails Program (RTP) received a significant boost in funding with the passage of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETA-LU). Idaho will receive \$1.1 million in FY 2006 that will increase to \$1.3 million in FY 2009.

Our Motorbike Recreation Fund has grown by an average of 16% per year for the last ten years. As a result of the revenue growth, we are expanding our Trail Cat Program by one machine and an additional Trail Ranger crew by next summer. These actions will allow the IDPR to increase its maintenance and (re) construction efforts on the Payette National Forest.

¹ 1978 IDPR Trails Inventory, 1991 IDPR Trails Inventory, and 2006 PNF Travel Management Plan DEIS

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We want to meet with the PNF staff to discuss how our expanded Trail Ranger Program and Trail Cat Program, as well as our grant programs can assist the PNF in its trail maintenance and reconstruction efforts. By working together, our agencies can provide quality trail-based recreation opportunities for both motorized and non-motorized recreationists.

Successful summer travel management requires providing a broad range of recreational access opportunities for both motorized and non-motorized recreationists in a broad variety of recreation opportunity settings. Alternatives B and D fall short in providing quality off-highway motorbike opportunities.

Motorbike opportunities have already been significantly reduced by 64% since 1978 with Alternative A (no-action alternative). The proposed action (Alternative B) reduces those opportunities even further by closing an additional 121.3 miles of trail (19%). Alternative D eliminates 176.5 miles (27.4%) of trail.

Alternatives B and D also fall short in providing ATV trail opportunities. Alternative B would increase ATV trail miles by 25.1 miles. Alternative D would reduce ATV trail opportunities by 3.4 miles.

In 2005, the IDPR conducted a survey of registered ATV and Motorbike Owners. We are enclosing this report for your reference. In that survey, we found that ATV owners are looking for more areas to ride, not fewer. They support creating OHV trails by designating some old logging roads as OHV Trails. The PNF needs to consider designating trails when planning road-decommissioning projects.

We believe that designating trails (both motorized and non-motorized) with old logging roads and short connecting trails is the best way to provide additional recreation trail opportunities.

The PNF has ample non-motorized opportunities in Primitive, Semi-Primitive Non-motorized, and Semi-Primitive Motorized settings (Recreation Opportunity Spectrum). The PNF is lacking non-motorized opportunities in Roded Natural and Roded Modified settings.

The best way to meet the demands in Roded Natural and Roded Modified settings is to convert some old roads into trails. This allows additional motorized and non-motorized opportunities without closing additional single-track motorized opportunities.

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Converting these old roads into trails can tap into other funding sources besides the recreation budget. Old roadbeds have lower initial construction costs than new trail construction because the roadbed is already constructed and heavy equipment can be used to narrow the roadbed width.

The Boise National Forest has had great success in creating these opportunities on the Emmett, Lowman, Idaho City and Mountain Home Ranger Districts. We suggest that your recreation and transportation staff work closely with the Boise National Forest to develop these opportunities in the future.

The PNF needs to reverse the trend of providing fewer and fewer recreation opportunities. If the closure trend continues, within 25 years, no motorized access will exist on the Forest. Within 50 years, we could see half of the existing non-motorized opportunities around.

Winter General Comments

Most of the winter recreation that occurs on the PNF occurs around McCall, New Meadows and Donnelly. The west side of the Forest receives relatively little use compared with the east side.

The McCall area is a popular destination for both motorized and non-motorized recreationists. *Snow West* magazine in 2004 recognized McCall as being a one of the top five snowmobile destinations in western North America. Ponderosa State Park has played host to the Junior Olympics. Brundage Ski Area and Tamarack Resort offer unparalleled alpine opportunities. The two resorts also offer guided cat skiing opportunities. The PNF offers human-powered backcountry skiing opportunities off of the Lick Creek Road and near Jughandle Mountain.

Generally, non-motorized winter recreationists (skiers and snowshoers) are limited to areas no further than 4 miles from a plowed parking area. The PNF offers relatively few of these areas close to population centers. When designating additional non-motorized areas, the PNF needs to consider distance from a plowed road and parking issues. We can assist the PNF with the construction and maintenance of non-motorized winter parking areas with the RTP grant program and the Park N' Ski program.

Conversely, snowmobilers can access terrain thirty to fifty miles away. The PNF has the opportunity to offer more snowmobile access in these remote areas without conflicting with non-motorized winter recreationists.

Alternatives B and D offer fewer snowmobile opportunities and eliminate important snowmobile areas such as Bear Basin, Lick Creek, and Slab Butte-Granite Mountain. If the PNF is seriously considering eliminating snowmobile access in these areas, the PNF should open other areas like Squaw Point, Chimney Rock, and Bemis Point as outlined in Alternative C. These areas are too far from plowed roads for even die-hard backcountry skiers.

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Alternative B and D don't open the areas listed above in order to protect wolverine and lynx habitat connectivity. The DEIS notes that lynx hair samples have yet to be collected on the PNF. The DEIS also notes on Page 3-177 that wolverines have not been detected in these areas. These closures are unneeded for wildlife protection.

We are concerned that the Bear Basin closure could encourage more use in already crowded winter parking lots. In order to alleviate potential parking problems, we recommend that the Bear Basin closure allow a snowmobile corridor to connect with the old Brundage Road and the Warren Wagon Road. This will allow McCall resident snowmobilers to access trails without impacting already crowded parking lots.

The corridor should be clearly marked on the ground and speed limits should be implemented through Bear Basin Area. The marking of the corridor will help snowmobiles stay on the trail. The speed limits will improve safety between skiers and snowmobilers (if skiers use the snowmobile corridor) and reduce noise levels.

Parking is a critical issue for both motorized and non-motorized recreationists. Regardless of any alternative that is selected, parking will have to be addressed in the near future. The current snowmobile-parking situation finds snowmobilers competing for a limited number of parking spaces. This winter, some of the parking lots overflowed causing congestion. Non-motorized recreationists will need parking facilities at any new designated area. The PNF staff needs to work the winter recreation community to find a solution to the parking issue.

Area Specific Comments

Hells Canyon Management Area 1 (MA 1)

Only one management change is proposed in this area. Road #50111 is proposed to be designated as an ATV route under Alternative C. This road dead ends at a scenic overlook of Hells Canyon. The surrounding terrain is steep, so ATV recreationists are not likely to leave the road surface. We encourage the PNF to designate this road as an ATV route in the final decision.

Snake River Management Area 2 (MA 2)

This management area has over a dozen proposed changes. The majority of these changes under the alternatives involved closing trails to motorbike use or designating some roads for ATV use.

Proposal 2-1 would close the Mickey Creek Trail #230 to Motorized Use under all of the Action Alternatives. This trail provides a connector between the Lick Creek Ridge Trail #231 and the Upper Bear Creek Trail #228. The Lick Creek Ridge Trail #231 was closed under the Lick Creek Timber Sale decision. This decision should be reexamined.

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The Lick Creek Ridge Trail #231 was closed in order to improve elk security. Elk security is a seasonal hunting issue. A year-round closure is unnecessary. Both the Lick Creek Ridge Trail #231 and the Mickey Creek Trail #230 should be open to motorcycle use seasonally (closed to motorized use during the elk rifle season).

Part of the problem with elk security in this area is a long elk-hunting season. The archery season runs from August 30 through September 30th. The elk rifle season runs from October 25th through November 3rd. The deer rifle season runs from October 10th through October 31st in this area. The overlapping seasons and hunter density is also a contributing factor in elk security decline.

Proposal 2-2 closes the June Creek Trail #234 under Alternative B and Alternative C. The primary reason for this closure is that the trail receives little use. Lack of use should not be a reason for closure. The trail provides an important connector and looping opportunity with Grouse-Grizzly Trail #252. The PNF should consider keeping this trail on the system and applying for RTP grant to reconstruct the trail.

Proposal 2-3 closes the Smith Mountain Bypass Trail #516 under Alternatives B and D. This trail if reopened under Alternative C would eliminate the need for motorcyclists to travel on the Black Lake Road #112 in order to connect with the Lost Basin Trail #517. Trail motorcyclists prefer using trails over roads. For this reason, we recommend that Trail #516 be designated for two-wheeled motorized use.

Proposal 2-4 closes Trail #286 under all action alternatives (B, C, D). This trail provides a connector between the Brownlee Campground and Trail #245. If this trail is closed, recreationists will have to drive to the #245 trailhead, using Highway 71. We recommend that this trail be placed in storage status until legal access can be obtained to the Trail #245 trailhead. Valuable connector trails like Trail #286 should not be lost.

Proposal 2-5 closed Trail #225 under all action alternatives. Part of the trail is missing. This trail should be placed in storage status. It could provide a valuable non-motorized opportunity in the future.

Proposals 2-7, 2-8, and 2-9 close Trails #252, #253, and #254 under Alternatives B and D. Alternative C keeps these trails open to motorcycle use. We encourage the Payette National Forest to keep these trails open to motorcycle use. These trails provide a skilled looping opportunity that is rare in the Snake River Management Area. The terrain is sufficiently rugged to keep motorcyclists on the trails. In addition, the rugged terrain keeps all but skilled motorcyclists off these trails.

There is some concern that keeping these trails open to motorized use could affect the Cuddy Mountain Research Natural Area (RNA). Trail #253 forms the boundary of the RNA. The terrain is steep enough that motorcyclists can't travel off trail and affect the RNA. The RNA designation should not be a reason to close this trail because the trail isn't within the RNA. It forms the boundary of the RNA.

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Proposal 2-10 designates Road #50143 as an ATV Trail under Alternative C. This action is unnecessary. Trail #358 used to be designated as an ATV Trail and provided access to the Lick Creek Lookout. In order to provide ATV access to the Lick Creek Lookout, we recommend that this trail be reopened to ATV use.

A vandalism incident at the lookout was the major reason that this trail was closed. We recommend that the lookout be refurbished and rented out to recreationists during the summer season. This would help reduce the chance of vandalism.

Proposal 2-11 designated Road #50362 as an ATV Trail under Alternative C. This road is a short spur road (0.7 miles) that doesn't provide a looping opportunity. This proposal could be dropped from Alternative C.

Proposal 2-12 designates Road #51858 as an ATV Trail under Alternative C. This road does provide a looping opportunity with Road #002 and Road #073. If elk security is an issue in this immediate area, the route could be closed seasonal during the rifle-hunting season.

Weiser River Management Area 3 (MA 3)

This management area is large and contains 57 management changes under the various alternatives. Rather than address each change by alternative, we will explain our reasons on each route that we would like to see changed in order to shorten our comments.

Several trails have been broken up by road construction, timber harvest, or grazing and are being proposed for closure. These trails are Trail #214, Trail #201-213, Trail #249, Trail #330, Trail #237, Trail #247, Trail #248, and Trail #244. We agree that these trails are broken up, but they could provide a future recreation trail opportunity. The IDPR recommends that these trails be placed into storage status until such time that they can be reconstructed and maintained. These trails are critical in providing additional trail opportunities.

Proposal 3-2 reopens Trail #214 under Alternative C. Alternatives B and D close this trail to all use. Trail #214 provides a valuable short (0.4 mile) connecting trail opportunity between Trail #201 and Trail #203. It also provides an alternative route to using Trail #210. We encourage the Payette National Forest to reopen this trail to 2-wheel motorized use.

Proposal 3-9 would close Trail #203 under Alternatives B and D to 2-wheel motorized use. This trail should remain open for its entire length. This trail is one of the few long trails in the Council Mountain area and provides sufficient length, combined with the other open trails to provide a day long riding experience.

The length of this trail would make it undesirable for hikers. Non-motorized recreationists have numerous opportunities on nearby West Mountain. This closure is unnecessary for a non-motorized experience.

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Alternative B would close the lower part of Trail #263 to two-wheel motorized use in Proposal 3-10a. This closure disrupts a valuable motorcycle looping opportunity using Trail #258 and Trail #259. The main reason for this closure is to protect water quality on the lower half of East Pine Creek. This closure is unneeded to protect water quality.

The trail doesn't ford East Pine Creek and is located out of the riparian zone. Our Trail Rangers have maintained this trail for many years. The lower trail has a couple places that need to be reworked (a total of a half a mile), but other than those spots the trail provides a great riding opportunity. We suggest that the Weiser Ranger District apply for an ORMV or RTP grant to fix these two sections of trail. The trail should remain designated for two-wheel motorized use under all action alternatives.

Proposals 3-11 through 3-17 designate roads for ATV use under Alternative B and C. These proposals are important in providing additional ATV opportunities. We encourage you to designate these roads as ATV trails in the final decision. Proposals 3-18 and 3-19 authorize use on two established roads. These roads provide important recreation access. We encourage the adoption of these roads into the Payette National Forest road system.

Proposal 3-36 closed Trail #331 to 2-wheel motorized use under Alternative C. We assume that the reason for the closure is the lack of an easement in Section 35. The IDPR is willing to work with the Payette National Forest, Adams County, and the landowner to obtain access to this trail. The IDPR recommends that this trail be placed in storage status until the access problems can be resolved.

The remaining changes in MA-3 (3-37 through 3-57) are from Adams County. The county commissioners are very interested in creating some ATV loop opportunities on Council and Cuddy Mountain areas. We encourage the Payette National Forest (PNF) to adopt these changes to provide ATV opportunities if the transportation analysis shows that it is safe and feasible. The IDPR is willing to partner with both the PNF and Adams County to provide additional ATV opportunities.

In Alternative C, the Sturgill Mountain winter closure would be removed because the Hitt Mountain ski area is no longer in operation. We encourage this area to be reopened to snowmobile use. Currently, the road to the ski area is not being plowed and it does not offer non-motorized winter access or winter wildlife habitat. This closure is unnecessary.

Rapid River Management Area 4

This management area has six changes, all trail-related. Most of these changes involve closing trails to motorized use.

Proposal 4-1 closes the Frypan Creek Trail #279 under Alternatives B and D. Alternative C would keep this trail open to 2-wheel motorized use. The IDPR recommends closing this trail to motorcycle use as recommended in Alternative B

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and D. This trail does not offer any looping opportunities for motorcyclists and dead ends in the Rapid River Wild River corridor.

Proposal 4-2 closes the Tepee Springs Trail #162 to two-wheel motorized use under Alternatives B and D. This trail provides one of the few motorized access routes from the Little Salmon River to the Hazard Lakes country. This trail should remain open to two-wheel motorized use as described in Alternative C.

The Hard Butte Trail #344 is proposed for closure to two-wheel motorized use under Alternatives B and D (Proposal 4-3). This trail provides an excellent looping opportunity for motorcyclists under Alternative C. The IDPR recommends that this trail remain open for two-wheel motorized use. Any problems associated with this trail could be fixed with an ORMV or RTP grant application.

Proposal 4-4 closes the Rankin Mill Trail #191 to all forms of motorized use. This old jeep road offers one of the few ATV opportunities in this Management Area. Resource damage being caused by the hunting community could be solved by a seasonal motorized use closure (during the rifle-hunting season) and enforcement by the USFS and the Idaho Department of Fish and Game (IDFG). IDFG Conservation Officers have the ability to enforce travel regulations pursuant to a 2004 MOU between the IDFG and the USFS. A seasonal closure targets violators and should be tried first before a yearlong closure.

Proposal 4-5 closes the Patrick Butte Trail #153 to motorcycle use. The main reason for this closure is that the switchbacks are supposedly too tight for motorcyclists to use. Motorcyclists have used this trail for many years (at least since 1980). The switchbacks are tight, but experienced motorcyclists can negotiate them. This trail should remain open to two-wheel motorized use as outlined in Alternative C.

Proposal 4-6 closes the Trail #371 to motorcycle use. This short connector trail provides access between the Elk Lake Trail #347 and the Patrick Butte Trail #153. These two trails eventually connect in Sec 32. This duplicate route could be eliminated from the Payette Forest Travel System.

The IDPR is concerned about the closures proposed for snowmobiling in the Granite Mountain Area and the Patrick Butte Area in Alternatives A, B, and C. Winter non-motorized access is not provided for either the Patrick Butte Area or the Granite Mountain Area. The Granite Mountain closure's purpose is to provide a commercial sno-cat skiing experience.

When the original special use permit was signed, it was agreed that both commercial skiers and snowmobilers would share the area. The PNF needs to sit both Brundage Mountain Corp. and the Idaho State Snowmobile Association down to find a solution for the Granite Mountain Area. This solution should be the winter use allocation for the area.

The Patrick Butte closure would be disastrous for snowmobile opportunities in the Hazard Lakes area under Alternative D. This area provides prime backcountry

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snowmobiling opportunities on this side of the forest. These opportunities can't be found elsewhere on the Forest. The PNF should not close the Patrick Butte Area to snowmobiling.

Middle Little Salmon River Management Area 5

This management area has only one change identified in the DEIS. Under Alternative C, Road #50173 would be opened to ATV use. Opening this road will help provide an ATV loop opportunity using a combination of roads and trails. We encourage the PNF to open this road to ATV use.

The PNF needs to consider reopening the Pollock Mountain Trail #179 to two-wheel motorized use. This trail provides access to Pollock Mountain ridge and Ant Basin. This would enable a small loop opportunity for motorcyclists. The trail crosses several closed roads. We would be willing to work with the PNF to install gates where the trail crosses the closed roads to prevent travel on these roads.

Goose Creek/Hazard Creek Management Area 6

This management area proposes six changes in the summer and designates additional non-motorized areas in the winter. The DEIS recognizes this area as having some of the highest winter recreation use on the PNF.

Proposal 6-3 closes the southern end of the Vance Creek Trail #160. A washed-out bridge is the reason for the closure. Closing the trail to two-wheel motorized use will not eliminate resource damage. Non-motorized recreationists will still try to cross the stream where the bridge washed out. The IDPR recommends that the PNF apply for an RTP or ORMV grant to replace the bridge. This bridge would help to alleviate any resource damage and eliminate the need for the closure.

Proposal 6-4 closes a small portion of the Hard Butte Trail #344 near Rainbow Lake and Black Lake to two-wheeled motorized use. We support this closure. The distance to the lakes is relatively small (1/4 mile to a 1 mile) and would help to protect lake resource values.

Proposal 6-5 closes the Tepee Springs Trail #162 to motorized use. The trail is currently designated for two-wheeled motorized use, but ATVs are using the trail. Before closing the trail to motorcyclists, we would be willing to assist in placing barriers to ATV use to keep this trail open to motorcyclists. This trail provides one of the few access points to the Hazard Lake country from the Little Salmon River.

Proposal 6-6 closes the Duck Lake Road #50268. The DEIS notes that resource damage is occurring because of heavy use. The road is also in bad condition. The PNF should consider decommissioning this road, in addition to closing the road.

Alternative D closes the Hidden Lake Trail #511 in proposal 6-7. The trail provides a short looping opportunity for motorcyclists. If the trail is causing resource damage, it

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should be identified for reconstruction rather than closure. The IDPR recommends that this trail remain open to two-wheeled motorized use.

The Bear Basin Area is identified under each of the Action Alternatives in varying sizes. The PNF needs to consider the actions of adjacent landowners when designing the Bear Basin non-motorized area. The Idaho Department of Lands (IDL) does not restrict snowmobile use in the area adjacent to the western boundary identified in Alternative B and D. This could lead to numerous snowmobile incursions into the non-motorized area because of the difficulty of seeing the area on the ground.

A better solution is identified in Alternative C. The area west of the Old Brundage Mountain Road #451 would be closed to snowmobile use and the area east of the road would be open to snowmobile use. If the road is groomed as a snowmobile trail, it would provide a much more defined boundary than the Forest/IDL boundary.

The closure should not also encourage skiers to use the West Face Parking Lot. This snowmobile parking lot is frequently full already. Encouraging skiers to park there would only heat up tensions between snowmobilers and skiers. The Bear Basin Non-motorized area is essential to replacing the lost opportunities at Little Ski Hill.

Alternative D would close the Slab Butte Area to snowmobile use. The Slab Butte Area is located far enough away from the Brundage Ski Area to be relatively inaccessible to skiers (human powered). In addition, the area is also a prime snowmobiling area. The area should remain open to snowmobile use.

Payette Lakes Management Area 7

The management area has several changes for winter recreation under the various alternatives and four changes proposed for summer. This management area serves as the backdoor for McCall and receives heavy recreation use (both summer and winter).

The DEIS notes on Page 2-37 that skiers would access the Bear Basin closure from the West Face parking lot. This lot was developed as a snowmobile parking lot and is maintained by the McCall Snowmobile Program. The lot can be overcrowded frequently, so we suggest that an alternative non-motorized parking solution be found. On the last page, we suggested a change for the design for the Bear Basin closure. Those comments apply for this management area also.

Alternative D closes the Black Tip area near Upper Payette Lake. The Black Tip area is located over six miles from the closest trailhead (Francis Wallace). This distance, combined with having to ski on a high-speed groomed snowmobile trail makes the area relatively undesirable for some winter non-motorized recreationists (having to share the groomed snowmobile trail). The Francis Wallace trailhead is a popular trailhead for snowmobilers headed to Burgdorf, Secesh, and Warren. Designating this area could further compound parking issues at the Francis Wallace trailhead. If skiers want this area closed, they should be required to find and build a parking area.

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Alternative D also closes the entire west side of the Lick Creek Road. The east side of the road is already closed. Skiers are generally looking for slopes within the first four miles of the trailhead. The closure under Alternative D extends all the way to Lick Creek Summit, which is too far for most skiers to ski. The PNF should consider Alternative C for this closure. Alternative C protects and designates key backcountry skiing slopes on the west side of Lick Creek Road.

Alternative D designates a large portion of land on the East side of Payette Lake for winter non-motorized use. The western boundary of this closure follows the USFS/IDL boundary. This boundary is difficult to distinguish on the ground. The PNF needs to work with both the nordic community and snowmobile community to come up with an easily distinguishable area that winter recreationists can define.

The draft plan places two short unclassified roads into classified roads under all action alternatives as described by Proposals 7-3 and 7-4. Proposal 7-3 provides access to a dispersed campsite and Proposal 7-4 provides trailhead parking. We encourage the PNF to adopt these unclassified roads.

Proposal 7-5 closes the Box Lake Trail #110 under Alternative D to protect resource values. We are not aware of any large-scale resource damage in the area. Box Lake is one of the few lakes that motorcyclists can access. Non-motorized recreationists have numerous lakes they can access near McCall. If a closure is seriously considered, it should start in Section 32 at the meadow just above the lake (200 to 300 feet). Motorcyclists would still have the ability to ride almost to the lake.

Proposal 7-6 closes the Victor Creek Trail #117 under Alternative D to protect resource values. This trail was recently reconstructed with ORMV grant funds (ORMV Grant #G4303V04.00 in the amount of \$40,000). **Closing this trail is a violation of IDAPA 26.01.31.350.** The PNF does not have the authority to unilaterally close this trail without first consulting our department and resolving the conversion.

Kennally Creek Management Area 8

Various alternatives propose changes for both summer and winter in this management area. Alternative D would expand the Jughandle Mountain closure in the winter. A total of twelve management changes are proposed in the summer. This management area's close proximately to McCall and Donnelly make it a popular recreation destination area.

Alternative D expands the existing Jughandle Mountain snowmobile closure to include Boulder Mountain. The DEIS notes that making the existing closure larger, would make it more definable on the ground.

A larger closure isn't necessarily more definable. Definable winter closures should follow groomed trails, ridges and streams. These are items that are easily distinguished in the winter. The west half of the closure follows the forest boundary, which isn't definable in many places.

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The main reason for expanding the closure is to provide a non-motorized opportunity at Boulder Mountain. Snowmobilers have been using the Boulder Creek drainage to access the Kennally Creek drainage from McCall. This is an important access routes that needs to be retained.

The PNF should work with the nordic community and the snowmobile community to come up with a more distinguishable non-motorized winter recreation area for Jughandle Mountain.

Proposals 8-1 and 8-2 close the Needles Trail #101 and the East Fork Kennally Creek Trail #99 under Alternatives B and D. These two trails provide important motorcycle access to the South Fork of Salmon River. The trails provide a quality skilled level looping opportunity that should not be lost. The area is recommended for Wilderness under the revised Forest Plan. Use and future motorized use will not be high enough in this area to detract from its wilderness characteristics. The Hells Canyon Wilderness, Gospel Hump Wilderness, and Frank Church River of No Return Wilderness all had extensive motorcycle use in portions of the areas before they were designated wilderness.

Proposal 8-3 manages Road #50265 as an ATV Trail under Alternatives B and C. This road is critical in providing an ATV Trail opportunity in this management area. The Paddy Flat Vegetation Management Project recognized the need for this opportunity and it should be carried forward to the final decision.

Proposals 8-4 and 8-5 close Road #50014 and Road #51892 under Alternative B and D. Alternative C keeps these roads open seasonally. These two roads provide access to the Gold Fork drainage from the Paddy Flat drainage. They eliminate the need for OHV recreationists having to travel on county roads. We encourage the PNF to keep these roads open seasonally as recommended in Alternative C.

Proposal 8-6 through 8-11 closes seven roads as a result of the Paddy Flat Vegetation Management Project. The decision for this project was signed on December 21, 2005. These proposals should be removed from the FEIS.

Lake Creek/French Creek Management Area 9

The DEIS notes on Page 2-43 that this area is relatively remote with most access being trail orientated. Alternative D proposes an extensive winter closure in the northern half of the management area. The remaining proposals change summer trail designations.

Alternative D closes popular snowmobile destinations such as Lava Butte. The closure would not provide a non-motorized recreation experience because it is so far from the Upper Elevation Parking Lot or Brundage Ski Area Parking Lot that the area is inaccessible to all but those skiers who want to camp overnight just to get there. The DEIS does not present sufficient evidence that this closure is needed. The area should remain open as described in Alternatives B and C.

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Proposal 9-1 closes the Patrick Butte Trail #153 and #155 to two-wheel motorized use under Alternatives B and C. The main reason for closing this trail is that the numerous switchbacks are supposedly not rideable for motorcyclists. Motorcyclists have used this trail for many years (at least since 1980). The switchbacks are tight, but experienced motorcyclists can negotiate them. This trail should remain open to two-wheel motorized use as outlined in Alternative C.

Proposal 9-2 closes the lower portion of the Little French Creek Trail #348 to motorcycle use under Alternatives B and D. The main reason for this closure is that the trail traverses several boggy areas in the bottom half of the trail. This is a resource issue that needs to be corrected whether the trail is closed or not. A horse can devastate trail tread in boggy areas. We recommend that this trail remain open to motorcycle use and that the trail be rehabilitated with either an ORMV or RTP grant.

Proposal 9-3 closes the Little French Meadow Trail #503 to motorcycle use under Alternatives B and D. Closing this trail disrupts an important motorcycle looping opportunity. We recommend that this trail remain open to motorcycle use as described in Alternative C.

Proposal 9-4 closes the lower half of the French Creek Trail #116 under Alternative D and designates it non-motorized under Alternative B. Alternative C keeps this trail open to motorcycle use. No legal access exists for the lower portion of the trail where it crosses private property. The current owner has posted NO TRESPASSING! signs on the property.

This landowner may be unwilling to work with the Forest Service for various reasons, but might be willing to work with Idaho County or the Idaho Department of Lands. Until this access issue is resolved, we recommend that the lower trail be placed in storage status rather than closed. The trail should remain open to motorcycle use after the access issue is resolved.

Proposal 9-5 closes a portion of the Clayburn Trail #505 under Alternatives B and D. Alternative C would keep this trail open to two-wheel motorized use. This trail is a duplicate route. Motorcyclists can use the Cirque Basin Trail #506 to access the Lava Butte Lakes. We recommend that this trail be abandoned in order to allocate funding to other trails.

Proposal 9-6 closes the North Creek Trail #105 to motorcycle use under Alternative D. The North Creek Trail #105 provides a valuable looping opportunity for motorcyclists. This trail allows motorcyclists to connect the French Creek Trail #116 with the Bear Pete Trail #142. We recommend that this trail remain open to motorcycle use as described in Alternative B and C.

Proposal 9-7 closes the Link Trail #371 to motorcycle use under Alternative D. This trail provides access to John Lake and Paradise Lake without having to drop off the ridge using Trails #347 and #153. We recommend that this trail remain open to motorcycle use as described in Alternatives B and C.

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Proposal 9-8 closes the Lava Lake Trail #374 to all uses under Alternative D. The DEIS notes that this trail was destroyed by the 1994 Corral Fire. Why wasn't this trail reestablished with fire rehabilitation funding? Rather than abandon this trail, we recommend that this trail remain open to motorcycle use. Our trail ranger crews could work on opening this trail back up.

Fall Creek/Warren Creek Management Area 10

Secesh and Warren residents use this management area frequently. It is also popular for a variety of management activities. This management area serves as one of the more heavily used motorized areas on the McCall Ranger District. It also contains a portion of the Idaho Centennial Trail (west portion).

Alternative C removes the current closure west of Burgdorf Summit. Prior to the large fires, most of this area was inaccessible to snowmobilers. Now that the fires have burned off much of the timber, the area has opened up and it is a desirable snowmobile play area. This area could be opened in consideration of other areas lost to snowmobilers like Bear Basin or the west half of Lick Creek. This closure is so isolated, that only winter residents of Secesh would use this area in a non-motorized fashion.

Alternative D's expansion of the closure is not justified. Supposedly, this closure is designed to improve wildlife habitat connectivity (for wolverine and lynx). Wolverines have extremely large home ranges. Many of these home ranges overlap popular snowmobile destinations. Until further wolverine research is completed, a closure for wildlife habitat connectivity is unwarranted.

Proposal 10-2 closes a portion of the Steamboat Ridge Trail #128 under all action alternatives. We believe the ID Team made a mistake in drawing the proposed closure. The closure, as drawn on the DEIS maps, eliminates an important motorcycle looping opportunity. The closure should start at the intersection of the Steamboat Ridge Trail #128 and Wangdoodle Trail #129. Closing the trail south of Trail #129 disrupts the loop opportunity.

The PNF should consider opening Trail #128 for its entire length. Opening the trail provides an important loop opportunity. Currently little if any maintenance is taking place. Opening the entire trail gives the trail a better chance of being maintained by OHV users.

Proposal 10-3 closes the Cottontail Point Trail #137 under Alternative B and C. The trail is abandoned under Alternative D. The DEIS notes that the trail traverses numerous boggy areas that can't be rerouted. Horse use can also cause extensive damage to wet ground and streams. Rather than just close this trail to motorcycle use, we recommend that this trail be abandoned as recommended in Alternative D.

Proposal 10-4 closes a portion of the James Creek Trail #132. The DEIS notes that this portion of the trail is located on steep ground in erodible soils. The Payette

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National Forest Transportation GIS Coverage Layer shows this portion of trail to be at a proper grade. The old trail on the topo maps is not. We recommend this trail be reconstructed to the proper grade and be open to motorcycle use to Republican Flat in Section 3.

Proposal 10-10 designates the Carey Creek Road #50318 as an ATV trail under Alternative C and closes the road under Alternative D. This road provides access to the Marshall Mountain Mining District that still has some active claims. The USFS is required to provide claim owners reasonable access. The road is also a portion of the Idaho Centennial Trail (west). We recommend that this road be at least maintained as an ATV trail as described in Alternative C. We would be willing to work with the McCall Ranger District to reconstruct portions of this road with our Trail Cat program, if the road is designated as an ATV trail.

Upper Secesh River Management Area #11

This management area is popular for dispersed camping and ATV Riding. We were pleased to see that the proposed action looked at adopting many non-system roads into system roads. This will allow access to these dispersed campsites.

This management area contains the Squaw Point and Chimney Rock snowmobile closures. Alternative B keeps these closures while Alternative C removes the closures and Alternative D expands the closures.

The Squaw Point closure was originally implemented to provide a non-motorized ski area that could be accessed by snowmobile. Skiers that use snowmobiles to access ski slopes have many more access opportunities than muscle-powered skiers do. Snowmobile skiers have the ability to access vast areas off of the Lick Creek Road. We recommend that this closure be lifted as described in Alternative C to replace those lost opportunities in Bear Basin and off of the Lick Creek Road.

The PNF should also consider lifting the Chimney Rock IRA closure. This area is remote and receives very little non-motorized winter use. The Burgdorf Fire opened previously inaccessible terrain to snowmobilers. This area could be used as a trade for lost snowmobile opportunities near McCall.

Proposals 11-1 through 11-11 manage closed roads as ATV trails in Alternatives B and C. Alternative D would not open these roads to ATVs. This management area receives a lot of ATV use on the McCall Ranger District. Designating these roads, as ATV trails would help manage that use. We recommend that proposals 11-1 through 11-11 be designated as ATV trails.

Proposals 11-17 through 11-20 adopt seven non-system roads as system roads to provide access to dispersed campsites. These roads provide access to those campsites. Without access to the campsites, new dispersed campsites would crop up elsewhere. We are pleased to see that these recommendations carry across the range of alternatives.

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Proposal 11-21 closes Road #51871 under the range of action alternatives. The DEIS notes that this road is in a wet location and requires heavy maintenance. We concur with the PNF recommendation to close this road.

Proposal 11-22 closes a portion of the Steamboat Ridge Trail #128 (north of junction of Trail #128 and Trail #129). The map shows this closure incorrectly. The ID Team needs to correct this mistake before the FEIS. Otherwise, a very valuable motorcycle looping opportunity will be lost.

Proposal 11-23 closes the Victor Creek Trail #117 under Alternative D to protect resource values. This trail was recently reconstructed with ORMV grant funds (ORMV Grant #G4303V04.00 in the amount of \$40,000). **Closing this trail is a violation of IDAPA 26.01.31.350.** The PNF does not have the authority to unilaterally close this trail without first consulting our department and resolving the conversion. The trail needs to remain open to two-wheel motorized use.

South Fork Salmon River Management Area 12

This management area contains an extensive amount of summer trails (337 miles). The trail system provides numerous looping opportunities for motorized and non-motorized recreationists.

Alternative D expands winter snowmobile closures while Alternative C offer fewer snowmobile closures. The closures as described in Alternative D do not offer a non-motorized recreation opportunity. They are located too far from any plowed road to provide reasonable access for skiers. The final decision should not add an additional closure north of Savage Point as described in Alternative D. It would provide minimal wildlife connectivity (because of the large changes in elevation) for wolverines and lynx.

Eighteen management changes are proposed for summer travel management under the various alternatives. Alternative C offers the best opportunity for expanding motorized opportunities and retaining non-motorized opportunities for this management area.

Proposal 12-2 opens the Davis Ranch Road Trail #76 to two-wheel motorized use under Alternative C. The DEIS asserts that this road is only passable on foot because of the washed out culverts. We recommend that this trail be reconstructed to allow motorcycle use. It would provide an outstanding riding opportunity along the South Fork of the Salmon River. The PNF also needs to consider providing reasonable access to the property owner along the South Fork Salmon River.

Proposal 12-3 opens the Log Mountain Trail #92 under Alternative C. Alternatives B and D abandon the trail. The trail provides access to a unique viewpoint on the PNF. We recommend that the trail be opened to two-wheel motorized use as described under Alternative C. We can assist with the reconstruction of the trail with either ORMV or RTP grant funds.

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Proposal 12-4 through 12-6 abandons the White Rock Trail #303, Blackmare Cutoff Trail #304, and South Fork Blackmare Trail #305 under Alternative B and D. Alternative C would keep these trails on the inventory. The PNF should not be abandoning trails because of a lack of use. Valley County's population is exploding. This trail's proximity to Tamarack Resort could make it popular in the future. We recommend that this trail remain open to non-motorized use as described in Alternative C. We can assist with the reconstruction of these trails with RTP grant funds.

Proposal 12-7 closes the Eagle Rock Trail #290 because of a lack of use under Alternatives B and D. Alternative C keeps this trail open to motorcycle use. Lack of use is not an excuse for abandoning a trail. The main reason this trail receives little use is a lack of maintenance. We are willing to maintain this trail under our Trail Ranger Program. We recommend that this trail remain open to two-wheel motorized use as described in Alternative C.

Proposal 12-8 closes the Cougar Creek Trail #98 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this trail open to motorcycle use. The Cougar Creek Trail is the main access route from Paddy Flat to the South Fork Salmon River. It provides motorcycles large loop opportunities. The ID Team judges this trail to be unsuitable for motorcycle use, but our staff with extensive off-highway motorcycle experience know that this trail can be ridden without causing damage and has been ridden by experienced motorcyclists. We recommend that this trail remain open to two-wheel motorized use as described in Alternative C.

Proposal 12-9 closes the Williams Peak Trail #73 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this trail open to motorcycle use. The Williams Peak Trail provides access to Rainbow Arch and two loop opportunities using either Deadman Creek Trail #75 or the Rainbow Ridge Trail #70. The ID Team judges this trail to be unsuitable for motorcycle use, but our staff with extensive off-highway motorcycle experience know that this trail can be ridden without causing damage and has been ridden by experienced motorcyclists. We recommend that this trail remain open to two-wheel motorized use as described in Alternative C.

Proposal 12-10 closes the remaining open portion of the South Fork Sheep Creek Trail #71 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this trail open to motorcycle use. Closing this trail disrupts a loop opportunity using Trail #73 and Trail #70. The PNF is directed to emphasize loop opportunities under Objective 1250 in the Revised Forest Plan. Closing this trail goes against the Objective. We recommend that this trail remain open to two wheel motorized use as described in Alternative C. The PNF also should apply for an ORMV or RTP grant to fix the problems on this trail.

Proposal 12-11 closes the Deadman Creek Trail #75 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this trail open to motorcycle use. Closing this trail disrupts a loop opportunity with Trail #73. We recommend that this

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trail remain open to two-wheel motorized use as described in Alternative C. The PNF also should apply for an ORMV or RTP grant to fix the problems on this trail.

Proposal 12-12 closes the Martin Ridge Trail #301 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this trail open to motorcycle use. Closing this trail disrupts a loop opportunity with Trail #98. The grades on this trail are steep, but the tread is fairly stable. The steepness of this trail largely restricts motorcycle travel to only going down the ridge, not up the ridge. This trail provides a unique expert level riding opportunity that is rare in Southwest Idaho. We recommend that this trail remain open to two-wheel motorized use as described in Alternative C.

Proposal 12-13 closes the Blackmare Trail #100 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this trail open to motorcycle use. Closing this trail disrupts a loop opportunity with Trail #98 or Trail #301. The PNF is directed to emphasize loop opportunities under Objective 1250 in the Revised Forest Plan. Closing this trail goes against the Objective. We recommend that this trail remain open to two-wheel motorized use as described in Alternative C.

Proposal 12-14 closes a section of the Steamboat Ridge Trail #100 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this section of trail open. The proposed closure as drawn on the DEIS Map MA 12 disrupts a valuable motorcycle looping opportunity. If a closure is going to be implemented, we recommend that the trail only be closed, north of the Trail #129/Trail #100 junction. This action will retain the looping opportunity.

Proposal 12-15 closes the South Fork Salmon River Trail #76 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this section of trail open. This trail is popular with expert motorcyclists. Closing this trail also disrupts a large loop opportunity using a combination of roads and trails (Secesh River Trail #107). The PNF is directed to emphasize loop opportunities under Objective 1250 in the Revised Forest Plan. Closing this trail goes against the Objective.

The main reason for closing this trail is the lack of culverts crossing many of the side streams. The original culverts were too small. Rather than abandon the trail, we recommend that the PNF look at a long-term project of restoring this trail/road.

We recommend that this trail remain open to two-wheel motorized use as described in Alternative C.

Proposal 12-16 closes the South Fork Salmon River Trail #77 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this section of trail open. This trail is also popular with expert motorcyclists. Closing this trail disrupts a loop opportunity with Trail #76. The PNF is directed to emphasize loop opportunities under Objective 1250 in the Revised Forest Plan. Closing this trail goes against the Objective. The PNF Staff's main reason for closing the trail is the difficult ford across the South Fork Salmon River. This river can be crossing during

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low flows by expert motorcyclists. We recommend that this trail remain open to two-wheel motorized use as described in Alternative C.

Proposal 12-17 designates the Hamilton Bar Road an ATV trail under Alternative B. Alternative C would keep this road open to passenger vehicles and Alternative D would close this road to all motorized uses. The main reason that this road is proposed for an ATV trail, is that the road is no longer passable by full-size vehicles. The PNF should consider reconstructing this road to proper standards. In the interim, it should be designated as an ATV trail as described in Alternative B.

Proposal 12-21 closes the Rainbow Ridge Trail #70 to two-wheel motorized under Alternatives B and D. Alternative C keeps this trail open to motorcycles. Closing this trail to motorcycles disrupts a loop opportunity with Trail #73 and Trail #75. The PNF is directed to emphasize loop opportunities under Objective 1250 in the Revised Forest Plan. Closing this trail goes against the Objective. We recommend that this trail remain open to two-wheel motorized use as described in Alternative C.

Proposal 12-22 closes the East Fork of Kennally Creek Trail #99 to two-wheel motorized use under Alternatives B and D. Alternative C keeps this trail open to motorcycles. Trail #99 is a major access route from the Paddy Flat area to the South Fork of Salmon River. Closing this trail disrupts a major loop opportunity using Trails #102 and Trail #96. The PNF is directed to emphasize loop opportunities under Objective 1250 in the Revised Forest Plan. Closing this trail goes against the Objective. This trail should remain open to motorcycles as described in Alternative C.

Big Creek/Stibnite Management Area 13

This management area is one of the most remote in the forest. It is farther away than other management areas on the PNF for Valley County residents and visitors. The DEIS didn't proposed any management changes for summer and only one management change for winter under Alternative D.

Alternative D creates a new snowmobile closure in the Profile Peak area in order to improve wildlife habitat connectivity. Snowmobilers have to trailer their snowmobiles to Yellow Pine in order to use this area. The difficult winter conditions along the South Fork Salmon River Road limit the number of snowmobilers in this area. Given the limited amount of snowmobile use in the area, we fail to see how snowmobiles are affecting wildlife habitat connectivity. In our opinion, this closure is unnecessary. The PNF should adopt Alternative B for winter management of this area.

The DEIS identifies ATV opportunities in this management area. These opportunities were dropped because they need further NEPA analysis before construction can begin. We encourage the PNF to complete this analysis. These old roads will provide Yellow Pine/Edwardsburg residents and visitors ATV opportunities. We are willing to assist with the construction of the trails with our Trail Cat Program.

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Comparison of Alternatives Comments

Table 2-28 gives the number of miles of open roads and trails and closed roads and trails under the range of alternatives. This table lacks critical information. The Payette National Forest has 713 miles of Wilderness Trails in the Frank Church River of No Return Wilderness and the Hells Canyon Wilderness². These wilderness trail miles need to be added to the miles of non-motorized trails on the PNF. The miles of non-motorized trails on the PNF range from 1,211 miles under Alternative C to 1,350 miles under Alternative D with the Wilderness trail mileage added in.

Table 2-29 on Page 2-70 illustrates how the four alternatives affect the indicators. One indicator is proximity of non-motorized areas to parking and access points for winter-based activities. This indicator assumes that adequate parking opportunities at the existing lots already exist.

Snowmobilers heavily use the West Face Parking Lot. This parking lot is frequently filled to capacity on weekends and holidays. In our opinion, the lot can't accommodate additional non-motorized use. This results in Alternative D providing Poor-Good access for non-motorized winter parking.

We were pleased to see that the PNF analyzed approximately(?) acres of skiable terrain. This analysis includes the Granite Mountain and Slab Butte proposed closures. These two areas are being used by Brundage Mountain's snowcat skiing operation. These two areas do not provide a non-motorized skiing opportunity. We suggest that the PNF also analyze the amount of non-motorized skiing opportunity (amount of terrain accessible through muscle power).

Table 2-30 on Page 2-71 shows how the four alternatives impact costs to program management. The table concludes that Alternative C would have minimal to no savings for program management. We disagree with that conclusion. The DEIS fails to take into account the increase in Recreational Trails Program (RTP) funding and the expansion of our Trail Ranger and Trail Cat Programs. These items could significant saving the PNF hundreds of thousands dollars per year. Alternative C gives modest saving to program management.

Table 2-31 addresses the "Degree of public safety provided based on separation of uses." Separation of use is a poor indicator for public safety. Separation of motorized and non-motorized use does not guarantee public safety. Hikers and mountain bikers can spook pack stock on non-motorized trails. Pack trains can jam up going opposite directions. On motorized trails, the sound of the motorcycle or an ATV gives the equestrian some warning before the vehicles arrive. We disagree that Alternative D would improve summertime trail safety and Alternative C would worsen summertime trail safety. All action alternatives provide relatively safe recreation trail opportunities.

² 2003 Payette National Forest GIS Travel Coverage Layer

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Table 2-33 on Page 2-73 analyzes roadless character and wilderness potential. The DEIS asserts that Alternative C would have a negative effect on wilderness attributes in inventoried roadless areas in the Weiser River Management Area 3 (MA 3). The revised Payette National Forest Land and Resource Management Plan did not recommend any Wilderness in MA 3. Alternative C would not affect wilderness attributes in MA 3.

The analysis for Table 2-34 on Page 2-77 is inadequate. The indicator is "Number of inventoried stream crossing on designated roads and motorized trails." GIS also planners to clear add up the number of water crossings on road and the number of water crossing on trails. Until this analysis is completed, we regard this indicator to be inadequate.

Table 2-35 asserts that Alternative C is "Not consistent with Forest Plan direction for the tributaries to the SFSR (except in the Secesh River and East Fork SFSR)" for change in WCI for stream bank condition. It has been our staff's experience that stream bank condition is dependent on the number of water crossings in a given MA (motorized and non-motorized) and the design of those water crossings. Whether motorized use is on the trail or not, stream bank condition is more influenced by the design of the water crossing, rather than the uses of the water crossings. Alternative C is consistent with Forest Plan direction.

Affected Environmental and Environmental Consequences Comments

The DEIS covers motorized winter recreation use on Page 3-8. The analysis uses some registration designation information from our Registration Information System (RIS) database. The FEIS should show that information in Reference Appendix B.

The DEIS states on Page 3-8 that "Idaho County shows a drop of seven percent during those dates." Idaho County registration designations go to the Grangeville and Elk City grooming programs. These programs do not groom on the PNF and Idaho County registration designations have little bearing on snowmobile use on the PNF. The sentence should be removed.

The DEIS does an excellent analysis of Program Management Costs. The PNF should note that we are expanding our Trail Ranger Program by one crew in 2007. The trail crew expansion allows us to maintain approximately 250-300 miles of trail per year on the PNF. We are also expanding our Trail Cat Program next year by one operator. This action should allow use to construct or reconstruct an additional 50 miles of trail per year in Southwest Idaho.

The DEIS makes an incorrect reference on Page 3-10. We were pleased that the 2004-2005 Idaho Outdoor Recreation Needs Assessment was cited, but it should be listed in Reference Appendix B.

The DEIS makes an important statement to consider when selecting a preferred alternative on Page 3-26. The DEIS states "There is not an immediate need for additional non-motorized trails that has been identified by the public, and the

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existing system seems to be providing the needed opportunities for solitude, quiet and primitive recreation experiences."

The PNF needs to provide both motorized and non-motorized recreation opportunities. Alternatives B and D decrease two-wheel motorized trails to the point, that motorcyclists would be driven elsewhere. The Boise and Sawtooth National Forests are starting their travel plan revisions. Do you expect these National Forest to pick up the displaced visitors?

The DEIS has a typographical error on Page 3-42. The DEIS states "James Creek trail 132 and Steamboat Ridge trail 128 are proposed for non-motorized designation to alleviate past motorized violations into the Frank Church River of No Return Wilderness." The Steamboat Ridge Trail #128 does not go into the wilderness.

On Page 3-45, the DEIS notes that "Current maintenance costs on the forest are approximately \$700/mile." This is an extremely high maintenance cost. Our Southwest Trail Ranger Crew costs average \$58.58/mile with supervision and capital depreciation costs.³ Bringing a trail back up to standard, generally doubles our cost/mile basis.

The PNF needs to consider that under Alternative B and D, that abandoning so many trails might actually decrease the PNF trail budget. Retaining trail mileage under Alternative C might help keep trail maintenance dollars and/or justify an increase in trail maintenance dollars. In any event, we believe that the expansion of the Trail Ranger Program and the Trail Cat Program, combined with an aggressive grant application strategy by the PNF, can bring significant cost savings to the PNF recreation budget.

On Page 3-57 the DEIS states "Changing area and trail descriptions from motorized to non-motorized or vice versa is not irretrievable because the Forest could always change the designation in the future." While it is true that the PNF could change the designation in the future, can the PNF staff cite even one significant result that opened a non-motorized trail to motorized use? Our records show that motorcyclists have lost 327.3 miles of trail since 1991. The PNF is not going to change any designation in the near future with this decision. We regard the decision to close trails to motorized use to essentially be an irreversible decision, because so few closed trails are ever opened back up.

The DEIS fisheries analysis assumed that road density (miles of roads per unit area) was directly proportional to the number of crossings and stream bank condition on Page 3-132. This analysis is inadequate. Road density isn't necessary proportional to the number of crossings. Roads can go along ridge tops or parallel drainages, yet rarely cross a stream. Conversely some roads can go back and forth through drainages and have many crossings.

³ 2005 Trail Ranger Cost per Mile, IDPR Outdoor Recreation Program

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The FEIS needs to do a GIS analysis of the number of road stream crossings in each management area under the various alternatives. The PNF has a transportation layer and a stream layer. Those two layers can give the IDT the answers to the number of stream crossings under the various alternatives.

Table W-5 on Page 3-209 illustrates Acres of Wolverine Denning Habitat Open and Closed to Over-snow Vehicle use by Alternative (FC-RONR Wilderness not included). This table is overly simplistic and does not reflect the actual impacts that the various alternatives have.

Both motorized and non-motorized winter recreationists affect wolverine denning habitat. This table also assumes that because an area is open to snowmobiles, that it is accessible to snowmobiles.

Not all wolverine natal denning habitat may be accessible to snowmobiles (even though it may be open). Excessive slopes or vegetation can block snowmobile access to denning habitat. The PNF needs to reanalyze these figures to show what winter recreationists can access and what they can't access under the various alternatives.

Conclusion

The Payette National Forest (PNF) Travel Management ID Team did an outstanding job involving the public and cooperating agencies. The size and scope of the project made our comments quite lengthy. We hope you find these comments useful in designing a decision that serves both motorized and non-motorized recreationists.

With an increasing population and more citizens using the PNF, the PNF staff should not be looking at reducing trail opportunities, but expanding opportunities. While it is true that National Forest budgets are tight, a cooperative relationship between our department and the PNF can go a long way toward meeting recreation trail demand.

We are interested in finding out what final decision will be made on this plan. The DEIS did not identify a preferred alternative. We would greatly appreciate a meeting between the ID Team and our Recreation Staff before a final decision is reached. This could help us understand why the PNF is taking a certain management direction, and help the PNF understand our position.

We appreciate the opportunity to comment on the DEIS. We look forward to working with the Payette National Forest on improving its trail system in the future. If you have any questions about our comments, please contact Jeff Cook, Outdoor Recreation Analyst at (208) 334-4180 ext. 230.

Sincerely,



Robert L. Meinen, Director
Idaho Department of Parks and Recreation

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IDAHO DEPARTMENT OF FISH AND GAME
SOUTHWEST REGION
McCALL OFFICE
555 Deinhard Lane
McCall, Idaho 83638

Dirk Kempthorne / Governor
Steven M. Huffaker / Director

May 19, 2006



Clifford J. Dils
Acting Forest Supervisor
Payette National Forest
P.O. Box 1026
McCall, ID 83638

Re: Payette National Forest Travel Management Plan Draft Environmental Impact Statement

Acting Forest Supervisor Dils:

The Idaho Department of Fish and Game (Department) has reviewed the Payette National Forest Travel Management Plan DEIS. The Department understands that this proposal would revise the current Travel Plan by designating a site-specific transportation system for snow-free and over-snow travel. All snow-free motorized vehicle use will be restricted to designated routes. Some of the following comments are restating comments submitted in the original scoping for this project.

The increased use of off-highway vehicles (OHVs, off-highway motorcycles and ATVs) on public lands and, in particular, their use during the hunting season has resulted in four basic issues that affect fish and wildlife management.

First, is the increased vulnerability of deer and elk to harvest. A number of studies demonstrate a strong relationship between motorized access and vulnerability to harvest. In the 1980s and early 1990s vulnerability to harvest was reduced through road closures during the hunting season because road access for full sized vehicles was the problem. The advent of ATVs added a new dimension to this problem. The use of ATVs on trails, roads closed to full sized vehicles, and cross country has substantially increased vulnerability to harvest. This could ultimately lead to reduced hunting opportunities in order to maintain healthy big game populations.

Second, the use of OHVs in hunting creates social conflicts between hunters. These conflicts are caused by both lawful and unlawful use of OHVs on public land. They include violating road/trail/area closures, chasing of game with ATVs (fair chase), noise, and disturbance of game and hunters. A substantial portion of hunters use ATVs or motorcycles, but many do not. Those who do not and even some that do, desire hunting

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 May 19, 2006
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opportunities that are largely non-motorized, that is, large blocks of land that are not traversed with motorized trails or allow motorized cross country travel.

Third, is the avoidance of habitat. This is a concern where the motorized route density is so high that very little of an area is further than one-half mile from a motorized route. The rapid increase in recreational OHV riding outside the hunting season has increased motorized travel on many roads and trails that were lightly used in the past, increasing the potential to reduce the effectiveness of habitat. Blocks of habitat greater than 250 acres in size and more than a half mile from roads seem to provide security and buffers from human disturbance.

Fourth, is the resource damage caused by cross-country travel, that is, travel off of an established trail and/or the pioneering of new trails. This damage takes many forms including erosion from improper placement and design of user-created trails, damage to vegetation, spread of invasive species, damage to wetlands, and damage to streams to name just a few.

This set of problems, the perceived inaction by federal land management agencies, and the constant barrage of public comments regarding the use and misuse of OHVs during the hunting season prompted the Idaho Fish and Game Commission to establish the motor vehicle rule for hunters in 2002. Simply stated, the rule only allows the use of motor vehicles as an aid to big game hunting on roads open to and capable of travel by full sized vehicles. The rule has been at least partially successful in addressing some of the problems outlined above but is not a substitute for a balanced and effective travel plan. This rule has been implemented in 28 game management units, covering approximately 30% of the land area of the state. We believe that thoughtful implementation of the Forest Service Travel Management Rule will reduce the need for the motor vehicle rule and the number of units included in it.

As stated in our earlier letter, we strongly support the Forest Service Travel Management Rule, in particular, restricting motorized travel to designated roads and trails. Elimination of cross country travel will significantly reduce resource damage, address some of the conflicts between motorized and non-motorized hunters, and contribute to reducing vulnerability to harvest. In addition designating the right mix and density of single and double track trails, implementing hunting season closures where necessary, and minimizing the number of areas with a high density of motorized routes will ameliorate the concerns outlined above. In addition, we strongly recommend that no exception to the designated route rule be allowed for game retrieval.

Effective enforcement is an integral component of the travel plan. We are encouraged by the approach the Forest Service is using to standardize the motor vehicle use map across all National Forests. This should help with compliance, most of which is voluntary. We are aware that the Payette has only one LEO and that makes it difficult to enforce travel

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restrictions in addition to all the other enforcement demands on the forest. The Department and the Forest Service Master MOU allows the Department to enforce motor vehicle restrictions on the National Forests of Idaho. We are willing to assist in the enforcement of the travel plan and recommend that other Forest personnel be involved in monitoring and assisting LEOs with administering the travel regulations, especially during the fall hunting seasons.

The Forest did a good job of displaying potential wolverine denning habitat and habitat connectivity corridors. The Forest also identified disturbance of denning habitat from over-snow vehicle use as the management action likely to have the greatest potential for adverse impacts on the reproductive success of wolverines (DEIS, page 3-216). The importance of habitat connectivity was also stressed. Percent acres of denning habitat protected from over-snow vehicle use on the forest are presented, with Alternative D being the alternative with the most protection. However, the only recent, confirmed wolverine occurrences, some by DNA analysis, and probably the priority areas for denning habitat protection and maintenance of habitat connectivity, are in the areas least protected. The area between Lick Creek Summit-Secech Summit-Bruin Mountain-Slab Butte appears to be a priority area for wolverine occurrence and needs to be appropriately protected (excluding the groomed trail on the FS Road 21). This area is found within the Slab Butte to Patrick Butte, and the FC-RONR to Hells Canyon (south) corridors identified in the DEIS. Without protection of connectivity corridors and denning habitat of known occupied wolverine habitat we would find it difficult to conclude that the effects of the proposed alternatives would not have impact on population viability without a more thorough analysis.

More site specific comments are included in the attachment. We look forward to working with the Forest on implementing a travel management plan that protects fish and wildlife and associated recreation while providing opportunities for OHV recreation on the Payette NF. We request a meeting with the Forest to discuss these recommendations. We believe it would be productive to include the Idaho Department of Parks and Recreation in that discussion. If you have any questions or need further clarification please contact Jeff Rohlman at 634-8137.

Sincerely,



Al Van Vooren
Southwest Regional Supervisor

AVV/jr
Encl: (1) Supplemental Comments
Copy: IDFG (Leitzinger, Rohlman, Trent)

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**Idaho Department of Fish and Game Supplemental Comments
Payette National Forest Travel Plan DEIS**

<p>Management Area 1 – Hells Canyon</p>
<p>We do not see any significant impacts to the wildlife resources or the sportsmen from management actions proposed in any of the alternatives.</p>
<p>Management Area 2 – Snake River</p>
<p>The conversion of motorized trails 231, 252, 253, and 254 to non-motorized is sound. The area accessed by these trails has a long history of motorized vehicle road closure violations, especially during the fall hunting seasons, effectively eliminating big game security within the Grade/Dukes area.</p> <p>A portion of Trail 252 in Sections 7 and 18, and adjacent to the east boundary of the Cecil D. Andrus WMA (AWMA) at Dukes Creek and Board Gulch, is not highlighted as part of the Trail 252 motorized closure. We are not sure if this is an intentional omission or an oversight, but we recommend that it also be included in the closure to protect big game security and to provide uniformity to the access management systems and motorized restrictions for both the AWMA and adjacent USFS lands.</p> <p>We believe it is important to consider additional trail closings to motorized vehicles, especially Trails 251, 250, 259, and 255. Closing Trail 255 is a priority, as it connects to the Grade/Dukes closure area and would provide a route for motorized vehicles to access the entire closure. Leaving Trail 259 open to motorized (2-wheel) vehicles negates the positive effects of the existing and proposed trail closures, especially for big game security. It is also one of the trails with a history of frequent motorized vehicle violations by ATVs during the fall hunting seasons. Because this trail is adjacent to AWMA, those violations have negatively impacted the access management and wildlife use of AWMA during fall/winter hunting seasons.</p> <p>Road 50044 is identified as a seasonal road on the Management Area 2 map. The first 1,000 feet of this road are to be closed and obliterated as a wildlife mitigation requirement as identified in the Record of Decision for the Grade-Dukes Final Supplemental Environmental Impact Statement (August 1999).</p>
<p>Management Area 3 – Weiser River</p>
<p>In numerous correspondences we have expressed our concern about elk security on the forest, especially on the west side. Data for percent elk habitat security areas by game management unit in Table W-11 support this concern. As stated in our comments during scoping, we find it imperative that this analysis be conducted on the 5th level HUC scale, such as was used in the road density analysis. This scale will allow an assessment of impacts on a level small enough to be related to elk use, yet large enough for making meaningful management changes. This analysis and implementation of appropriate changes is necessary to implement the goals and intent of the Payette National Forest Plan as described on page 6 of Appendix E and to bring security areas to at least 30% of total acres.</p> <p>We recommend obliteration of road 50043 in the former Southeast Corner Timber Sale area. This was proposed for mitigation of increase elk vulnerability due to road construction and hiding cover losses.</p> <p>Road 50233 (ID 3-16) needs to remain closed or obliterated to minimize soil erosion and provide elk security. Road 50209 (ID 3-17) needs to remain seasonal closed regardless of its conversion to ATV trail as mitigation for elk security in the Middle Fork Weiser River Watershed Assessment.</p>

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<p style="text-align: center;">Management Area 4 – Rapid River</p> <p>We agree with the Forest for recommending motorized closure on the trails listed in Proposal IDs 4-1 through 4-5, inclusive. These closure will provide much needed resource protection for soils, wildlife, and fisheries.</p>
<p style="text-align: center;">Management Area 5 – Middle Little Salmon</p> <p>All alternatives appear to be similar in this management area. We recommend this area be reviewed to make sure adequate (>30%) portions of the area provide elk security habitat.</p>
<p style="text-align: center;">Management Area 6 – Goose Creek/Hazard Creek</p> <p>The proposed changes in Alternative B and D are adequate to protect fish and wildlife during snow free months. The proposed over-snow management for all alternatives is inadequate to protect known populations of wolverine. The Slab Butte to Patrick Butte connectivity corridor needs to be protected.</p>
<p style="text-align: center;">Management Area 7 – Payette Lakes</p> <p>The proposed over-snow management for all alternatives is inadequate to protect known populations of wolverine. The portion of the FCRNOR-Big Creek connectivity corridor needs to be protected between the Slab Butte/Patrick Butte corridor and Needles IRA to Marshall Mountain corridor.</p>
<p style="text-align: center;">Management Area 8 – Kennally Creek</p> <p>Alternatives B and D adequately protect big game security.</p>
<p style="text-align: center;">Management Area 9 – Lake Creek/French Creek</p> <p>Proposal Ids 9-1 through 9-4 are sound management proposals and will provide needed resource protection for anadromous fisheries and wildlife. The proposed over-snow management for all alternatives is inadequate to protect known populations of wolverine. The Slab Butte to Patrick Butte connectivity corridor needs to be protected.</p>
<p style="text-align: center;">Management Area 10 – Fall Creek/Warren Creek</p> <p>All of the action alternatives adequately protect fish and wildlife values.</p>
<p style="text-align: center;">Management Area 11 – Upper Secesh</p> <p>Our concerns for fish habitat protection, and especially Chinook salmon, steelhead, and bull trout habitat, lead us to recommend that Proposal Ids 11-7 through 11-11 in the Ruby Meadows area be managed as non-motorized. The current state of these trails is degrading important spawning and rearing habitat for the protected salmonids. To continue to encourage motorized use in this area would only exacerbate the problem. The Chinook salmon that spawn in the Secesh River comprise one of the most significant contributions to wild salmon reproduction in Idaho.</p>
<p style="text-align: center;">Management Area 12 – South Fork Salmon River</p> <p>Chinook salmon, steelhead, and bull trout habitat protection and improvement are paramount in the management area. We strongly urge the Forest to carry forward with the proposed elimination of trails and conversion of motorized trails to non-motorized trails. Alternative D best meets this directive. Alternative B can meet this directive with minor modifications. Impacts to anadromous fish habitat from activities proposed in Alternative C would be unacceptable.</p>
<p style="text-align: center;">Management Area 13 – Big Creek/Stibnite</p> <p>We concur with the over-snow management displayed in Alternative D to protect wildlife habitat connectivity.</p>

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Nez Perce



TRIBAL EXECUTIVE COMMITTEE
P.O. BOX 305 • LAPWAI, IDAHO 83540 • (208) 843-2253

April 5, 2006

Clifford J. Dils
Acting Forest Supervisor
Payette National Forest
PO Box 1062
McCall, ID 83638

RE: Payette NF Travel Management Plan DEIS Comments

Dear Mr. Dils:

The Nez Perce Tribe would like to briefly comment on the Payette National Forest Travel Management Plan which will govern the use of roads and motorized trails in the Payette National Forest. The Payette National Forest is largely within the Nez Perce Tribe's aboriginal territory, which was ceded to the United States in the Treaties of 1855 and 1863 in exchange for the United States' protection of the Tribe and its retained rights and resources. Tribal members use the Payette NF to exercise many of their retained treaty rights, including fishing, hunting and gathering.

General Comments

The extensive road network created to facilitate the massive logging campaigns of the early 20th century negatively impacted every aspect of the Tribe's treaty resources, as well as many cultural and spiritual sites. The development and utilization of a road/OHV trail network eliminates and fragments habitat, compacts soils, disturbs or destroys organic layers, and causes higher rates of erosion and mass wasting. Roads are one of the single biggest contributors of sediment to the regions streams and rivers, and in some cases as much as 40 percent of the sediment produced in a watershed was attributed to logging roads (Reid, 1980; Kahklen, 2001). This sediment ruins the gravel beds which support viable spawning habitat, chokes redds already in the riverbed, and lowers overall recruitment and escapement (Cederholm *et al.*, 1980). As such, the Tribe is opposed to building new roads or trails without obliterating and recontouring old roads.

Roads and motorized trails also promote the spread of noxious weeds and invasive plants (Sheley & Petroff 1999). Roads provide dispersal of exotic species via three primary

mechanisms: providing habitat by altering conditions, making invasions more likely by stressing or removing native species, and allowing easier movement by wild or human vectors (Trombulak & Frissell 2000). Vehicles, including OHVs and two-wheeled vehicles, transport the seeds of exotic plants and encourage growth, displacing native plants and their communities (Sheley & Petroff 1999).

The Tribe appreciates that the Payette NF is taking steps to reduce unrestricted cross country motorized travel. The benefits of keeping all types of motorized vehicles on the road/trail network are significant. However, the Tribe remains concerned about the level of two-wheel motorized trails that remain on the Forest, or that will be added to the network. The Tribe is essentially concerned that, in reality, these trails will not be limited to two-wheeled motorized use. It is the experience of the Tribe's staff that with the growing numbers of OHV users, more and more of them are disregarding road designations and closures. The Tribe frequently sees this on closed logging roads, and the Tribe expects that the same is likely to happen with restricted two-wheeled motorized trails.

With the Forest Service's smaller and smaller budgets, it will be very difficult for the agency staff to patrol and enforce trail designations, and as a result, the Tribe feels that ATV use will be expanded to the two-wheeled trail system, as is already happening. *See e.g.* DEIS, pg. 3-62. This problem could be addressed by reducing the number of two-wheeled motorized trails on the Forest. Is there truly a need for five times the number of trails for two-wheeled use versus four wheeled use? If so, are their plans to monitor the use of the trails to make sure ATVs are not using those trails. Also, does the Forest Service have any plans for a strategy to deal with the growing unauthorized motor vehicle use discussed in Chapter 3 of the DEIS?

Concerns about Impacts to Wildlife

The Tribe has hunted elk in the Payette forest area for millennia. Yet, because of a variety of factors, including to a significant degree road building, the elk populations have dwindled from what they once were. While it is undisputed that elk summer and winter range habitat will be improved by cutting down on cross-country motorized vehicle use, there will still be a significant impact to elk because of existing and newly proposed motorized trails and roads. Roads and trails allow hunters easy access to the hunting grounds, especially with more and more hunters using the ATV as a hunting platform. Because of this, as stated elsewhere in these comments, the Tribe would like to see the permanent closure of additional presently unneeded logging roads, and the reduction and closure of trails directly within large swaths of elk summer and winter range, where it exists on the Forest.

It has been clearly documented that elk use of an area is directly related to the amount and intensity of vehicle use. It has been well documented that elk use declines dramatically within ½ mile of open roads (Thomas & Towell 1982; Leege 1984; Lyon 1979; Hieb 1976; Perry & Overly 1977; Rost & Bailey 1979; Witmer & deCalesta 1985). In fact, elk use diminishes about 88% within the first 100 feet from any open road, 53% from 100 to 660 feet and 28% up to one mile away (Lyon 1984). Motorized trail use likely has similar impacts on elk habitat.

The Tribe is also concerned about the combination of widespread largely unregulated over-snow use of motorized vehicles with the lack of information related to impacts of over-snow motorized travel and wildlife. It is commonsense that wildlife would be adversely affected by these machines in a time of year when they are already at risk. As a result, the Tribe requests that the Forest cut back on over-snow motorized vehicle use in important habitat areas, like elk winter range, and lynx habitat pending scientific review showing no significant impacts. Because many of the wildlife species are already at risk from other environmental and man-made factors, the Forest Service should take a cautious approach to management.

Concerns about Aquatic and Riparian Areas

The DEIS goes to great length to discuss the existing condition and the change created by each alternative. However, much of this information is presented in a confusing manner as abstract concepts are used in place of hard data, thereby muddling one's understanding of the potential impact/benefits. For example, in the discussion of MA 12 on pg. 3-125, the table states that 14% of the available RCAs (9,457 acres) are currently open to motor vehicle use of some sort. The table goes on to state that the change by alternative is a -13% reduction. On first glance, a reader would think that as a result of the action, the remaining RCAs open to motorized vehicles would be 1% of the total available RCA acreage ($14\% - 13\% = 1\%$). However, the SWI 2 narrative description states that this would be a "minor" reduction; and thus action must actually be a 13% reduction of the 9,457 acres open to motorized travel, or in other words, a 1,229 acre reduction of the RCA's open to motorized travel. It would be clearer if the DEIS stated the hard data, the 1229 acre reduction, instead of the abstract number, the 13% reduction. Eliminating this type of obfuscation would greatly increase the ability of the public to understand the document. The clear presentation of data is especially important with RCAs as the Tribe would like to see major reductions of road/motorized trail miles in RCAs where sediment input to the streams is moderate to high.

Overall, the Nez Perce Tribe appreciates the steps taken by the Forest Service to reduce impacts to IRA's, water quality, and elk habitat from unrestricted motorized vehicle use. Nonetheless, the Tribe would like to see more action taken, especially to reduce roads and motorized trails in RCA's, as well as in subwatersheds with a high vulnerability rating. For example, in the South Fork Salmon MA, 85% of the roads are located in subwatersheds with a high vulnerability rating. DEIS, 3-91. Unsurprisingly, the MA has 15 subwatersheds listed as 303(d) limited for water quality under the Idaho water quality standards. DEIS, 3-74.

Conclusion

While the Tribe generally opposes the creation of OHV trails, the Tribe understands that the Forest Service has a mandate to provide for a multitude of uses on the Forest. The Tribe generally requests that with the creation or designation of new trails, that old trails, or unused logging roads be permanently put to rest by obliteration. This is the only way that OHV impact can be restricted to designated trails, and have as little impact as possible.

Despite some of the negative comments contained in this letter, the Tribe is very pleased that the Payette National Forest has decided to take steps to reign in ATV/OHV use on the

Forest. This decision should go a long way toward balancing the competing uses and needs to more appropriately protect the ecosystem and the resources that Tribal members depend on, while continuing to provide ample recreational activities. Thank you for your consideration of the Tribe's comments. If you have any questions, comments, or concerns related to the issues raised in this letter, please feel free to contact Ryan Sudbury in the Tribe's Office of Legal Counsel at (208) 843-7355.

Sincerely,



Rebecca A. Miles
Chairman
Nez Perce Tribal Executive Committee



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



May 19, 2006

Reply To
 Attn Of: ETPA-088

Ref: 04-057-AFS

Mark J. Madrid, Forest Supervisor
 USDA Forest Service
 Payette National Forest
 P.O. Box 1026
 McCall, ID 83638

Dear Mr. Madrid:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the **Payette National Forest Travel Management Plan** (CEQ No. 20060045) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS proposes a no action (Alternative A) and three action alternatives. Alternative B (Proposed Alternative) was designed to meet a variety of resource issues by slightly decreasing roads and motorized trails while increasing miles of roads designated for ATV usage. Alternative C responds to requests for more motorized access in summer and winter by increasing the miles of motorized trails and areas open to over-snow vehicle use. Alternative D responds to concerns about the effects of motorized access on visitors desiring a non-motorized experience and on habitat connectivity for wolverine by reducing road and motorized road miles and closing large areas to over-snow motorized use.

EPA's comments address those matters that relate directly or indirectly to the authorities of EPA, consistent with our review responsibilities under Section 309 of the Clean Air Act. Our review places particular emphasis on ensuring impacts to water quality, air quality and wetlands are minimized or mitigated. We also consider purpose and need and supporting information as they relate to the identification of reasonable and feasible alternatives and their associated environmental impacts.

Alternative Analysis

Alternative B appears to have been identified as the Proposed Alternative to strike a balance among the requests of the various users of the forest. Some prefer increased motorized usage on the forest and others prefer less motorized usage and protection of sensitive resources.

Each alternative would result in some measure of improvement in water quality and aquatic habitat, depending on the Management Area (MA) considered. Alternative D would likely achieve the greatest benefits to water quality and aquatic habitat and therefore would likely be the environmentally preferred alternative. EPA supports the selection of an alternative that meets the purpose and need with minimum impacts to the environment. Because the analysis of Alternative C in the DEIS shows that there would be degradation of water quality and aquatic habitat in some MA's, and because this alternative does not appear to meet purpose and need, we would not support the selection of Alternative C.

Public Water Supply

EPA appreciates that the draft EIS provides an analysis of the number of public water supply systems by MA. Table SW-1 indicates that MA 3 has 2 subwatersheds that serve as public drinking water supply, while MA 7 has 6 subwatersheds and MA 13 has 1. It also gives a vulnerability rating based on parameters such stream bank damage, sediment loads, channel modification, flow disruption, thermal changes, chemical contamination, and biological stress.

Our primary concern is the management of MA 3, which currently has 78% of the MA open to cross-country motor vehicle use and 70% of riparian conservation areas (RCAs) open to cross-country motorized travel. We commend the USFS for designing each alternative to consist of a significant reduction in the RCA areas open to cross-country or motorized use. However, alternatives B and C would result in a significant increase in miles of designated ATV and OHV trails. We recommend that the final EIS discuss the potential effect that the increase in designated ATV and OHV use would have on drinking water supplies in the MA.

The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies that manage lands that serve as drinking water sources to protect these source water areas. Source Water is untreated water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source Water Areas are the sources of drinking water delineated and mapped by the states for each federally regulated public water system.

EPA is making an effort to notify federal land management agencies that the Idaho Department of Environmental Quality has completed source water assessments for the state of Idaho. They can provide the USFS with a database of information about the watersheds and aquifers that supply public water systems. We recommend that the USFS contact the IDEQ to help identify source water protection areas within or downstream of the project area. Typical databases may contain GIS and Access information of the watersheds and aquifer recharge areas, the most sensitive zones within those areas, and the numbers and types of potential contaminant sources identified for each system.

We have also posted a draft document on EPA's Regional drinking water website, EPA Region 10 Source Water Protection Best Management Practices (BMPs) for USFS and BLM. This document is a compendium of BMPs that were collected from a host of sources directed at protecting drinking water. This document is intended to provide a broad list from which to select appropriate BMPs that can be applied to a specific plan or project. The list is not comprehensive and additional BMPs may be appropriate to ensure adequate protection of source water areas.

A link to this document, which can be found on EPA's Region 10 website at www.epa.gov/r10earth (click "Water Quality", under Programs click "Drinking Water", click "Source water and Wellhead Protection 2005 Workshop Summary").

Clean Water Act Section 303(d) Listed Streams

According to Table SW-1, MA-12 contains a high amount (15) of subwatersheds that contain Clean Water Act Section 303(d) listed streams. The pollutants of concern are sediment and metals. Table SW-26 indicates that MA 12 has 213.5 miles of roads and motorized trails in subwatersheds with a high watershed vulnerability rating and 91.4 miles of designated roads and motorized trails within riparian conservation areas. We recommend that the selected alternative contain the maximum amount of road closure available, particularly in areas vulnerable to erosion and sediment delivery, to allow recovery of the impaired streams in MA-12. We also recommend that the decision maker take a hard look at the increase of 3.3 miles of ATV trail in Alternative B and consider removing this increase since it would potentially offset the otherwise expected improvement in water quality.

EPA has rated the draft EIS as EC-1 (Environmental Concerns – Adequate Information), due to concerns related to protection of public water supply, impaired streams and aquatic habitat, consistent with EPA's rating system (enclosed).

We appreciate the opportunity to comment on the draft EIS for the Payette National Forest Travel Management Plan. If you would like to discuss issues related to our review, please contact Denise Clark at (206) 553-8414 or myself at (206) 553-1601.

Sincerely,



Christine B. Reichgott, Manager
NEPA Review Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

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

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

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

Category 2 – Insufficient Information

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

Category 3 – Inadequate

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

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

6.2 Travel Management Plan DEIS – Public Comment and Response Summary

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6. <i>The Forest Service should complete the analysis of travel management with a minimum of paperwork.</i>	56
7. <i>The Forest Service should ensure that Recreation Objective REOB18 from the Forest Plan is followed.</i>	56
8. <i>The Forest Service should consider all resources when analyzing travel management.</i>	56
9. <i>The Forest Service should only consider implementation of road closures/restrictions during travel planning, not during District-level NEPA planning.</i>	56
10. <i>The Forest Service should clarify the definition of closed so that it does not appear that areas, trails, or roads are closed to foot traffic as well.</i>	56
11. <i>The Forest Service should consider that combining both winter and summer recreation into three somewhat “polarized” alternatives makes it difficult for people to comment in a multi-use fashion.</i>	56
12. <i>The Forest Service should consider in the analysis the differences between the east and west zone of the forest.</i>	57
13. <i>The Forest Service should indicate that many of the proposed ATV trails are in fact closed roads being converted to trails.</i>	57
14. <i>The Forest Service should consider access for the elderly and disabled as a significant issue.</i>	57
15. <i>The Forest Service should separate winter closures proposed for wildlife protection from those proposed for non-motorized winter recreation.</i>	57
16. <i>The Forest Service failed to analyze an adequate range of alternatives for snowmobiling.</i>	57

17. *The Forest Service should support the conclusions found in the document with research and indicate how applicable federal rules and regulations are being followed in each alternative.* 58

18. *The Forest Service failed to analyze an alternative that truly addresses the need to increase motorized opportunities.* 58

19. *The Forest Service should analyze an alternative that meets the direction found in the NFMA for renewable and sustainable resources including motorized recreation.* 58

20. *The Forest Service should display the amount of non-motorized and motorized opportunities available in an unbiased way. Non-motorized users in fact have the use of the entire Forest, including the Wilderness.* 58

21. *The Forest Service should consider the environmental effects of past restriction of motorized use when proposing to close more motorized trails or areas.* 58

22. *The Forest Service should consider that the analysis presented in the DEIS appears to be biased against motorized use and users.*..... 58

23. *The Forest Service should analyze the semi-primitive experience in winter to assess the incompatibility of motorized and non-motorized winter sports.* 59

24. *The Forest Service should do an analysis of the capabilities of the Forest to sufficiently monitor, enforce, and carry out public education in support of the new travel plan.*..... 59

25. *The Forest Service should clarify the following: Page 3-17, MA 6. Goose Creek/Hazard Creek – Winter. first paragraph.. Since both ski areas are under Special Use Permit, as is the case for the Brundage Snow Cat operation, all three should be listed. (398:50200)*..... 59

26. *Attention needs to be given to the rounding off of figures all the way through the DEIS.*... 59

27. *The Forest Service should clearly identify the reasons for, and opportunities created by, identifying areas as suitable for motorized or non-motorized use in winter.* 59

28. *The Forest Service should clearly explain how the analysis presented in the DEIS complies with sections 101 and 102(1) of the National Environmental Policy Act (NEPA) and other environmental laws.* 59

29. *The Forest Service should ensure that the alternatives presented in the DEIS follow the direction found in Executive Order 11989.*..... 60

30. *The Forest Service should clearly indicate that the travel plan decision will not be the only decision affecting road and trail closures. Rather NEPA analyses and decisions will continue on the Forest and more roads and trails may be closed to mitigate those actions.*..... 60

31. *The Forest Service DEIS lacks sufficient site specific analysis.* 60

32. *The Forest Service improperly used the travel plan to adjust ROS inventories.* 60

33. *The Forest Service should develop a Winter Recreation Plan.*..... 61

34. *The Forest Service should have separated winter and summer recreation in the DEIS.*.... 61

Purpose and Need **61**

35. *The Forest Service’s stated purpose and need included wildlife, vegetation, soils, and watershed management, but the analysis focuses on recreation.* 61

36. *The Forest Service should make sure the analysis supports the stated purpose and need for the project.* 61

37. *The Forest Service should display ALL pertinent Forest Plan direction.*..... 61

Issues **61**

38. *The Forest Service should consider the importance of travel management to the snowmobiling community.*..... 61

39. *The Forest Service should identify all existing resource problems affected by travel management.* 62

40. *The Forest Service should complete a road analysis to assess the effects of road management to all resources.* 62

41. *The Forest Service should consider an alternative that opens roads to non-motorized use only during the winter.* 62

42. *The Forest Service should not consider allowing more motorized use in existing IRA's.* ... 62

43. *The Forest Service should have good rationale for constructing any new roads or trails.* 62

44. *The Forest Service should consider an alternative that analyzes complete closure to over-snow travel.* 63

45. *The Forest Service should analyze an alternative that designates some areas open to motor vehicle use.* 63

46. *The Forest Service should analyze an alternative that opens all unauthorized roads and trails.* 63

47. *The Forest Service should consider the resource effects of non-motorized winter recreation.* 63

48. *The Forest Service should collaborate with local recreation groups to improve the alternatives.* 63

49. *The Forest Service did not adequately factor in the nationwide trend of increasing motorized use.* 63

50. *The Forest Service should consider the carrying capacity of the forest for various modes of recreation.* 64

51. *The Forest Service should consider using old logging roads and roads planned for decommissioning as trails.* 64

52. *The Forest Service should analyze the environmental effects of increasing snowmobile use, such as has occurred in the last decade. Effects to air quality, water quality, noise pollution, and wildlife should all be considered.* 64

53. *The Forest Service should consider that the project design features which address noxious weeds in the DEIS are insufficient to reduce the spread of these weeds to a non-significant issue when considered at the forest level.* 64

54. *The Forest Service should analyze the effects of snowmobile exhaust on air quality as a significant issue.* 64

55. *The Forest Service needs to review the factors used when determining non-significance of issues to make sure they comply with the NEPA.* 64

Definitions **65**

56. *The Forest Service should clarify the definition of “cross country motor vehicle use” particularly in designated corridors.* 65

57. *The Forest Service should fully define what is meant by “closure” in the FEIS, including the types of management that would be authorized to close routes.* 65

58. *The Forest Service has used the term “unauthorized” incorrectly in the DEIS.* 65

59. *The Forest Service has incorrectly described the proposed winter closure at Granite Mountain in the DEIS which should be described as “snowmobile free” rather than non-motorized due to the permitted snow cat operation in the area.* 65

Monitoring **65**

60. *The Forest Service should monitor all travel-way closures to assure that they are achieving the travel management objectives for which they are closed.*..... 65

61. *The Forest Service should consider more effective methods of road closure/barriers because current methods such as gates and berms seem to often be ineffective.*..... 65

62. *The Forest Service should commit to implementation and effectiveness monitoring for travel management.*..... 66

Project Design Features..... **66**

63. *The Forest Service should include project design features to ensure recognition of environmental concerns that may arise as a result of travel route and area designation.* 66

64. *The Forest Service should evaluate the description of Project Design Features to ensure they are feasible.* 66

Maps & Data Display..... **66**

65. *The Forest Service should improve the presentation of the proposals and maps in the FEIS.* 66

66. *The Forest Service should improve the winter maps so they better display the areas closed to motorized over-snow use.*..... 66

67. *The Forest Service should better describe the winter closures in the FEIS.*..... 66

68. *The Forest should change the way the alternatives are displayed in the Comparison of Alternatives tables.*..... 66

69. *The Forest Service should identify the Brundage Snow Cat permitted area on the maps in the FEIS.* 66

Alternatives..... **66**

70. *The Forest Service should choose an alternative that gives a better depiction of current recreation use than the No Action Alternative discussed in the DEIS.* 66

71. *The Forest Service should develop another alternative that does not restrict motorized access anywhere except the Wilderness.*..... 67

72. *The Forest Service should develop an alternative that increases the opportunity for non-motorized recreation.*..... 67

73. *The Forest Service should complete a RAP and address more road closures, relocations, and obliterations because the current alternatives do not adequately mitigate current impacts to forest resources.*..... 67

74. *The Forest Service should consider an alternative that incorporates the ISSA proposals in their entirety, including entering the Secesh and Needles Recommended Wilderness areas. .* 67

75. *The Forest Service should consider an alternative that addresses the loss of unauthorized roads.* 67

76. *The Forest Service should develop an alternative that is more responsive to the increasing demand for motorized recreation opportunities.* 67

77. *The Forest Service should develop an alternative that is more responsive to the increasing demand for both motorized and non-motorized recreation opportunities.* 68

78. *The Forest Service should develop an alternative that does not allow degradation of any natural resources over time.* 68

Cumulative Effects..... **68**

79. *The Forest Service should consider the cumulative effects of the loss of OHV trail nationwide.*..... 68

Fisheries **68**

80. *The Forest Service should re-evaluate the use of number of stream crossings as a proxy for potential for fuel spills because fuel spills occur relatively rarely at stream crossings or otherwise.* 68

81. *The Forest Service should consider that if there are problems occurring with pollution or sediment at stream crossings on roads and trails, this is the fault of the design or maintenance of the facility, and not of the public who is using the facility.*..... 68

82. *The Forest Service should consider that there is no research to back up claims that OHV use and trails have any effect on fisheries populations.*..... 68

Soil & Water..... **68**

83. *The Forest Service should consider that while roads can affect the recruitment of large woody debris to streams, trails do not.* 68

84. *The Forest Service should consider erosion and sediment from the existing road and motorized trail network.*..... 69

85. *The Forest Service should consider the soil and water resource damage caused by motorized cross-country travel.* 69

86. *The Forest Service should identify and mitigate environmental concerns associated with new road or trail construction.* 69

87. *The Forest Service should consider obliterating unauthorized road and relocating roads outside Riparian Conservation Areas (RCAs).* 69

88. *The Forest Service should fully describe the methods used in road closures.*..... 69

89. *The Forest Service should consider the effects of differing snow melt patterns caused by snowmobile use on soil moisture levels; and.* 69

90. *The Forest Service should consider the impacts of all uses, motorized and non-motorized, on sediment/erosion from trails.* 70

91. *The Forest Service should consider that erosion and sediment from trails that receive equestrian use is at least as great as that from motorized use.*..... 70

92. *The Forest Service should consider effects of snowmobile emissions, including cross-country snowmobile use, on water quality.*..... 70

93. *The Forest Service should not limit the extent of snowmobile use because of potential impacts to the soil resource.* 70

94. *The Forest Service should consider that the sediment produced from disturbance on an OHV trail is considerably less than that produced from an open road.* 71

95. *The Forest Service should consider that the conclusions concerning the effects of vehicle use on soils and vegetation seem to be based on assumptions rather than research or local data.* 71

96. *The Forest Service should clarify the data presentation in the Soil & Water section of the EIS.*..... 71

97. *The Forest Service should discuss the effects of the alternatives on the drinking water supplies in Management Area 3.*..... 71

Wildlife..... **71**

98. *The Forest Service should analyze lynx management using the most recent information and amend the Forest Plan to reflect this direction.*..... 71

99. *The Forest Service should consider the health and safety aspects of leaving snags when roads and trails are constructed or reconstructed.*..... 71

100. *The Forest Service should consider the effects of increasing snowmobile activity on wildlife.*..... 72

101. *The Forest Service should consider that human recreation has little effect on wildlife.* .. 72

102. *The Forest Service should consider the likelihood that potential lynx habitat surrounding McCall is not occupied.* 72

103. *The Forest Service should re-evaluate the suitability of areas identified as lynx habitat using more up-to-date information; and:*..... 72

104. *The Forest Service should re-evaluate the potential effects of snowmobiling on lynx using the most up-to-date research; and:*..... 72

105. *The Forest Service should amend the Forest Plan direction for lynx because no lynx are known to be present on the Forest and the most recent research would lead to different, probably smaller, delineations of potential habitat.* 72

106. *The Forest Service should consider the relative effects of motorized versus non-motorized recreation in winter on wildlife.*..... 72

107. *The Forest Service failed to adequately analyze the effects of snowmobile use on wolverine and lynx habitat.*..... 72

108. *The Forest Service should evaluate in an unbiased manner the effects of motorbike use on elk security as compared to the effects of hunting.* 72

109. *The Forest Service should maintain wildlife migration corridors in all alternatives.*..... 72

110. *The Forest Service should consider that the most recent research is inconclusive regarding the effects of human interactions with elk and elk habitat effectiveness.* 72

111. *The Forest Service should consider that it is the management policies of Idaho Fish & Game that are contributing to the harassment of big game species, rather than motorized traffic.*..... 72

112. *The Forest Service should reanalyze the currently closed roads to determine if the new elk security guidance in the 2003 Forest Plan would still require these roads to be closed year-round.*..... 72

113. *The Forest Service should consider that OHV use during hunting season increases animal vulnerability to harvest.* 73

114. *The Forest Service should consider that OHV use throughout the year reduces the effectiveness of big game habitat.* 73

115. *The Forest Service should consider that the areas of wolverine denning habitat being protected in Alternative D are not those that should be the highest priority.*..... 73

116. *The Forest Service should evaluate the closure of additional roads and trails within elk summer and winter range to protect the animals from motorized vehicle use, especially during hunting season.* 73

117. *The Forest Service should limit over-snow motorized use until impacts to wintering wildlife habitat can be fully assessed.* 73

Firewood **73**

118. *The Forest Service should consider that none of the alternatives provides sufficient access for firewood collection and that firewood cutting is a significant issue.* 73

119. *The Forest Service should consider that much of the forest has burned in the last 30 years and should be opened for fuelwood cutting.* 73

Noxious Weeds **73**

120. *The Forest Service should consider that motorized traffic on the forest contributes to the spread of noxious weeds.* 73

Trails - General **74**

121. *The Forest Service should consider providing more opportunities for OHV trail riders because use is increasing.*..... 74

122. *Because motorized use is increasing the Forest Service should provide more motorized trails laid out in systems such as those recommended by the Blue Ribbon Coalition.* 74

123. *The Forest Service should keep all motorized trails open because they provide such a variety of opportunities for all users motorized and non-motorized.*..... 74

124. *The Forest Service should consider that with the closure of all off-road travel and the reduction in available motorized trails, adverse impacts and user conflicts are likely to occur due to overuse on the remaining motorized trails.*..... 74

125. *The Forest Service should consider that restricting trail use to non-motorized due to lack of maintenance, or on those that receive little use or are considered “expert” is not valid. These trails have value to the public that uses them.*..... 74

126. *The Forest Service should open all trails outside the Wilderness to motorized use.* 74

127. *The Forest Service should evaluate all 2-wheel trails to determine whether or not they can accommodate ATV traffic.*..... 75

Trail Closure/Restriction..... **75**

128. *The Forest Service should consider rerouting or improving maintenance on trails where there are water quality issues, rather than restriction to non-motorized use only.* 75

129. *The Forest Service should not close motorized trails to gain non-motorized mileage, instead they should construct new non-motorized trails and keep all existing motorized trails.* 75

130. *The Forest Service should consider that the needed skill level limits the use on “expert” OHV trails.*..... 75

131. *The Forest Service should consider that expert level trails are scarce and there is a growing population of experienced OHV users out there that desire that experience.* 75

Single Track Motorized Trails..... **75**

132. *The Forest Service should provide more, not less, single track motorized trails.* 75

133. *The Forest Service should consider that the need for single track trail for mountain bike use is not being addressed on the Payette National Forest.* 76

134. *The Forest Service should consider that single-track trails often end up being used by ATV users as well.*..... 76

Loop Trails **76**

135. *The Forest Service should provide more loop trail opportunities.* 76

Groomed Snowmobile Trails **76**

136. *The Forest Service should use the most current lynx studies to assess the management of groomed snowmobile trails.*..... 76

137. *The Forest Service should not decrease the amount of groomed snowmobile trail because use is increasing.*..... 76

138. *The Forest Service should add new “link” trails to the existing system.*..... 77

139. *The Forest Service should consider eliminating the Snowmobile Overlook because it leads to intrusion violations on the Brundage Ski Area permitted area.* 77

Closed Roads 77

140. *The Forest Service should provide turn-arounds at gates and barriers on closed roads.* 77

141. *The Forest Service should consider that by restricting access many families and seniors will no longer be able to participate in activities which they have historically enjoyed.* 77

142. *The Forest Service should not close any more roads than those that are already closed.* 77

Unauthorized Roads 77

143. *The Forest Service should consider an alternative that addresses the loss of unauthorized roads in currently open areas.* 77

144. *The Forest Service should not designate any unauthorized routes open because it rewards the illegal construction of these routes.* 78

145. *The Forest Service should recognize that most summer motorized users would only use the existing (unauthorized) road beds and would not drive “off-road” and not penalize them because of the few users who do cause resource damage off-trail.* 78

146. *The Forest Service should realize that creation and use of “unauthorized” routes is an indication of unmet demand for motorized recreation opportunities.* 78

Road & Trail Decommissioning 78

147. *The Forest Service should decommission roads or trails for every new mile of road or trail created.....* 78

Jurisdiction 78

148. *The Forest Service should indicate roads that fall under other jurisdiction clearly on the maps so people can easily recognize them.....* 78

149. *The Forest Service should maintain public access on roads managed under cost share agreements.* 79

Maintenance 79

150. *The Forest Service has not adequately considered the impacts from a lack of maintenance on the existing road network.* 79

151. *The Forest Service should consider that trail maintenance has not been adequately funded for the past two decades, even with the existing system of trails.* 79

152. *The Forest Service should consider that lack of trail maintenance is a poor excuse for reducing the number of trails or limiting access.* 79

153. *The Forest Service should consider that reducing the number of trails available for motorized use may also reduce the amount of trail maintenance funds available through partnerships with the IDPR and other grant and volunteer efforts.* 79

154. *The Forest Service should consider that faulty design and maintenance of roads and trails are not the fault of the public but of the managing agency.....* 80

RS 2477 80

155. *The Forest Service should evaluate roads that it has closed since 1976 for potential RS 2477 rights.* 80

156. *The Forest Service has not correctly addressed RS 2477 in the DEIS. The PNF lacks the authority to close roads or determine jurisdiction on roads.....* 80

Administrative Use..... 81

157. *The Forest Service should not use roads closed to the public under the guise of “administrative use”.....* 81

Collaboration/Partnerships..... 81

158. *The Forest Service should make better use of grants and partnerships to fund maintenance of trails and to keep trails open.* 81

159. *The Forest Service should consider using volunteers and grants to help maintain trails, so that more trails may be kept open.*..... 81

160. *The Forest Service should consider using RPT grant monies and the Park N’Ski program to create more parking areas for winter recreation users.* 81

161. *The Forest Service should make better use of grants and partnerships to fund the snowmobile management program.* 81

Motorized Recreation – General Comments..... 81

162. *The Forest Service should clearly define when there is sufficient snow for over-snow motorized travel to be allowed.*..... 81

163. *The Forest Service should keep motorized and non-motorized users separate so that non-motorized users can enjoy nature.* 81

164. *The Forest Service should not close any areas to motorized recreation.* 81

165. *The Forest Service should consider that motorized use on the Forest has affected all Tribal treaty resources.*..... 81

166. *The Forest Service should remove all motorized use from the National Forest because of the negative resource effects.* 82

167. *The Forest Service should consider the impacts of non-motorized recreation as well as those of motorized recreation.* 82

168. *The Forest Service should consider that people have been using motorized trails and roads for a long time and the trails and country they access have great value to them.* 82

169. *The Forest Service should use public education to prevent resource damage by motorized trail users.* 82

170. *The Forest Service should provide as many motorized opportunities as possible because so many people, including the very young, the elderly, the disabled, and veterans, value them.* 82

171. *The Forest Service should completely overhaul the legislation and direction that have led to the current management course.*..... 83

172. *The Forest Service should provide OHV recreation opportunities.*..... 83

173. *The Forest Service should consider that resource damage caused by OHV use usually only occurs in isolated areas.* 83

174. *The Forest Service should consider that it is easier for snowmobiles to travel a distance from trailheads/parking than for non-motorized users who need opportunities within a close distance from access points.*..... 83

Non-motorized Recreation – General Comments..... 83

175. *The Forest Service should consider the value of non-motorized recreation opportunities to society and the environment.*..... 83

176. *The Forest Service should provide a balance between motorized and non-motorized recreation opportunities.*..... 83

177. *The Forest Service should consider that motorized and non-motorized recreation is often incompatible.*..... 84

178. *The Forest Service should consider that non-motorized trails tend to be under-utilized.* 84

Access - General 84

179. *The Forest Service should consider that public access is an important resource for future generations.*..... 84

180. *The Forest Service should consider that a large portion of the population must use motorized vehicles to access the forest because of physical limitations.*..... 84

181. *The Forest Service should consider that providing a broad spectrum of recreation opportunities is good for the local economy.*..... 84

182. *The Forest Service should consider that providing a broad spectrum of recreation opportunities disperses use and increases safety.*..... 84

183. *The Forest Service should continue to allow access using the 1994/1995 travel map which the public is used to and finds to be adequate.*..... 85

184. *The Forest Service should not limit access to any type of recreation.*..... 85

185. *The Forest Service should consider that there is a difference between the remote backcountry, which may still be accessed by road, and Wilderness which is entirely non-motorized.*..... 85

Separate Use **85**

186. *The Forest Service should consider that non-motorized recreation provides the most resource protection and therefore motorized access should be limited.*..... 85

187. *The Forest Service should provide more non-motorized areas within easy access distance from major roads and parking areas.*..... 85

188. *The Forest Service should continue to provide a winter non-motorized area in Bear Basin for use by Nordic skiers.*..... 85

189. *The Forest Service should consider that separate use areas provide a number of benefits including a safer recreation experience and more protection of natural resources.*..... 85

190. *The Forest Service should consider that motorized and non-motorized use is not compatible because the noise and air pollution from motorized vehicles is not amenable to non-motorized recreationists.*..... 86

191. *The Forest Service should consider that there is currently not enough area designated for non-motorized recreation on the Payette.*..... 86

192. *The Forest Service should consider the many people that utilize the areas available for snowmobiling on the Payette NF.*..... 86

193. *The Forest Service should consider that definable boundaries and separate use areas provide the best experience for the non-motorized recreationist in winter.*..... 86

194. *The Forest Service should consider that there are not as many non-motorized recreationists as motorized and that there are already several areas set aside for non-motorized use, both summer and winter.*..... 86

195. *The Forest Service should consider a seasonal closure in the area utilized by the Brundage Snow Cat special use permit.*..... 87

196. *The Forest Service should consider that excluding snowmobiles from portions of the Brundage Mountain Snow Cat skiing permitted area is essential for the business to survive.* 87

197. ... (Continue 196) *.For the safety of the program’s patrons.*..... 87

198. *The Forest Service should consider that snowmobiles have a much larger range than human-powered recreationists and can quickly travel by any non-motorized areas.*..... 87

199. *The Forest Service should evaluate whether or not the non-motorized areas created would be large enough and distant enough from areas of motorized use to provide quiet and a feeling of solitude.*..... 87

200. *The Forest Service should create exclusive use areas for snowmobilers as well if they are going to do so for non-motorized use.*..... 87

Shared Use 87

201. *The Forest Service should consider that additional access is needed for ATV riders.*..... 87

202. *The Forest Service should consider that shared use areas and routes are not enjoyable or safe for non-motorized recreationists.* 88

203. *...(Cont.202) Because snowmobiles are able to access areas they couldn't in the past, and they can track up an area in minutes.* 88

204. *The Forest Service should consider that Nordic skiers and snowmobiles cannot safely share the same trails.* 88

205. *The Forest Service should consider that creating separate use areas for non-motorized recreation is a form of discrimination.* 88

206. *The Forest Service should consider that the areas open to snowmobiling currently are crowded and that reducing the area open will increase the problems caused by crowding.* ... 88

207. *The Forest Service should consider that non-motorized recreationists typically only use areas within 4 miles of a parking lot or road, so only areas that meet these criteria should be set aside for exclusive non-motorized use.*..... 88

208. *The Forest Service should consider that motorized and non-motorized use conflict in winter is very real and not just a perception.*..... 88

Restricted Off-road Motor Vehicle Use 88

209. *The Forest Service should consider that ATVs on existing unauthorized routes and on skid trails are the only means of forest access that some can physically use.*..... 88

210. *The Forest Service should consider that OHV use should be kept to open roads and motorized trails.* 89

211. *(Cont. 210) Because it causes resource damage.* 89

212. *(Cont. 210) Because it protects big game vulnerability and reduces hunter conflicts.* 89

213. *The Forest Service should consider that problems caused by off-road vehicle use are an enforcement problem and not all users should be punished for the few that abuse the privilege.* 89

Corridors 89

214. *The Forest Service should consider the creation of some open corridors on the Krassel Ranger District, as has been done on the rest of the Forest, because I see no valid reason for closing the entire District.*..... 89

215. *The Forest Service should consider that 300 foot corridors will not provide adequate opportunities for dispersed camping.*..... 89

216. *The Forest Service should create designated dispersed camping sites rather than creating corridors for dispersed camping along motorized routes.*..... 89

Multiple Use..... 90

217. *The Forest Service should consider that the National Forest belongs to the people and not to the agency and therefore should be completely accessible by the public in the manner of their choosing; and:*..... 90

218. *The Forest Service should consider that all of the Forest should be open for multiple uses; and:* 90

219. *The Forest Service should consider that the Forest is for the people.*..... 90

Maps, Signs..... 90

220. *The Forest Service should consider that there may not be adequate funds to sign all designated routes which will cause confusion for the public.*..... 90

221. *The Forest Service should consider that signing open routes only could be very confusing to the public.*..... 90

222. *The Forest Service should consider other methods besides signing or gates to indicate that routes are closed.*..... 90

223. *The Forest Service should display the permitted boundary for the Brundage Snow Cat Program Special Use Permit.* 90

224. *The Forest Service should consider that the “closed to motorized use unless posted open” policy is both agency and public friendly.* 90

225. *The Forest Service should realize that having the MVUM map as the main public education tool and enforcement mechanism is not very user friendly.* 91

226. *The Forest Service should consider that better winter recreation maps showing topographical features are needed for the FEIS.*..... 91

Game Retrieval..... 91

227. *The Forest Service should consider that the rules governing game retrieval are not clear in the DEIS.*..... 91

228. *The Forest Service should consider that some people are physically unable to retrieve game except by motorized means.*..... 91

229. *The Forest Service should not allow an exception for travel off-designated routes for game retrieval.* 91

Equestrian Use 91

230. *The Forest Service should consider that it is unclear if access to established trailheads for horse trailers has been maintained.* 91

User Education 91

231. *The Forest Service should be proactive in user education for the new travel management plan to be effective.* 91

Enforcement 91

232. *The Forest Service should consider that the Selected Alternative will have to be enforced for it to be effective.* 91

233. *The Forest Service should consider that user groups may be willing to help with self-policing and enforcement of the new travel plan.*..... 92

234. *The Forest Service should consider that most problems with illegal ATV use occur during hunting season and could be mitigated by stepping up enforcement at this time.* 92

235. *The Forest Service should consider that the Department of Fish & Game is authorized to help with enforcement during the hunting season.*..... 92

Trailheads/Parking 92

236. *The Forest Service should analyze parking and trailhead management as a significant issue because existing locations are currently at full or over-full levels of use; and:*..... 92

237. *The Forest Service should consider that the increase in Forest visitors is leading to congestion and overcrowding at parking areas and trailheads, particularly in winter.* 92

238. *The Forest Service should not analyze a parking facility on Smokey Boulder Road because adjacent private property owners are experiencing vandalism and trespass from forest visitors in the area already.* 92

Special Use Permits..... 92

239. *The Forest Service should consider that it is not always understandable to the public that exemptions to the travel plan route designations can be made for special use permits and administrative use. 92*

240. *The Forest Service should make it clear that holders of special use permits may be given motorized access if needed to carry out the terms of their permit. 92*

Definable Boundaries 93

241. *The Forest Service should consider the CIRC proposal presented during scoping because it has the most identifiable and enforceable boundaries. 93*

242. *The Forest Service should ensure that areas designated for non-motorized use in winter have definable boundaries such as ridges. 93*

Budget 93

243. *The Forest Service should not use the agency budget as a rationale for management. ... 93*

Wilderness 93

244. *The Forest Service should consider that only a small percentage of the public uses wilderness and additional “de facto” wilderness areas that exclude motorized use should not be created..... 93*

245. *The Forest Service should consider paving a road through the middle of the Frank Church River of No Return Wilderness so that it can be enjoyed by many more people..... 93*

246. *The Forest Service should consider that the Frank Church River of No Return Wilderness provides ample non-motorized opportunities..... 93*

247. *The Forest Service should include the non-motorized trail opportunities available in the FCRNRW when displaying the alternatives..... 94*

248. *The Forest Service should only consider the attributes associated with Wilderness through ROS designations. 94*

Recommended Wilderness 94

249. *The Forest Service should reconsider the effects of snowmobile use on potential designation of recommended wilderness areas..... 94*

250. *The Forest Service should consider that any increase in, or the continued allowance of, motorized use in Recommended Wilderness areas could have a negative impact on their potential for future wilderness designation..... 94*

251. *The Forest Service should consider that snowmobile use in recommended wilderness areas would not impact their future consideration for wilderness areas because the impacts of snowmobiles are not lasting..... 94*

252. *The Forest Service should consider that only Congress can create Wilderness..... 94*

253. *The Forest Service should defer any travel management decisions for Recommended Wilderness until the State of Idaho’s Roadless Review process is complete. 95*

Economics 95

254. *The Forest Service should complete a more thorough economic analysis using studies such as the one funded by ISSA in 2005..... 95*

255. *The Forest Service should consider the socio-economic value of Forest recreation, both motorized and non-motorized, on the local community. 95*

256. *The Forest Service should consider the economic analysis done for the Forest Plan and make sure it is consistent with any analysis done for the travel management plan..... 96*

257. *The Forest Service should draft a comprehensive plan for commercial recreation use on the Forest.* 96

258. *The Forest Service should take into account that the backcountry skiing industry has grown by 300 percent in the last year.*..... 96

259. *The Forest Service should consider that having a variety of recreation opportunities on the National Forest is best for the local economy.*..... 96

260. *The Forest Service should consider that money isn't everything, and that even recreation opportunities that generate little local income have value.* 96

Pollution..... **96**

261. *The Forest Service should consider the effects of snowmobile pollution on water quality.* 96

262. *The Forest Service should consider that more snowmobilers are using new technology to reduce noise and pollution by their machines.*..... 96

Noise **96**

263. *The Forest Service should consider that it is currently difficult for non-motorized winter recreationists to find an area without snowmobile traffic on the Forest.* 96

264. *The Forest Service should not allow more motorized use so that the quiet in the Forest is preserved.*..... 96

Health & Safety **97**

265. *The Forest Service should consider that snowmobile use in the Brundage SnowCat program special use permit area is incompatible because of the potential for unsafe conditions.*..... 97

266. *The Forest Service should reassess the safety of heavily used trails where motorized and non-motorized users mix; and:* 97

267. *The Forest Service should give the issue of safety more discussion in the DEIS; and:* 97

268. *The Forest Service should consider that snowmobiling and skiing do not mix because of safety issues.*..... 97

Conflict of Uses/User Conflict..... **97**

269. *The Forest Service should consider that the snowmobile community has worked with both Brundage Mountain Ski Resort and the Tamarack Resort to reduce the user conflicts occurring between their patrons and snowmobilers.*..... 97

270. *The Forest Service should consider that back country skiing and snowmobile use are usually not compatible.* 97

271. *The Forest Service should consider that many user groups, including the BackCountry Horseman, are willing to work with other recreation user groups to reduce use conflict.* 97

272. *The Forest Service should consider that decreasing the area available for both motorized and non-motorized recreation will increase user conflict; and:*..... 97

273. *The Forest Service should consider that user conflict is relatively isolated: and:* 97

274. The Forest Service should consider that conflict between recreational uses has incorrectly been identified as a significant issue; and: 97

275. *The Forest Service should consider that OHV use during hunting season causes conflict between hunters.* 97

Public Involvement

Comment Period

1. The Forest Service should extend the comment period to allow the public enough time to review the large amount of information presented in the Draft EIS.

Agency Response: The Forest Service received several requests for an extension on the 45-day comment period for the DEIS. The Forest granted an additional 45-day extension of the comment period to accommodate these requests.

2. The Forest Service should consider that if the Selected Alternative is a mix of the alternatives presented in the DEIS, the public will not have had an opportunity to comment on this “blended” alternative.

Agency Response: The Forest Service is providing an additional 30-day comment period on the FEIS to allow for public input on Alternative E – a new alternative combining elements of the other alternatives, responding to public comment on the DEIS, and reflecting site-specific access needs of the Ranger Districts.

Comment Analysis

3. The Forest Service should consider that the public comment process and analysis is often not understandable to the public.

Agency Response: The Forest acknowledges that the agency’s environmental analysis process, which is prescribed by law and regulation, is complex and not always easy to understand. During the process, agency personnel have been available to discuss any questions the public may have on both the process and the technical analysis of the project. The Payette has held a number of public meetings, which have been good venues for the public to ask clarifying questions.

Forest officials have also responded to inquiries by phone, e-mail, and in person.

In addition, the County commissioners for Adams, Valley, and Washington Counties were part of the extended Interdisciplinary Team for the project. The commissioners were available to their local constituents for questions and information, and also held public meetings to discuss travel management.

Agency Organization, Funding & Staffing

4. The Forest Service should reduce administrative costs to allow more funding for trail maintenance to reach the ground.

Agency Response: Administrative costs are not determined locally by the Payette National Forest, but at higher levels of the Forest Service and federal government. Control of these costs is outside the scope of this travel planning project and decision.

Collaboration & Partnerships

5. The Forest Service may have improperly worked with State and local governments as cooperators in the travel planning process.

Agency Response: The authority for the Forest Service to participate in an agreement to cooperate with the counties is provided by the National Environmental Policy Act, 42 USC 4321 et seq. The authority of the Counties to participate as cooperating agencies is provided by the NEPA regulations at 40 CFR 1501, 1506, and 1508. The four local counties were invited to participate in the travel planning process as cooperating agencies as provided by the NEPA regulations. In addition, the State of Idaho Parks and Recreation Department participated informally in the travel management process, rather than under a Memorandum of Understanding as a cooperating agency.

Environmental Analysis

Analysis - General

6. The Forest Service should complete the analysis of travel management with a minimum of paperwork.

Agency Response: Due to the Forest-wide scope of travel management planning, the potential for broad resource and social effects, and the requirements of federal environmental laws and regulation, a certain level of analysis and accompanying paper work is required. The Agency does make every effort to keep paperwork (and costs) to a minimum while still meeting statutory requirements. Both the DEIS and the FEIS are available electronically, on the internet and on CD, to minimize paper costs.

7. The Forest Service should ensure that Recreation Objective REOB18 from the Forest Plan is followed.

Agency Response: Recreation Objective REOB18 (Forest Plan 2003: p. III-63) states: “Initiate a process of phased, site-specific travel management planning as soon as practicable. Prioritize planning based on areas where the most significant user conflicts and resource concerns are occurring. Identify and address inconsistent access management of roads, trails, and areas across Forest, Ranger District, and interagency boundaries.” The Forest initiated travel planning in 2004 in response to this objective and followed the direction therein during the development and analysis of travel management alternatives presented in the DEIS and FEIS.

8. The Forest Service should consider all resources when analyzing travel management.

Agency Response: The Forest Service has analyzed effects to those resources most likely to be affected by travel route designation. It would be unnecessarily burdensome and unproductive to analyze effects to resources that are not likely to be affected.

9. The Forest Service should only consider implementation of road closures/restrictions during travel planning, not during District-level NEPA planning.

Agency Response: The designation of routes for travel management was analyzed at a Forest level, rather than at the narrower, site-specific level of most Ranger District NEPA projects. Travel management planning is an on-going process, and situations change on the ground over time. Potential route designations would be reviewed as site-specific District projects are proposed. If management considerations require changes or alternate options for a specific area, these would be analyzed at that time and subject to public comment consistent with NEPA regulations (40 CFR 1500-1508) and Forest Service NEPA policy in the Forest Service manual and handbook (FSH 1909.15 section 18).

10. The Forest Service should clarify the definition of closed so that it does not appear that areas, trails, or roads are closed to foot traffic as well.

Agency Response: The DEIS was not clear, so the definition of closed has been revised in the FEIS to make it clearer that non-motorized traffic is almost always allowed on areas, roads, and trails anywhere on the Forest unless management considerations such as safety, or law, such as in designated Wilderness, where mechanized travel, including mountain biking, is not allowed.

11. The Forest Service should consider that combining both winter and summer recreation into three somewhat “polarized” alternatives makes it difficult for people to comment in a multi-use fashion.

Agency Response: The five alternatives analyzed in the FEIS balance between the extremes of too few to analyze the real options, or too many to be understandable. Formulating alternatives that emphasize different recreational uses reduces the number of alternatives and the length of analysis, and simplifies the understanding of alternatives.

The public may comment on any elements or combination of proposals from the various alternatives, and reviewers are not confined to supporting one alternative or another. The Deciding Officer is also free to select different elements from each of the five alternatives when formulating the Selected Alternative.

12. The Forest Service should consider in the analysis the differences between the east and west zone of the forest.

Agency Response: Proposals for the DEIS were developed at the Management Area level (see DEIS Chapter 2). Management areas are land areas with similar management goals and are smaller than “east zone” and “west zone”. Using management areas separates out differences caused by both resource and management concerns. The thirteen management areas reflect east zone-west zone geographical differences.

13. The Forest Service should indicate that many of the proposed ATV trails are in fact closed roads being converted to trails.

Agency Response: Converting closed roads to trails is discussed in DEIS Chapter 2 – Alternatives, in the “Road and Trail Proposals by Alternative” table in each Management Area (MA) section. The table lists whether the proposal is on a road or trail for each Proposal ID.

14. The Forest Service should consider access for the elderly and disabled as a significant issue.

Agency Response: See DEIS p. 1-14 through 1-16, “Access for people with disabilities” for the discussion of this issue. The Agency is bound by Federal law to protect the rights of disabled individuals in a non-discriminatory manner; therefore all alternatives address this issue by assuring that reasonable restrictions on motor vehicle use are applied to everyone. In conformance with section 504, wheelchairs are welcome on all NFS lands that are open to foot travel and are specifically exempted from the definition of motor vehicle, even if they are battery powered.

15. The Forest Service should separate winter closures proposed for wildlife protection from those proposed for non-motorized winter recreation.

Agency Response: The FEIS contains more discussion of the rationale for each winter closure area in the description of the alternatives found in Chapter 2.

16. The Forest Service failed to analyze an adequate range of alternatives for snowmobiling.

Agency Response: The four alternatives analyzed in the DEIS provide for between 886,650 to 1,116,100 acres open to over-snow motorized use. The DEIS also analyzed 226 to 245 miles of groomed snowmobile trails. The Forest Supervisor believed that the range of alternatives in the DEIS was adequate to respond to all significant issues raised in scoping and meet the Purpose and Need for the project. Between draft and final EIS, Alternative E was developed and analyzed to further consider public comments and resource specialist input.

Over-snow motorized use has not yet reached levels that would necessitate allocating more area or regulating access to the currently available area. Crowding of vehicles and users at trailheads dissipates away from the trailheads. While snowmobile registrations have been going up in Valley and Adams counties, they dropped statewide in 2006 (IDPR 2006). See Chapter 3, Recreation, for an analysis of the effects of the alternatives on snowmobiling.

An additional alternative that considered access into the recommended wilderness areas of the Secesh and Needles inventoried roadless areas IRA was suggested by public comments, considered by the Forest Service, but dropped from further analysis. In the FEIS see Chapter 2, Section 2.2, Alternatives Considered but Eliminated from Detailed Study for the discussion of this alternative. In the FEIS, additional acres open to over-snow motorized use were added into Alternative C adjacent to, but not in the Secesh and Needles

recommended Wilderness and were analyzed in full in Alternative C, Chapter 3.

17. The Forest Service should support the conclusions found in the document with research and indicate how applicable federal rules and regulations are being followed in each alternative.

Agency Response: Whenever research is available to support analysis and conclusions in the document, it has been cited (see Chapter 3 and Appendix B). Compliance with Federal laws, rules, and regulations is documented in Chapter 1, Purpose and Need, and Management Direction and Chapter 3, individual resource sections, Environmental Consequences.

18. The Forest Service failed to analyze an alternative that truly addresses the need to increase motorized opportunities.

Agency Response: Provision of recreational opportunities and access needs are two of several criteria the responsible official must consider under federal regulations when designating routes for motor vehicle use. The Payette National Forest is popular with many people for many uses. It is not possible to accommodate all user demands on all acres while also protecting water quality, wildlife habitat, and other natural resources that people come to enjoy and which laws have been enacted to protect. Forest Service managers need to balance user interests against these other criteria when designating routes and areas.

Different alternatives provide for different degrees of motorized uses. Alternative C, in particular presented in Chapter 2 of the EIS, provides a feasible proposal for increasing motorized use while remaining within the scope of the travel management analysis.

19. The Forest Service should analyze an alternative that meets the direction found in the NFMA for renewable and sustainable resources including motorized recreation.

Agency Response: Designation of routes or areas to meet future potential demand is

challenging at best. The Agency prefers to assure that current demand is being met while protecting resource values and staying within budgetary constraints.

20. The Forest Service should display the amount of non-motorized and motorized opportunities available in an unbiased way. Non-motorized users in fact have the use of the entire Forest, including the Wilderness.

Agency Response: The FEIS clarifies that non-motorized use, including foot travel, horseback riding, and bicycles, is allowed both on and off-trail across the Forest. The Payette includes approximately 791,000 acres of the Frank Church—River of No Return Wilderness. Wildernesses are not within the project area for travel management (DEIS Chapter 1, Section 1.5, Project Scope). However, it is considered in the recreation cumulative effects analysis (FEIS Chapter 3)

21. The Forest Service should consider the environmental effects of past restriction of motorized use when proposing to close more motorized trails or areas.

Agency Response: Effects of past management and other historic natural events are taken into account during the analysis and description of the current condition. See the discussion of existing condition in Chapter 3, resource sections.

22. The Forest Service should consider that the analysis presented in the DEIS appears to be biased against motorized use and users.

Agency Response: The Forest made every effort to avoid bias toward or against any recreation uses or users. All action alternatives do reduce motorized access to the Forest in terms of cross-country travel. This can reduce motorized opportunities, but lessens the potential for adverse resource impacts and follows national direction. The Travel Plan implements national Forest Service direction. The final rule for travel management of motor vehicle use directs all National Forests to evaluate limiting cross-country motor vehicle use to designated routes and areas only.

Alternative C, described in Chapter 2 of the EIS, increases motorized trail opportunities above the current level. Alternative E, also described in Chapter 2 of the FEIS, maintains motorized opportunities at about the current level, with a reduction in two-wheel motorized trails and an increase in ATV/OHV trails. Recent Idaho survey data indicate that approximately 76% of motorized users ride an ATV and 22% ride motorcycles, so a shift in the balance of trails allocated to the two is not an unreasonable proposal (Achana 2005).

Alternative B reduces area open to snowmobile by 2%, Alternative C increases access by 7%, and Alternatives D and E decrease access by 19 and 11% respectively within the project area. Statewide snowmobile registrations were down in 2006. These alternatives provide the Deciding Officer with a range of motorized access alternatives for winter travel.

23. The Forest Service should analyze the semi-primitive experience in winter to assess the incompatibility of motorized and non-motorized winter sports.

Agency Response: Components of a semi-primitive experience are described in the Recreation effects analysis in Chapter 3, under the discussion for Recreation Issue 2: Motorized and non-motorized opportunities in winter.

24. The Forest Service should do an analysis of the capabilities of the Forest to sufficiently monitor, enforce, and carry out public education in support of the new travel plan.

Agency Response: The Forest Service agrees that availability of management resources should be a consideration in designating routes for motor vehicle use. The Deciding Officer will use judgment and discretion to determine a system of designated routes that is supportable by the average anticipated Forest budget. However, at times, resources are scarce, and the Payette staff does not believe that this scarcity should lead to blanket closures of lands to recreational users. Volunteers and cooperators can supplement

agency resources for maintenance and administration, and their contributions are considered in this evaluation. See Chapter 3, Recreation, Effects Analysis, for a discussion of this issue by alternative.

25. The Forest Service should clarify the following: Page 3-17, MA 6. Goose Creek/Hazard Creek – Winter. first paragraph.. Since both ski areas are under Special Use Permit, as is the case for the Brundage Snow Cat operation, all three should be listed. (398:50200)

Agency Response: The description listed the two ski areas on the Forest, which are under ski area use permits. Brundage Mountain Snow Cat operation is not a ski area permit, but is an outfitter and guide activity offered by the Brundage Mountain Resort. Outfitters and guides are not listed in detail or individually. Also refer to: page 3-18, MA 7 Payette Lakes – Winter.

26. Attention needs to be given to the rounding off of figures all the way through the DEIS.

Agency Response: In the FEIS figures are rounded to reflect the available precision of the data and do not provide more decimal points than the technology supports.

27. The Forest Service should clearly identify the reasons for, and opportunities created by, identifying areas as suitable for motorized or non-motorized use in winter.

Agency Response: The FEIS contains additional discussion of the rationale for each winter closure area.

28. The Forest Service should clearly explain how the analysis presented in the DEIS complies with sections 101 and 102(1) of the National Environmental Policy Act (NEPA) and other environmental laws.

Agency Response: The Record of Decision to be issued after consideration of public comments on the FEIS will identify the Selected Alternative and discuss rationale for its selection, as provided in 40 CFR 1502 (B). The Selected Alternative will be that

alternative which best meets section 101 of NEPA through the principles and requirements of section 102 as determined by the Deciding Officer. Subsection (1) requires that policies, regulations, and laws shall be interpreted and administered in accordance with the NEPA statute. The Travel Plan FEIS is consistent with the statute.

29. The Forest Service should ensure that the alternatives presented in the DEIS follow the direction found in Executive Order 11989.

Agency Response: The final rule is consistent with provisions of Executive Order 11644 and Executive 11989 regarding off-road use of motor vehicles on Federal Lands. Executive Order 11989 authorizes the agency to designate roads and trails as suitable for motor vehicle use and to close all other areas and trails to that use (DEIS Chapter 1, section 1.11). The action alternatives presented in the DEIS close the Forest to all off-route travel with the exception of a 300 foot corridor on roads and a 100 foot corridor on motorized trails, which is open for dispersed camping. This corridor is designated only in areas where no adverse effects to forest resources are expected from the off-road use. Some areas, identified in the analysis and shown on the maps, would be closed to any motorized travel off designated routes due to sensitive resource protection needs. Areas with sensitive resources proposed for closure to motorized off-route travel include: known areas with northern Idaho ground squirrel colonies, the Lake Creek area on the McCall Ranger District, and the entire Krassel Ranger District. In these areas, all dispersed camping would be restricted to designated sites.

Restriction of off-route vehicle travel is expected to reduce the likelihood of adverse resource effects across the Forest. The Forest still retains the authority given in Executive Order 11989 to close areas or routes where considerable adverse effects are occurring.

30. The Forest Service should clearly indicate that the travel plan decision will not be the only decision affecting road and trail closures. Rather NEPA analyses and decisions will

continue on the Forest and more roads and trails may be closed to mitigate those actions.

Agency Response: The cumulative effects discussion in each resource section in Chapter 3 in the DEIS covers known expected actions that may affect road or trail management. Appendix D lists the actions that have been considered in the analysis of cumulative effects for travel management. Future proposals, NEPA analyses, and decisions may have the effect of closing (or opening) more roads to motorized uses.

31. The Forest Service DEIS lacks sufficient site specific analysis.

Agency Response: Analyses completed at the Forest level, such as travel management, are less site-specific than analyses completed for projects done at a smaller scale. However, the EIS does provide site-specific, as opposed to programmatic (Forest Plan-level) analysis. Every Proposal ID route, whether a road or a trail has received extensive site-specific internal analysis and documentation. The summary analysis documentation presented in Chapter 3 of the DEIS reflects extensive site-specific data, such as road and trail crossings. Most of the proposals analyzed in the action alternatives in the document were developed during site-specific RAPs (Road Analysis Processes) conducted by the Ranger Districts or based on trail inventory data.

32. The Forest Service improperly used the travel plan to adjust ROS inventories.

Agency Response: The Payette National Forest LRMP of 2003 includes the recreation objective of adjusting the ROS classes as a result of travel planning (found in the Management Area (MA) specific direction for each MA under Recreation Resources.). After the FEIS and Record of Decision are completed, the Forest may adjust the ROS classes to reflect the changes made in both summer and winter travel.

33. *The Forest Service should develop a Winter Recreation Plan.*

Agency Response: The Payette has considered the recommendation to prepare a Winter Recreation Plan. Such a plan would be a programmatic blueprint for winter recreation management across the Forest. While desirable, such a Plan is not a high enough priority for limited Forest budget and staff resources. The 2003 Forest Plan already provides some programmatic direction for recreation across the Forest and in the 13 Management Areas. This Travel Plan analysis will provide additional recreational guidance at the site-specific level. If through monitoring, the combination of Forest Plan and Travel Plan direction proves inadequate in meeting recreational objectives, the Forest will review this option.

34. *The Forest Service should have separated winter and summer recreation in the DEIS.*

Agency Response: Inclusion of both summer and winter recreation in the DEIS does make the document fairly complex. However, the presentation of both seasons in one document does allow the Forest user to get the “big picture” for recreation on the Payette National Forest. As much as possible, the discussions of effects and display of data for the two seasons have been separated to keep the distinction between winter and summer management clear.

Purpose and Need

35. *The Forest Service’s stated purpose and need included wildlife, vegetation, soils, and watershed management, but the analysis focuses on recreation.*

Agency Response: In addition to recreation, effects to wildlife, vegetation, and soil and water are all analyzed in Chapter 3 of the DEIS, and the FEIS. Additional information appears in this Response to Comments appendix and the Project Record.

36. *The Forest Service should make sure the analysis supports the stated purpose and need for the project.*

Agency Response: The degree to which each alternative meets the purpose and need of the planning project is answered in several places throughout the DEIS and FEIS. DEIS p. 1-4 lists the six elements of the “purpose” of the project. Table 2-1, Forest Summary – Travel Opportunities by Alternative – compares the miles and acres of roads, trails, and areas open and closed to motorized uses by alternative. The effects of alternatives tables throughout Chapter 3 compare how each alternative meets the resource effects elements of the purpose and need. And the Record of Decision to be issued after the FEIS comment period will evaluate each alternative in terms of how well it meets the purpose and need among other factors.

37. *The Forest Service should display ALL pertinent Forest Plan direction.*

Agency Response: The DEIS and FEIS identified selected goals, objectives, standards, and guidelines that are particularly pertinent to Travel Planning. The option of reprinting all Forest Plan direction and placing it in the FEIS was considered but not accepted because of substantial bulk and costs compared to the limited benefit.

Issues

38. *The Forest Service should consider the importance of travel management to the snowmobiling community.*

Agency Response: The Payette National Forest staff does understand the importance of travel management planning to the snowmobile community. Alternative C, described in the Chapter 2 of the DEIS, was developed partly to reflect the desire the over-snow motorized community has for additional motorized over-snow play areas by adding an additional 78,160 acres of over-snow motorized opportunities.

39. *The Forest Service should identify all existing resource problems affected by travel management.*

Agency Response: Across the Forest there are numerous resource problems of various degrees of magnitude. The Agency does not believe that an exhaustive analysis of every potential effect that might be caused or has been caused by travel route designation is necessary or would serve the public interest very well. The Forest has focused the analysis on those issues and resources that are most likely to be affected by route designation, and that will give the Deciding Officer the most relevant information in making her decision from among the alternatives described.

40. *The Forest Service should complete a road analysis to assess the effects of road management to all resources.*

Agency Response: The Payette Forest Plan (2003) included a Forest-wide roads analysis process (RAP) at the broad scale. A large amount of the PNF watersheds have had a more specific RAP. The Forest Service disagrees that a complete inventory of user-created routes is required in order to complete the designation process. A complete detailed inventory would be time-consuming and expensive, delaying completion of route designation. Planning based on public involvement, careful design, and site specific environmental analysis provides the best method for identifying a sustainable, managed system of routes and areas addressing user needs and safety, with a minimum of environmental impacts. See comment 39 for additional response.

41. *The Forest Service should consider an alternative that opens roads to non-motorized use only during the winter.*

Agency Response: An alternative that considered only one type of use, be it solely motorized or non-motorized, would not meet the Purpose and Need for this project, which, in part, is to balance management considerations with recreation opportunities. Nor would it meet many of the goals and

objectives of the Forest Plan, one of which is to “Provide an array of winter recreation experiences, while mitigating conflicts between motorized and non-motorized use and wintering wildlife.” Through this travel management process the Forest has strived to provide opportunities both for motorized and for non-motorized users.

42. *The Forest Service should not consider allowing more motorized use in existing IRA’s.*

Agency Response: All inventoried roadless areas (IRAs) on the Payette National Forest provide for both motorized and non-motorized recreation opportunities, while maintaining the undeveloped character of the area. Only those IRAs recommended for wilderness designation (portions of the Needles and Secesh IRAs) have Forest Plan standards that do not allow for development of additional motorized use. This issue is analyzed in the FEIS in Chapter 2, under Alternatives Considered but Eliminated from Detailed Study.

43. *The Forest Service should have good rationale for constructing any new roads or trails.*

Agency Response: No new road construction was proposed in the alternatives analyzed in the DEIS or FEIS. New trail construction is limited to small segments of trail construction to connect existing routes or to relocate/re-route a trail to avoid resource damage. These activities are subject to project design features to limit resource impacts (see Section 2.2.2 of the FEIS). Some unauthorized roads are proposed for conversion to NFS roads. If selected for conversion, these roads would be brought up to the appropriate standard for their level of use. The Payette agrees that proposals for new trail construction must have good rationale, because funding for trail maintenance is not adequate to cover the current trail system. Therefore, in Alternatives B and C only a few miles of new trail are proposed that would connect and create some ATV trail loop opportunities. Most of these “new” trail miles are actually conversion of either unauthorized roads or trails to NFS trails, or closed NFS roads to trails. All added

ATV trails would need to be brought up to appropriate trail standards before being designated for use.

44. The Forest Service should consider an alternative that analyzes complete closure to over-snow travel.

Agency Response: Such an alternative would not meet the Purpose and Need for this project, which, in part, is to balance management considerations with recreation opportunities. Nor would it meet many of the goals and objectives of the Forest Plan, one of which is to “Provide an array of winter recreation experiences, while mitigating conflicts between motorized and non-motorized use and wintering wildlife.” (Forest Plan 2003: III-62: REGO06). Through this travel management process the Forest has strived to provide opportunities for both motorized and non-motorized users.

45. The Forest Service should analyze an alternative that designates some areas open to motor vehicle use.

Agency Response: Areas open to cross-country motor vehicle use were analyzed as part of the No Action alternative. This alternative, or portions of this alternative, could be chosen by the Deciding Officer. In all action alternatives a corridor for motorized access to dispersed camping within 300 feet of open roads, and 100 feet of motorized trails, is proposed when such use would not compromise resource values. There were no additional areas proposed for inclusion in any of the action alternatives either by Agency personnel or by the public. Inclusion of additional cross-country travel areas would also be inconsistent with national direction (36 CFR Parts 212, 251, 261, 295 “*Travel Management; Designated Routes and Areas for Motor Vehicle Use*” Federal Register 2005: 70FR68264) to limit indiscriminate travel through designating defined routes for motor vehicle use.

46. The Forest Service should analyze an alternative that opens all unauthorized roads and trails.

Agency Response: The Forest considered and added some individual roads and trails that were recommended during the public scoping process into Alternative C, and Alternative D. Alternative E in the FEIS also added several additional routes in response to public comments on the DEIS.

The addition of all unauthorized roads and trails into the NF system would result in an unaffordable road system that could not be brought up to Agency standards or maintained at the Agency’s current budget levels. The Agency’s budget is expected to continue to decline in the foreseeable future. In addition, allowing use on all unauthorized roads would likely have unacceptable impacts to wildlife, water, fisheries, and other resources.

47. The Forest Service should consider the resource effects of non-motorized winter recreation.

Agency Response: Effects of non-motorized and motorized recreation in winter and summer were discussed in the Wildlife analysis in the DEIS, Chapter 3.

48. The Forest Service should collaborate with local recreation groups to improve the alternatives.

Agency Response: The alternatives presented in the DEIS were developed as a result of extensive public involvement with local recreation groups and users through the public comment process on the Proposed Action, and as a result of discussions by the Winter Recreation Forum. Also, Valley, Adams, and Washington County participated as cooperating agencies and helped to develop the alternatives. Idaho State Parks and Recreation and Idaho Department of Fish and Game also participated as informal members of the team. Alternative E, which is analyzed in the FEIS, was formulated by incorporating public comments on the DEIS, including those from local recreation groups.

49. The Forest Service did not adequately factor in the nationwide trend of increasing motorized use.

Agency Response: See response to comment 19.

50. The Forest Service should consider the carrying capacity of the forest for various modes of recreation.

Agency Response: At this point in time the Forest does not receive enough recreation use and crowding to warrant assessing the carrying capacity for different forms of recreation. (USDA Forest Service 2003b: NVUM).

It is possible that in the future such studies could be necessary.

51. The Forest Service should consider using old logging roads and roads planned for decommissioning as trails.

Agency Response: During travel planning the Forest considered many routes that public or internal comment brought forward as potential trails, including routes on old logging roads.

Roads already planned for decommissioning by previously signed decision were considered already evaluated for their merits for other uses.

Any future projects where road decommissioning is proposed will be presented to the public for comment. Should some of these routes be desirable as potential trails they will be evaluated during the analysis of that future project.

52. The Forest Service should analyze the environmental effects of increasing snowmobile use, such as has occurred in the last decade. Effects to air quality, water quality, noise pollution, and wildlife should all be considered.

Agency Response: The DEIS and FEIS include such effects in the environmental analysis of Chapter 3 and in disclosures of non-significant effects in Chapter 1. Also see comment responses above and below for each resource section listed.

53. The Forest Service should consider that the project design features which address noxious weeds in the DEIS are insufficient to reduce

the spread of these weeds to a non-significant issue when considered at the forest level.

Agency Response: All Forest Plan management direction, including direction pertaining to noxious weeds, is incorporated by reference in this project. See Section 1.7, Management Direction, in the DEIS and FEIS, and Chapter 3, Management Direction, in the Payette National Forest Plan. This direction presents a comprehensive Integrated Weed Management approach for control and eradication of noxious weeds.

54. The Forest Service should analyze the effects of snowmobile exhaust on air quality as a significant issue.

Agency Response: The Forest does not have jurisdiction over vehicle use emissions, so remedies for this concern are outside the scope of the proposed action. Also, effects of all motorized vehicles together across the Forest are not expected to risk violation of air quality standards. See Chapter 1, Section 1.10.2 Non-Significant Issues in the DEIS.

55. The Forest Service needs to review the factors used when determining non-significance of issues to make sure they comply with the NEPA.

Agency Response: As stated on p. 1-9 of the DEIS, the Forest ID team grouped all public comments into categories, developed issues, and separated issues into two categories—significant, and non-significant. The significant issues were those that were useful in formulating an alternative to the proposed action, or in disclosing environmental effects. The CEQ Regulations state several times that a NEPA analysis needs to focus on significant issues and discuss only briefly issues other than significant issues. For example, 40 CFR 1500.1 (b), 1500.2(b), and 1500.4(c). As instructed in Forest Service national training, significant issues are “significant” by reason of their scope, magnitude, or extent of their effects. Note that “significant issues” have a separate and distinct definition from “significant effects” (40 CFR 1508.27). Chapter 1 lists and discusses the significant issues (section 1.10.1), and then lists and

describes the non-significant issues including rationale for their non-significance in the environmental analysis (section 1.10.2).

Definitions

56. *The Forest Service should clarify the definition of “cross country motor vehicle use” particularly in designated corridors.*

Agency Response: This term has been better defined in the FEIS.

57. *The Forest Service should fully define what is meant by “closure” in the FEIS, including the types of management that would be authorized to close routes.*

Agency Response: The definition of “closed” in the FEIS has been clarified so that it is understood that non-motorized use is allowed on all closed routes and areas unless prohibited due to management concerns. See response to Comment 56 above.

Travel management is a route designation process and does not authorize closure activities such as decommissioning, placement of gates, or construction of earthen berms. Such proposals would require additional site-specific NEPA analysis.

58. *The Forest Service has used the term “unauthorized” incorrectly in the DEIS.*

Agency Response: The Forest’s use of the term is as described in the national travel management rule (Federal Register 2005: 70FR68264). See Appendix A, Glossary, in the DEIS and FEIS.

59. *The Forest Service has incorrectly described the proposed winter closure at Granite Mountain in the DEIS which should be described as “snowmobile free” rather than non-motorized due to the permitted snow cat operation in the area.*

Agency Response: The snow cat skiing operation is under a Special Use authorization and is an exception (as authorized under their Special Use Permit) to the non-motorized status of the Granite Mountain closure area in Alternatives B, C, D, and E that will allow

back-country skiers access to a snowmobile-free slope. During the winter, when the snow cat skiing operation is not running, the area will be completely non-motorized. There have been many seasons where snow levels have not been sufficient to run the snow cat at any time during the season. As the DEIS stated (p. 2-33), this closure would create an area “for non-motorized winter recreation within reasonable distance of parking.” The intent of the closure is to provide a non-motorized backcountry skiing area separate from snowmobiling use areas.

Monitoring

60. *The Forest Service should monitor all travel-way closures to assure that they are achieving the travel management objectives for which they are closed.*

Agency Response: Implementation and effectiveness monitoring of travel plan designations will occur periodically after the decision is made to adopt a plan. Monitoring was generally addressed in the DEIS on p. 2-7. Specific implementation and effectiveness monitoring plans are listed in Appendix E in the FEIS, and when finalized will become part of the Record of Decision for this project.

61. *The Forest Service should consider more effective methods of road closure/barriers because current methods such as gates and berms seem to often be ineffective.*

Agency Response: Part of the purpose and need identified in the DEIS is to designate a system of open roads, trails, and areas. All roads and trails are considered closed to motorized use unless designated open by the PNF motor vehicle use map (MVUM), which will follow the travel plan decision. Designated routes would be identified on the MVUM using nationally directed uniform standards, and signs identifying those routes open to public travel would be posted on the ground to the extent practicable. (DEIS page 2-4). Actual physical closure or road obliteration is considered outside the scope of this document but may be considered with future site-specific projects (DEIS p. 2-2).

62. *The Forest Service should commit to implementation and effectiveness monitoring for travel management.*

Agency Response: The Forest is committed to implementation and effectiveness monitoring for travel management. The Project Design Features in Chapter 2 Section 2.2.2 of the DEIS, and the monitoring and evaluation listed in Section 2.2.3 all are designed to evaluate the effectiveness of the route and area designation made with the travel management plan decision. Specific implementation and effectiveness monitoring plans are listed in Appendix E in the FEIS, and are expected to be part of the Record of Decision for this project.

Project Design Features

63. *The Forest Service should include project design features to ensure recognition of environmental concerns that may arise as a result of travel route and area designation.*

Agency Response: The alternatives do include such project design features, as described in Chapter 2, description of the alternatives.

64. *The Forest Service should evaluate the description of Project Design Features to ensure they are feasible.*

Agency Response: The Forest believes all Project Design Features (PDFs) listed in the FEIS are feasible. Monitoring will evaluate if travel management decisions including PDFs are implemented, and how effective the implementation is in accomplishing the desired outcomes.

Maps & Data Display

65. *The Forest Service should improve the presentation of the proposals and maps in the FEIS.*

Agency Response: The Forest has updated and streamlined the maps for the FEIS.

66. *The Forest Service should improve the winter maps so they better display the areas closed to motorized over-snow use.*

Agency Response: The winter maps have been reconfigured to better display winter closure areas.

67. *The Forest Service should better describe the winter closures in the FEIS.*

Agency Response: See response to comment 15.

68. *The Forest should change the way the alternatives are displayed in the Comparison of Alternatives tables.*

Agency Response: The format and level of detail in the Comparison of Alternatives tables were selected to highlight key information that varies between alternatives in order to provide a reasoned basis for choice. They were designed to focus on differences rather than similarities.

69. *The Forest Service should identify the Brundage Snow Cat permitted area on the maps in the FEIS.*

Agency Response: The Brundage Snow Cat operation is only one of hundreds of special use activities that are permitted on the Forest. Many of these permitted activities have effects on route or area use. These activities are authorized only for the permittee however, and do not apply to the public at large, and therefore would not be displayed on the MVUM or in the EIS for travel management planning. The Brundage Snow Cat operation is discussed in the Recreation Section of Chapter 3 of the DEIS

A discussion of permitted uses can be found in Chapter 2 Section 1.10.2 Non-Significant Issues.

Alternatives

70. *The Forest Service should choose an alternative that gives a better depiction of current recreation use than the No Action Alternative discussed in the DEIS.*

Agency Response: The No Action Alternative in the DEIS and FEIS is continuation of the current condition for travel route designation as described in the 1995 Travel Plan Map as

modified by the 2004 *Backroads* map. Current levels of use for designated routes and areas were described and compared to the action alternatives in the resource sections in Chapter 3 of the DEIS.

71. The Forest Service should develop another alternative that does not restrict motorized access anywhere except the Wilderness.

Agency Response: While the National Forest belongs to all Americans, they do not have a right to unrestricted use of National Forests. Congress established the Forest Service to provide reasonable regulation of the National Forest so that they can be enjoyed by future generations. Presidential orders affirm the authority to manage motorized use.

The primary goal of the travel management plan is to provide a system of roads, trails, and areas that provides recreation opportunities for both motorized and non-motorized users in a manner that is environmentally sustainable over the long term. An alternative that emphasizes only one type of use would not provide this array of opportunities.

While off-highway vehicle travel has been recognized as an appropriate activity on Forest system lands, the agency has been given recent direction to manage OHV travel (36 CFR Parts 212, 251, 261, 295 “*Travel Management; Designated Routes and Areas for Motor Vehicle Use*” Federal Register 2005: 70FR68264). Executive Orders direct the Forest Service to manage OHV travel on Forest system lands to protect forest resources and reduce conflict of uses (Executive Order [E.O.] 11644 (February 8, 1972) as amended by E.O. 11989 (May 24, 1977)). Allowing OHV travel on the Forest anywhere at any time would not comply with these orders.

72. The Forest Service should develop an alternative that increases the opportunity for non-motorized recreation.

Agency Response: Alternative D, described in Chapter 2 of the DEIS, provides increased opportunities for non-motorized recreation. This alternative was developed in response to internal and public comment on the Proposed

Action (Alternative B). Like the other action alternatives, it limits motorized travel off roads.

73. The Forest Service should complete a RAP and address more road closures, relocations, and obliterations because the current alternatives do not adequately mitigate current impacts to forest resources.

Agency Response: As presented in Chapter 3 of the DEIS the analysis of resource impacts for the alternatives does not indicate that unacceptable impacts are occurring due to the No Action condition, or would occur due to implementation of any of the action alternatives. Road relocation and road decommissioning were both outside the scope of the proposed action.

74. The Forest Service should consider an alternative that incorporates the ISSA proposals in their entirety, including entering the Secesh and Needles Recommended Wilderness areas.

Agency Response: See response to comment 16.

75. The Forest Service should consider an alternative that addresses the loss of unauthorized roads.

Agency Response: The DEIS did consider and disclose the consequences of not designating unauthorized roads in the Environmental Consequences section in Chapter 3, under the recreation issue sections pertaining to miles of open and seasonally open roads, and in acres open to cross-country motor vehicle use on pages 3-24, 3-33, 3-35, and 3-36; and in the Cumulative Effects section for recreation on pages 3-55.

76. The Forest Service should develop an alternative that is more responsive to the increasing demand for motorized recreation opportunities.

Agency Response: See response to comments 18 and 19.

77. *The Forest Service should develop an alternative that is more responsive to the increasing demand for both motorized and non-motorized recreation opportunities.*

Agency Response: See response to comments 18 and 19.

78. *The Forest Service should develop an alternative that does not allow degradation of any natural resources over time.*

Agency Response: The Payette does not agree that motor vehicle use should be allowed only when and where it can be clearly proven in advance to be harmless to the environment. Rather, designation decisions need to be made balancing public desires for recreation opportunities with acceptable impacts to resources.

Cumulative Effects

79. *The Forest Service should consider the cumulative effects of the loss of OHV trail nationwide.*

Agency Response: One principle of cumulative effects analysis is that the geographical area of analysis needs to be large enough to capture off-site or delayed effects of a causative action, but also small enough that the incremental effect is not lost in the large background. In the case of the Payette, gain or loss of OHV trails locally would not be discernible at the national scale, and thus analysis at that scale would provide no value. In the case of reduction of OHV trail by this Travel Plan, there is no substantial loss of trail mileage in any alternative.

Natural Resources Management

Fisheries

80. *The Forest Service should re-evaluate the use of number of stream crossings as a proxy for potential for fuel spills because fuel spills occur relatively rarely at stream crossings or otherwise.*

Agency Response: The term “spill” as it is used in the DEIS uses the EPA definition for “harmful discharge” which includes a vehicle leaving an oily sheen on the surface of the water as it passes through, not just contamination from a ruptured fuel tank or other mishap. Normal vehicle use at fords often leaves a residue of oil on the surface of the water from outside contamination of the vehicle with petroleum products.

81. *The Forest Service should consider that if there are problems occurring with pollution or sediment at stream crossings on roads and trails, this is the fault of the design or maintenance of the facility, and not of the public who is using the facility.*

Agency Response: See response to comment 154.

82. *The Forest Service should consider that there is no research to back up claims that OHV use and trails have any effect on fisheries populations.*

Agency Response: Many studies have indicated that OHV use has negative effects on natural resources, including fish and fish habitat. Stokowki and LaPointe completed a comprehensive literature review in 2000 (*Environmental and Social Effects of ATVs and ORVs: An Annotated Bibliography and Research Assessment.*) Research conducted on the Payette National Forest is cited in Chapter 3, Fisheries, Environmental Effects.

Soil & Water

83. *The Forest Service should consider that while roads can affect the recruitment of large woody debris to streams, trails do not.*

Agency Response: The Payette agrees the potential effects of roads and trails on recruitment of large woody debris to streams is dependent on the width of the cleared area and proximity to the stream. However, the Forest does not agree with a blanket statement that trails do not affect recruitment of large woody debris since it is dependent upon the size and location of the trail.

84. *The Forest Service should consider erosion and sediment from the existing road and motorized trail network*

Agency Response: Soil and water issue 1 (DEIS p. 1-11) states “the type, extent, and location of roads, trails, and motorized areas in the travel management plan may degrade soil productivity, accelerate erosion, and deliver sediment to streams.” Six soil and water indicators deal specifically with type, extent, and location of open roads and types of motorized trails (DEIS p. 3-69). A qualitative description of the soil and water resource damage and a quantitative change from the No Action Alternative is found in the Soil and Water resource section of Chapter 3, Affected Environment and Environmental Consequences.

85. *The Forest Service should consider the soil and water resource damage caused by motorized cross-country travel.*

Agency Response: All action alternatives prohibit motorized cross-country travel, including travel on all unauthorized roads (DEIS p. 1-5). Impacts to soil and water resources from motorized cross-country travel are addressed with two soil and water indicators – SW1: Percent of the Management Area (MA) designated open to cross-country motor vehicle use and/or limited motorized access; and SW2: Percent of riparian conservation areas (RCAs) in designated areas open to cross-country motor vehicle use and/or limited motorized use (DEIS p. 1-11). A qualitative description of the soil and water resource damage and a quantitative change from the no action alternative is found in the Soil and Water Resource section of Chapter 3, Affected Environment and Environmental Consequences.

86. *The Forest Service should identify and mitigate environmental concerns associated with new road or trail construction.*

Agency Response: No new road construction is proposed in the alternatives analyzed in the DEIS or FEIS. New trail construction is limited to small segments of trail construction

to connect existing routes or to relocate/re-route a trail to avoid resource damage. These activities are subject to project design features to limit resource impacts (see Section 2.2.2 of the FEIS) and mitigate environmental concerns.

87. *The Forest Service should consider obliterating unauthorized road and relocating roads outside Riparian Conservation Areas (RCAs).*

Agency Response: Road obliteration and road relocation is not part of any of the alternatives and was considered to be outside the scope of this proposed action (DEIS p. 2-2). The authorized use of unauthorized roads within RCAs is reduced by the elimination of cross-country travel. “Limited motorized access for dispersed camping would be permissible within 300 feet of designated roads and 100 feet of designated motorized trails as long as it does not result in resource damage such as rutting, fording of streams, crossing wet meadows, creating new unauthorized routes, spreading noxious weeds, or similar resource degradation” (DEIS p. 2-4).

88. *The Forest Service should fully describe the methods used in road closures.*

Agency Response: Part of the purpose and need identified in the DEIS is to designate a system of open motorized vehicle routes. All roads and trails are considered closed unless designated open. The PNF motor vehicle use map (MVUM) will use nationally directed uniform standards, and signs identifying those routes open to public travel would be posted on the ground to the extent practicable (DEIS p. 2-4). Physical closure or road obliteration is considered outside the scope of this proposed action but is an appropriate option to be considered on future site-specific projects.

89. *The Forest Service should consider the effects of differing snow melt patterns caused by snowmobile use on soil moisture levels; and.*

Agency Response: Fahey and Wardle (1998) provide an excellent review

of effects of differing snowmelt pattern caused by snowmobile use on soil moisture levels. In summary, snow compaction by snowmobiles and snow grooming equipment affects soil by: 1) Decreasing soil temperature, 2) Increasing frost penetration, 3) Increasing the time that soil takes to thaw, 4) Causing soil to thaw at the surface rather than uniformly through the profile, 5) Increasing snow density and thermal conductivity, resulting in slower snowmelt, which in-turn impacts on bacterial decomposers and litter decomposition, 6) Retarding snowmelt which is likely to cause changes in vegetation composition through changes in length of growing season and soil moisture distribution, 7) Reducing temperature gradients within the snow which can have an impact on organisms inhabiting the subnival environments, 8) Grooming on ski runs can cause up to a 70% reduction in abundance of whole soil fauna. Literature review does indicate snowmobile use can change the soil moisture and the soil environment. The greatest impacts will occur on groomed ski runs and groomed snowmobile trails. Backcountry snowmobile use should disperse the amount of compaction and reduce the soil impacts. While the Forest recognizes the potential change on soil moisture and soil ecosystems, the Forest does not believe these impacts result in any significant issues.

90. The Forest Service should consider the impacts of all uses, motorized and non-motorized, on sediment/erosion from trails.

Agency Response: Soil and water issue 1 (DEIS p. 1-11) states “the type, extent, and location of roads, trails, and motorized areas in the Travel Management Plan may degrade soil productivity, accelerate erosion, and deliver sediment to streams. “Hiking and horseback riding would be permitted anywhere on the Forest, unless otherwise posted” (DEIS p. 2-4). There are five specific indicators dealing directly with the type, extent, and location of motorized trails (DEIS p. 3-69). The FEIS expands on the description of erosional impacts of hikers, horses, motorcycles, and mountain bikes.

91. The Forest Service should consider that erosion and sediment from trails that receive equestrian use is at least as great as that from motorized use.

Agency Response: See response to Comment 90.

92. The Forest Service should consider effects of snowmobile emissions, including cross-country snowmobile use, on water quality.

Agency Response: The Forest has conducted a literature review on the issue of snowmobile emissions and its effects on the chemistry of snowmelt runoff and has determined that this is a non-significant issue for the Payette. Please refer to Chapter 1 of the FEIS. The most comprehensive studies have been done within the last decade at Yellowstone National Park. Studies by Ingersol (1998), Tyler (2000), Arnold and Koel (2006) have found that pollutants are found at detectable levels in the snowpack areas with high snowmobile use. However, these concentrations are generally low and are dispersed and diluted as they enter the surrounding watershed and streams. Even in the areas of high snowmobile use, concentration of pollutants in the watershed are below levels likely to threaten human or ecosystem health. In Olliff, Legg, and Kaeding (1999), the authors concluded, “Appreciable contamination from emissions from backcountry snowmobiles probably occurs with less frequency than high use areas along groomed routes”. These references are discussed in the FEIS and are part of the Project Record.

93. The Forest Service should not limit the extent of snowmobile use because of potential impacts to the soil resource.

Agency Response: The Payette agrees that snowmobile use does not degrade soil productivity. “Winter access is not addressed as a soil and water issue because over-snow vehicle use (snowmobiles) does not degrade soil productivity, accelerate erosion, or deliver sediment to streams”. (DEIS p. 3-69)

94. *The Forest Service should consider that the sediment produced from disturbance on an OHV trail is considerably less than that produced from an open road.*

Agency Response: The Forest did consider that sediment produced from OHV trails may differ from sediment produced from open roads. On page 3-96 in the DEIS the Forest stated, “ATV trails can have similar effects to soil productivity and water quality as roads but the effects differ based on the width of the travel way”. In addition, the Forest disclosed that, “ATV trails create additional problems due to steep grades, lack of designed stream crossings, and difficulty of maintaining water management features.” As stated in the DEIS, the ATV and OHV indicator “is best used to evaluate the relative difference between the alternatives on the extent of designated ATV and OHV trails”.

95. *The Forest Service should consider that the conclusions concerning the effects of vehicle use on soils and vegetation seem to be based on assumptions rather than research or local data.*

Agency Response: The foundation of the conclusions concerning the effects of vehicle use on soils and vegetation are based on a combination of widely accepted publications, research, professional experience, and local data. The effects of road and trail construction and vehicle use on accelerated erosion and sediment rates are well established. The Forest referred to Meyers 2002, “Managing Degraded Off-Highway Vehicle Trails in Wet, Unstable, and Sensitive Environments”, when describing the Existing Conditions and the Environmental Consequences. Subwatershed vulnerability is derived from local land system inventories and inherent erosion ratings.

96. *The Forest Service should clarify the data presentation in the Soil & Water section of the EIS.*

Agency Response: Based on public comment the Forest adjusted the data presentation in the Soil and Water section between the DEIS and the FEIS. The Forest added the acre numbers to Soil and Water Indicators 1 and 2, while

retaining the percentage figures. This should clarify exactly how many acres are affected and how the percentage numbers were calculated.

97. *The Forest Service should discuss the effects of the alternatives on the drinking water supplies in Management Area 3.*

Agency Response: There are no surface public drinking water supplies located on the Payette NF within Management Area 3.

Wildlife

98. *The Forest Service should analyze lynx management using the most recent information and amend the Forest Plan to reflect this direction.*

Agency Response: The analysis of the effects of the Travel Plan on lynx used the most recent information available and described where this information may differ from current Forest Plan direction. In summer 2007, the PNF plans to work with the Lynx Biology Team to reevaluate the Forest’s lynx analysis areas (LAUs) and lynx habitat. The Lynx Biology Team is comprised of federal agency biologists and was chartered to develop the Lynx Conservation Assessment and Strategy (LCAS August 2000) to provide consistent information and guidance. Since its completion, the Lynx Biology Team has provided assistance with lynx habitat mapping and interpretation of the LCAS upon request by several National Forests. If amendments to lynx management are found to be warranted, then lynx direction in the Forest Plan may be modified in the future.

99. *The Forest Service should consider the health and safety aspects of leaving snags when roads and trails are constructed or reconstructed.*

Agency Response: As discussed in Comment 43 above, the Travel Plan alternatives propose minor amounts of road and trail reconstruction or construction that would follow Forest Service and Forest Plan direction. Due to low numbers of snags in some area of the Forest, it may be beneficial to include direction to

maintain snags during road and trail work, but safety concerns would take precedence in those cases.

100. The Forest Service should consider the effects of increasing snowmobile activity on wildlife.

Agency Response: The effects of over-snow motor vehicle use, particularly snowmobiles, were analyzed in the wildlife section of Chapter 3. Concerns over the effects of this activity to wildlife, were part of the reason for the development of Alternative D. Approximately 18 percent of the winter closures in this alternative were proposed to protect wildlife.

101. The Forest Service should consider that human recreation has little effect on wildlife.

Agency Response: The effects of human recreation on wildlife are disclosed in the wildlife section of Chapter 3.

102. The Forest Service should consider the likelihood that potential lynx habitat surrounding McCall is not occupied.

Agency Response: Information on lynx occurrence on the PNF was described in the DEIS and updated in the FEIS.

103. The Forest Service should re-evaluate the suitability of areas identified as lynx habitat using more up-to-date information; and:

104. The Forest Service should re-evaluate the potential effects of snowmobiling on lynx using the most up-to-date research; and:

105. The Forest Service should amend the Forest Plan direction for lynx because no lynx are known to be present on the Forest and the most recent research would lead to different, probably smaller, delineations of potential habitat.

Agency Response: See response to Comment 98.

106. The Forest Service should consider the relative effects of motorized versus non-motorized recreation in winter on wildlife.

Agency Response: These activities and the potential effects on wildlife species of concern were addressed in Chapter 3.

107. The Forest Service failed to adequately analyze the effects of snowmobile use on wolverine and lynx habitat.

Agency Response: The potential effects of snowmobile use on wolverine and lynx habitat were addressed in Chapter 3.

108. The Forest Service should evaluate in an unbiased manner the effects of motorbike use on elk security as compared to the effects of hunting.

Agency Response: Additional discussion was provided in the FEIS on the effects of motorized recreation activities and hunting on elk.

109. The Forest Service should maintain wildlife migration corridors in all alternatives.

Agency Response: Each alternative would allow for wildlife migration corridors, but the alternatives differ by the amount, extent, and connectivity of the corridors. See discussion of environmental effects on wildlife corridors in Chapter 3.

110. The Forest Service should consider that the most recent research is inconclusive regarding the effects of human interactions with elk and elk habitat effectiveness.

Agency Response: Elk habitat security and human impacts on elk were addressed in Chapter 3 of the DEIS and FEIS.

111. The Forest Service should consider that it is the management policies of Idaho Fish & Game that are contributing to the harassment of big game species, rather than motorized traffic.

Agency Response: See response to comment 108.

112. The Forest Service should reanalyze the currently closed roads to determine if the new elk security guidance in the 2003 Forest Plan

would still require these roads to be closed year-round.

Agency Response: Some closed roads were proposed to be opened in one or more of the alternatives. Elk security for each alternative is analyzed in Chapter 3 of the DEIS and FEIS.

113. The Forest Service should consider that OHV use during hunting season increases animal vulnerability to harvest.

Agency Response: The effects of OHV use during hunting season were considered in the development of the alternatives particularly B, D, and E as evidenced by the number of OHV trails that would have seasonal closures to improve elk security.

114. The Forest Service should consider that OHV use throughout the year reduces the effectiveness of big game habitat.

Agency Response: In the analysis of effects to elk security (Chapter 3), OHV and ATV trails were considered to have the same impacts as roads.

115. The Forest Service should consider that the areas of wolverine denning habitat being protected in Alternative D are not those that should be the highest priority.

Agency Response: The Forest Service met with Idaho Department of Fish and Game biologists to further understand their concerns about protection of potential wolverine denning habitat. Based on IDF&G's concerns, an additional closure area (Bruin Mountain) was proposed in Alternative D in the FEIS. The wildlife analysis in Chapter 3 discusses the potential benefits of this additional closure.

116. The Forest Service should evaluate the closure of additional roads and trails within elk summer and winter range to protect the animals from motorized vehicle use, especially during hunting season.

Agency Response: Closure of additional roads and trails within summer and winter elk range was analyzed as part of Alternative D in the DEIS and FEIS. Environmental effects are described in the wildlife section of Chapter 3.

117. The Forest Service should limit over-snow motorized use until impacts to wintering wildlife habitat can be fully assessed.

Agency Response: Over-snow motorized use is limited to various degrees in each alternative. Alternative D would provide the greatest reduction and protection to wildlife.

Firewood

118. The Forest Service should consider that none of the alternatives provides sufficient access for firewood collection and that firewood cutting is a significant issue.

Agency Response: The Payette agrees that access for firewood cutting is an important issue. However, this issue is outside the scope of route designation for travel management planning because it is handled by the Forest in a separate permitting process. In the DEIS and FEIS see Chapter 1 Section 1.10.2 Non-Significant Issues for a discussion of access for firewood cutting.

119. The Forest Service should consider that much of the forest has burned in the last 30 years and should be opened for fuelwood cutting.

Agency Response: This concern is outside the scope of the travel management planning purpose and need (see response to Comment 118 above). Access to areas for recovery of burned timber for fuelwood is covered under the firewood permitting process.

Noxious Weeds

120. The Forest Service should consider that motorized traffic on the forest contributes to the spread of noxious weeds.

Agency Response: The potential for spread of noxious weeds by motorized traffic as a result of travel route designation is discussed in the DEIS and FEIS in Chapter 1, Section 1.10.2, Non-Significant Issues.

Transportation System Management

Trails - General

121. The Forest Service should consider providing more opportunities for OHV trail riders because use is increasing.

Agency Response: In Alternatives B, C, and E the Forest recognizes the need for additional ATV trails and provides for them in varying numbers of additional miles. In addition, Alternative C provides an additional mile of OHV trail (4-wheel drive road). In the “Recreation Opportunities” section of the FEIS, the Forest has identified a future opportunity for preparation and distribution of an ATV route map.

While OHV use is increasing locally (almost 67% in the past five years), only 15.6% of surveyed Forest visitors in 2003 indicated that motorized recreation was their primary reason for visiting the area, and of that 15.6 % only 2.8 % of visitors were visiting for off-road vehicle use (most were in passenger cars). Given this level of use and declining Forest budgets, large increases in trail mileage are probably not needed or feasible at this time.

122. Because motorized use is increasing the Forest Service should provide more motorized trails laid out in systems such as those recommended by the Blue Ribbon Coalition.

Agency Response: Alternatives B, C, and E, presented in Chapter 2 of the FEIS, do provide ATV loop trail opportunities in response to requests from summer motorized recreationists. These alternatives increase the amount of ATV trail offered on the Forest.

Alternative C, designed with the help of the Adams County commissioners, provides a number of large ATV loop systems using existing roads on the west side of the Forest. ATV trails are also available for use by 2-wheel motorized users, although Forest staff understand that for many 2-wheel motorized riders ATV trails do not provide their preferred single-track riding experience.

123. The Forest Service should keep all motorized trails open because they provide such a variety of opportunities for all users motorized and non-motorized.

Agency Response: The Forest recognizes the valuable resource all trails, motorized and non-motorized, provide to the public, and believes the miles of motorized trails through all alternatives provide an acceptable array of manageable (safe, affordable) opportunities. This reflects part of the purpose and need for the project.

124. The Forest Service should consider that with the closure of all off-road travel and the reduction in available motorized trails, adverse impacts and user conflicts are likely to occur due to overuse on the remaining motorized trails.

Agency Response: Some motorized trails already receive heavy use, especially on peak weekends during the summer. But many motorized trails on the Payette, receive little use because they are not known or are not located next to a popular campground or trailhead. Closing a popular trail within a popular area could concentrate use on the remaining trails. Closing some “little used” motorized routes in “low use” areas would have little effect on trail use patterns.

125. The Forest Service should consider that restricting trail use to non-motorized due to lack of maintenance, or on those that receive little use or are considered “expert” is not valid. These trails have value to the public that uses them.

Agency Response: The Forest understands that steep, challenging trails do provide an opportunity for some expert riders. When proposing different motorized and non-motorized designations through the five alternatives in the FEIS, these opportunities, and their potential loss were analyzed and disclosed in Chapter 3.

126. The Forest Service should open all trails outside the Wilderness to motorized use.

Agency Response: The National Forest is not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the National Forest to provide different opportunities for recreation.

Recreation is not the dominant purpose for the creation of Wilderness, but rather the purpose is maintenance of wilderness characteristics. Most non-motorized recreational use is expected to occur outside the Wilderness. Therefore the Forest will manage for a balance of uses in the project area (which does not include the Wilderness).

127. The Forest Service should evaluate all 2-wheel trails to determine whether or not they can accommodate ATV traffic.

Agency Response: The Payette recognizes the value of maintaining the single-track trail experience for 2-wheel motorized use only. Many 2-wheel motorized users prefer using single-track trail. All alternatives provide 4-wheel ATV opportunities to some degree. See Chapter 2 Alternatives for a description of the ATV trail opportunities in each alternative.

Trail Closure/Restriction

128. The Forest Service should consider rerouting or improving maintenance on trails where there are water quality issues, rather than restriction to non-motorized use only.

Agency Response: The Forest has included improvements or small areas of trail re-route to address water quality and other resource issues associated with motorized trails in many areas. However there are situations where it is impossible to reroute trails completely around meadows and other wet areas, and conversion to non-motorized use is the only option to protect these resources.

Also, while some funding is available through grants and agreements with the State and other groups, the Forest budget for trail management is very limited. Many grants require that the Forest match with an equal amount of funds.

Funds for trail relocation, which is a costly activity, divert monies that could perhaps be better used elsewhere.

129. The Forest Service should not close motorized trails to gain non-motorized mileage, instead they should construct new non-motorized trails and keep all existing motorized trails.

Agency Response: The Forest Service budget has been declining for many years. Construction of new trail, either motorized or non-motorized, is limited (due to funding) to approximately 1 mile a year. Partnerships and grants allow for some minor amounts of trail construction, reconstruction, and maintenance, but most require a matching contribution by the Forest Service.

130. The Forest Service should consider that the needed skill level limits the use on "expert" OHV trails.

Agency Response: The Agency agrees that expert trails provide a desired recreation experience. However, due to potential safety and liability issues the Forest is limited in the amount of such opportunities it can provide. The Forest has attempted to provide a diversity of motorized trail experiences for varying levels of riding ability. Also, many trail users are new to the area and may not realize the level of experience needed to negotiate a trail until they have ridden several miles.

131. The Forest Service should consider that expert level trails are scarce and there is a growing population of experienced OHV users out there that desire that experience.

Agency Response: See response to Comment 130.

Single Track Motorized Trails

132. The Forest Service should provide more, not less, single track motorized trails.

Agency Response: The Payette acknowledges the value of the single-track motorized trail and provides a system of trails we believe are manageable for the future in the alternatives

analyzed in the DEIS and FEIS. Alternative A provides the most single-track motorized trail miles, and Alternative D provides the fewest. All alternatives meet the purpose and need statement which is to provide a “manageable” system of trails, which means an affordable and safe system.

With limited financial resources available for trail construction the Forest must allocate money carefully. Only 2.8% of Forest visitors surveyed in 2003 came to the Forest with off-road vehicle riding as their primary activity. Even when considered as part of multiple activities, only 7.4% of surveyed visitors used off-road vehicles to reach their destination. In addition, most off-highway vehicle users in Idaho use ATVs (77%), while only 22% use 2-wheel motorbikes (Achana 2005). All alternatives accommodate this level of use, when balanced against other motorized and non-motorized recreation opportunities on the Forest.

133. The Forest Service should consider that the need for single track trail for mountain bike use is not being addressed on the Payette National Forest.

Agency Response: The alternatives in the FEIS provide from 408 to 582 miles of single-track motorized trail, and 495 to 614 miles of non-motorized, mostly single-track width, trail available for mountain bike use. In addition, the Central Idaho Mountain Bike Association (CIMBA) has proposed a trail system for future NEPA analysis in the Bear Basin area. This opportunity is listed under Management Area 6 in Chapter 2 of the EIS.

134. The Forest Service should consider that single-track trails often end up being used by ATV users as well.

Agency Response: Under all alternatives in the EIS ATV use is restricted to trails designated for ATV use and to open roads (for State licensed drivers). The Forest recognizes unauthorized ATV use occurs, but with enforcement, education and public self-policing will strive for improved compliance. Any use of other routes by ATV users is

unauthorized and subject to action by Forest law enforcement personnel.

Loop Trails

135. The Forest Service should provide more loop trail opportunities.

Agency Response: One of the main objectives of Alternative C summer management proposals was to provide ATV loop opportunities. Many of the proposed ATV trails on closed roads in Alternative C connect with open NFS roads to provide loop opportunities. Many single track and non-motorized trails can also provide “loop” trails when using open NFS roads as connectors. A section on “loop opportunities” was added to the FEIS Chapters 2 and 3 to address trail “loop” opportunities. The Forest hopes to provide a map of ATV loops in partnership with local motorized user groups and Idaho State Parks & Recreation.

Groomed Snowmobile Trails

136. The Forest Service should use the most current lynx studies to assess the management of groomed snowmobile trails.

Agency Response: The analysis of the effects of the Travel Plan, including groomed snowmobile trails, on lynx utilizes the most recent information available, and describes where this information may differ from current Forest Plan direction. This was assessed in the wildlife section of the FEIS in Chapter 3.

137. The Forest Service should not decrease the amount of groomed snowmobile trail because use is increasing.

Agency Response: The Payette National Forest works in conjunction with Idaho State Parks and Recreation and Valley County to develop and maintain the network of groomed snowmobile trails on the Forest. Routes are agreed to and maintained by Valley County through a 5 year cost share agreement signed by the Payette National Forest, Valley County and Idaho State Department of Parks and Recreation.

While the numbers in Chapter 2 in Table 2-1. Forest Summary – Travel Opportunities by Alternative in the DEIS make it appear that the amount of groomed snowmobile trail is going down, in fact, they remain steady or are proposed to increase. Alternative A does not reflect the amount of trail that is currently groomed. Rather, Alternative A mileage reflects the amount that is authorized under the cost share agreement currently. However, the County has chosen not to groom this entire system for some years. Alternatives B and D reflect the amount of trail that is currently being groomed by the County. Alternatives C and E add a few routes requested through public input.

138. The Forest Service should add new “link” trails to the existing system.

Agency Response: Alternatives C and E propose adding new link trails to the groomed snowmobile trail system. These trails, by creating loop systems, would improve grooming efficiency and provide the loop experience recreation users desire.

139. The Forest Service should consider eliminating the Snowmobile Overlook because it leads to intrusion violations on the Brundage Ski Area permitted area.

Agency Response: The Payette recognizes that motorized over-snow intrusions have occurred within the non-motorized ski area boundaries, and will continue to monitor the area, patrol, sign, and educate snowmobilers on this issue in cooperation with the ski resort and local snowmobile groups.

Closed Roads

140. The Forest Service should provide turn-arounds at gates and barriers on closed roads.

Agency Response: Forest Service design policy requires a turnaround for the “critical vehicle” at all road closure points and at the terminus of a dead end road. The “critical vehicle” is the largest vehicle that is determined to use the road under the road management objectives.

Actual physical closure or road obliteration is considered outside the scope of the travel plan purpose and need but may be considered on future site specific projects. This issue would be addressed as physical closures are implemented.

141. The Forest Service should consider that by restricting access many families and seniors will no longer be able to participate in activities which they have historically enjoyed.

Agency Response: The Forest will continue to maintain between 1,606 miles (Alternative A) and 1,638 miles (Alternative D) of open road to provide access for general forest recreation. With fall seasonal road closures between 1,134 miles (Alternative A) and 1,123 miles (Alternative D) of road would remain open. Access for people with mobility problems is discussed in the DEIS, Chapter 1, pages 1-14 through 1-15.

142. The Forest Service should not close any more roads than those that are already closed.

Agency Response: Access on Forest roads is restricted for a variety of reasons including resource problems, duplicate access, and wildlife protection. Cost of maintenance of open or seasonal roads versus the cost of maintaining closed roads is another factor in road management decisions.

The Forest Service road maintenance program is not fully funded by Congress, and minimum maintenance funding for the current road system often does not occur. Adding more roads to the Forest Service system through adoption of unauthorized roads is not economically feasible. In addition, many unauthorized roads have design and location problems causing resource damage. These problems would have to be corrected before the roads could be added to the National Forest system adding to the financial burden.

Unauthorized Roads

143. The Forest Service should consider an alternative that addresses the loss of unauthorized roads in currently open areas.

Agency Response: See response to comment 0.

144. The Forest Service should not designate any unauthorized routes open because it rewards the illegal construction of these routes.

Agency Response: All alternatives incorporate some specific unauthorized travel route proposals, but beyond these specific proposals the remaining unauthorized roads will not be designated. Unauthorized travel routes have a variety of origins. Some are historical roads built to access timber or range facilities, some are from early mining and exploration, and some have been recently created by off-highway vehicle use. Under the 1988 Forest Plan, 33% of forest acres outside of Wilderness were managed as open to cross-country motorized travel, therefore travel was allowed on unauthorized routes within these open areas.

Not all user created routes were created by unauthorized off-road use. Road and trail inventory information has been collected for some of the unauthorized routes found in the project area. This information is available in the Project Record.

145. The Forest Service should recognize that most summer motorized users would only use the existing (unauthorized) road beds and would not drive “off-road” and not penalize them because of the few users who do cause resource damage off-trail.

Agency Response: While it is no doubt true that recreationists would use the existing unauthorized route system to travel, adding this entire route system to the Forest’s System trail networks is not fiscally feasible or environmentally responsible. Funding for trail management is not sufficient to allow for the addition of hundreds of miles of new trail that would have to be maintained, relocated, etc. Therefore during the scoping period for travel management the Forest asked the public to help the Agency identify any of the unauthorized routes that are receiving enough

use to make their addition to the National Forest trail system worth evaluation.

146. The Forest Service should realize that creation and use of “unauthorized” routes is an indication of unmet demand for motorized recreation opportunities.

Agency Response: Rather than being an indication of unmet demand, oftentimes these user-created unauthorized routes instead reflect a desire of the rider to explore new territory, test the limits of themselves or their machine, or to arrive at a destination by a more direct route than may already exist.

The Payette feels the five alternatives provide a sufficient range of motorized and non-motorized recreation opportunities at this time.

Road & Trail Decommissioning

147. The Forest Service should decommission roads or trails for every new mile of road or trail created.

Agency Response: The Forest identified those areas in need of a high level of watershed protection in the 2003 LRMP as Management Prescription Categories 3.1 and 3.2 – Passive and Active Restoration and Maintenance of Aquatic, Terrestrial and Hydrologic Resources. Because management actions, including road and trail reconstruction, may only temporarily degrade watershed conditions it becomes necessary to decommission some road or trail for every new mile of road or trail created. For the remainder of the Forest it was not deemed necessary from a watershed standpoint to offset road and trail construction, although during future site-specific analysis road and trail decommissioning may be proposed.

Jurisdiction

148. The Forest Service should indicate roads that fall under other jurisdiction clearly on the maps so people can easily recognize them.

Agency Response: In the DEIS and FEIS roads not under Forest Service jurisdiction were depicted using a different line symbol. The MVUM will adhere to agency-wide

mapping standards which include displaying only roads that will be open to motorized travel. Roads under non-Federal jurisdiction that will remain open to motorized travel are distinguished by jurisdiction on the maps. Other non-Federal roads and non-system roads (referred to as “unauthorized roads” in the Travel Plan) will not be displayed on the maps, according to national direction.

149. The Forest Service should maintain public access on roads managed under cost share agreements.

Agency Response: The Forest Service has primary jurisdiction on roads covered by Cost Share Road Easements. The Forest Service retains traffic regulation authority over the roads. Therefore, the Forest Service determines, on a road-by-road basis, the level of management, including whether a road should be open or closed to motorized public use. The agency bases road management decisions on agency goals, Forest Plan direction, and funds available for road maintenance. When public use is allowed on such roads, the Forest Service is responsible to ensure that the public use does not materially interfere with the other landowner’s easement rights.

Maintenance

150. The Forest Service has not adequately considered the impacts from a lack of maintenance on the existing road network.

Agency Response: Forest personnel check NFS roads during the course of carrying out their job duties and routinely report maintenance problems to the appropriate department. The Forest implements approximately 100 to 200 miles of scheduled road maintenance a year. The analysis in Chapter 3 of the DEIS for watershed conditions across the Forest addresses this concern. Soil and water indicators SWI 3, 6, 7, and 8 all are broad indicators of the potential for negative impacts due to road surface erosion and events such as culvert failure.

151. The Forest Service should consider that trail maintenance has not been adequately funded for the past two decades, even with the existing system of trails.

Agency Response: The Forest did consider trail funding and maintenance costs in the DEIS and FEIS and the effects are displayed in Chapter 3, Recreation – Effects of Alternatives, Cost to Program.

152. The Forest Service should consider that lack of trail maintenance is a poor excuse for reducing the number of trails or limiting access.

Agency Response: The issue regarding funding, which drives the Forest’s ability to carry out trail maintenance, is beyond the scope of this project. Congress authorizes Forest Service appropriations. The Forest is committed to using whatever funds are available or can leverage to implement the decision for travel management once it is adopted. The Forest makes appropriate use of all other sources of funding, and has a number of successful cooperative relationships with the state of Idaho and other partners. Volunteer agreements with user groups and others have proven successful in extending agency resources for trail construction, maintenance, monitoring, and mitigation.

Costs in trail maintenance, as well as the need for trails to provide a satisfactory recreation experience to the motorized and non-motorized users, were both considered when proposing the future trail systems in all alternatives. The proposed system was not purely the result of finances, although budget was one consideration.

153. The Forest Service should consider that reducing the number of trails available for motorized use may also reduce the amount of trail maintenance funds available through partnerships with the IDPR and other grant and volunteer efforts.

Agency Response: The amount of funds available through partnerships and grants is dependent upon trail-specific projects and the ability of the Forest to match the grant funds

rather than the total miles of motorized trail on the Forest.

154. The Forest Service should consider that faulty design and maintenance of roads and trails are not the fault of the public but of the managing agency.

Agency Response: The Payette does not consider Agency infrastructure or budget problems to be the fault of the public. However, the ability of the Forest to correct resource problems caused by faulty design and maintenance is limited by budget realities and must be considered when proposing viable road and trail management options.

RS 2477

155. The Forest Service should evaluate roads that it has closed since 1976 for potential RS 2477 rights.

Agency Response: The Forest Plan states that before taking any action to close or remove a road from the landscape, the Forest Service should evaluate the merits of an assertion of public right-of-way under R.S. 2477. To establish a right-of-way under R.S. 2477 requires three tests as outlined in Forest Service Intermountain Region direction (Regional Forester 5510/2730 memo of February 12, 2001):

- It must be shown that the statutory grant of the right-of-way was accepted prior to inclusion of the land in the National Forest System (NFS),
- It must be shown that a highway had been constructed and dedicated to public use in accordance with applicable laws prior to inclusion of the land into the NFS, and
- It must be shown that the right-of-way has been continuously used and maintained as a public highway. If not, it may be deemed abandoned by applicable laws.

The Forest Service cannot evaluate or concur with assertions for public rights-of-way without sufficient information to determine if

any of these elements have been met. Without sufficient evidence of title, the Forest Service cannot recognize any claim of a real property interest in land under its administration. If the public has specific information that could help the agency evaluate the existence and validity of historic R.S. 2477 routes, even those the Forest Service may have closed or decommissioned prior to or post-1976, the agency could review past road closures and take appropriate action to re-establish historic routes. Without supporting evidence or a judicial determination of validity, the Forest Service may take action necessary to protect resources where there is a demonstrated, compelling, and immediate need to take such action. See FEIS Chapter 1, Section 1.10.2 Non-Significant Issues for an in-depth discussion of R.S. 2477 Rights-of-Way.

156. The Forest Service has not correctly addressed RS 2477 in the DEIS. The PNF lacks the authority to close roads or determine jurisdiction on roads.

Agency Response: The Forest Service does not assume jurisdiction over legitimately established public roads. The Forest Service is not, through travel planning, proposing to physically remove from the landscape or prohibit public foot travel on any road or trail within the Payette National Forest. The agency is, however, proposing to manage motorized use on roads that may or may not be public under R.S. 2477. The agency has the authority to restrict the method of public travel--specifically, motorized--on roads or trails across National Forest System lands. The issue not being addressed through travel planning is whether a large number of roads and trails for which assertions of public right-of-way under R.S. 2477 have been filed are indeed public roads. The Forest Service cannot evaluate or concur with assertions for public rights-of-way without sufficient information to determine if any of the elements required for establishment of title to the right-of-way have been met (See response to comment 155). See FEIS Chapter 1, Section 1.10.2 Non-Significant Issues for an in-depth discussion of R.S. 2477 Rights-of-Way.

Administrative Use

157. *The Forest Service should not use roads closed to the public under the guise of “administrative use”.*

Agency Response: As stated in the DEIS and FEIS administrative use will be limited, regulated, and done on approval of a line officer only. Exceptions to this are emergencies such as fire suppression, and search and rescue operations.

Collaboration/Partnerships

158. *The Forest Service should make better use of grants and partnerships to fund maintenance of trails and to keep trails open.*

Agency Response: The Forest understands, values, and depends on partnerships to sustain the developed recreation and trails programs on the Forest. These partnerships and their contributions were discussed in the DEIS and FEIS in Chapter 3, Recreation – Environmental Consequences.

159. *The Forest Service should consider using volunteers and grants to help maintain trails, so that more trails may be kept open.*

Agency Response: The Forest does consider and use volunteers and other partners to the degree appropriate, as described in Chapter 3 Recreation – Cost to Program, in the DEIS and FEIS.

160. *The Forest Service should consider using RPT grant monies and the Park N’Ski program to create more parking areas for winter recreation users.*

Agency Response: The Forest Service will pursue funds available through grants and partnerships once the Record of Decision is signed for this travel management analysis.

161. *The Forest Service should make better use of grants and partnerships to fund the snowmobile management program.*

Agency Response: Many aspects of the Forest’s snowmobile program management are

funded through grants and partnerships with the Counties, Idaho Department of Parks and Recreation, and local snowmobiling clubs.

Recreation Management

Motorized Recreation – General Comments

162. *The Forest Service should clearly define when there is sufficient snow for over-snow motorized travel to be allowed.*

Agency Response: Defining over-snow seasons with dates are not feasible because of the varying weather patterns affecting the snow base. The best way to define sufficient snow for over-snow use is to state that the user must have sufficient snow coverage on the ground to maneuver and drive the motorized vehicle without causing any impact to the soils beneath the snow (no rutting or vehicle tracks). This information has been added to the FEIS in Chapter 2, Project Design Features.

163. *The Forest Service should keep motorized and non-motorized users separate so that non-motorized users can enjoy nature.*

Agency Response: The alternatives analyzed in the DEIS and FEIS provide a range of both motorized and non-motorized opportunities in both summer and winter. Non-motorized use areas and trails are provided for enjoyment of nature in a quiet environment.

164. *The Forest Service should not close any areas to motorized recreation.*

Agency Response: See response to comments 121, 126, 127, and 129.

165. *The Forest Service should consider that motorized use on the Forest has affected all Tribal treaty resources.*

Agency Response: The Nez Perce Treaty of 1855 provides in part for: “the right of taking fish at all the usual and accustomed places... and or erecting temporary buildings for curing, together with the privilege of hunting, gathering roots and berries, and pasturing their horses and cattle upon the unclaimed lands.”

The Nez Perce Tribe has reserved certain rights in their ceded territory.

The Fort Bridger Treaty of 1868 for the Shoshone-Bannock Tribes provides that the Tribe “has the right to hunt on the unoccupied lands of the United States.” The Shoshone-Bannock Tribes have reserved certain rights in their ceded territory. Also, the Tribes claim to have reserved guaranteed continuous use “rights” to utilize resources, off the reservation and within the region that encompasses and includes lands of the Snake and Salmon River watersheds. The ceded lands of the Nez Perce and the Shoshone-Bannock Tribes do not overlap. The Forest Service does not have the authority to adjudicate the meaning of these phrases. There are several possible legal theories, some of which conflict with one another.

The Shoshone-Paiute Tribes have longstanding interest in the resources on the land that encompasses what is now the west half or the Payette National Forest.

As the DEIS Chapter 3 Affected Environment acknowledged, illegal damage to cultural resource sites does occur on the Payette NF facilitated by illegal off-highway vehicle use.

Although the Agency does not believe that this constitutes a violation of treaty rights, it is taking measures to reduce such damage. One way is by applying Forest Plan standards and guidelines for reduction of unsanctioned off-highway use. Another is the national OHV rule that prohibits unauthorized motorized uses. A third is this travel planning process to establish a system of roads, trails, and areas where motorized use is allowed. Through these and other means the Agency strives to protect the fish, wildlife, plant, and other natural elements the Treaties were designed to protect.

166. The Forest Service should remove all motorized use from the National Forest because of the negative resource effects.

Agency Response: This option would not be consistent with national policies or the Forest Plan. National Forests are managed by law for multiple use. They are managed not only for

recreation, but also for timber, grazing, mining, and other specific uses. Uses must be balanced overall, rather than one given preference over another.

167. The Forest Service should consider the impacts of non-motorized recreation as well as those of motorized recreation.

Agency Response: The design of the five alternatives and analysis of environmental effects in the EIS in Chapter 3 consider impacts from both forms of recreation.

168. The Forest Service should consider that people have been using motorized trails and roads for a long time and the trails and country they access have great value to them.

Agency Response: The Agency recognizes these values. Public comment periods for the proposed action and the DEIS allowed for the public to bring forward roads and trails that have historical value to them. These roads and trails could then be analyzed for inclusion in one of the alternative proposals.

169. The Forest Service should use public education to prevent resource damage by motorized trail users.

Agency Response: The Forest has, and will continue to, promote “Tread Lightly” education objectives with continued signing and recreation patrol education with forest visitors. The Payette will also use the correct design standards for ATV, mountain bike, and 2-wheel motorized trails when constructing and reconstructing trails.

The Forest will work in conjunction with the popular and well-known Idaho Interagency OHV Coordinating Group, and the Statewide Ad Campaign organizations who continue to champion the “Stay on the Trails” campaign and promote responsible riding of motorized vehicles on all public lands.

170. The Forest Service should provide as many motorized opportunities as possible because so many people, including the very young, the elderly, the disabled, and veterans, value them.

Agency Response: The Forest has analyzed five alternatives in the FEIS. These alternatives provide an array of motorized and non-motorized opportunities. Not all proposed changes were a result of damage caused by motorized use. Proposals are also tied to a “desired recreation experience” the forest wants to provide to recreational users, which in some cases is a quieter, non-motorized experience.

While it is true that a recent Idaho Parks and Recreation Survey found that 52.4 percent of Idaho residents engage in some form of motorized recreation (Achana 2005), site specific statistics for the Payette (USDA Forest Service 2003b) indicated that 7.4% of visitors annually participate in off highway vehicle travel, with 2.4% visiting the Forest with off highway vehicle travel being their only form of recreation. Snowmobile travel accounts for 6.4% of the total annual visits to the Forest. The most popular motorized activity on the Forest is driving for pleasure on roads, with 22.3% of forest visitors participating annually.

171. The Forest Service should completely overhaul the legislation and direction that have led to the current management course.

Agency Response: The OHV rule, which guided the process the Payette National Forest used during the travel management analysis, is not legislation, but a federal rule. This rule went through several years of formulation and public involvement prior to becoming a rule. The final rule requires designation at the field level, with public input, of those NFS roads, trails, and areas that are open to motor vehicle use. The final rule would have no effect on users or on the environment until designation of roads, trails, and areas is complete for a particular administrative unit or Ranger District, with opportunity for public involvement. This final rule is essentially procedural and “overhauling” it is outside the scope of this EIS.

172. The Forest Service should provide OHV recreation opportunities.

Agency Response: The Forest provides OHV opportunities in all the alternatives to varying degrees. Alternative A provides the most opportunities with 645.4 miles of motorized trail, and 511,950 acres of area open to off-road motorized use. Alternative D provides the least with 468.9 miles of OHV trail.

173. The Forest Service should consider that resource damage caused by OHV use usually only occurs in isolated areas.

Agency Response: The Forest analyzed and considered affects to resources caused by OHV use in the EIS in Chapter 3 recreation, soils, wildlife, and fisheries sections.

174. The Forest Service should consider that it is easier for snowmobiles to travel a distance from trailheads/parking than for non-motorized users who need opportunities within a close distance from access points.

Agency Response: This issue is addressed in Chapter 3 Recreation, Issue 2. Access points and proximity to them were an important factor in determining the proposed locations for winter non-motorized use areas.

Non-motorized Recreation – General Comments

175. The Forest Service should consider the value of non-motorized recreation opportunities to society and the environment.

Agency Response: The Forest considered the importance of non-motorized recreation in both summer and winter months, and has addressed those needs, at different scales, in Alternatives A through E in the FEIS.

176. The Forest Service should provide a balance between motorized and non-motorized recreation opportunities.

Agency Response: The Forest provided for both motorized and non-motorized trail opportunities across the Forest in summer and winter months. However, opportunities were not allocated on a percentage basis, but instead to provide for both experiences.

People’s opinion on what constitutes a “balance” between these uses is highly variable. The alternatives provide a mix of motorized and non-motorized opportunities. The Deciding Officer can choose any of the five FEIS alternatives or a combination of alternatives.

177. The Forest Service should consider that motorized and non-motorized recreation is often incompatible.

Agency Response: The Forest has provided a mix of motorized and non-motorized routes and areas in the Alternatives described in Chapter 2 of the DEIS and FEIS. Some areas provide a mostly motorized experience, such as is found in Management Area 3, described on page 2-21 in the FEIS. Other areas such as Management Area 13 (DEIS, p. 2-59) provide a more non-motorized experience. Across the project area (the Forest not including Wilderness), the experience is generally a mix of motorized and non-motorized reflecting the multiple use policy that guides the Agency.

178. The Forest Service should consider that non-motorized trails tend to be under-utilized.

Agency Response: Data collected during the National Visitor Use Monitoring study conducted in 2003 on the Payette indicate that a majority of recreation on the Forest is non-motorized. In the same study perception of crowding also shows that of surveyed users, motorized and non-motorized, 65% feel there is “hardly anyone there”. On a scale of 1 to 10, 85% of surveyed visitors perceived crowding as less than a 5. All areas of the Forest, including developed campsites, are not perceived as over crowded or even crowded by most visitors. It appears that motorized and non-motorized recreation opportunities, including non-motorized trails, are not being fully utilized. This lack of crowding (relatively low utilization) is considered a positive attribute and valuable drawing point for recreation on the Forest.

Access - General

179. The Forest Service should consider that public access is an important resource for future generations.

Agency Response: Access to the Forest is maintained in various degrees in all five alternatives in the FEIS. The selecting official will have five to choose from to provide access for the future.

180. The Forest Service should consider that a large portion of the population must use motorized vehicles to access the forest because of physical limitations.

Agency Response: Comment acknowledged. All alternatives provide a diversity of access options including open roads and motorized trails for those with physical limitations. The selecting official will have the choice of the five Alternatives in respect to access by motorized means.

181. The Forest Service should consider that providing a broad spectrum of recreation opportunities is good for the local economy.

Agency Response: All alternatives presented in the DEIS and FEIS provide for a broad spectrum of motorized and non-motorized recreation opportunities. Chapter 2 in the DEIS and FEIS describes the alternatives. Economics are discussed on page 1-17 in the DEIS. The discussion of the impact of travel management on the economy has been expanded in the FEIS (See Chapter 2 in the FEIS).

182. The Forest Service should consider that providing a broad spectrum of recreation opportunities disperses use and increases safety.

Agency Response: See response to Comment 178. The lack of crowding indicates that use is fairly dispersed and most areas of the forest are safe. In some areas, particularly around popular camp spots, trailheads, and parking, there may be sufficient crowding that forest users need to use care to have a safe experience. See Chapter 3, Recreation for a

discussion of the effects by alternative on crowding and safety.

183. The Forest Service should continue to allow access using the 1994/1995 travel map which the public is used to and finds to be adequate.

Agency Response: The 1994/95 travel map, as modified by the *BackRoads* map, is one of the alternatives considered in the DEIS – Alternative A, No Action (DEIS, p. 2-9). This alternative is described in Chapter 2 of the DEIS and analyzed in Chapter 3 of the DEIS.

184. The Forest Service should not limit access to any type of recreation.

Agency Response: The Forest Service believes that the Agency should provide access for both motorized and non-motorized users in a manner that is environmentally sustainable over the long term. The National Forest System (NFS) is not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the National Forests to provide contrasting opportunities for recreation.

185. The Forest Service should consider that there is a difference between the remote backcountry, which may still be accessed by road, and Wilderness which is entirely non-motorized.

Agency Response: The Wilderness is not part of the project area for this travel management planning. The primary purpose of Wilderness is preservation of an area where evidence of man is minimal to non-existent rather than as an area for extensive non-motorized recreation. Types of use designations allowed in wilderness are already decided by legislation (Wilderness Act). Therefore the Wilderness was not included in the project area.

The analysis area does include many areas of remote ground accessible by road, and motorized and non-motorized trail. The Alternatives presented in the DEIS and FEIS generally retain access to all areas although the

balance of motorized versus non-motorized access may vary by alternative.

Separate Use

186. The Forest Service should consider that non-motorized recreation provides the most resource protection and therefore motorized access should be limited.

Agency Response: The Payette does not agree that motor vehicle use should be allowed only when it can be clearly proven to be harmless to the environment. While resource effects should be minimized, the importance of providing a broad spectrum of recreation opportunities, including opportunities for motorized use, is recognized. See 36 CFR §212.55, Criteria for designation of roads, trails, and areas, of the national motor vehicle use rule (Federal Register 2005: 70FR68264) for a complete listing of criteria the Deciding Officer must evaluate prior to making his or her selection for route designation.

187. The Forest Service should provide more non-motorized areas within easy access distance from major roads and parking areas.

Agency Response: The Forest considered non-motorized areas within easy access as one of the major recreation issues, and analyzed it in the DEIS and FEIS, Chapter 3 – Recreation (Recreation Issue #2).

188. The Forest Service should continue to provide a winter non-motorized area in Bear Basin for use by Nordic skiers.

Agency Response: The Bear Basin non-motorized area was considered and analyzed in differing amounts of acres in Alternatives B, C, D, and E in the FEIS.

189. The Forest Service should consider that separate use areas provide a number of benefits including a safer recreation experience and more protection of natural resources.

Agency Response: The Forest considered safety as a major recreation issue and analyzed it in Chapter 3, Recreation – Environmental

Consequences section: Recreation Issue 4: Safety.

While research generally supports the notion that non-motorized recreation has fewer resource impacts than motorized use, this is not always the case. In some instances non-motorized use causes comparable or even greater impacts than motorized use. Impacts to trails from horseback riding, hiking, and biking can cause rutting on trails, especially during the wet season. Recreational use can cause disturbance and adverse impacts to wildlife. The effects of motorized versus non-motorized use is addressed by all natural resources within Chapter 3.

190. The Forest Service should consider that motorized and non-motorized use is not compatible because the noise and air pollution from motorized vehicles is not amenable to non-motorized recreationists.

Agency Response: The Forest recognizes that some types of recreation experiences need separation of uses for the user to fully enjoy their opportunity. Therefore, throughout the alternatives analyzed in the DEIS and FEIS, the Forest did consider allocating use in some areas solely to non-motorized use, to provide for some reduction in the potential for conflict of uses, and in some cases, improved safety of the users.

191. The Forest Service should consider that there is currently not enough area designated for non-motorized recreation on the Payette.

Agency Response: Alternative D analyzed in the DEIS and FEIS was developed to address concerns for more non-motorized recreation opportunities in summer and winter. Additional winter non-motorized areas were added to Alternative D in the FEIS to address wildlife habitat concerns.

192. The Forest Service should consider the many people that utilize the areas available for snowmobiling on the Payette NF.

Agency Response: Perception of crowding as measured in the National Visitor Use Monitoring Study in 2003 on the Payette

National Forest indicated that only 15% of surveyed visitors (summer and winter) felt that the area they visited was crowded or overcrowded. Most survey respondents (65%) indicated they experienced little to no crowding.

While popular snowmobile play areas such as Goose Lake and Brundage Reservoir, or trailheads and trails immediately adjacent to parking areas, may experience some crowding on busy days, for the most part the current available open area can accommodate the level of use the Payette is receiving. Alternatives B and D do reduce the available area open to snowmobiles. With the exception of the Granite Mountain closure, the areas selected for closure to motorized use are not expected to heavily impact or cause crowding of snowmobiles. Alternative C analyzed in the DEIS increases the amount of area open to snowmobiling.

193. The Forest Service should consider that definable boundaries and separate use areas provide the best experience for the non-motorized recreationist in winter.

Agency Response: The Forest did consider and has proposed several separate use areas for non-motorized winter recreation in the action alternatives presented in the FEIS. Chapter 3, Recreation provides documentation of the analysis of these areas and assesses the boundaries for ease of recognition.

194. The Forest Service should consider that there are not as many non-motorized recreationists as motorized and that there are already several areas set aside for non-motorized use, both summer and winter.

Agency Response: Payette National Forest recreation data collected in 2003 indicate that most of the recreation use on the Forest is non-motorized rather than motorized with 15.6 percent of respondents stating that their primary activity was some form of motorized recreation (includes off-highway vehicle travel – 2.8%, driving for pleasure on roads – 6.2%, snowmobile travel – 5.4%, motorized water travel – 1.0%, and other motorized land/air

activities – 0.2%). The remainder of respondents did not list motorized activities as the focus of their recreation on the Forest although they may have used some form of motorized vehicle to access their primary activity recreation. (USDA Forest Service 2003b NVUM)

195. The Forest Service should consider a seasonal closure in the area utilized by the Brundage Snow Cat special use permit.

Agency Response: The permitted area for the Brundage Snow Cat operation is independent of non-motorized recreation area designation. Parts of the permitted area are proposed for closure to motorized use, and other parts would remain open. In Alternative A, representing the existing situation, most of the permitted Snow Cat skiing area is also open to motorized use. Generally, designation of a seasonal closure would create more confusion for the public and more managerial costs for the Forest.

196. The Forest Service should consider that excluding snowmobiles from portions of the Brundage Mountain Snow Cat skiing permitted area is essential for the business to survive.

Agency Response: Alternatives B, C, D, and E all close a portion of the area currently under Special Use Permit to Brundage Snow Cat to allow for additional non-motorized over-snow back-country ski opportunities. Permittees must consider existing land use allocations when applying for a Special Use authorization with the Forest. The Forest is not responsible for modifying existing land uses to make any outfitter or guide operation more viable. That is the responsibility of the permittee, and one of the many considerations their business must take into consideration when applying for a Special Use Authorization.

197. ... (Continue 196) .For the safety of the program's patrons.

Agency Response: Safety is discussed in the FEIS in Chapter 3, Recreation, Recreation Issue 4, Safety. The issue of skier safety in areas of snowmobile use is one facet discussed

under this issue. Effects by alternative on safety are analyzed in Chapter 3.

198. The Forest Service should consider that snowmobiles have a much larger range than human-powered recreationists and can quickly travel by any non-motorized areas.

Agency Response: See response to comment 187.

199. The Forest Service should evaluate whether or not the non-motorized areas created would be large enough and distant enough from areas of motorized use to provide quiet and a feeling of solitude.

Agency Response: This issue is evaluated in the FEIS, Chapter 3, Recreation, Issue 5: Recreation Opportunity Spectrum (ROS). The analysis discusses the impacts of the alternatives on the ROS for both summer and winter. One aspect of ROS classification is the probability that the user will experience solitude and tranquility.

200. The Forest Service should create exclusive use areas for snowmobilers as well if they are going to do so for non-motorized use.

Agency Response: Areas that are heavily used by snowmobile do tend to end up as exclusive use areas for snowmobilers, due to safety concerns, noise, and other impacts many non-motorized users seek to avoid. However, in areas of more dispersed motorized use, conflicts between the two uses are minimal, and therefore multiple use can be emphasized.

Given the large acreages of the Payette open to over-snow motorized use under all the alternatives considered in the travel plan (57 % to 73 %), the need for areas dedicated to exclusive motorized use has not been widely expressed or proven as necessary.

Shared Use

201. The Forest Service should consider that additional access is needed for ATV riders.

Agency Response: See response to comments 0, 121, and 122.

202. *The Forest Service should consider that shared use areas and routes are not enjoyable or safe for non-motorized recreationists.*

Agency Response: See response to comment 189.

203. *...(Cont.202) Because snowmobiles are able to access areas they couldn't in the past, and they can track up an area in minutes.*

Agency Response: The action alternatives presented in the FEIS all propose some areas of closure to motorized over-snow use. These areas are proposed partly to provide the non-motorized public with a snowmobile free untracked powder experience.

204. *The Forest Service should consider that Nordic skiers and snowmobiles cannot safely share the same trails.*

Agency Response: See response to comment 189.

205. *The Forest Service should consider that creating separate use areas for non-motorized recreation is a form of discrimination.*

Agency Response: Part of the purpose and need for the project was to reduce conflict between uses. A valid method of accomplishing this is by separating motorized and non-motorized use areas and routes. The Forest believes that we should provide for both motorized and non-motorized users. However, the Forest is not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the Forest to provide different opportunities for recreation. The best method for making choices on the designation of areas and routes for use is through involvement and planning with local interested parties as is being done for this travel management analysis.

206. *The Forest Service should consider that the areas open to snowmobiling currently are crowded and that reducing the area open will increase the problems caused by crowding.*

Agency Response: While crowding can occur on some of the groomed snowmobile routes, it

is not common in the play areas. Payette Forest data (USDA Forest Service 2003b) do not indicate that forest users - both summer and winter - are feeling yet that the Forest is crowded. Most survey respondents indicated that on a scale of 1 to 10 there was "hardly anyone there" (over 50%). While some popular areas may be crowded on high use days (weekends/holidays), recreationists are dispersed sparsely throughout the vast majority of the forest.

The alternatives analyzed in the FEIS provide a range of area open to snowmobiling, with Alternative C providing the most open area.

207. *The Forest Service should consider that non-motorized recreationists typically only use areas within 4 miles of a parking lot or road, so only areas that meet these criteria should be set aside for exclusive non-motorized use.*

Agency Response: While it is true that back country skiers who do not own snowmobiles can only reasonably access areas within 3 to 4 miles of a parking area, some back country skiers do use snowmobiles to access skiable terrain. Alternatives B, C, and D in the DEIS all include some areas designated for non-motorized winter use that can only be accessed by snowmobile. This serves to disperse use by back country skiers.

The Forest analyzed this issue under Recreation Issue #2 in Chapter 3 of the FEIS, Recreation – Environmental Consequences.

208. *The Forest Service should consider that motorized and non-motorized use conflict in winter is very real and not just a perception.*

Agency Response: The Forest acknowledges that conflict among motorized and non-motorized uses is occurring, particularly in winter. This issue is addressed in the FEIS, Chapter 3, Recreation Issue 2.

Restricted Off-road Motor Vehicle Use

209. *The Forest Service should consider that ATVs on existing unauthorized routes and on*

skid trails are the only means of forest access that some can physically use.

Agency Response: Many unauthorized roads were recommended for conversion to system roads or trails and were analyzed in the alternatives in the FEIS. Opening all unauthorized roads would not meet the purpose and need for this travel plan.

210. *The Forest Service should consider that OHV use should be kept to open roads and motorized trails.*

Agency Response: All action alternatives do limit OHV use to open roads and designated motorized ATV trails. The action alternatives do allow for limited motorized use in a 300' corridor along open roads and 100' of motorized trails for dispersed camping so long as there are no negative impacts to resources.

211. *(Cont. 210) Because it causes resource damage.*

Agency Response: See comment response 210.

212. *(Cont. 210) Because it protects big game vulnerability and reduces hunter conflicts.*

Agency Response: See comment response 210.

213. *The Forest Service should consider that problems caused by off-road vehicle use are an enforcement problem and not all users should be punished for the few that abuse the privilege.*

Agency Response: Forest Service law enforcement personnel play a critical role in ensuring compliance with laws and regulations, protecting public safety, and protecting National Forest resources. The travel plan will not increase the agency's budget or the number of law enforcement officers. Proposed travel management must be reasonable to enforce given the existing and anticipated law enforcement budget and personnel level.

The Forest did not receive any substantive public or internal comments indicating that the

Forest should consider opening any areas of the Forest to off-road motor vehicle use in summer except for dispersed camping, and for requests for firewood collection, which will be covered under a separate permitting process.

Corridors

214. *The Forest Service should consider the creation of some open corridors on the Krassel Ranger District, as has been done on the rest of the Forest, because I see no valid reason for closing the entire District.*

Agency Response: Alternative A in the DEIS and FEIS analyzed a 300 foot corridor on the Krassel Ranger District. The Deciding Officer could select some open corridors on the District.

215. *The Forest Service should consider that 300 foot corridors will not provide adequate opportunities for dispersed camping.*

Agency Response: Three hundred foot corridors should accommodate most demand for dispersed camping. In high use areas or areas with sensitive resources the Forest may identify additional dispersed campsites beyond the 300 foot corridor. Designated dispersed campsites will be identified on the MVUM as well.

216. *The Forest Service should create designated dispersed camping sites rather than creating corridors for dispersed camping along motorized routes.*

Agency Response: The Interdisciplinary Team for this project did discuss designating all dispersed campsites on the Forest. The team determined identifying, signing, and enforcement of all designated dispersed sites was not feasible or cost effective. Identification of Forest corridors were deemed more cost effective and posed little risk to resource values. In areas where sensitive resources have been identified, including northern Idaho ground squirrel habitat on the west side, the Lake Creek area on the McCall Ranger District, and the Krassel Ranger District on the east, the Forest would designate

dispersed sites if one of the action alternatives is selected. These sites would be located on the MVUM. For the future, the Forest retains the authority to prohibit dispersed camping in areas where unacceptable resource damage occurs. Such areas would be added to the MVUM.

Multiple Use

217. *The Forest Service should consider that the National Forest belongs to the people and not to the agency and therefore should be completely accessible by the public in the manner of their choosing; and:*

218. *The Forest Service should consider that all of the Forest should be open for multiple uses; and:*

219. *The Forest Service should consider that the Forest is for the people.*

Agency Response: Comments are acknowledged.

Maps, Signs

220. *The Forest Service should consider that there may not be adequate funds to sign all designated routes which will cause confusion for the public.*

Agency Response: The Forest is committed to allocating funds for on-the-ground signing efforts once the travel plan is complete. Education, including on-the-ground signing of routes and enforcement activities, will be accomplished through leveraging limited funds and personnel with partners and other funding. Although not required under the new travel rule, which states under Subpart A, 36 CFR 261.13 that the MVUM is the only requirement for enforcement of travel restrictions on the ground, travel route status will be signed on the ground to the greatest extent possible. It will also be the responsibility of the user to have and understand the motor vehicle use map displaying all of the open motorized routes on the Forest.

221. *The Forest Service should consider that signing open routes only could be very confusing to the public.*

Agency Response: The new national policy for managing OHV use on National Forest System lands establishes the same signing and mapping policy for all Forests across the nation, therefore making it less confusing. Once all Forests have completed the travel planning process, mapping for roads and trails will follow this policy displaying only open motorized routes.

The MVUM will be the legal document used to enforce the Travel Management Plan. This will be the case on all National Forests under the new rule.

222. *The Forest Service should consider other methods besides signing or gates to indicate that routes are closed.*

Agency Response: The Forest will continue to utilize some barrier rocks, gates, and berms to close off roads, but policy will state that only the posting of open motorized roads and trails, and production of a motor vehicle use map, available to the public, is required to enforce the closures. See response to Comments 218 and 219.

223. *The Forest Service should display the permitted boundary for the Brundage Snow Cat Program Special Use Permit.*

Agency Response: Special uses, including the Brundage Snow Cat permit, are addressed in Chapter 1 of the FEIS. No alternative is developed specifically for the Brundage Snow Cat permit. There are no other special use permit areas displayed on any of the maps and it would not be consistent to display the permitted boundary of only one of numerous special use permit holders. Alternatives B, C, D, and E all have winter non-motorized areas on lands within the permitted boundary for the Brundage Snow Cat operation.

224. *The Forest Service should consider that the “closed to motorized use unless posted open” policy is both agency and public friendly.*

Agency Response: Comment is acknowledged.

225. *The Forest Service should realize that having the MVUM map as the main public education tool and enforcement mechanism is not very user friendly.*

Agency Response: The Forest will continue to use signs to provide information and inform users. However, the Forest has found that posting routes as open or closed has often not been effective in controlling use. Signs have proven difficult to maintain, and are often subject to damage and vandalism. Therefore, the Agency has decided to place more responsibility on the user to obtain a copy of the MVUM and to remain on designated routes or designated areas displayed on the MVUM.

226. *The Forest Service should consider that better winter recreation maps showing topographical features are needed for the FEIS.*

Agency Response: The Forest is providing a Forest winter recreation map in the map packet accompanying the FEIS, and the Record of Decision, if different. However, to be manageable, these maps will still be at a large enough scale that fine detail, such as topographical lines, will not be displayed.

Game Retrieval

227. *The Forest Service should consider that the rules governing game retrieval are not clear in the DEIS.*

Agency Response: Changes to game retrieval distances apply to motorized use only. There are no proposed changes to any type of non-motorized methods of game retrieval including equestrian access and wheeled deer carts.

228. *The Forest Service should consider that some people are physically unable to retrieve game except by motorized means.*

Agency Response: There is no legal requirement to allow people with disabilities to use OHVs or other motor vehicles on roads, trails, and areas closed to motor vehicle use

when such access is not open to the general public. All hunters will be responsible for assuring that they are able to retrieve game that they have killed by authorized means.

229. *The Forest Service should not allow an exception for travel off-designated routes for game retrieval.*

Agency Response: While the national rule regulating motor vehicle use does allow for creation of corridors for game retrieval, use of this provision is not encouraged. The Regional Forester in Region 4 has determined that regional policy will not allow creation of corridors specifically for game retrieval. ID Fish and Game also does not support travel off designated routes for game retrieval.

Equestrian Use

230. *The Forest Service should consider that it is unclear if access to established trailheads for horse trailers has been maintained.*

Agency Response: No established developed recreational trailheads were eliminated under any alternative. Some unauthorized roads will not be designated for use, which could potentially eliminate some parking and informal trailheads along these routes. Popular dispersed parking areas were marked by the public and recreation resource specialists for retention as parking areas. They are shown on the FEIS maps for Alternative E.

User Education

231. *The Forest Service should be proactive in user education for the new travel management plan to be effective.*

Agency Response: See response to comment 232.

Enforcement

232. *The Forest Service should consider that the Selected Alternative will have to be enforced for it to be effective.*

Agency Response: The Forest is committed to proceed with education and enforcement of the

travel management decision using articles in the local papers, signing, extra on-site patrol, and by producing and making available maps of both summer and winter motorized designations. The Payette has recently recruited and filled a second law enforcement officer position. The Forest will also rely on continued cooperation with the Idaho Department of Fish and Game, the public, and local county law enforcement.

233. The Forest Service should consider that user groups may be willing to help with self-policing and enforcement of the new travel plan.

Agency Response: Forest staff acknowledge how important the use of volunteers and user groups will be to the success of the new travel designations. The Payette will encourage and rely on help from all users to implement the new designation decision.

234. The Forest Service should consider that most problems with illegal ATV use occur during hunting season and could be mitigated by stepping up enforcement at this time.

Agency Response: The Forest does have additional enforcement officers during hunting season. Typically the Idaho Department of Fish and Game provides help during this time of year. However, even with additional enforcement officers the Forest is too large to adequately patrol.

235. The Forest Service should consider that the Department of Fish & Game is authorized to help with enforcement during the hunting season.

Agency Response: The Payette acknowledges this role and works closely with the IDF&G during that time.

Trailheads/Parking

236. The Forest Service should analyze parking and trailhead management as a significant issue because existing locations are currently at full or over-full levels of use; and:

237. The Forest Service should consider that the increase in Forest visitors is leading to congestion and overcrowding at parking areas and trailheads, particularly in winter.

Agency Response: The scope of travel management planning on the Payette does not include trailhead and parking construction. The project is designed to designate a system of roads, trails, and areas for motorized use. New parking and trailhead facilities would be assessed in separate site-specific NEPA analyses, and will continue to be assessed in the future as the need arises.

238. The Forest Service should not analyze a parking facility on Smokey Boulder Road because adjacent private property owners are experiencing vandalism and trespass from forest visitors in the area already.

Agency Response: There are no proposals currently under consideration for any parking facility along Smokey Boulder road. If construction of a parking facility on the Smokey Boulder Road is analyzed by the Forest, public input will be solicited during the specific NEPA process. Comments and concerns about this potential facility are best directed to the Forest at that time.

Special Use Permits

239. The Forest Service should consider that it is not always understandable to the public that exemptions to the travel plan route designations can be made for special use permits and administrative use.

Agency Response: See response to comment 240.

240. The Forest Service should make it clear that holders of special use permits may be given motorized access if needed to carry out the terms of their permit.

Agency Response: The FEIS discusses how special use permits are handled and their relationship to travel planning. Any route or area needed to carry out a special use permit will be analyzed and, if deemed necessary, authorized under the permit.

Definable Boundaries

241. *The Forest Service should consider the CIRC proposal presented during scoping because it has the most identifiable and enforceable boundaries.*

Agency Response: Every effort has been made to place winter closure area boundaries on definable topographical landmarks. However, it is not always possible to meet this goal and stay within the desired area. Some signing will be needed for closure areas, regardless of the alternative selected. For instance, many closure areas abut the Forest boundary. Usually this boundary is not recognizable, particularly in winter when property tags may be buried in snow. The Central Idaho Recreation Coalition's (CIRC) proposal was considered in the development of both Alternatives B and D in the DEIS. However, other comments from other winter recreation groups were also taken into account.

242. *The Forest Service should ensure that areas designated for non-motorized use in winter have definable boundaries such as ridges.*

Agency Response: See response to comment 241.

Budget

243. *The Forest Service should not use the agency budget as a rationale for management.*

Agency Response: The Forest must consider the expected budget and funding trends when proposing changes in management. It would be misleading to the public if the Forest proposed management actions it is unlikely to be able to fund. Forest recreation and law enforcement funds are already stretched thin under the current travel plan. While partnerships and grants can make up for some budget shortfalls, it is unrealistic to expect these avenues to fund the Forest's primary recreation programs, including the trail maintenance, construction, and management of General Forest Areas across the Forest. General Forest Areas are dispersed recreation areas – dispersed camping

areas in the summer, and snowmobile play areas in the winter. See Chapter 3, Recreation, in the FEIS for a discussion of sources of funding and current recreation budget trends.

Land and Special Designations

Wilderness

244. *The Forest Service should consider that only a small percentage of the public uses wilderness and additional "de facto" wilderness areas that exclude motorized use should not be created.*

Agency Response: The Forest is not proposing to create any additional Recommended Wildernesses with the travel management proposals. In most cases, areas retain some level of motorized access, unless it did not exist prior to this analysis. In fact, portions of the Secesh and Needles Recommended Wilderness areas currently allow motorized use, including winter motorized use, and there are no plans to change this at this time.

245. *The Forest Service should consider paving a road through the middle of the Frank Church River of No Return Wilderness so that it can be enjoyed by many more people.*

Agency Response: Travel management within the Frank Church Wilderness of No Return was not within the scope of this project, nor was it included within the project area. Road construction of any kind is not permitted in Wilderness areas. Under the Wilderness Act, evidence of man or his activities is to be minimal or non-existent in designated Wilderness. Recreation is not the driving force behind Wilderness creation. The complete Wilderness Act of 1964 provides a definition and management rationale for Wilderness.

246. *The Forest Service should consider that the Frank Church River of No Return Wilderness provides ample non-motorized opportunities.*

Agency Response: Recreation is not the driving force behind the creation of

Wilderness. Therefore, management of non-motorized opportunities on the Forest rightly focuses on the non-Wilderness portion of the Forest. The following is a quote from the Wilderness Act of 1964: “A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor and does not remain. An area of wilderness is further defined to mean in this chapter an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;”

247. *The Forest Service should include the non-motorized trail opportunities available in the FCRNRW when displaying the alternatives.*

Agency Response: See comment response 246.

248. *The Forest Service should only consider the attributes associated with Wilderness through ROS designations.*

Agency Response: The Frank Church River of No Return Wilderness was not within the project area for this Travel Management Plan, thus this is outside the scope of this project.

Recommended Wilderness

249. *The Forest Service should reconsider the effects of snowmobile use on potential designation of recommended wilderness areas.*

Agency Response: The Forest has analyzed the effects of over-snow motorized use in the Secesh and Needles IRA. This analysis can be found in the FEIS, Chapter 2, Alternatives considered but eliminated from detailed study.

250. *The Forest Service should consider that any increase in, or the continued allowance of, motorized use in Recommended Wilderness areas could have a negative impact on their potential for future wilderness designation.*

Agency Response: Existing mechanical transport (which includes mountain bicycles) uses in recommended wilderness areas are allowed to continue, as provided for by the Forest Plan guidelines for recommended wilderness. The continued use as allowed so long as it does not degrade wilderness values, cause resource damage, or result in user conflict. (Forest Plan 2003: p. III-74: WRGU05). Forest Plan standard 1203 states that “No new motorized or mechanical uses will be allowed, except where these uses must be allowed in response to reserved or outstanding rights, statute, or treaty.” This direction has been further analyzed and clarified in the FEIS, Chapter 2, Alternatives considered but eliminated from detailed study.

251. *The Forest Service should consider that snowmobile use in recommended wilderness areas would not impact their future consideration for wilderness areas because the impacts of snowmobiles are not lasting.*

Agency Response: See response to Comment 250. While the direct effects of snowmobile use—noise, exhaust, tracks, and displacement of other uses—are temporary, there are also indirect effects that happen later in time or at a distance from the snowmobiling. And in the case of proposed wilderness, establishing a new use of a roadless area can decrease the area’s future suitability for wilderness designation. In addition, Payette Forest Plan direction is to not promote motorized or other non-conforming uses in proposed wilderness (Forest Plan 2003: III-74). The Plan allows existing mechanical uses of proposed wilderness provided it does not degrade wilderness values, cause resource damage, or result in user conflicts.

252. *The Forest Service should consider that only Congress can create Wilderness.*

Agency Response: The Forest is not proposing to create any additional Wilderness (or recommended Wilderness) areas with this travel plan action.

253. The Forest Service should defer any travel management decisions for Recommended Wilderness until the State of Idaho's Roadless Review process is complete.

Agency Response: Recently, the State of Idaho moved forward with recommendations for the management of Idaho's IRAs using the Petition of Governor James Risch: State Specific Rulemaking for Roadless Areas in Idaho, September 20, 2006.

In the petition, the Governor's Office states they received both county and individual recommendations to form their guiding principles. Generally these themes outline basic management activities that may or may not occur within a given IRA.

The "Idaho Roadless Area Themes" developed by former Governor Risch recommended the entire Secesh and Needles Recommended Wilderness areas for designations of "Wild Land Recreation" – Management Theme 1.

This theme designation is the most restrictive of all recommendations with the exception of already designated Wilderness, which is listed as "Primitive".

Management Theme 1 "Wild Land Recreation" emphasizes:

- A desired future condition that will continue to show little evidence of historical or human use.
- That natural process of the area will continue to predominate, which will allow visitors to enjoy the same type of primitive recreation opportunities they found in the past.
- Areas will be managed to protect the wilderness characteristics and primitive recreation opportunities of the area if and until Congress exercises its authority pursuant to the Wilderness Act to formally designate the area as "Wilderness".

In regards to motorized travel Theme I preserves currently existing routes and class of vehicle, but recognizes the potential for further limitations through National Forest Travel Planning.

The Governors Petition treats the recommended Wilderness with almost identical protection as the Forest Plan under this MPC.

The Governors public involvement efforts further affirm the Idaho publics desire to keep these areas as they are. .

Social and Economic

Economics

254. The Forest Service should complete a more thorough economic analysis using studies such as the one funded by ISSA in 2005.

Agency Response: Because none of the alternatives in the FEIS limit numbers of users entering an area, it is speculative to analyze an economic effect with the different alternatives. A negative impact to snowmobile use could positively affect non-motorized use, and balance out any expected economic changes. Several economic studies were reviewed for both motorized and non-motorized economic benefits. See the FEIS section responding to the need for an economics analysis in Chapter 1 "Non-significant issues". Additional citations for local economic studies, including ISSA's study, have been reviewed and are listed in the references section.

255. The Forest Service should consider the socio-economic value of Forest recreation, both motorized and non-motorized, on the local community.

Agency Response: The Forest did analyze the socio-economic impacts of travel management in the DEIS, Chapter 1, Section 1.10.2 Non-Significant Issues. Additional analysis can be found in the same section in the FEIS.

256. *The Forest Service should consider the economic analysis done for the Forest Plan and make sure it is consistent with any analysis done for the travel management plan.*

Agency Response: While the overall trend for number of recreation jobs and amount of income created by Forest Service recreation in local communities is predicted to rise over the course of this decade, the percentage contribution of recreation jobs and income to the total economy is relatively stable. (USDA Forest Service 2003a: FEIS Vol. 3: p. 3-957). There was no analysis done assessing potential shifts over time in the type of recreation conducted on the Forest.

257. *The Forest Service should draft a comprehensive plan for commercial recreation use on the Forest.*

Agency Response: Comment noted. This suggestion is more extensive and outside the scope of travel management planning.

258. *The Forest Service should take into account that the backcountry skiing industry has grown by 300 percent in the last year.*

Agency Response: Almost all recreation sectors have experienced growth in the recent past. Refer to Chapter 1 in the FEIS for a discussion of the role of economics and recreation on local communities and businesses.

259. *The Forest Service should consider that having a variety of recreation opportunities on the National Forest is best for the local economy.*

Agency Response: The Forest does consider a variety of recreation opportunities as important for the local economy and the Travel Plan strives to provide a diversity of opportunities in concert with maintaining resource values. See Chapter 1 of the FEIS for a discussion of the role of economics and recreation on local communities and businesses.

260. *The Forest Service should consider that money isn't everything, and that even recreation opportunities that generate little local income have value.*

Agency Response: Comment acknowledged.

Pollution

261. *The Forest Service should consider the effects of snowmobile pollution on water quality.*

See Section 1.10.2 Non-Significant Issues in Chapter 1 of the FEIS. This non-significant issue is discussed under Effects of Snowmobile Use.

262. *The Forest Service should consider that more snowmobilers are using new technology to reduce noise and pollution by their machines.*

Agency Response: Comment is acknowledged. New technology is beneficial in some respects to motorized and non-motorized users and may be a factor in selection of a travel plan alternative.

Noise

263. *The Forest Service should consider that it is currently difficult for non-motorized winter recreationists to find an area without snowmobile traffic on the Forest.*

Agency Response: The Forest has taken this into consideration and this is one of the reasons action alternatives all propose additional closures to over-snow motorized use. See Chapter 2 in the DEIS and FEIS for a description of proposed winter closures.

264. *The Forest Service should not allow more motorized use so that the quiet in the Forest is preserved.*

Agency Response: The Forest recognized the need to provide for a non-motorized winter recreation experience, and analyzed different options for providing for that opportunity in the DEIS and FEIS.

Health & Safety

265. *The Forest Service should consider that snowmobile use in the Brundage SnowCat program special use permit area is incompatible because of the potential for unsafe conditions.*

Agency Response: See response to Comments 194 and 195.

266. *The Forest Service should reassess the safety of heavily used trails where motorized and non-motorized users mix; and:*

267. *The Forest Service should give the issue of safety more discussion in the DEIS; and:*

268. *The Forest Service should consider that snowmobiling and skiing do not mix because of safety issues.*

Agency Response: Although this tendency may be true in some cases, the degree of compatibility between the two uses varies on a site-specific basis. The alternatives provide for different degrees of mixes of the uses and safety is addressed as a primary issue under all alternatives in Chapter 3: Recreation.

Conflict of Uses/User Conflict

269. *The Forest Service should consider that the snowmobile community has worked with both Brundage Mountain Ski Resort and the Tamarack Resort to reduce the user conflicts occurring between their patrons and snowmobilers.*

Agency Response: The Forest acknowledges that good work has been done to date to reduce user conflicts, and anticipates that this education, signing, and relationship building will continue. The Forest also recognizes that to address the concerns of the non-motorized community, an analysis looking at some potential land use allocations for non-motorized winter recreation was necessary.

270. *The Forest Service should consider that back country skiing and snowmobile use are usually not compatible.*

Agency Response: Although this may be true in some cases, the degree of compatibility between the two uses varies on a site-specific basis.

271. *The Forest Service should consider that many user groups, including the BackCountry Horseman, are willing to work with other recreation user groups to reduce use conflict.*

Agency Response: Comment noted and the Payette thanks you for your response. The Forest will look for your support during the implementation stage of the travel plan.

272. *The Forest Service should consider that decreasing the area available for both motorized and non-motorized recreation will increase user conflict; and:*

273. *The Forest Service should consider that user conflict is relatively isolated; and:*

274. *The Forest Service should consider that conflict between recreational uses has incorrectly been identified as a significant issue; and:*

Agency Response: See response to Comments 22, 0, 176, 177, and 190

275. *The Forest Service should consider that OHV use during hunting season causes conflict between hunters.*

Agency Response: See analysis presented on conflict with hunting and OHV users, Chapter 3, Recreation.

