APPENDIX E - RESPONSE TO COMMENTS - SUMMARY

FINAL ENVIRONMENTAL IMPACT STATEMENT

UPPER & LOWER EAST FORK CATTLE AND HORSE

ALLOTMENT MANAGEMENT PLANS

INTRODUCTION

The *Draft Environmental Impact Statement: Upper & Lower East Fork Cattle & Horse Allotment Management Plan (DEIS)* was released in April, 2003. Comments on the DEIS were solicited from the public and other agencies during a 45-day period (April 7, 2003 – May 30, 2003) following release of the document.

During the comment period, 212 comments were received. (12 additional comments were received after the formal comment period closed.) These comments were recorded as they arrived, and after the comment period closed they were reviewed for content. Individual comments were extracted and categorized. Subsequently, all the individual comments were provided to the appropriate members of the interdisciplinary (ID) team assembled for the project so that they could draft responses. Once the ID team responses were complete, the entire range of comments and responses was re-compiled and synthesized into the summary form presented in this document. A list of letters received, by respondent, and letter number, is included in Table 1 below. The comment letters, the log of commentors, and the compilation of individual comments and responses are included in the project record.

Table 1.
Respondents to the DEIS – Upper & Lower East Fork C & H Allotment Management Plan

Name	Organization	DEIS INPUT #
Leland G. Heinrich	Valley County	1
Gene E Bray		2
Fritz R Dixon M D		5
Paul Belzer		6
Roland and Joyce Rovetto		7
Attn: Mike Mathews,		
Regional Director	Senator Larry Craig	8
Attn: Laurel Hall		
Natural Resources	Congressman Mike Simpson	8
Melvin & Glenda Christian		9
Ginger Harmon		10
G. Callie	New Mexico Cattle Grower's Assoc.	11
David and Kathy Richmond	Friends of the West	12
Scott Phillips		13

Marilyn Martin		14
Mickey Garcia		15
Joanie Fauci		16
Bill Hughes		17
William Lowe		18
Susan Rahmann / Patrick Csizmazia		19
Gloria		20
Lindy Cogan		21
Jeanne & Tom Liston		22
Vanessa Crossgrove	Environmental Resource Center	23
Chuck Pezeshki		24
George Wuerthner		25
Lois Tulleners		26
Shayne Vinagre		27
Jan Nissl		28
Matt Bullard		29
June Heise		30
Brian Emerick		31
Diane French		32
Kat Mills		33
Bill Holland-Smith		34
Stephen Gerrish		35
Dean Miller		36
Susan Kerins		37
Stephanie Wicks		38
Dick Ringelstetter		39
Borg Hendrickson		40
Melissa Wintrow		41
Alan Reynolds		42
Steve Wolper		43
Jack Rose		44
Michele Slaton		45
Anne Zauner		46
Steve Pauley		47
Richard Artley		48
Ellen Glaccum		49
Terry Rudd		50
Margaret Fuller		51
Lois Glenn		52
Darcie & Michael Clair		53
Jeffrey & Jill Glenn		54
John Whitecraft		55
Sandy Vail		56
Dan Mansfield		57
Mary Fran Groll & Bill Hendrickson		58
Ted Chu		59
Leslie Conner		60
Bob Gregg		61
Gerald A Jayne		62

Tom Chelstrom		63
Beth Duke		64
Jacqueline Ellers		65
Doug & Sheryl.Harvey		66
Ann Nosworthy		67
Laird, Joy, & Ian Erman		68
Rob Thornberry		69
Fred Rabe		70
Linda Porasso		71
Jonathan Ratner		72
Steven Glow	Salish Kootenai College	73
Mr. & Mrs. J.L. Denison		74
Dan Gilmore		75
Dan Durham	Environmental Resource Center	76
Steve Bruce		77
Douglas, Marcia Lee, and Karl Berg		78
Sandra Hyde		79
Kaz Thea	Alliance for the Wild Rockies	80
Steven & Helen Rayshick		81
Christopher Cook		82
Idaho Dept. of Parks & Recreation		83
Sydney & Karen Dowton		84
B.I. Friedlander		85
Jan Harold		86
Brian Brown		87
Tryg Sletteland		88
Barry Braden		89
Rick Hobson		90
Kelley Mitchell Pedigo		91
Mark M. Giese		92
Veronica Egan	Great Old Broads for Wilderness	93
Jason Rasco	Pacific Northwest Academy	94
Jack Doolittle		95
John M. Zebutis		96
Bob Brister		97
Tim Lengerich		98
M. Keene Hueftle		99
Jerome K. Fulton		101
Sue M. Setscik		102
Ken W. Bosworth		103
Barbara & Robert Dargatz		104
Andrew R. Walters		105
Gary E. Richardson		106
Barbara Warner	Marion County Water Watch	107
Eugene Krebsbach		108
Mark Solomon		109
Julian Hatch	Boulder Regional Group	110
Kay Merriam		111
Connie Jeffcoat		112

Vince Lowe		113
Paul Edwards		114
Robert Blair		115
Elaine French		116
Jan Swanstrom		117
Kitlyn Rescinito		118
Preston Sleeger	U.S. Dept. of Interior	119
George & Frances Alderson		120
Jeannette Bowman		121
Larry Barnes		122
Shelli Mittman	Jarvis Group Architects	123
Rebecca Wiegand		124
Harris Bros.		125
Sheila Boester		126
Kim Mazik		127
Natalie Carew		128
Chris Johnson		129
Mike Murphy		130
Lindy Crea		131
John Robison	Idaho Conservation League	132
Jennifer Robbins Smith		133
Steven Lysne		134
Seth Horstmeyer		135
Tom Davis		136
Mark Elbroch		137
Pam Hawes		138
J.K. Smithstone		139
William D. Arvey		140
Alan C. Gregory		141
Bill Leavell	Idaho Rocky Mountain Ranch	142
Blaine County Commissioners		143
Jeff Enos		144
Roger Elmore		145
Mari Wania		146
Dan Daigh		147
Steve Cote	National Resource Conservation Service (USDA)	148
Christopher Kuntzsch		149
John Tanner		150
Anne Hayden		151
Jeanine Brandeis		152
Diana J. Landis		153
Rosemary Lowe		154
Kate & Steve Power		155
Roy Heberger		156
Stew Churchwell		157
Nils A. Ribi		158
Steve Lowe		159
Carl & Patricia Olsson		160

Dale Grooms		161
Ralph Maughan		162
Edward Bottum		163
Marge Carmichael		164
Karen Davies & W.H. Shillington		165
Jon Marvel	Western Watersheds Project	166
Lahasha Johnston	The Wilderness Society	168
Richard Curtis		171
Ryan Still		172
Andy Harding		173
Leah Marie Holce		174
Oralie McAtee		175
Dick Meyer		176
Richard B. Meyer		176
Clee Sealing		177
Debra K. Ellers		178
Bob Jonas		179
Jorge Andromidas		180
Lynne Stone	Boulder-White Clouds Council	181
Linn Kincannon	Idaho Conservation League	182
Dave Nelson	Idaho Cattle Association	183
William Brailsford	Flying Triangle Inc.	184
James L. Caswell	Office of Species Conservation	185
David R W Hoefer		186
Dave Hoefer		186
Randy Long and Michelle		187
Karen Klitz		188
Tim Thomas		190
Gretchen E. Dale		191
Jim Nelson and Linnea Matson		193
Lin Hintze	Custer County Commissioners	194
Tim Sedgwick		195
John R Swanson		196
Eddie & Lura Baker	Baker Ranch Partnership	197
Richard & Betty Baker		198
Wayne & Melodie Baker		198
Steve Munson		200
Don Wiseman		201
Lu Warner		202
Ashley Korenblat		204
Randall French		205
William Pryor		206
Ralph Harris		207
Ron and Cynthia Slaton		208
T.J. Morris		209
Greg Burak		210
Linda Davis		211
Pat Beattie		213
Jane Beattie		214

Robert and Marilee Johnston		216
Rick Colwell		217
Patrick A. Takusugi	Idaho State Department of Agriculture	218
Mary Sealing		219
Dan Robbins		220
Ashley Greene		221
Steven M. Deffe		222
Judith Leckyone Lee	Environmental Protection Agency, Region 10	223-L
Gerald Orcholski		224-L
Dr. Donald W. Johnson		100 / 199a/ 199b
Louise Wagenknecht		170a / 170b
Rob Jonas		192a / 192b
Steve Willer		203a
203b		
Gary & Jackie Ingram		212-L
Christopher Simms		215-L
Eddie Jr. & Lura Baker		3 / 197
Rachel Thomas		4 / 189

Commentors identified 13 main categories of issues, as summarized in Table 2. Some of the larger, more complex issues have been broken down into Categories. Following the table, the specific comments in each issue category are summarized in bullet form, followed by the agency's response. Letters that raised a given issue or Category are noted. Table 2 also notes the page number where each issue/Category is addressed in this document.

Many of the issues raised are interrelated, creating a high potential for redundancy in the responses. We endeavored to reduce repetition by cross-referencing responses where appropriate.

Table 2. Description of issues and Categories identified in the comment letters

Issue Number and Category		**Category and Description**	
1	Economics	1a	Economic Impacts to Permittees
		1b	Compensation to Permittees (permit right/privilege)
		1c	Economic Impacts - General
2	Livestock Management	2a	Range Improvements (Fences, Water Troughs, Exclosures, etc.)
		2b	Permit terms/ compliance / grazing impacts
		2c	Grazing Systems
		2d	Capability / Suitability
3	Wildlife	3a	Wildlife - General
		3b	Wildlife – Bighorn Sheep
		3c	Wildlife - Wolves
		3d	Wildlife - ESA
4	Fisheries	4a	Fisheries - General

		4b	Fisheries – Threatened & Endangered
5	Vegetation	5a	Vegetation (native & non-native) Impacts
		5b	Stubble Height / Forage Utilization / Forest Plan standards
		5c	High alpine communities / Railroad Ridge
		5d	Riparian & Wetlands / seeps
6	Soils/Water	6a	Soils / erosion
		6b	Water Quality / Hydrology
7	SNRA	7a	PL 92-400 / General
		7b	Substantial Impairment
		7c	Multiple Use
		7a	PL 92-400 / General
8	Recreation	8a	Impacts / Enjoyment
		8b	Hunting
		8c	Wild landscape / Wilderness character
9	NEPA Process/DEIS	9a	Purpose & Need
		9b	Issues
		9c	Proposed Action & Alternatives
		9d	NEPA – Miscellaneous
		9e	Supporting Data & Monitoring / Bias
		9f	Effects
10	Wildfire/Fuels		
11	Access/Motorized		
12	Ecosystem / Watershed		
13	Miscellaneous	13a	Education / Interpretation
		13b	Restoration of damaged sites
		13c	Request for more information
		13d	Use of electronic mail / mailing lists
		13e	Collaboration
		13f	Miscellaneous
99	Non-Issue: Supports or Opposes an Alternative	99	Supports Alternative 1 Opposes Alternative 1 Supports Alternative 2 Opposes Alternative 2 Supports Alternative 3 Opposes Alternative 3

Per 40 CFR 1503.4 "Response to Comments", all substantive comments received on the draft statement (or summaries thereof where the response has been exceptionally voluminous), should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement. Due to the volume of comments received, we have chosen to compile a summary of the comments raised during the Draft EIS comment period. The original comments received and the complete "response to comments" can be found in the Project Record.

Comments that noted or supported/opposed an alternative (Non-Issue 99) are not discussed in the Response to Comments as those are considered opinions. The Decision-Maker has read all the comments.

Issue 1: Social/Economic

Category 1a: Economic Impacts to Permittees

Public Comment 1a.1
Support cooperation with existing users, including gradual phase out, to allow time to find alternative solutions including alternative pastures so ranchers can maintain an economically viable operation. Hope that you have considered how new restrictions and regulations will affect the permittees and the economic viability of their operations.

Associated Letters: 1, 33, 50, 81, 89, 92, 155

Response: Economic effects to permittees were considered and displayed in the EIS. Efforts have been made to work with alternative management operations and the decision allows for flexibility in management. Alternative pastures are extremely limited as are options for other pastures during phase-out.

Public Comment 1a.2
If ranchers cannot afford to have their own land they cannot afford to have their own cattle. They need to find something else as many of us have had to at least once in our lives.

Associated Letters: 118

Response: Thank you for your comment. Your opinion is noted for the Decision-Maker.

Public Comment 1a.3
The need for permittees to make a living does not outweigh the need to preserve healthy environments and recreation opportunities. The unique qualities of the area need the opportunity for full recovery.

Associated Letter #'s: 123, 138, 186, 178

Response: Thank you for your comment. Your opinion is noted for the Decision-Maker.

Public Comment 1a.4
The concerns of the permittees should be given the most attention, they have years of experience managing the lands.

Associated Letter #s: 183

Response: The National Forest Management Act and National Environmental Policy Act require that we listen to and consider equally the concerns of all shareholders of the National Forest System lands.

Public Comment 1a.5
A reduction in permitted numbers will require permittees to make a choice between ranching on their own private lands with higher concentrations along the East Fork of the Salmon River or to subdivide, either of which may be more impactive to SNRA values than current grazing.

Associated Letter #s: 183, 194, 197, 212-L, 218-L

Response: We recognize that there is a potential for subdivision of those lands if grazing if phased out. This was disclosed in the EIS under the economic - Indirect Effects. We also recognize that there is a potential for increased impacts to private lands along the East Fork of the Salmon River. This was disclosed in the EIS in Chapter 4 – Environmental Consequences.

Public Comment 1a.6
The decreases associated with Alternative 2 will make grazing impractical, the EIS should more fully discuss the economic impacts to permittees.

Associated Letter #s: 218-L, 223-L

Response: Economic effects to permittees were considered and displayed in the EIS. NEPA requires socio-economic effects to be considered only if they are related to a "primary" effect on, or are a sufficient nexus to, the physical or biological environment.

Public Comment 1a.7
Permittees should be given one more chance to manage cattle more effectively through a reduction in numbers. If that makes grazing on the allotments unprofitable, then do not graze there any longer.

Associated Letter #s: 31

Response: Thank you for your comment. Your opinion is noted for the Decision-Maker.

Category 1b: Compensation to Permittees (permit right versus privilege)

Public Comment 1b.1
No compensation should be given to the permittees.

Associated Letter #s: 5

Response: Consideration for compensation is beyond the scope of this project.

Public Comment 1b.2
Consider buy-outs to compensate permittees and protect natural resources, including wildlife needs and recreation values of the White Clouds.

Associated Letter #s: 21, 47, 61, 81, 87, 104, 106, 107, 110, 121, 124, 136, 141, 142, 143, 146, 155, 160, 162, 175, 178, 181, 188, 192, 193, 211, 219

Response: Permit buyouts as an option is beyond the scope of this project.

Public Comment 1b.3
Grazing in this area does not serve the public interest. Ranching on public land in this area should not continue to be supported by the American taxpayer.

Associated letters: 124, 175, 188, 215-L

Response: Thank you for you comment. Your opinion is noted for the Decision-Maker.

Category 1c: Economic Impacts – General

Public Comment 1c.1
Any restriction of activities can create a ripple effect in the local economy. Hope that the reductions being proposed will not penalize the permittees to the point that they cannot continue to operate. The vast majority of the county land is under Federal management.

Associated Letters: 1, 8

Response: We recognize that a majority of the County is in Federal ownership as displayed in the EIS. As is indicated in Chapter IV, 1/3 reductions proposed may result in one or more of the permittees no longer being able to operate. We also recognize that this loss will have economic impacts to the local economy.

Public Comment 1c.2
The Federal government through one agency or another has purchased, condemned or trespassed almost all of Custer County. Five percent private land does not create enough tax revenue to support a county.

Associated Letters: 7

Response: We recognize that a majority of the County is in Federal ownership as displayed in the EIS. The County does receive compensation through "Payments in Lieu of Taxes" (PILT) program and the "Secure Rural Schools and Communities Self-Determination Act of 2000" Program. The relationship between counties and the Forest Service is an important one, in part because of economic benefits that the counties receive directly from federal land managers. These direct benefits are linked to two specific funds:

The Secure Rural Schools and Community Self-Determination Act of 2000 - The Secure Rural Schools and Community Self-Determination Act of 2000 (Public Law 106-393) was signed into law on October 30, 2000. This law was enacted "to restore stability and predictability to the annual payments made to States and counties containing National Forest System lands and public domain lands managed by the Bureau of Land Management for use by the counties for the benefit of public schools, roads and other purposes for fiscal year (FY) 2001 through 2006 (October 1 – September 30).

Before Public Law 106-393 was enacted, the Forest Service returned 25 percent of revenues from the sale of forest products and permitted operations to counties which contain National Forest System land, through the "25 Percent Fund Law of 1908." The amount that a county received from each National Forest's 25 percent fund was proportional to the percent of the Forest located in that county. State regulations stipulated that 70 percent of the funds were to be used for public roads, with 30 percent used to fund public schools.

Under Public Law 106-393, counties will have the option of continuing to receive payments under the 25 Percent Fund Act, or electing to receive their share of the average of the three highest 25 percent payments made to the State during the period of FY 1986 through FY 1989 (the "full payment amount").

Payments in Lieu of Taxes - Counties also receive payments from the Federal Government based on the Payments in Lieu of Taxes (PILT) Act of 1976. PILT is a federal revenue-sharing program designed to compensate local governments for the presence of tax-exempt federal lands within their jurisdiction. PILT payments are *not* linked to revenues generated by the sale of National Forest products or permitted activities.

The Act authorizes payments under one of two alternatives, based on the acres of qualifying federally managed acres ("entitlement acres") within the county, subject to a payment ceiling based on county population. The amount paid to the county is the higher of two alternative calculations. However, PILT payments are appropriated each year by Congress, and actual payments may be less than those calculated.

Public Comment 1c.3
Alternatives 2 & 3 will be just letting Captain Marvel and his band of enviroterrorists call the shots. If you decide this issue out of fear of his lawsuits than you can look forward to the time when Custer County is all Federal lands.

Associated Letters: 7

Response: Your opinion is noted. The Rescissions Act and FS manuals require that allotment management plans be evaluated and updated through the NEPA process as is being done for these allotments. As stated in Chapter 1, "Decision to be Made", our primary objective is to determine if grazing should be continued, and if so, under what circumstances.

Public Comment 1c.4
Implementing Alternative 3 would result in lasting improvement on the ground and would result in considerable savings to the tax-paying public.

Associated Letters: 12

Response: We can neither dispute or support the comment that Alt. 3 would result in considerable savings to the tax paying public.

Public Comment 1c.5
The economics of grazing on public lands does not compute. The Federal Government has NO obligation to artificially prop up economically unsustainable business operations.

Associated Letters: 13

Response: The Federal Government "artificially propping up" operations is outside the scope of the analysis and not something the FS will discuss in the FEIS.

Public Comment 1c.6
Recreation uses and natural resources are more valuable to Idaho than ranching and can provide more income. Diminishing these values can result in economic impacts.

Removal of grazing from the SNRA in a consistent and fair manner can increase contributions to the economy of Idaho through visitors to the area.

Preservation of our natural resources for the enjoyment of recreational users and protecting wildlife habitat, high alpine lakes, water quality and meadows are the highest and best use of public lands.

Associated Letters: 19, 35, 110, 143, 162

Response: Thank you for you comment. Your opinion is noted for the Decision-Maker.

Public Comment 1c.7
Federal AUM rates are set too low there by subsidizing permittees.

The receipts of $1.35 per AUM do not come close to compensating for the destruction of public resources and wildlife.

Associated Letters: 36, 56, 66,160, 165, 178

Response: Grazing fees are outside the scope of this FEIS. Grazing fees are calculated in accordance with Executive Order No. 12548, dated February 14, 1986. The Executive Order specifies that the fees shall not be less than $1.35 per month in any grazing year.

Public Comment 1c.8
The administrative cost of public lands grazing is greater than the revenue generated. These costs may well be compounded further by long-term damage done to the ecology of the lands used for grazing, forcing greater expenditures later.

The cost to administer these allotments exceeds revenue by a factor of at least 20. The cost to the environment and to the Federal treasury far outweigh the benefit of continued livestock grazing

Associated Letters: 90, 95, 96, 97, 104, 109, 110, 114, 115, 140, 154, 158, 161, 174, 200, 215- L

Response: We do not have data available that shows cost to administer versus revenue generated is at least a factor of 20. We agree that administrative costs of public lands grazing, like other programs such as recreation, exceed the revenue generated. However, the "Multiple Use and Sustained Yield Act" provided for grazing and Congress sets the grazing fees.

Public Comment 1c.9
The money taxpayers lose in the administration of subsidized cattle ranching would be better spent improving wildlife habitat.

Associated Letter: 122

Response: Thank you for you comment. Your opinion is noted for the Decision-Maker.

Public Comment 1c.10
The vast majority of America's beef comes from private lands. We do not need public land beef. Do not compromise the integrity of the remaining public lands for a few ranching operations.

Associated letters: 134, 135

Response: Thank you for you comment. Your opinion is noted for the Decision-Maker.

Public Comment 1c.11
Recreation is one of the areas biggest industries and grazing threatens the long-term survival of this industry in the Sawtooth region.

Associated letters: 135

Response: We recognize that there are conflicts between livestock use and recreationist. Alternatives were developed to address these conflicts. However, we do not have data available showing that grazing is threatening the survival of the recreation industry.

Public Comment 1c.12
A partnership should be developed to assist Custer County in mitigating economic losses associated with loss of annual earnings.

Associated Letters: 143

Response: There are numerous opportunities for partnership with Custer County. Resource Advisory Committees (RAC) were implemented by the Congressional Delegation. Custer County Commissioners are members of a RAC. One of the roles of the RAC is to make decisions as to where the PILT dollars go and what projects are to be implemented.

The Idaho Department of Commerce has opportunities and staff in place to assist counties and cities in job replacements for individuals. They also have the Idaho Gem Community Program that also assists local cities and business owners to do various business ventures.

The Forest Service Rural Community Assistance Program has been used by the cities and the county of Custer and they have implemented various projects since its inception in 1990.

The USDA Natural Resources Conservation Service RC&D program, of which Custer County is a sponsor, can also assist them in grant writing and research into projects that any Dept. of Agriculture assistance may be needed for local farmers and ranchers.

Public Comment 1c.13
Regulations that put teeth into violations of range and wildlife and riparian degradation could work if for every violation a permanent and corresponding decrease in cattle numbers and range allotment were implemented.

The taxpayer shouldn't have to pick up the tab for continual monitoring for compliance, especially when these leases return so little to the treasury and local economy.

Associated Letters: 87, 162

Response: Regulations at 36 CFR 222 provide for administration of grazing permits. Procedures for non-compliance are established in Forest Service Manual and Handbook direction.

Public Comment 1c.14
Permit actions following violations of permit terms and conditions will continue under Alternative 2 as they have in the past. The volatility of the permits will remain and the possibility of livestock grazing as contemplated continuing as an economic activity is approximately 0. The final EIS must better analyze the economic feasibility of Alternative 2, which can only result in the ranch operations failing for economic as well as environmental reasons.

Associated Letters: 166

Response: The Forest Service respectfully disagrees. Alt. 2 incorporates management standards, direction, and improvements, decreasing the potential for future permit violations and subsequent permit actions.

Public Comment 1c.15
The statement that agriculture and related activities provide the major economic base for Custer County is incorrect. Urge you to check the Sonoran Institute's "Working Around the White Clouds" which shows that the largest employment sectors were Services and Professional (44%) and Government (18%)

Associated Letters: 181, 188, 203

Response: We did review the Sonoran Institute's report. We do agree that, as displayed in the Institute's report, agricultural and related activities may not be the major economic base for Custer County, but is one of the major economic bases. Chapter 3 of the FEIS has been updated to incorporate this change.

Public Comment 1c.16
The proposed actions of this document is not in compliance with the "Small Business Regulatory Enforcement Fairness Act of 1996".

Associated Letter: 189

Response: The Forest Service respectfully disagrees. Chapter IV of the FEIS includes and analysis of effects of the proposed action and alternatives.

Public Comment 1c.17
The negative impacts from permittees subdividing lands can be diminished through the efforts of Custer County if they wish to zone or include conditions on the subdivision.

Associated Letters: 186

Response: We agree. Custer County has the authority to determine the private land zoning.

Public Comment 1c.18
The EIS failed to adequately consider economic impacts. Any changes in these allotments along with several other allotments on the Sawtooth National Forest will have cumulative effects on the local economy. The Forest Service fails to provide information either on the cumulative impacts or the connected actions that the proposed actions will have on the permittees, the counties, and the surrounding region. Some examples of cumulative impacts that the agency must consider are:

- the economic impact to counties as livestock are systematically removed from these and other allotments throughout the region.
- the possibility that the permittees may be driven out of business.
- the very real possibility that may or all federal lands grazing permittees in the region may be incrementally driven out of business.
- the cumulative effect on local economies, schools, tax base, etc, from not only the losses of these allotments, but from the loss of employment, taxes, etc, from neighboring allotments

Associated Letter: 189

Response: NEPA requires socioeconomic effects to be considered only if they are related to a "primary" effect on, or are a sufficient nexus to, the physical or biological environment. The DEIS and FEIS did consider the potential impacts the proposed action and alternatives to the county and permittees. The DEIS nor the FEIS do not consider the impacts of systematic removal of livestock from other allotments through out the region as we do not feel this is a reasonable foreseeable action.

Public Comment 1c.19
The economic value of maintaining ranching is important not only to permittees but to Custer County and its tax base as well. The loss of even one cow has a dramatic effect on the revenue stream for the county.

Associated Letters: 194, 198

Response: We agree that maintaining ranching is important to both the permittees and Custer County. Further, we do recognize that the proposed reductions will have an economic impact on the permittees and the County, and has disclosed those effects in Chapter 4 of the FEIS.

Public Comment 1c.20
To say that livestock grazing strategies may not be cost effective to the federal government is misleading. Need to consider benefits associated with grazing such as fire minimizing with the reduction of fuel grasses, water developments installed and maintained by ranchers, trails cleared by ranchers, etc.

Associated Letters: 198

Response: Your opinion is noted. The cost effectiveness of livestock grazing is beyond the scope of this document.

Public Comment 1c.21
Recreational use is not cost effective for the federal government but there is only mention of increased use by recreationalists, no discussion of limiting use.

Associated Letters: 198

Response: The economics of recreation use on National Forests is beyond the scope of this document.

Public Comment 1c.22
Recreation provides some jobs in Custer County but are minimum wage and seasonal. As recreation increases, so do demands on EMTs, law enforcement, fire departments etc. and costs go up. Studies show that recreationists do not spend much money in the counties they recreate in.

Associated Letters: 198

Response: We concur and recognize this in the EIS.

Public Comment 1c.23
We agree with the negative impacts outlined in the EIS. We disagree that there are any realistic beneficial effects from grazing other than financial to the permittees.

There was no explanation as to what the figures in the Social/Economic tables mean or how they were obtained.

Associated Letters: 203

Response: Citations have been added to those tables missing them in the FEIS.

Public Comment 1c.24
II-18 - The dollar amounts listed in the table consisting of Social and Economic factors do not seem to vary by a great amount. The EIS should explain these figures and where the funds would come from to generate the $125,000 in Alternative 3.

Associated Letters: 223-L

Response: Chapter 3 of the EIS includes an analysis of estimated income to the community of Challis from livestock operations on the SNRA. The changes by alternative reflect reductions in estimated income based on reductions in permitted numbers. The 125,000 in Alt. 3 is income generated from grazing on the remainder of the allotments within the SNRA.

Public Comment 1c.25
Take exception to public lands ranching as a general position. Public lands ranching in general is a shameful waste of public resources, public resources are being use irresponsibly at the taxpayer expense, resources are being depleted and mismanaged, private land ranchers are put at a competitive disadvantage…

Associated Letters: 66

Response: Thank you for you comment. Your opinion is noted for the Decision-Maker.

ISSUE 2: LIVESTOCK MANAGEMENT

Category 2a: Range Improvements (Fences, Water Troughs, Exclosures, etc.)

Public Comment 2a.1
Regardless of the Alternative selected, exclosures should be immediately established over the entire leasing operation before any further grazing is allowed. Using the available existing fencing, starting right now, there should be an exclosure of at least one acre established on every square mile, specifically including some riparian areas, with a cow proof fence on half the acre, and a deer, elk, mountain sheep, and cow proof fence placed around the other half acre so the different effects of cows, and other wildlife can be regularly photographed and recorded. An alternative would the 16 foot square exclosures using 16 foot ranch panels with one or two over the top. The responsibility for maintaining the exclosures should be the lessees.

Associated Letters: 5

Response: An appropriate monitoring plan will be established to assess livestock grazing impacts.

Public Comment 2a.2
Under no circumstances should any water developments or fences be removed even if the eventual outcome is the elimination of grazing permits within the area. Allowing the fences and improved structures to remain will allow for future grazing and land management in the event of National

emergencies and food safety issues or instances like mad cow disease, extensive drought in the U.S., or other unforeseen problems.

Associated Letters: 6

Response: The type of fencing that could be constructed under Alt. 1 and Alt. 2 will be consistent with the values under which the SNRA was established. Depending on the location, fence styles may range from standard wire fences to log and pole structures. Alt. 3 is the only alternative calling for removal of range improvements and your opinion on maintaining range improvements and future needs is noted for the Decision-Maker.

Public Comment 2a.3
The public does have a clear interest in the maintenance (and restoration) of these lands to support wildlife, fisheries, and recreational and scenic values. "Improvements" such as fences and troughs do not serve wildlife but form hazards to their movements or well-being. Troughs, for instance, draw wildlife to an area that may have insufficient or inappropriate forage and cover, and they create new areas of heavy livestock impacts. You shut off the grazing and I'll have groups of people volunteering their time and money to remove all the fences you can find.

Associated Letters: 161, 188,

Response: Thank-you for your comment. Your opinion is noted for the Decision-Maker.

Public Comment 2a.4
If the condition of the range does not rapidly improve over the next three years, as show by improvements around the exclosures, I would choose Alt. 3 in the next cycle.

Associated Letter #: 5

Response: Thank you for your comment. Your opinion is noted for the Decision-Maker.

Public Comment 2a.5
Grazing in such steep terrain is not a manageable situation. Without extensive and intact fencing or impenetrable natural barriers, cattle are going to continue to get into the lakes and stream in this area; and, there are several endangered species for whom this area is their habitat. As I understand it, all efforts to keep cattle out of these areas [4th of July , Washington Lakes, & Chamberlain Basin, Frog Lake, & Little Redfish Lakes] have failed because it is impossible to fence them and therefore allowable grazing standards have not been met. The same management problem exists on the Upper East Fork allotment.

Associated Letter #s: 10, 43

Response: Alternative 2 does call for additional fencing and revision of allotment boundaries to improve livestock management.

Category 2b: Permit terms & compliance / grazing impacts

Public Comment 2b.1
No lease should be longer than 3 years.

Associated Letter #s: 5

Response: Term Grazing Permits are issued for 10 years by regulation.

Public Comment 2b.2
Cows put on too early or left on too late is simply thievery of the public resources in my opinion and should be charged criminally, not handled administratively. If a violation is found, all leasing should be instantly terminated and cows should be removed within 10 days, by force and at Government expense if necessary. Every lease should contain a provision that if every cow is not removed one day after the end of the least, the FS will hire contractors to remove them, with the costs added to the lessee's next years lease.

Associated letters: 5

Response: Administrative procedures for dealing with permit violations are directed by Forest Service regulation and policy.

Public Comment 2b.3
Over the past 14 years we and our constituents [Friends of the West] have experienced cows (alive and dead) in many of the pristine alpine lakes in this region. Frog Lake is one of the worst, but cows often frequent Baker, Little Redfish, Chamberlain Lakes basin, Washington basin, 4th of July, and Grand Prize Gulch. Where ever a cow has been allowed to trespass into [these areas] it's mark lasts literally for many years. Complaints have been logged at trailheads and at the SNRA to rangers, but little has been done to change this situation.

Associated letters: 12

Response: Alt. 2 and Alt. 3 were developed specifically to address these concerns.

Public Comment 2b.4
Cows put on too early or left on too late is simply thievery of the public resources should be charged criminally, not handled administratively. The permitees have consistently violated their grazing permits, to the detriment of public lands. The USFS does not have the manpower to enforce these grazing permits. Cattle grazing on the two concerned allotments has constantly violated Sawtooth Forest standards and regulations on stubble height of grass along streams, trampling of stream banks and springs, and trespassing into areas that are closed to grazing.

For a variety of reasons current permittees seem unable to manage their herds to even basic requirements they agree to when they take possession of those allotments. The SNRA has been working on this decision since the Sawtooth Forest Plan of 1987. Already ranchers have dealt with large cuts because of non-compliance on minimal grazing standards.

Should we hold cattle ranchers to a lower or higher standards than the rest of us? How many chances do they get? Yes it is their livelihood but should they be made to repair the damage or amend their way of doing business on our public lands. There should be no double standards for anyone or any business.

We do not see how Alt. 2 is going to prevent cattle from continuing to trespass via Germania Creek, up Washington Lake Creek (or whatever the route) to Washington and Fourth of July Lakes. Trespass has also occurred into Washington Basin and Chamberlain Basin. SNRA standards and guidelines -- which the DEIS lists -- state that livestock-recreation conflicts will be resolved in favor of recreation.

Not strictly enforcing regulations does a disservice not only to the resource and other users, but also most particularly to responsible permittees who risk losing their grazing privileges through no fault of their own.

Associated letters: 5, 21, 22, 33, 35, 36, 37, 38, 39, 40, 42, 44, 50, 62, 73, 74, 76, 80, 81, 86, 91, 95, 97, 100, 101, 102, 103, 106, 114, 124, 125, 133, 141, 142, 144, 146, 151, 153, 155, 158, 162, 167, 181, 182, 192, 203, 206, 215-L, 222-L

Response: Administrative procedures for dealing with permit violations are directed by Forest Service regulation and policy.

Public Comment 2b.5
Trespass cows on private fenced property have been a yearly menace to landowners where the cows have damaged fences and imported noxious weeds and spoiled private riparian areas and native plant communities, including willows and aspen stands.

Associated letters: 12

Response: The Forest Service has no jurisdiction on private land in the East Fork. These issues are addressed through livestock estray laws.

Public Comment 2b.6
Under the preferred alternative we are disappointed that you are closing part of our allotment to grazing (West Fork and South Fork of the East Fork) when it appears to us that the only reason being that our cattle have occasionally drifted out of the allotment in the Grand Prize area. West and South Fork has no history of not being in proper function condition and you or your range people have not given any indication in the past that we were not meeting standards. So it appears to us that cattle drifting out of the allotment is the problem.

Associated letters: 84

Response: Livestock drift out of the allotment has been a substantial, recurring problem that needs to be resolved. The EIS identifies approximately 20 percent of the East Fork that is accessible to grazing by cattle that does not currently meet vegetation management objectives. The proposed fences in Alt. 2 are to curtail drift (exclude cattle from straying or escaping from the allotment). The rationale for excluding the entire drainage was that the cumulative negative impacts, (resource damage and livestock drift), outweigh the benefits due to the limited number of capacity acres available.

Public Comment 2b.7

It is very troubling that the built-in response time between final decision and implementation is measured in years. If Alt 2 or Alt. 3 is picked, grazing will continue at status quo intensity until probably 2006 or longer. This is an unacceptably generous time frame and will certainly lead to further deleterious impacts. Rehabilitation of damage done will be correspondingly and unacceptably lengthened.

Associated letters: 140

Response: The timeframe for reductions is to give permittees time to find alternate grazing or make adjustments in the ranching operations. Effects associated with the timeframes have been shown in Chapter 3 of the EIS.

Public Comment 2b.7
The condition of the allotments and the justification for reductions in AUMs simply do not add up. We recommend the EIS be redone to actually reflect on ground conditions and that reductions in AUMs more realistically would fall in the 10% to 15 % not 35% to 70% range. And the 1987 Forest Plan did not forecast that the Upper and Lower East Fork allotments would fail repeatedly to meet the standards and guidelines in the Forest Plan, or Allotment Management Plans (AMPs), now called Allotment Operating Instructions (AOI).

Associated letters: 169

Response: Proposed stocking rates and seasons are based on actual and allowable use data compiled through our monitoring efforts over the past 10 years. The Allotment Management Plan (AMP) is a general plan designed to ensure that Forest Plan standards and guidelines are met over a period of years. The Annual Operating Instructions (AOI) is developed prior to each grazing season with specific instructions regarding that season's use.

Public Comment 2b.8
Alternative 2 (Proposed Action) Page II-7 - Both Allotments. As we read through this section, we wonder if the SNRA is going to assign a full-time range person to monitor both these allotments -- to make certain the allowable use standards are followed. Is there money for this? It takes several hours to go from Stanley and then walk or ride to the East Fork areas for which are the chronic problems.

In the past, permittees have had a difficult time meeting the standards. As the DEIS points out, the terrain is steep and difficult. If grazing is to continue in the East Fork, it will be extremely important to monitor and communicate often with the permittees the results of that monitoring.

Associated letters: 181, 182

Response: Monitoring for the East Fork Allotments will occur to verify progression towards and attainment of Desired Conditions for the vegetative resources specified in Appendix A of the Sawtooth National Forest Land and Resource Management Plan (Forest Plan). A monitoring plan for the selected alternative has been prepared (Appendix D). Key to the effectiveness and cost of this plan is the selection of the monitoring sites and the schedule for monitoring. Selection of these sites will be a collaborative effort including the SNRA, permittees and others. It is the intent of the SNRA to provide adequate funding to meet the monitoring requirements identified in the Record of Decision.

Public Comment 2b.9
The EIS does not provide for adequate management adjustments to resolve resource damage issues, wildlife conflicts, or user conflict resolution. The EIS States: "The following management adjustments would be made if monitoring indicates that objectives are not being met in a timely manner: 1. If allowable use standards are not met after three years with the initial or alternative grazing strategy, permitted livestock numbers and/or period of use will be reduced incrementally to meet these standards, or, if necessary, the affected area will be restricted from grazing. 2. In cases of excess use (livestock in unauthorized areas or times), the permittee will be given one year notice to rectify the situation. If the situation cannot be corrected, permitted numbers or season would be reduced to achieve compliance." This allows three years of misuse and illegal trespass and is not even a legal proposal under federal law. This EIS cannot permit illegal trespass, nor reserve their obligation to protect the resource or properly manage the SNRA.

Associated letters: 203

Response: Alternative 2 implements significant immediate changes in livestock use along with removing livestock grazing from significant portions of the allotments until specified recovery objectives have been achieved. Additionally, it implements an adaptive management process that provides for changes in management needed on a year-to-year basis as indicated by ongoing monitoring. Seasonal or annual adjustments in grazing numbers and/or season of use may be implemented as appropriate based on monitoring results. However, grazing permits would not be adjusted until 3 years of monitoring data and annual adjustments indicate that a modification to the grazing permit is appropriate.

Excess grazing use will be managed consistent with Forest Service Regulations (36 CFR 222) and Forest Service direction (FSM 2200 & FSH 2209.13). Depending on the circumstances of the particular incident, this may require that the permittee be given a specified time period for resolving the problem. The requirement of providing an appropriate time period for correcting a problem identified as a violation of a grazing permit was established by the United States Court of Appeals for the Ninth Circuit in Anchustegui v. Department of Agriculture, No. 99-35755.

Category 2c: Grazing Systems / Adaptive Management

Public Comment 2c.1
Page IV-46 of the DEIS states: A small area of approximately 130 acres, high on the ridge separating the Germania and East Fork drainages but within the Germainia drainage, would be added to the Upper East Fork allotment. He [Junior] would like to be the one to graze this.

Associated Letters: 6

Response: Proposed boundary changes are considered in Alternative 2. Your comment is noted for the Decision-Maker.

Public Comment 2c.2
The use of grazing zones and rotational grazing should be increased, with additional fencing and watering sites developed. Some fences should be constructed to protect small riparian areas – areas from 1 to 15 acres that will help stabilize soils and filter the runoff water. Use of organic or synthetic fertilizers should be mandated to increase the day matter production.

Specifically the FS should consider the proposals for a deferred grazing system as well as the combined herd option that is being developed. Additionally, the FS should consider the necessary range improvements including construction and maintenance of water improvements. Lastly, construction and/or maintenance of boundary and drift fences as proposed should be considered.

Associated Letters: 6, 8

Response: Grazing systems, combined herd options, and range improvements such as fencing and watering sites can be implemented under either Alt. 1 or Alt. 2 and is within the scope of the decision. The annual operating instructions (AOI) specify the number, class, type of livestock, timing of and during of use, and the grazing strategy appropriate for each year. While use of organic or synthetic fertilizers may be an effective management practice on private pastures, it has not been shown to be an economical treatment of forest rangelands. The effects on the environment of the addition of nitrates, phosphates, and

other chemicals present in fertilizers have not been addressed in the EIS. The ROD will therefore not include any recommendation for their use.

Public Comment 2c.3
At one point "holistic management" was attempted by the affected ranchers, but the terrain was not applicable to this approach and the commitment of the ranchers and their riders was absent.

Associated Letters: 12

Response: Thank-you for your comment. Your opinion is noted for the Decision-Maker.

Public Comment 2c.4
In the past we have indicated that we were willing to do our part in constructing a fence on the allotment boundary. This is still our feeling, therefore we are protesting the closing of the West Fork to grazing.

Associated Letters: 84

Response: Closing the West Fork to grazing is not proposed in Alternative 1 or 2. The proposed drift fence/cattleguard will be located at a convenient location to control livestock drift off the allotment.

Public Comment 2c.5
The South Fork already has a fence to keep cattle from using the upper reaches and we are in the protesting any additional fencing on the South Fork as it is already properly protected from cattle drifting too far up.

Associated Letters: 84

Response: Thank-you for your comment. The location and need for additional fencing cited in the alternatives will be reviewed and verified on the ground before construction is allowed.

Public Comment 2c.6
We believe the small areas that you have added to our allotment that we have used in the past are the proper things to do as it naturally fits into our allotment.

Associated Letters: 84

Response: Thank-you for your comment. Your opinion is noted for the Decision-Maker.

Public Comment 2c.7
We are very disappointed that you are not considering the vacant East Pass Allotment as it also fits naturally with our allotment and would give us a way to rest part of the allotment every year.

Associated Letters: 84

Response: We are actively investigating opportunities for replacement range to offset impacts to grazing operations associated with the two allotments. The East Pass Allotment on the Challis National Forest is one area being considered.

Public Comment 2c.8

We would like to recommend that we divide the Bowery Unit into two parts giving us some flexibility in developing some rest on the allotment. You fence the campground below our private property in the immediate area around the toilet (approx. three acres).

Associated Letter: 84

Response: The East Fork campground fence is proposed in both Alternatives 1 & 2. Dividing Bowery and Long Tom into 2 pastures is being considered.

Public Comment 2c.9
We think it is also important that we develop a way to extend the time that our cows are on the allotment because the cost of transportation is so expensive. We would recommend that our turn-on date be June 11 as most permittees in the East Fork and Stanley Basin are able to do.

We would like to see you negotiate strongly with the NMFS and FWS for the extension of our season as time on the allotment is more important than the numbers.

Associated letters: 84

Response: The proposed grazing seasons are discussed and evaluated in Alternatives 1 & 2. Consultation agreements developed with FWS and NOAA Fisheries under the Endangered Species Act has established mitigation requirements that limit the grazing season on many of the areas on the two allotments.

Public Comment 2c.10
Granted under Alt. 2, the area of grazing impact is reduced substantially from current conditions under Alt. 1. However it appears that grazing intensity in terms of HM / capable acre will remain exactly the same as under Alt. 1. If that is so, I question assertions that under Alt. 2 improvements in terms of moving towards management objectives are expected.

Associated letters: 140

Response: The HM/capable acres ratio is the same in the two alternatives. This results from the method used to calculate the HM adjustment for the difference in capable acres between Alternatives 1 & 2. As discussed in the DEIS, the proposed HMs in Alternative 1 are the product of the allowable use data.

Public Comment 2c.11
Pg. II-2 and IV-92. Despite repeated attempts throughout the DEIS to explain the differences between "permitted", "actual", "allowable" and "proposed" use, the explanations fail to deliver full comprehension for readers. For example, it is clear that permitted use numbers exceed actual use numbers substantially. Is that due to voluntary cutbacks on the part of permit holders, or "adaptive management" actions taken by USFS to reduce impacts? The DEIS (Pg. IV-93) refers to "good faith efforts" by permittees to meet the terms and conditions of the grazing permits, when, in fact, it seems that the restrictions were placed on them by the USFS.

Also one questions why the "permitted use" numbers have not been downwardly revised accordingly over time? Paragraph 3 (IV-92) seems to make the point that allowable use numbers are "calculated" based upon meeting "management standards", and may differ from "actual" numbers. But in the text table (IV-92) one sees that the allowable use figures under Alt. 1 exceed the actual use. Which brings up the question: why would they be greater if it has been well documented that under Alt. 1 management objectives have consistently not been achieved? Another question is why these numbers do not seem to

agree throughout the document. For example, the numbers for actual use presented on IV-92 are quite different from those on pg. III-5, paragraph 7.

Associated Letters: 140

Response: The actual use numbers are lower than the permitted numbers due to several factors: voluntary non-use by the permittees, shortened seasons due to utilization standards, and TES restrictions. The actual use numbers on IV-92 reflect the 10-year average and those on III-92 represent the 3-year (2000-2002) average. The allowable use numbers are a 10-year average.

Public Comment 2c.12
By the way, Holman Creek should be removed from the available grazing base. It is a steep, narrow valley with a thin and very degraded riparian corridor. Wholly unsuitable for public lands grazing in my estimation.

Associated Letters: 142

Response: Thank-you for your comment. Your opinion has been noted for the Decision-Maker.

Public Comment 2c.13
Since the evidence is overwhelming that long term rest (from large herbivores) on much of the Upper and Lower East Fork has the greatest potential to cause substantial impairment of SNRA values (to wildlife, soils health and hydrology for instance) it is relevant and important that any evaluation of no grazing alternatives or even substantially reduced grazing, be properly evaluated or alternative measures (which replace the impacts of large herbivores like cattle) be suggested.

The draft EIS also does not allow any room for improving livestock distribution (a listed significant issue) to help meet Forest Plan Guidelines because one writer states that a big concern with cattle grazing is that they graze a disproportionate amount in the riparian areas, leaving uplands little used. Moving (herding) cattle to the uplands would, however, likely cause harm to the alpine vegetation and soils (Phalen 2002).

Associated Letters: 148

Response: The alternatives developed in DEIS were formulated specifically to address these issues. The effects analysis of the alternative display for the public and the deciding official the differences between eliminating livestock grazing from the allotments, reduced stocking levels and areas where grazing is authorized and continuing the current management direction. The substantial impairment analysis is addressed in the EIS per direction established in Appendix I of the Forest Plan.

Public Comment 2c.14
Bison and domestic cattle graze very similarly and in fact closely enough related that you can breed them together (beefalo). Well managed (planned) grazing of livestock grazing effects bluebunch wheatgrass, Idaho fescue, indian ricegrass and almost all the rest-intolerant perennial bunchgrasses in a very positive fashion, in that it keeps them alive and vigorous and more abundant. Total rest on these grasses severely weakens them or kills them and decreases seedling germination, this is a well known fact. The old top growth on most perennial bunchgrasses must be removed or they do not tiller well and roots die off. Repeated severe and prolonged overgrazing (grazing occurring on re-growth) cause similar loss of vigor, productivity and root die off.

Fire produces bare soils and has other potentially negative affects, such as emission of greenhouse gases and some direct mortality on wildlife and resulting in severe removal of all the cover and forage for

wildlife and soil protection. These bunchgrasses are probably highly important to many wildlife species and their overall health, including productivity, vigor, diversity and abundance is likely a crucial wildlife consideration.

Associated Letters: 148

Response: Bunchgrasses in the EIS area have evolved with some level of grazing from wildlife and native ungulates. Removal or reduction of livestock grazing from the area will reduce, but not eliminate, grazing of bunchgrasses. Even under the no grazing alternative, grazing of bunchgrasses will continue from wildlife species, native ungulates, and recreation livestock. Effects of the alternatives on range conditions and on plant diversity are discussed in the EIS.

Bunchgrasses evolved under a very different fire regime than currently being experienced on the allotments. Fire played an important ecological role in the development and maintenance of native bunchgrass rangelands, the density and size of coniferous timber stands, and the number and condition of aspen stands on the allotments. The natural occurrence of wildfire has been significantly altered by the presence and actions of modern man including fire suppression and livestock grazing practices. The EIS does not attempt to address the role that livestock grazing has had in relation to the effects that modern human presence and actions have had on the alteration of the natural role of wildfire on the allotments.

Public Comment 2c.15

The positive effects of livestock grazing upon vegetation and soils etc, must be considered in any document that truly evaluates the impacts of livestock grazing upon wildlife. Almost any activity on the allotment, whether induced by man or whether natural events, has both positive and negative ramifications, all of which needed to be weighed against achievement of a purpose or goal.

Associated Letter: 148

Response: We agree that an action can have both positive and negative consequences. Those effects were discussed in Chapter 4 of the EIS.

Public Comment 2c.16

I see a problem with an adaptive management strategy. The problem is temporal in nature in that the adaptive management apparently will be looking a year into the future and not within-grazing season to obtain remedies to monitored problems. Also, the permittees have demonstrated an inability or lack of will in the management of livestock on the allotments. The demonstrated lack of active herd management after cattle are let onto the allotments is a problem for adaptive management to work. Cattle stray off allotments. Nothing is done about it within-season.

What is the basis for the rationale that adaptive management would work in view of past experience with permittees? Given very real budgetary constraints is the monitoring in place to achieve adaptive management as a management tool?

An adaptive management strategy with flexibility to "respond to changing conditions and unexpected results" will not be the most direct and likely route to obtain public land resource objectives. There is, at this time, no reliable way to determine any level (permitted numbers) or season of grazing that will move these resources to the desired conditions.

Alternative 3, cessation of domestic livestock grazing, will without question produce the most timely results. If, and/or when, monitoring results show that desired conditions have been attained, only then,

should any attempt to identify the level of grazing and season of use that could maintain those conditions be initiated with an "adaptive management strategy".

On page 1-6 regarding the proposed action paragraph, what the USFS is labeling adaptive management is no more than strict regulatory management with no flexibility. What has been used is allotment management and it has worked pretty well, what is proposed is regulatory management based on numbers only - it has nothing to do with allotment management.

Associated Letters: 156, 169, 199

Response: The EIS documents the expected effects of the alternatives that include the adaptive management emphasis. In-season monitoring along with direction established in the Annual Operating Instructions (AOI), allotment management plan, and monitoring plan will provide the opportunity to modify grazing practices during the grazing season and on a year-to-year basis as needed to achieve the management objectives and desired conditions identified in the EIS and the Forest Plan.

Public Comment 2c.17
The only correct thing to do with the West Pass Creek area is leave it and the area ranchers alone. These ranchers have a right to farm this property and know as well as I do that by choosing Alt. 2, you will have effectively put the final nail in the coffin of the area ranchers (loss of 40% of their cattle will raise their cost of operation so that they cannot operate) putting them with the only choice but to stop raising cattle.

Associated Letters: 159

Response: Thank-you for your comment. Your opinion is noted for the Decision-Maker.

Public Comment 2c.18
We note on page II-14 that the current grazing management plan is referred to as a scheme. Since when did an allotment management plan be characterized as a scheme in an official document. Scheme is a negative word indicating something is amiss. We cannot believe that the USFS would allow such a term to be used in an official document. We expect it would be removed.

Associated Letters: 169

Response: The word “scheme” will be replaced with the word system or strategy.

Public Comment 2c.19
We feel grazing on these allotments has moved range conditions continuously in an improved direction and that stewardship on these allotments is working well. We feel that no cuts are justified and only slight reductions should be considered on strategic areas to avoid documented complaints by recreationists that have legitimate concerns, not the environmental activist turned part-time recreationist that will complain about everything in the hopes of shutting down and locking up an entire area.

Associated Letters: 169

Response: In-season management is addressed in the Annual Operating Instructions (AOI).

Public Comment 2c.20
If you choose to adopt this Alternative, then please stop allowing trailing of cattle from Sheep Creek trailhead along the East Fork Salmon River to the allotment boundary (and/or to the private land.) The

river section below Bowery Creek and the Bowery Creek trailhead especially need protection from trailing and lingering cows and calves. There is precedent -- the Stanley Basin Allotment reduction SFEIS stopped trailing along the Salmon River.

Associated Letters: 181

Response: Some of the trailing issues identified in this comment are related to non-National Forest System lands (private and BLM administered lands). Trailing and grazing issues on these lands are outside of the SNRA administrative authority and the scope of this EIS. Part of the cited area, which receives impacts from both livestock and camping, will be fenced to exclude livestock grazing. Any remaining problems associated with grazing use along the East Fork of the Salmon River can be managed within the adaptive management process in alternatives 1 and 2 or would not be an issue under the no-grazing alternative except for allowing access to private lands. Under the no-grazing alternative, trailing through National Forest System lands to private lands would be managed through the livestock use permit process (FSH 2209.13, Chapter 30).

Public Comment 2c.21
Throughout the DEIS, text discusses the importance of protecting aspens, meadows, springs and seeps. We have walked extensively the Grouse/Albert Unit on the west side of the East Fork. We have sent you photos of the cattle damage to aspens, meadows, springs and seeps. It's steep terrain with few flat areas, and cattle congregate there. The Grouse/Albert Unit should be closed. Alt. 2 will only continue the same sorry scene that is now present.

Associated Letters: 181

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Public Comment 2c.22
We oppose adding this meadow and snow melt pond at approximately 8400 feet high on the Germania side of the Cut-Off trail to the allotment. The rugged terrain is unsuited to cattle grazing and it will be simply impossible to enforce terms of the grazing permit at Trail Basin. Similarly, along Bowery Cut-Off trail and "Cow Heaven"-- better termed "Cow Hell". In the past, we have sent the SNRA detailed comments and photos outlining the problems associated with cattle grazing in Trail Basin and Bowery Cut-Off.

Associated Letters: 181

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Public Comment 2c.23
We support the closure of Bowery Creek to grazing. There are many negative effects to the creek from grazing - loss of vegetation, trampling, and bank damage. In addition, cows have trespassed into East Pass Creek- and eliminating grazing in Bowery Creek, which provides access, will hopefully eliminate that problem.

Associated Letters: 182

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Public Comment 2c.24

In the past, several recommendations have been made to the managers of the SNRA to improve problem areas or potential problems. These recommendations have been largely ignored. For example, a plan to replace the current management of the allotment with a deferred grazing system was at one time considered, but then dropped with no rationale other than the fear of a lawsuit. Running from the threat of lawsuits is no way to manage the range. The resistance to utilize this deferred system displayed a great failure on the part of the SNRA managers. The SNRA must provide for flexibility in its management of a resource that is always changing.

If the Forest Service was truly concerned about the "fish" then they would have used the vacant sheep allotment as suggested by the upper East Fork permittee but instead this honest attempt for range improvement was ignored thus boosting our opinion that this document is totally biased against cattle grazing.

This statement also neglects to acknowledge the fact that permittees have requested changes in management that have been denied and that they are willing to change management for the betterment of the resource.

Associated Letters: 183, 198, 212-L, 218-L

Response: The SNRA acknowledges that the grazing permittees have worked hard to address grazing issues on the two allotments. The SNRA remains committed to working with the grazing permittees and others in a cooperative, collaborative manner to address livestock grazing issues. Alternatives 1 and 2 rely on implementation of an adaptive management strategy that provides for the opportunity to modify grazing practices to achieve grazing standards, management direction and the desired conditions described in the EIS and the Forest Plan. In this context, deferred grazing use of the allotments was allowed during the 2003 grazing season. The decision relative to the use of the vacant sheep allotment has been investigated and continues to be discussed with the Challis-Salmon National Forest who administers this area.

Public Comment 2c.25
There should be a built in allowance for the increase in animal units when monitoring show that range conditions support such an increase.

Associated Letters: 189

Response: Stocking rates and season length can be administratively modified should conditions dictate.

Public Comment 2c.26
Regarding the boundary between Germania and Upper East Fork Allotment the boundary should be on top of the ridge and kept with the Germania grazing allotment.

Associated Letters: 197

Response: This boundary adjustment can be considered by the Decision-Maker and is within the range of alternatives.

Public Comment 2c.28
Pg I-3 There is no mention of the improvement in the range, which has occurred over the years by our proactive work and efforts to learn and apply new methology to grazing, i.e., implementation of rest rotation grazing, involvement in Challis Experimental Stewardship Program, efforts towards range improvements, i.e., fencing and water developments, requests to change from the rest rotation grazing

system to a deferred grazing system. Seth Phalen also stated at our grazing meeting on March 7th that our range was improving and in an upward trend.

Associated Letters: 198

Response: It is appropriate to recognize that considerable change has occurred on the allotments as the result of management efforts by the permittees, SNRA and others. As discussed in Chapter 3 of the EIS (pg.III-4), significant portions of the allotments, particularly upland vegetation plant communities (90 %) meet desired conditions described in the Forest Plan. However, the EIS also demonstrates that there are significant areas of concern on the allotments that need to be addressed. For example, nearly 24% of the streamside areas that are accessible by livestock do not meet Forest Plan vegetation management objectives (Table III-3): Characteristics of streams within the major hydrologic drainages of the East Fork allotments).

Public Comment 2c.29
Livestock grazing in East Pass Creek is strictly incidental. There is only one drift fence to physically restrict movement from Bowery and Long Tom Creeks into East Pass Creek with the remainder of the allotment boundary being a natural barrier offered by topography. It is known and accepted by SNRA staff that it is impossible to prevent a handful of cattle from slipping over these natural barriers and eluding riders for a few days. The length of the grazing period in the Upper East Fork Allotment adjacent to East Pass Creek itself will limit the amount of utilization that can occur. As per Section 7 consultation, livestock must be removed from pastures containing bull trout habitat by August 15 each year. The restricted grazing period simply does not allow cattle to spend enough time in East Pass Creek to make significant utilization.

Associated Letters: 218-L

Response: Thank-you for your comment. It is the responsibility of the permittee to keep livestock within the allotment boundaries and to adhere to season of use and stocking numbers. Any violations of the permits terms are handled administratively.

Public Comment 2c.30
It is surprising and disappointing that there is little discussion in the document in regards to historic uses or stocking levels on these two allotments. In the mid-1900s, prior to the involvement of the Idaho Rangeland Committee and the Challis Experimental Stewardship Program, the Upper and Lower East Fork allotments were grazed season long at considerably higher stocking rates. In addition to cattle grazing, several bands of sheep used the same grazing areas each year. According to ranchers and Forest Service personnel familiar with this country prior to and following the changes, great improvements in range condition have been made since the adjudication and initiation of the rest rotation system. This history is essential to understanding and effectively managing current conditions.

Associated Letters: 218-L

Response: It is appropriate to understand the history of livestock grazing on these allotments. Additionally, there have been significant efforts since the mid-1900's to improve grazing management and rangeland conditions on the allotments. Efforts made by the grazing permittees, the SNRA, Idaho Rangeland Committee, University of Idaho, and others have resulted in management prescriptions and actions that have improved significant portions of the allotments (see discussion of Public Comment 2c.26). However, it must be noted that these management changes have not been effective in resolving significant grazing conflicts and impacts to riparian and other ecosystems including issues associated with

the listing of salmon, steelhead, and bulltrout (1992 – 1999). This EIS addresses six significant issues (EIS Chapter I, pages 8-10) that continue to need resolution.

Public Comment 2c.31
The DEIS states that four permittees hold grazing permits for 564 cow-calf pairs, but it is also stated that the maximum permitted Head Months would be limited to 553 for the Lower East Fork Allotment. The EIS should reconcile this numerical difference.

Associated Letters: 223-L

Response: The 564 cow-calf pairs (1994 HMs) is the current permitted numbers in the Lower East Fork Allotment. The 553 HMs is the proposed permitted numbers based on allowable use data.

Category 2d: Capability / Suitability

Public Comment 2d.1
The Forest Service needs to incorporate in the Final EIS an analysis of the capability mapping which was carried out by the Sawtooth National Forest which delineated capable areas in both of these allotments and incorporate that analysis into whether any of the lands in the allotments in Alternative #2 are capable of supporting livestock use

We have seen a capability map prepared by SNRA range staff of the Upper East Fork Allotment. This should be included in the FEIS, along with an explanation. The map shows how incapable the Upper East Fork Allotment is for cattle grazing due to factors such as distance from water, steepness of slope, conifer forests, rocks, bluffs, and so on. Perhaps there is a similar map for the Lower East Fork. The capability map is a useful tool and easy to understand.

Associated Letters: 166, 181

Response: Documentation not included in the FEIS may be found in the project record. The Revised Forest Plan (2003) addressed Capability and Suitability. The capability and suitability of lands for domestic livestock grazing is determined at the land and resource management planning level (Deputy Chief's 1920 letter dated 4/25/1997). Capability analyses such as the one referenced and the analysis conducted during the Forest Plan Revision used information available in Geographical Information System (GIS) databases to model or estimate capable grazing lands. These capability models were used in conjunction with records of actual grazing use and monitoring data to determine carrying capacity (number of livestock and season of use) at the allotment level for the EIS that would result from implementing the alternatives in the EIS.

Issue 3: Wildlife

Category 3a: Wildlife – General, Summary of Comments Received

Public Comment 3a.1
Eliminate cattle grazing as it impacts winter habitat forage for elk and mule deer, and impacts T&E species, wolf habitat, and riparian areas.

Associated Letters: 12, 19, 22, 66, 86, 160, 167, 178, 180, 202

Response: Concerns regarding grazing effects to riparian areas, fish, wildlife including bighorn sheep and wolves, and winter habitat are discussed in Chapters III and IV. Alternative 3 includes discontinuing grazing on the allotments.

Public Comment 3a.2
Further analyze livestock impacts to amphibians, snails, and Columbia spotted frog.

Disclose whether or not there are frogs at Frog Lake and, if not, where they went.

Associated Letters: 25, 144

Response: Amphibians, including spotted frogs, are addressed in Chapters and IV. Snails were not identified as an issue and were not addressed. No surveys for mollusks have been conducted within the allotments.

There are frogs at Frog Lake. See Chapters III and IV for discussion of status and effects.

Public Comment 3a.3
Reconsider the assumption that forage competition between elk and cattle is small because grazing has occurred in this area for so long the impacts to elk habitat are unknown, particularly impacts from reductions in willow and aspen communities.

Associated Letters: 140

Response: Elk population numbers can vary based on many factors. But, for whatever reason, elk numbers in this Unit have been increasing over the past decade. It is also true that we do not know what population numbers were prior to the beginning of livestock grazing in the area. However, Idaho Department of Fish and Game population objectives are exceeded in this Unit, which is the current standard we use. Effects to willow and aspen habitats are addressed in Chapter III.

Public Comment 3a.4
Consider impacts to beaver from grazing since this species is historically ubiquitous in mountain drainages of the western states and plays an important role in watershed ecology and riparian function.

Associated Letters: 140

Response: Beaver do occur in the East Fork of the Salmon River. Beaver were not identified as an issue. However, the EIS does address effects to aspen and riparian habitat condition, which can be assumed to have an effect on beaver.

Public Comment 3a.5
Explain the rationale used for assuming pollinator studies conducted in other places where grazing impacts were analyzed do not apply to the East Fork.

Explain the rationale supporting the "jump" from possible effects to pollinators to specific cumulative effects and remove all conclusions formulated using supposition or opinion data and validate conclusions with data.

Reconsider the conclusion that one alternative or another will benefit or harm pollinators since there is a lack of adequate research and a thorough understanding of how livestock can affect bio-diversity.

Associated Letters: 148

Response: Several long-term scientific studies (Soderstrom er al. 2001; Fussell and Corbet 1992) have documented a decrease in insect and floral biodiversity with increased grazing. While the level of effects of livestock grazing on insect and plant biodiversity within the East Fork allotment are currently unknown, it is known that plants have been impacted by over utilization in some key areas and effects to insects are likely. A discussion on regional relevance of pollinator studies is included in Chapter III on pages III-79-80.

Public Comment 3a.6
Consider the research indicating that long term rest decreases bio-diversity in seasonal rainfall environments, such as the East Fork, and that planned grazing can restore and enhance biodiversity.

Consider delaying range management actions, such as grazing on important duck nesting areas until, July as it might help increase nesting success and later grazing might help improve the feed value for the brood.

Associated Letters: 148

Response: Livestock are grazed within the allotments in most years through the end of the growing season and due to very low rainfall in most years, re-growth (during the same growing season) of these grazed areas is rare. Additionally, range utilization monitoring in these allotments has shown that the appearance of green, nutritious vegetation after livestock have been in the allotments is uncommon. Delaying grazing until after duck nesting areas would be beneficial, though late season grazing would likely not improve foraging due to the lack of re-growth.

Public Comment 3a.7
Why in Table III-6 is there a change in accessible acres for flammulated owl and three-toed woodpecker between alternatives 1 and 2 when the narrative said there was no effect to these species habitat? Revise information regarding a drop in acres accessible to sensitive species, specifically flammulated own and northern three toed woodpecker, because prior information indicates that livestock grazing has had little effect on their habitat.

Associated Letters: 148

Response: It is appropriate to show areas accessible to cattle for all sensitive species under all alternatives. Because there is a boundary change (reduction in acres) in alternative 2, it is appropriate to show the change in habitat acres within the allotments for all sensitive species regardless if there was an effect from livestock grazing or not.

Public Comment 3a.8
The DEIS fails to address the potential of these lands to support higher and more robust populations of all wildlife native to these allotments. For example, even the analysis of the effects of alternative #3 fails to address the potential for recovery of Rocky Mountain Bighorn Sheep to population levels no longer at risk of extinction (as is the case currently) by genetic failure from inbreeding of populations like the White Cloud herd where numbers of individual sheep are less than 80.

Additionally, the other alternatives need to more thoroughly analyze how they would continue to suppress viable populations of all wildlife which compete with wildlife for forage or whose habitats are degraded by livestock.

Associated Letters: 166

Response: The Forest Service doesn't have the information to predict population levels for all native species. The DEIS addresses effects to habitats of species. Relating population numbers to changes in habitat is too uncertain to predict.

Public Comment 3a.9
Remove speculations regarding spotted frogs and effects of livestock grazing since monitoring information gathered by the Idaho Farm Bureau indicates that livestock grazing helps increase frog populations due to the increase in the insect base.

Associated Letters: 169

Response: The status of and effects to spotted frogs are addressed in Chapters III and IV. The Forest Service doesn't agree with the statement that cattle grazing is required for Columbia spotted frog conservation. Spotted frogs do require adequate vegetation for both insect production and cover. Several riparian areas within both allotments show a reduction in vegetative cover, in both woody and herbaceous species.

Public Comment 3a.10
On page III-70 we find interesting the USFS dissertation on pollinators. We would like documentation on the use of pesticides used on this allotment, for we suspect this is sheer speculation without any basis in fact. If there is use of pesticides on federal ground what was the intent? We are not aware of any grasshopper or cricket control on these allotments, so pesticides affecting pollinators would be almost unheard of. We also find the conclusion that grazing has caused a drop in pollinators with no mention of drought rather strange. Certainly the 3 year drought we are experiencing has had an effect on flowering forbs and graminoid species and this should be accounted for rather than simply to blame cattle as the likely cause.

Associated Letters: 169

Response: The statement of pollinator decline on page III-70 was not meant to be specific to the East Fork allotment. The intent of the writer was to document factors of global decline of pollinators. In the paragraph following this global decline information, the writers discuss those factors that may be contributing to insect decline within the allotment. Pesticide use within the allotment is not discussed. This point will be clarified in the Final EIS. Additionally the comments presented here on drought are valid and will be included in the Final EIS.

Public Comment 3a.11
Livestock grazing on the SNRA is not in bighorn, elk or deer winter ranges. Their ranges are on the lower BLM range, lower Challis Forest range and on private property. Their numbers are not declining and so this statement should be removed.

Associated Letters: 198

Response: According to Idaho Department of Fish and Game, elk numbers have been increasing in this Unit, bighorn sheep numbers have been declining, and mule deer numbers have remained stable. All these species occur within one or both of the allotments in the winter according to Idaho Department of Fish and Game surveys. It is true that elk do not always avoid cattle or areas where they graze. The

Forest Service acknowledges that elk winter range occurs on BLM and private lands. However, observations by Forest Service personnel and data from aerial winter counts by Idaho Department of Fish and Game demonstrate that elk winter range also occurs within the Upper and Lower East Fork Allotments (an estimated 8,300 acres and 9,400 acres respectively).

Public Comment 3a.12
Deseret Industries performed a study on their ranch that showed that cattle will not trample eggs or young, so this statement that "trampling may also impact eggs, and ground nesting bees" is not validated with scientific evidence, shows bias and should not be in this document.

Associated Letters: 198

Response: There are many scientific studies that show that ground-nesting bees may be impacted by livestock trampling (Buchmann and Nabhan, 1996;Kearns et al. 1997; Allen-Wardell et al 1998).). The direct and indirect negative impacts of livestock grazing including nest destruction, trampling of vegetation, and habitat alteration were addressed in the DEIS page III-70.

Public Comment 3a.13
Consider the impacts to willows and aspen from elk as cattle do not graze on this type of vegetation if grasses are available.

Statements that livestock grazing is impacting big game winter range through over-utilization are not true. Consider that enforcement of the stubble height standards in riparian areas so severely restricts the time livestock are in the area that utilization of the uplands is insignificant, except in localized areas.

Associated Letters: 198, 218-L

Response: Elk do indeed browse on aspen and willow mainly during the winter months. Heavy use of these vegetation species by livestock has been observed in many places within the allotments outside of elk winter range. These observations indicate that livestock do cause an affect. The Forest Service respectfully disagrees that livestock are not on the allotments long enough to affect willow and aspen and that elk have more of an impact on aspen and willow than cattle within these allotments. Utilization standards are what is desired, not what has necessarily been achieved. Many areas in both allotments have not met standards over the years.

Public Comment 3a.14
Influences of grazing on the suitability of sage grouse habitat have not been qualified on either the Upper or Lower East Fork Allotments. With the presence of heavy upland grazing, there is the potential to reduce hiding cover sufficiently to negatively effect nesting success. Upland utilization on these two allotments has not been monitored closely enough to conclusively say what the impacts are. It is doubtful that nesting cover can be significantly impacted, as upland utilization is limited because of riparian stubble height requirements. Additionally, much of the allotment is high enough in elevation that it is summer and fall habitat rather than nesting and early brood rearing. Riparian areas are important foraging areas for grouse, however, grazing will often provide more palatable and nutritious forage later into the season that otherwise would have matured and been less attractive to the birds.

Associated Letters: 218-L

Response: There is no claim that the Lower East Fork contains nesting sage grouse habitat. The discussion of effects to sage grouse habitat relates to brood rearing habitat, particularly late summer and

fall habitat can be found in Chapters III and IV. Re-growth of grazed areas during the same season is rare in the East Fork area, so the effect of green, nutritious vegetation rarely occurs.

Public Comment 3a.15
On page IV-79 of the DEIS the impacts of Alternative #2 on pollinators is described as follows: "Under Alternative 2 direct and indirect effects of livestock grazing will likely continue in the redefined allotment boundaries and may result in: reducing plant species (pollen or nectar sources) needed by certain pollinators, decreased plant vigor, trampling of vegetation, nest destruction for (sic) of ground-nesting species, conversion of seeps and spring to livestock troughs, and decreased water availability for pollinators. " This level of impact cannot be supported under the SNRA enabling legislation or current regulation. Alternative #3 resolves these problems.

Associated Letters: 166

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 3a.16
Native animals, including small birds and mammals, have an intrinsic high value because they represent the results of thousands of years of adaptation to these western environments. Especially now that so many species' ranges are a fraction of their pre-European size, native plant communities - animal homes - must be protected from intrusion and degradation, including fences, roads, water diversions, and livestock grazing. Wolves and other predators serve a vital function in the health of native fauna and should not be killed to protect exotic animals.

Associated Letters: 188

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Category 3b: Wildlife – Big Horn Sheep

Public Comment 3b.1
Basing conclusions on the East Fork Salmon River Bighorn Sheep Habitat Management Plan 1977 isn't very encouraging. Suggesting adequate winter range for the Bighorn herd after a decade of population decline can be achieved by a change from 40% to 30% utilization (on paper) is naive, and begs real questions.

Associated Letters: 2

Response: Currently, 50% forage utilization is allowed in upland areas, including bighorn sheep winter range. The proposed action would reduce use in bighorn sheep winter range to 30%. The Forest Service feels that 30% use requirement within bighorn sheep winter range will allow adequate residual forage.

Public Comment 3b.2
Is the 22% of winter range in SNRA of equivalent quality to the grazed portion on the 78% of BLM, S-CNF, State and private lands? What is happening on this other 78% of winter range remaining for Bighorns? Is there concomitant improvement or is it business as usual at 50% utilization on these other lands.

Associated Letters: 2

Response: The quality of forage among land ownerships is not known. The Salmon-Challis National Forest has a standard of 50% utilization of uplands, which includes bighorn sheep winter range. Within the East Fork Salmon watershed the BLM excludes livestock grazing from designated critical bighorn sheep winter range (roughly 4,000 acres) and has a standard of 40% utilization on designated general bighorn sheep winter range (roughly 7,000 acres) prior to June 20 and 60% after June 20, which is considered the dormant season.

Public Comment 3b.3
What has happened to the quality of the forage left by livestock over the last 25 years? Have succulent forbs and other Bighorn ice cream varieties been supplanted by less nutritious varieties, especially at the "hard winter" lower elevations?

Associated Letters: 3

Response: We do not have sufficient available information to address this comment over the extent of rangelands on the allotments. There is information in the project record and summarized in Chapter 3 of the EIS that identifies current vegetative condition and diversity of various plant communities including aspen, riparian communities, etc. Chapter 3 of the EIS also identifies that bighorn sheep populations have declined over the last decade. Plant communities within the allotments that have significant amounts of bluebunch wheatgrass are an important component of bighorn sheep winter range. The EIS does not identify if there is a link between the current condition of these plant communities and decreasing sheep populations.

Public Comment 3b.4
Do the agencies (SNRA, S-CNF, and BLM) contemplate managing the risk now carried largely by the Bighorn herd, by last resort methods such as airlifting emergency winter feed? If so this sounds as though the agencies are selling AUM's at $1.43 in the summer and then buying AUMs back at $35 to $ 50 per AUM delivered as practiced by IDFG when elk on livestock depleted winter range are fed pelletized alfalfa.

Associated Letters: 2

Response: There are no plans that the Forest Service is aware of to supplementally feed bighorn sheep by helicopter or any other means.

Public Comment 3b.5
Forego grazing and dedicate the area to bighorns until the herd has reached 90% of the allowed size according to the Sawtooth Forest's Land and Resource Management Plan and reduce upland utilization from 40% to 30%.

Close the area to livestock grazing to protect critical habitat for big horn sheep.

Give special consideration to improving forage for bighorn sheep and maintaining the herd by limiting forage competition and decreasing cattle numbers or limiting permitted areas.

Associated Letters: 2, 10, 140, 154, 181, 5, 14

Response: Closing bighorn sheep range to cattle grazing would eliminate the potential for forage competition within the Lower East Fork Allotment. There are likely many factors, including forage issues, currently affecting this herd however. This population has fluctuated quite dramatically over the past 80 plus years. Livestock grazing, domestic sheep from the 1880's to1965 and domestic cattle from

1965 to present, has occurred throughout these population fluctuations. There was a large die-off of bighorn sheep due to scabies in the 1870's and again between 1910-1915, along with a lungworm outbreak. Scabies was not considered to be caused by transmission from domestic sheep. However, poor range condition during the early part of the 20th century, caused by livestock grazing, is thought to have contributed to the severity of the disease effects. Historically bighorn sheep range in the area extended into the southern White Clouds and northern Boulders. Bighorn sheep tend to exhibit fixed use patterns. Once population numbers decline and range contraction occurs, expansion back to historic areas may not occur without reintroduction efforts.

Public Comment 3b.6
Analyze the benefits of livestock grazing in keeping a sufficient balance of forage volume and forage nutrition and vigor.

Associated Letters: 148

Response: The Forest Service acknowledges that livestock grazing at certain use standards can improve palatability of some species for ungulates. However, the condition of numerous riparian areas and aspen stands in these allotments are evidence that livestock grazing has not had a beneficial effect to vegetation and forage species. This assessment is based on observations by range and botany staff of reduced plant vigor, soil loss, and vegetation trampling that is evident in many areas.

Public Comment 3b.7
Re-consider the location of bighorn sheep wintering habitat as it seems to be on private land and not within the East Fork allotment area.

Associated Letters: 148

Response: Based on survey data from Idaho Department of Fish and Game and from information in the study conducted by Lauer and Peek in this area, bighorn sheep do use parts of the Lower East Fork Allotment in winter. The DEIS does not make any claims about the lack of importance of private lands to this herd in the winter. Due to the potential for competition for bluebunch wheatgrass, the Forest Service is proposing 30% utilization in identified bighorn sheep winter range to ensure that forage in these areas is adequate after cattle graze the area in order to comply with the following Forest Plan standard " Big game requirements for space and forage have priority in the management of winter range used in common by livestock and big game" (WIST07).

Public Comment 3b.8
Consider that cattle help keep bluebunch plants vigorous and alive because the plant will re-grow from basal tillers making them more desirable and nutritious to bighorn sheep, which is why bighorns have evacuated the bighorn exclosures to graze in areas previously grazed by cattle.

Associated Letters: 148

Response: There are no cattle exclosures within bighorn sheep winter range within the Lower East Fork Allotment and none have been proposed. Bighorn sheep have been documented on the allotment in winter. In order to ensure that adequate winter forage for bighorn sheep is available on the allotment, the Forest Service is proposing to allow 30% use of bighorn sheep winter range. Regarding re-growth, due to the fact that livestock are grazed within the allotments in most years through the end of the growing season and due to very low rainfall in most years, re-growth (during the same growing season) of areas grazed by livestock is rare. Additionally range utilization monitoring in these allotments has shown that the appearance of green, nutritious vegetation after livestock have been in the allotments is uncommon.

Public Comment 3b.9
Provide documentation and data on how conclusions regarding livestock competing with and negatively effecting bighorns considered in the research by Lauer and Peek, 1976 applies to the situation on the East Fork.

Associated Letters: 148

Response: The Lauer and Peek, 1976 study cited was conducted within and adjacent to the Lower East Fork C&H Allotment. Therefore it is directly applicable to the area.

Public Comment 3b.10
Consider impacts by cattle to critical bighorn habitat including forage competition and obstacles resulting from fencing.

Associated Letters: 178

Response: Any fences constructed would be built to allow passage by bighorn sheep and antelope as well as mule deer and elk. The Forest Service feels that it is not feasible for the permittees to control livestock in the Big Lake Creek area without a fence.

Public Comment 3b.11
Low numbers of big horn sheep is due to natural cycles, lung worm and golden eagles killing the lambs in the spring.

Associated Letters: 198

Response: Based on information from a study conducted on bighorn sheep in the East Fork Salmon River in the 1970's and from information from Idaho Department of Fish and Game winter surveys, bighorn sheep use areas within the Lower East Fork Allotment, mainly in Bluett and Big Lake Creeks. There are likely many factors, including forage issues currently affecting this herd.

Public Comment 3b.12
The area provides critical habitat for big horn sheep and other species of wildlife.

Associated Letters: 106, 134

Response: Thank you for your comment. Big horn sheep and their habitat are addressed in the EIS, pages III 63-64, IV-63, IV-64, IV-69, IV-76, IV-81.

Public Comment 3b.13
With the decline of the White Cloud Bighorns, we urge you to discontinue cattle grazing on the bighorn's winter range, as you have done, on their summer range. Please do not build a mile-long fence in upper Big Lake Creek. At the least, wait three years and see how permittees do in fulfilling the terms of grazing permits.

Critical wildlife habitat for the dwindling White Cloud bighorn sheep herd would still be grazed by cattle under Alternative #2 which reduces grazing somewhat and closes some areas, but continues to allow environmental degradation beyond a sustainable level.

Associated Letters: 181, 215-L

Response: Thank you for comment. The Forest Service feels that it is not feasible for the permittees to control livestock in this area without this fence.

The current situation allows 50% use in upland areas, including bighorn sheep winter range. The proposed action would reduce use in bighorn sheep winter range to 30%. The Forest Service feels that 30% use requirement within bighorn sheep winter range will allow adequate winter forage for bighorn sheep

Public Comment 3b.14
Please change (pg 7 of 20): "Cattle allotments will not be converted to sheep allotments within occupied bighorn sheep habitat." To " . . .within occupied or potential bighorn sheep habitat." This enhances the priority status of big game species and is more in keeping with the publics desire to return to historical range of species and habitat.

Associated Letters: 203

Response: This statement is a Forest Plan objective (RAOB04, page III-45), which would require a Forest Plan amendment in order to change. The Upper and Lower East Fork Allotments were sheep allotments in the past. There are no plans to convert them back to sheep allotments.

Category 3c: Wildlife – Wolves:

Public Comment 3c.1
Phase out grazing to adequately protect wolves and reduce wolf/livestock conflicts.

Cattle presence on these allotments is a direct threat to wolves.

Associated Letters: 10, 14, 24, 73, 74, 97, 106, 110, 114, 122, 141, 178, 192, 195, 215-L

Response: While the presence of cattle on the Upper and Lower East Fork allotments could result in control of wolves, no livestock depredations by wolves have occurred within the Upper or Lower East Fork Allotments to date. Predator control would continue on the adjacent Salmon-Challis allotments, the BLM allotments and on private land whether or not livestock occur in the Upper and Lower East Fork Allotments on the SNRA.

Public Comment 3c.2
Further, limiting or ending grazing in the White Clouds would benefit the newly-established wolf packs there, and limit their provocative interactions with cattle which, in truth, are on the natural hunting grounds of the packs. Economically, decreasing the number of cattle available to the wolves would also decrease the money needed for predator control actions by a state in an already poor economic situation.

Associated Letters: 90

Response: No livestock depredations by wolves have occurred within the Upper or Lower East Fork Allotments. Predator control is undertaken by the federal government rather than the State of Idaho.

Public Comment 3c.3
Consider polls showing the majority of Idahoans support wolf recovery and stop the controlled killed of these animals which benefit the long term health of the land and the American people.

Lethal control of wolves is unacceptable.

It is the legal responsibility of the Forest Service to protect wolves.

Associated Letters: 12, 13, 33, 50, 66, 93, 102, 122, 124, 135, 192

Response: The Forest Service is bound by the Record of Decision on the Environmental Impact Statement for the Reintroduction of Gray Wolves to Yellowstone National Park and Central Idaho, which outlines the circumstances under which wolves are to be controlled. It should be noted that the Forest Service does not authorize or implement the control of wolves, the US Fish and Wildlife Service does. The US Fish and Wildlife Service also oversees implementation of the Endangered Species Act. As of the spring of 2003, the Sawtooth NRA is under a court order that prohibits the control of wolves within the boundary of the Sawtooth NRA. Control of wolves would continue on the adjacent Salmon-Challis allotments, the BLM allotments and on private land whether or not livestock occur in the Upper and Lower East Fork allotments on the SNRA.

Public Comment 3c.4
We respectfully request a biological assessment of the interaction / impacts /actions, etc. of grazing management and the alternatives with gray wolf management. The DEIS treats wolf management differently than the other species are treated. A fair assessment is required by NEPA and deserved by the public who expect this management plan to address wolf recovery and conflicts with livestock grazing, etc. The rationale provided in the DEIS is fundamentally flawed in that it does not recognize the cause and effect relationship between predator control efforts and a presence of cattle in the allotments. To say that predator control actions on the wolves are likely to continue at their same levels, no matter what alternative is chosen is ridiculous.

Associated Letters: 168

Response: A Biological Assessment was sent to the US Fish and Wildlife Service on July 31, 2003. Biological assessments are generally written after the NEPA document. Biological assessments are written to meet the requirements of consultation under Section 7 of the Endangered Species Act. Consultation with US FWS is required on all federal actions that may effect ESA listed species. The analysis in the DEIS did not say that predator control efforts would continue at the same level. It said that predator control would continue on the adjacent Salmon-Challis allotments, the BLM allotments and on private land regardless of which alternative is implemented for the Upper and Lower East Fork Allotments on the Sawtooth NRA.

Public Comment 3c.5
Correct information on wolves found in Chapter I as wolves have exceeded recovery goals and are being processed for de-listing, therefore the impact from cattle must be minimal.

Update information on current wolf activity, it is not correct in the DEIS.

Associated Letters: 168, 156, 169

Response: The recovery guidelines referred to on page I-9 of the DEIS are in regard to lethal control of wolves. These guidelines are within the Record of Decision for the Reintroduction of wolves to central Idaho and Yellowstone. This document contains the most current direction on control of wolves that depredate on livestock.

New information was obtained from the Nez Perce Tribe after publication of the DEIS and is included in the FEIS.

Public Comment 3c.6
Consider that predator control, in response to grazing has only occurred on private land along the East Fork Salmon River.

Associated Letters: 218-L

Response: While the presence of cattle on the Upper and Lower East Fork allotments could result in control of wolves, we agree that no livestock depredations by wolves have occurred within the Upper or Lower East Fork Allotments to date.

Public Comment 3c.7
Provide a better discussion of the conflict between wolf recovery efforts and continued lethal control by ranchers and how this will affect the wolf population.

Explore ways to reduce the risk of gray wolf mortality due to predator control under each alternative.

II-18 The DEIS states that under each alternative gray wolf mortality would remain high due to predator control. EPA recommends that the EIS explore a means for lowering this risk.

Associated Letters: 168, 223-L

Response: Effects of cattle grazing on wolves within the East Fork allotments are addressed in Chapter IV. The potential for mortality to wolves within the SNRA was addressed in the Final EIS. The effect of cattle grazing within the two allotments to wolf recovery within central Idaho was not addressed. Based on the number of successful wolf packs within central Idaho, wolf mortality within the two East Fork allotments would not affect recovery in this area.

The SNRA does not have jurisdiction over the Salmon-Challis National Forest, the BLM lands, or private lands that are adjacent to the allotments. Livestock grazing and the potential for wolf/livestock conflicts would continue in these areas regardless of whether or not cattle remain in the Upper and Lower East Fork allotments.

Public Comment 3c.8
The analysis of substantial impairment in Appendix C doesn't sufficiently pay attention to continued impacts on wolves in the SNRA.

Associated Letters: 10

Response: While the presence of cattle on the Upper and Lower East Fork allotments could result in control of wolves, no livestock depredations by wolves have occurred within the Upper or Lower East Fork Allotments to date. Predator control would continue on the adjacent Salmon-Challis allotments, the BLM allotments and on private land whether or not livestock occur in the Upper and Lower East Fork Allotments on the SNRA. The analysis for substantial impairment in Appendix C addresses only the eight allotments for which NEPA analysis has been completed. Guidance for determining substantial impairment is provided in Appendix I of the revised Sawtooth Forest Plan.

Public Comment 3c.9
Cattle grazing may be impacting wolf recovery": The wolf recovery is impacting cattle ranching on PRIVATE LANDS NEAR OUR HOME. I have never claimed a depredation on SNRA. The wolf recovery is at an all time high and is in the process for delisting, so there must not be an impact from the cattle.

Livestock grazing is not affecting wolf recovery efforts as the numbers of wolves and wolf packs has exceeded all expectations and the state is preparing for delisting.

Associated Letters: 197, 198

Response: The statement on page I-9 is a description of an issue that was identified during scoping not necessarily a claim by the SNRA. The DEIS states that no depredations have occurred within the Upper or Lower East Fork allotments on page IV-55.

The EIS does not state that livestock grazing is affecting wolf recovery efforts as defined by the Wolf Recovery Plan and the recovery goals of the U.S. Fish and Wildlife Service.

Public Comment 3c.10
Cattle grazing is not impacting wolf recovery numbers and the SNRA should defer this area to the specialists in charge of their recover- U.S. Fish and Wildlife Service. Wolf numbers have continued to increase even with lethal action being taken. What is going to control the number of wolves we have in order to keep a balance in nature if not man? Why is the effect on elk, deer, antelope and the sensitive species bighorn sheep not of importance to the SNRA? We have noted that since the wolves have been introduced, deer, elk and antelope are having their young right on the outskirts of our herd of cattle and not off by themselves. We see this as a natural instinct to try to provide some protection for their young. We have also had more than 70 head of cow elk in our private pastures calving out their young, this has not happened before the wolf introduction. Elk are also staying down on the winter range and in private pastures much later in the spring in areas where there are wolves.

Associated Letters: 198

Response: The DEIS does not state that livestock grazing is affecting wolf recovery efforts as defined by the Wolf Recovery Plan and the recovery goals of the U.S. Fish and Wildlife Service. Elk, mule deer, and bighorn sheep are of importance to the SNRA, which is why these species along with ungulate winter range were addressed in the DEIS. The SNRA is concerned with the sustainability of all species that are native to the area, including predators. It is normal for prey species of wolves to change their behavior once interactions with wolves have occurred.

Category 3d: Wildlife – ESA:

Public Comment 3d.1
Grazing is still impacting fisheries, wildlife, vegetation, and recreation. The fisheries include chinook salmon, steelhead, and bull trout, all Threatened species. T&E species of wildlife includes wolf, lynx, and bald eagle. The wolf has definitely been impacted by grazing, lynx habitat has been impacted, and bald eagles in the Lower East Fork Allotment probably have been impacted. In addition, there are several FS "Sensitive Species" of animals about which not much is known, and which may be negatively impacted. And grazing may be impacting several species of T&E and Sensitive plant species, especially the ones at high elevations.

Grazing has seriously degraded the public natural resources the SNRA was enacted to protect. The Forest Service may have violated the Endangered Species Act.

Associated Letters: 62, 136

Response: Thank you for comment. The FEIS addresses the effects of livestock grazing to several biological resources within the East Fork of the Salmon River. (See Chapter Four – Environmental Consequences) Forest Service personnel are unaware of any violation of the Endangered Species Act within these allotments.

Public Comment 3d.2
Writers of the draft EIS seem to want to portray livestock impacts as intuitively negative to as many species as they can, in spite of a lack of specific data that could help the reader come to this decision or another. Some general criticism regarding impacts of livestock grazing to some of the species listed include: Lynx (page III-60) in reference to impacts to lynx and its prey the hare, it states that livestock grazing has removed cover within much of the high elevation willow riparian areas and aspen forests which provide winter forage and cover for hares. They reference a 1969 study that apparently concludes that livestock grazing means lower numbers of snowshoe hares. The statement that livestock have removed cover in much of these habitats has very little meaning to this reader. How much cover roughly, is it even significant. I encourage writers of the final EIS to provide better information or not list this information, especially when referencing "predicted suitable habitat" only

Associated Letters: 148

Response: Unfortunately, livestock grazing does cause effects to several species that reduce the quality of their habitat. For example reduction in vegetation from grazing and trampling by livestock, reduces food and cover for snowshoe hare. The Forest Service is responsible for maintaining habitat in a condition that conserves all native species. In regard to Canada lynx, the Forest Service is required to determine predicted habitat as directed by the Lynx Conservation and Assessment Strategy.

Public Comment 3d.3
Some general criticism regarding impacts of livestock grazing to some of the species listed include: Bald Eagle (page III-60) this segment states that riparian areas around Jimmy Smith and Sullivan Lakes has been heavily grazed and trampled and cover removed for waterfowl prey species of eagles. This infers (to most readers perhaps) that livestock grazing is affecting the waterfowl populations and that eagles prey on waterfowl so grazing has an intuitively negative to bald eagles. The facts are that Bald eagles are reportedly rarely seen, if ever, on these lakes, according to locals, and according to nationally recognized experts on raptors, waterfowl are not prey species of bald eagles. Bald eagles are opportunistic and will take crippled ducks however, usually ones crippled by hunting. The writers inference that grazing negatively affects waterfowl, which eagles need, when indeed they probably don't even use these lakes, is an supposition only, and is lacking substance. These types of speculations have no place in a scientific document like an EIS.

Peregrine Falcon (page III-61) although its states here that peregrines eyries are not known to exist, suitable foraging habitat exists. It states food and cover have been altered by grazing. If peregrines use this allotment for hunting (e.g. for ducks, pigeons etc.) then this might be something to study, however, there is no indication peregrines use this area so why the negative comments. Perhaps the whole section on peregrines should be limited to stating that the use of this area by peregrines and impacts of grazing to peregrines is unknown or there is likely little affect, such as was mentioned for the Flammulated Owl and 3 toed woodpecker.

Associated Letters: 148

Response: Livestock grazing has affected the amount and quality of cover for waterfowl at these Lakes. There is no question that bald eagles are opportunistic. They will prey and scavenge on many types of organisms healthy and injured, including waterfowl.

New information has been obtained since publication of the DEIS. There is a peregrine eyrie at the mouth of the East Fork. This pair may be using the north end of the Lower East Fork, particularly Sullivan Lake. The FEIS has been updated to include this information.

Public Comment 3d.4
What is the statutory authority for the Forest Service's Sensitive Species and Management Indicator Species? Does the Forest Service use the same system as the Endangered Species Act for adding species to these list? Again, if not the ESA, what system of review and public input is utilized before the Forest Service adds a species as a Sensitive species or Management Indicator Species?

Associated Letters: 189

Response: The legal requirements for the selection of Management Indicator Species (MIS) are from the 1982 National Forest Management Act implementation planning regulations 36 CFR 219.19. Forest Service Manual (2621.1) refers to the selection of MIS:

> "Select management indicators for a forest plan or project that best represent the issues, concerns, and opportunities to support recovery of Federally-listed species, provide continued viability of sensitive species, and enhance management of wildlife and fish for commercial, recreational, scientific, subsistence, or aesthetic values or uses. Management indicators representing overall objectives for wildlife, fish, and plants may include species, groups of species with similar habitat relationships, or habitats that are of high concern."

There are some similarities in the way the Endangered Species Act listed species are selected, and the way the Forest Service selects species for the sensitive species list. Forest Service Manual (2670.5.19) defines a sensitive species as:

> Those plant and animal species identified by the Forest Service for which population viability is a concern, as evidence by: a. Significant current or predicted downward trends in population numbers or density, or b. Significant current or predicted downward trends in habitat capability that would reduce a species' existing distribution."

The Regional Forester makes the sensitive species determination after receipt and review of a petition requesting listing. The petition can be submitted by Forest Service personnel or by a member of the public. Forest Service Manual 2670.32.4 states that when a decision is being made to authorize a management activity, "the decision must not result in loss of species viability or create significant trends toward Federal listing." Interested members of the public would be able to comment on the Intermountain Region's sensitive species list and species selected as MIS through the review and comment periods associated with Forest Plans under revision. Comments would also be accepted during the review and comment periods of any management decision that are based on an analysis in a National Environmental Policy Act (NEPA) document. Interested members of the public can comment on adding or removing sensitive species or management indicator species from the regional or forest lists during the public comment period of any of these documents.

Public Comment 3d.5

I urge that habitat sanctuary preserve be established to fully protect species including the following: Gray wolf, Canada lynx, bald eagle, peregrine falcon, spotted bat, Townsend's Big Eared Bat, wolverine, fisher, northern goshawk, columbia spotted frog…

Associated Letters: 196

Response: Thank you for your comment. Establishing a sanctuary is outside of the scope of this project.

Public Comment 3d.6
There are no native salmonids that are listed for protection under the ESA on our [Lower East Fork] allotments. We have repeatedly told the SNRA managers this and the SNRA has never proven there are any on these allotments, and yet we are under tighter restrictive regulations for grazing and are penalized for not meeting standards that should not be in place.

Associated Letters: 198

Response: The Forest Service respectfully disagrees. Fish distribution is displayed in the DEIS, Table III-3, and in drainage by drainage descriptions in DEIS pages III-37-55. Although there are several drainages within the current boundaries of the Lower East Fork Allotment that are known to be absent of all ESA listed salmonids, there are also several drainages where bull trout, and to a lesser extent, steelhead and chinook, are known to occupy.

Public Comment 3d.7
The DEIS states that key habitat of threatened species may be impacted by grazing; therefore, EPA recommends that the EIS contain an assessment of Endangered Species Act (ESA) listed species and other biological resources.

Associated Letters: 223-L

Response: The DEIS addresses these concerns, as does the FEIS. See FEIS, Chapter III, pages and Chapter IV Environmental Consequences for a discussion of aquatic, terrestrial and TES species status and effects.

Issue 4: Fisheries

Category 4a: Fisheries - General

Public Comment 4a.1
Discontinue livestock because of the steep terrain and impacts and degradation to streams, water quality, riparian areas, native plant communities, wildlife habitat, wet meadows, and spawning and fish habitat.

The proposed action will improve conditions by closing to grazing some streams that have critical habitat.

Associated Letters: 25, 95, 113, 48, 97, 101, 106, 124, 126, 171

Response: Alternatives 2 and 3 would reduce and/or eliminate grazing from part or all of the allotments. The general effects of implementation of the grazing alternatives on stream and streamside areas are

described in general and by drainage and alternative in Chapter IV. Existing conditions are discussed by drainage in Chapter III. The Forest Service acknowledges the impacts of trampling on riparian areas, specifically at the Bowery Administrative Site in Chapter III.

Public Comment 4a.2
Minimize impacts to fish and aquatic wildlife by reducing the amount of silt and sediment.

Associated Letters: 104

Response: Alternatives 2 and 3 would reduce and/or eliminate grazing from part or all of the allotments resulting in a reduction of sedimentation. Effects of excess sediment on fish and aquatic habitats and the effects of nutrients are discussed in Chapter IV of the Final EIS.

Alternatives 2 and 3 would close some areas containing designated or proposed critical habitat for Endangered Species Act listed salmonids.

Public Comment 4a.3
Disclose the locations of the index areas and their lengths, in order to interpret and convert raw index counts into number of spawners, or the number of female Chinook per mile of spawning reach. More thoroughly describe and monitor the extent of juvenile rearing habitat.

Associated Letters: 140

Response: The boundaries of the Idaho Fish and Game trend areas 1a and 1b are described in the Final EIS and reflect descriptions provided by Idaho Fish and Game in Hassemer 1993. Snorkel surveys have been conducted in a number of tributaries on public land. The results are presented in the existing conditions, by drainage, in the Chapter III. Designated critical habitat for chinook has been defined by NOAA Fisheries as described in Chapter III.

Public Comment 4a.4
Disclose the amount of existing meadow habitat compromised by grazing. Better explain the statements: “observations suggest the forested reached are in near natural condition while the meadow has been compromised”.

Associated Letters: 140

Response: Vegetation Management Specialists have mapped areas throughout the allotments noting, among other things, "riparian areas not moving towards Forest Plan vegetation management objectives". Given the comprehensive nature of the mapping, it is considered an important characterization of the landscape. In nearly all cases, streams flow through such areas. These sentences, then, present the percent of total stream length within the drainage that flows through such areas. Not all stream areas are equally accessible to cattle, therefore the distinction is also presented for only the stream lengths, within the drainage, that are "generally accessible to livestock", such as in Chapter III-44.

Public Comment 4a.5
Reconsider westslope cutthroat trout because U.S. Fish and Wildlife Service’s conclusion was remanded for further consideration based on a more thorough understanding of genetic introgression through hybridization with other trout species.

Associated Letters: 166

Response: On August 7, 2003, the US Fish and Wildlife Service published their proposed rules for their "reconsidered 12-month finding" regarding an amended petition to list the westslope cutthroat trout for protection under the Endangered Species Act. The Service again concluded that the listing "is not warranted at this time" (68 FR 46989).

Public Comment 4a.6
Remove speculative statements regarding historical fish usage and water temperature from write-ups addressing adjacent riparian habitats based on studies indicating adjacent streams are meeting Cold Water Biota Criteria (16 degrees C).

Associated Letters: 169

Response: The paragraph in question clearly states that: "Streambank and in-channel conditions are thought to be functioning, although adjacent riparian habitats may be somewhat diminished from grazing." Since riparian areas can extend well beyond streambanks, it is not uncommon for riparian habitats to be altered to a greater extent near the margins than in the center near the stream. Water temperature is only one indication of the health of aquatic habitats.

Public Comment 4a.7
Remove references to rearing habitat being provided in the lowest reaches as Sullivan Lake has not been stocked with Westslope cutthroat as this lake freezes in the winter and natural fish barriers, including irrigation dewatering and hot water springs up Sullivan Creek prevent migration.

Associated Letters: 198

Response: Idaho Fish and Game has no record of stocking Sullivan Lake since 1967. The conclusion was derived from antidotal information from the results of the public fishing at Sullivan Lake. However, the dominance of westslope cutthroat within similar small drainages within the Salmon River canyon would suggest they may be, or could have been historically, the most common species in the drainage below the Lake. Idaho Fish and Game's "Idaho Rivers Information System" lists westslope cutthroat trout as "present" in Sullivan Creek. The Final EIS acknowledged barriers at the mouth in Chapter III, however cutthroat are known to persist in other drainages above similar barriers. Juvenile chinook are also known to routinely utilize the mouths of small tributaries for rearing and may have utilized Sullivan Creek historically as stated in the Final EIS.

Public Comment 4a.8
Big Lake Creek enters Jimmy Smith Lake on the BLM, not National Forest boundary. The outlet of Jimmy Smith Lake IS a barrier to fish migration. This holds the rainbow trout in the lake and prevents migration of fish from East Fork into the lake. Jimmy Smith Lake is a natural settling pond for Big Lake Creek, Corral Creek and Jimmy Smith Creek.

Associated Letters: 198

Response: The backwater of Jimmy Smith Lake extends onto National Forest. A standard 7.5 minute topographic map shows the confluence located on lands administered by National Forest. In reality it depends on the level of the lake, and where one considers it "entering". Suffice to say that Big Lake Creek enters the Jimmy Smith Lake within 1/4 mile of the National Forest boundary. No absolute barrier is known below Jimmy Smith Lake, such as a substantial vertical falls. The Forest Service would appreciate any information that would substantiate a complete barrier. A combination of features such as a narrow gorge and small stream size below the Lake may result in a barrier. As stated in Chapter III connections to

the East Fork are not apparent with only redband/rainbow observed above the lake. Jimmy Smith Lake serves as a sink for watershed sediments. This condition is acknowledged in the discussion of effects in the Final EIS, Chapter IV.

Public Comment 4a.9
Consider a letter by Idaho Fish and Game, dated June 24, 1996 showing that the number of fish in Jimmy Smith Lake has not changed in over 30 years and therefore the population is not being affected by livestock grazing.

Associated Letters: 198

Response: The Forest Service is not familiar with the letter cited. However, the Final EIS, Chapter III reports that spawning redband have been observed in Big Lake Creek, the primary tributary to Jimmy Smith Lake, in mid-July. When livestock are present in the pasture during the spawning, as well as the incubation period that follows, the potential exists for the trampling and disturbance effects described in the Chapter IV. Despite the condition of the population as a whole, the potential effects to individual fish or eggs remains real and as stated in Chapter 4.

Category 4b: Fisheries – Threatened and Endangered

Public Comment 4b.1
Provide evidence supporting the statement that spawning fish or redds are being disturbed by the presence of livestock as the mandatory off-dates decided through consultation is not supported by science at the time it was developed and is still not substantiated.

Consider the study by Ballard and Krueger, 1999 demonstrating that cattle have very little impact on the spawning activities of salmonids.

Associated Letters: 281 -L

Response: Though the risk of the effects may be small overall, as the comment implies, the potential for these effects to individual fish or eggs are real, as concluded in the study cited by the comment (note: a complete citation, nor even a title, was provided with the comment). The Endangered Species Act prohibits the "taking" of species listed for protection under the Act at the scale of the individual animal. Under the act "take" includes "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct" (ESA Sec. 3.19). Chinook, steelhead, and bull trout are listed for protection under ESA, and are known to occupy and spawn within the extent of the East Fork Allotments, as displayed in Chapter III, as well as by drainage descriptions of distribution. A history of consultations with the oversight agencies has clearly established that the potential effects to spawning and rearing fish, described in the Final EIS, would constitute "take".

Public Comment 4b.2
In spite of the cattle grazing reductions over the last few years, your own monitoring data shows aquatic habitat in the area is suffering heavily from grazing. This habitat is used heavily by salmon, steelhead, and bull trout, which are all listed under the ESA.

Associated Letters: 48

Response: Thank you for your comment. Known habitat conditions and fish distribution are displayed in general and by drainage in the Final EIS, Chapter III.

Public Comment 4b.3
The East Fork Watershed is an outstanding but fragile ecosystem. It is also the headwaters of the Columbia River, which is one of the world's most endangered, large river systems still capable of having its Northwest-defining fish resources restored. If the SNRA can't contribute more to this, what area can?

Favor ecological health over economic preservation to restore critical habitat for endangered bull trout and anadromous fish to its highest productive potential.

Associated Letters: 59, 136, 178, 171

Response: Pertinent management objectives specific to the SNRA are listed in Chapter's I and III, as referenced from the Sawtooth National Forest Revised Land and Resource Management Plan. These concerns are addressed in the Final EIS. Potential effects to ESA listed salmonids are discussed in general and by drainage in Chapter IV. Existing conditions of streams are described in general and by drainage in Chapter III.

Public Comment 4b.4
Close some streams that have critical habitat for fish to grazing.

Associated Letters: 103, 129, 133, 220-L

Response: Thank you for your comment. Alternatives 2 and 3, as described in the FEIS- Chapter II, pages 9-14, would close some areas containing designated or proposed critical habitat for ESA listed salmonids.

Public Comment 4b.5
Consider mapping the distribution of different life stages of steelhead in the drainage.

Associated Letters: 140

Response: Snorkel surveys have been conducted in a number of tributaries on public land. The results are presented in the existing conditions, by drainage, in Chapter III. Annual returns of steelhead remain very low and are highly variable year to year, which is the primary influence on annual distribution.

Much is known about the status of subpopulations of TES fish species, particularly the anadromous species, as discussed and displayed in the Final EIS, Chapter III. The status of our knowledge in each drainage is also presented in Chapter III.

Public Comment 4b.6
Examine the water diversions in the lower reaches to determine their effects on upstream migration of adults, downstream migration of smolt salmon and steelhead, and on the rearing juveniles of these species that may become trapped in irrigation diversions.

Associated Letters: 140

Response: Idaho Fish and Game assesses diversions in the Salmon River subbasin for screening needs and treats them as priority, funding, and opportunity presents. A small minority of the irrigation diversions within the East Fork watershed are located on National Forest System Lands.

Public Comment 4b.7
Analyze Chinook salmon spawning that has been documented above Bowery Guard Station in the East Fork itself and implement appropriate ESA restrictions to protect spawning habitat.

Associated Letters: 166

Response: The Final EIS discusses the occurrence of spawning in the upper East Fork in 2002. However, the Forest Service would appreciate any documentation of spawning in this upper segment (above the gorge near the confluence with Bowery Creek) in the years 1979 to 2001. Currently, livestock are required to be removed from the upper East Fork by August 1 for the protection of chinook spawning. This, and other on and off dates, are included in the description of Alternative 1, however these same constraints were inadvertently left out of the description of Alternative 2. These same basic requirements would apply and the presentation of the potential effects for Alternative 2, found in Chapter IV assumed that they were.

Standard GM-1 of PACFISH actually specifies that grazing practices that "retard or prevent attainment" of Riparian Management Objectives should be modified. Also note that the PACFISH amendment to the former FLRMP (1987) has recently been replaced with the revised Sawtooth National Forest Plan. There is a table in Chapter III that generalizes the anticipated recovery response that may result with the implementation of Alternative 2. Chapter IV explains the variables that can influence the recovery rate.

Public Comment 4b.8
The document lacks scientific evidence that livestock grazing is impacting listed species. Better document how livestock grazing and access is affecting or influence staging and spawning behavior or interfere with spawning activities of staging adults.

Standards and guidelines required by the Endangered Species Act for Threatened or Endangered Species, (such as stubble height requirements) should be implemented only in areas that are proven to contain those species - not throughout the entire allotment. Flexibility in grazing management should be re-instituted so as to ensure that the resources are used in the most efficient way. This is beneficial to both the land and the users of the land.

Associated Letters: 183, 212-L

Response: Section 7 of the Endangered Species Act requires Federal agencies to identify and describe the potential effects on listed species of any action the agency "authorizes, funds, or carries out". ESA also declares an affirmative obligation for Federal agencies to promote the recovery of listed species, and a conservative approach to the species' needs - that is, to promote recovery, not just avoid adverse effects. The required biological assessments are anchored on determining if actions "may affect" the species or their designated critical habitat. Over a decade of consultation with the ESA oversight agencies has established general expectations and thresholds of the action agencies. The alternatives reflect these known sideboards. Monitoring on the Sawtooth NRA has established that streamside activities can disrupt spawning behavior (McIntyre 1995, Dufour 1994). Elsewhere, trampling of redds has shown reduced survival (Roberts and White 1992). These potential effects are described in Chapter IV.

Livestock on and off dates apply only to those pastures where conflicts with ESA fish species are possible. Known fish distributions are displayed in general terms and by drainage in Chapter II. Existing grazing use standards may originate from a number of sources including the Forest Land and Resource Management Plan, PACFISH, or ESA consultations.

Public Comment 4b.9
Establish a habitat sanctuary preserve to protect species including Snake River sockeye salmon, Snake River steelhead, Columbia River bulltrout, and westslope cutthroat trout.

Associated Letters: 196

Response: Thank you for your comment. Establishing a sanctuary is beyond the scope of this document.

Public Comment 4b.10
Reconsider decisions regarding bull trout, cutthroat, and redband in Silver Rule Creek as there is no documentation confirming their presence.

Associated Letters: 198

Response: Chapter II identifies that bull trout, cutthroat, and redband trout have been observed in Silver Rule Creek, or Slate Creek downstream, within the pasture. Bull trout and cutthroat were documented in Silver Rule Creek as recently as 2000.

Public Comment 4b.11
Recognize that the fish migration barrier located at the mouth of Holman Creek prohibits fish migration.

Associated Letters: 198

Response: The Forest Service agrees that the highway crossing of Holman Creek, at its mouth, is believed to be a barrier to upstream migration for all salmonids.

Public Comment 4b.12
Remove the assumption that there are listed fish species are found in French Creek as there is no scientific documentation to support this.

Associated Letters: 198

Response: Salmonids were observed in French Creek in 2000. No alternative includes timing restrictions for French Creek due to ESA considerations (e.g. FEIS pg II-6): "a. Sullivan, French, Holman, Mill and Big Lake Creeks - No restrictions".

Public Comment 4b.13
Consider recreation impacts in East Pass Creek to trout spawning in addition to the impacts from livestock.

Associated Letters: 218-L

Response: As described in Chapter II, East Pass Creek is currently part of a vacant sheep allotment. Monitoring and observations within the SNRA indicates that concentrated recreation use can disturb spawning or incubating salmonids.

Public Comment 4b.14
Include proper use standards for Chinook salmon.

Associated Letters: 223-L

Response: As described in Chapter II, with the ESA listing of chinook salmon, grazing use standards were refined and modified. These standards continued to be refined, amended, and modified with subsequent ESA listing, and with the PACFISH amendment to the FLRMP. The most recent version of the standards in described in the Final EIS, Chapter II with Alternative 1.

Public Comment 4b.15
State how much of the 36 miles of streamside riparian areas not moving towards Forest Plan vegetation objectives are in critical habitat and more explicitly explain how these areas would be restored.

Associated Letters: 223-L

Response: The tables included in Chapter II present a summary of the effects of implementing each of the alternatives. Greater detail regarding the potential effects from each of the alternatives, as well as their expected rates of recovery, is provided in Chapter IV, including stream-by-stream discussions. In addition, adding the phrase "that would continue to be grazed" to the first four elements in the Fisheries and Hydrology table will help clarify the measures presented.

Public Comment 4b.16
Explain how under Alternative 3 critical Chinook, steelhead, and bull trout habitat would be 0 miles and consider these areas critical and take measures to protect these areas from present and future degradation by grazing.

Associated Letters: 223-L

Response: Alternatives 2 and 3 would likely result in improved habitat conditions and an increase in habitat complexity and diversity for many species of fish and wildlife, as described in Chapter IV. All projects should promote the preservation of rare species, promote recovery, and ensure habitat conservation in accordance with Endangered Species Act, National Forests Management Act, National Environmental Policy Act, Forest service directives and Federal regulations,. Additionally, management activities should promote (a) Resource Protection (36 CFR 219.27 Management Requirements). Under NFMA, we are required to (1) Provide for and maintain diversity of plant and animal communities to meet overall multiple use objectives, and promote diversity: Management prescriptions, where appropriate and to the extent practicable, shall preserve and enhance the diversity of plant and animal communities. Lastly, the standards and guides in Land and Resource Management Plan require that management actions protect health and vigor of native vegetation as well as maintain diversity and vigor of the native plant communities.

Public Comment 4b.17
Clarify whether or not cattle will continue to have access to streams bearing bull trout and consider restricting access to the streams that are accessible. Explain if bull trout inhabited streams refers to resident or migratory bull trout, or both.

Associated Letters: 223-L

Response: All life forms of Columbia River bull trout are equally protected under ESA. This level of information is available for only a few drainages, and noted in the drainage-by-drainage descriptions found in Chapter III.

Under Alternatives 1 and 2, cattle would continue to have access to some streams occupied bull trout prior to August 15. This is presented in many places in Chapter II and IV and by drainage again in Chapter IV.

Public Comment 4b.18
Further discuss the cumulative effects to fish species since the numerous listed fish exist within the project area and will continue to be effected in the future if grazing is continued.

Associated Letters: 223-L

Response: The discussion of cumulative effects common to all TES fish, and the closely related "hydrologic integrity", is discussed extensively in the Final EIS and by drainage and alternative in Chapter IV.

Public Comment 4b.19
Explain how Alternative 2 may affect critical bull trout habitat if cattle are removed from these areas.

Associated Letters: 223-L

Response: Chapter III explains that livestock are removed during the spawning and incubation period of bull trout (i.e. after August 15). This specific requirement could be better communicated by replacing the discussion with: "Beginning in 2000, as a result of bull trout consultation commitments, the Forest Service required livestock to be removed from drainages with bull trout inhabited streams by August 15, a date determined by the US Fish and Wildlife Service as the onset of bull trout spawning activity."

Public Comment 4b.20
Livestock grazing has damaged spawning streams of listed salmon, steelhead, and bull trout.

The East Fork is a critical spawning area for salmon and bull trout. Clear, cold, unsedimented streams are key to the future of Idaho's fisheries. Fisher Creek ponds/springs are an example of repeated overgrazing reducing water quality and quantity. In this area, stubble heights are frequently < 1/2" in wet sedge meadows with large hummocks covering prematurely dry spring areas.

Associated Letters: 106, 124

Response: These concerns are addressed in the FEIS. Potential effects to ESA listed salmonids are discussed in the FEIS pages IV 29-36, as well as drainage-by-drainage, by alternative, in FEIS IV 38-55. Existing conditions of streams are described in the FEIS pages III 36-38, as well as drainage by drainage in FEIS III 38-61.

Public Comment 4b.21
PACFISH/INFISH requires that management be adjusted to allow degraded streams to recover at near natural rates of recovery. The Fisheries & Hydrology table on page II-17 explains under Alternative 2 how rate of stream channel and aquatic habitat recovery will be slow in areas where grazing continues. This demonstrates that Alternative 2 is a clear violation of PACFISH/INFISH.

Associated Letters: 157

Response: Standard GM-1 of PACFISH actually specifies that grazing practices that "retard or prevent attainment" of RMOs should be modified. Also note that the PACFISH amendment to the former FLRMP

(1987) has recently been replaced with the revised Sawtooth National Forest Plan. The table on page II-17 generalizes the anticipated recovery response that may result with the implementation of Alternative 2. Page IV-42 of the DEIS explains the variables that can influence the recovery rate.

Issue 5: Vegetation

Category 5a: Vegetation (native & non-native) Impacts:

Public Comment: 5a.1
Recognize that cattle have serious effects on wildlife, destroy willow cover and forage, eliminate much of the healthy grasses, and have a negative presence.

Associated Letters:166

Response: Concerns regarding impacts from cattle to wildlife, willow cover, forage, and healthy grasses are discussed in the EIS, Chapters III and IV.

Public Comment: 5a.2
Aspen stands in Wickiup and Little Boulder Creeks are not moving toward forest plan objectives because the Forest cut these stands and thousands of others with a chainsaw to help winter feed for elk.

Associated Letters:197

Response: The Forest Service respectfully disagrees with the statement that aspen stands are not moving toward forest plan vegetation objectives. The aspen stands depicted in Figure III-32 of the Draft EIS were not cut with chainsaws. One can see that the mature trees on the ground fell due to age-related causes. The point of the picture is to depict the lack of regeneration due to livestock effects to the understory. The Forest also disagrees that thousands of aspen stands within the allotments were cut with chainsaws. While the SNRA has used aspen cutting as a method to regenerate aspen stands in some areas, it has not been done extensively in the East Fork Salmon River drainage.

Public Comment: 5a.3
Address and analyze monitoring and range evaluations that show that livestock are keeping a number of perennial (grazing tolerant) bunchgrasses alive and vigorous, including bluebunch wheatgrass, Idaho fescue, Indian ricegrass, needle or needle and thread grass.

Associated Letters: 148

Response: Range utilization monitoring in these allotments has shown that the appearance of green, nutritious vegetation after livestock have been in the allotments is uncommon. The Forest Service acknowledges that removal of some vegetative material from bluebunch wheatgrass plants (particularly if done during dormancy) can increase palatability of the plant the following growing season.

The benefits grazing provides to upland species must be weighed against the detrimental effect of grazing in riparian zones. Riparian habitat may be more crucial to the health of the entire ecosystem. It is questionable that livestock distribution into the uplands is sufficient to derive much of a beneficial result.

Public Comment: 5a.4

The statements regarding the impacts under the 3 alternatives appear inconsistent in regards to sensitive, proposed sensitive, and watch plants.

Associated Letters: 148

Response: Thank you for your comment. The connection between short-term impacts and long-term gains has been clarified in the FEIS.

Public Comment: 5a.5
Cattle grazing helps to increase plant vigor. Without grazing, plants become wolfy and lack nutritional value as has occurred in Sullivan Creek. Elk use in Sullivan Creek is concentrated along riparians and cattle are being blamed for the overgrazing done by this large herd.

Associated Letters: 198

Response: The poor conditions of the riparian areas in Sullivan Creek include heavy use of willows and other woody species. Elk mainly browse on woody species during the winter months and Sullivan Creek is not elk winter range. These impacts are caused by livestock grazing. Additionally, based on tracks and scat, it is evident that much of the trampling effects are due to livestock rather than elk.

Public Comment: 5a.6
Concerned that Alternative 2 does no fully protect sensitive plant species including White Cloud Milkvetch and Silvery/Jones' Primrose in a way that will meet the legal mandate of the SNRA.

Associated Letters: 166

Response: The completion and implementation of a Conservation Strategy for the plants will provide much improved protection for this and other TEPSC species despite the alternative selected. Fencing and other protective measures will be implemented to reduce impacts from grazing and other uses such as ORVs and recreation.

Public Comment: 5a.7
Discuss noxious weed eradication efforts to contain and control weed infestations along main roads as the success of these efforts is not evident.

Include a discussion on management actions necessary to control invasive species, particularly spotted knapweed.

Consider ISDA reviews that document noxious weed infested areas occurring on roads, ORV trails, campgrounds, and mining disturbed areas and document very little occurrence on interior portions of allotments that are remote and not accessible to these activities.

Associated Letters: 169, 218L

Response: All identified noxious weed infestations in the East Fork are aggressively treated, utilizing chemical and mechanical methods. All are relatively small (less than 5% cover) infestations and located along roads. The Forest Service has found a few infestations of spotted knapweed and yellow toadflax in areas that are not accessible by motorized vehicles. The EIS does acknowledge in Chapter III that as weeds move away from main travel routes invasions increase and the ability to contain becomes more

difficult. Mitigation for reducing non-native plant invasions was included in the Biological Assessment prepared for U.S. Fish and Wildlife Service and will be implemented.

Public Comment: 5a.8
The protection of native vegetation from further degradation including invasive plants, soil loss and compaction, and lowering of water tables should be of the highest priority.

Associated Letters: 188

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment: 5a.9
Establish a habitat sanctuary preserve to protect species including slender moonwort, Ute Ladies' tresses orchid, Whitecloud milkvetch, and Pointed draba.

Associated Letters: 196

Response: Establishment of a habitat sanctuary is beyond the scope of this document.

Public Comment: 5a.10
Plant density and vigor are much better measures of rangeland health.

Associated Letters: 212-L

Response: Thank-you for your opinion. It is difficult to respond, as we are unsure of what you are comparing plant density and vigor against. Rangeland Health assessed in manuals published by the Rocky Mountain Research Station, Region 4 and other resource specialists do not only use plant density and vigor as measures. Species composition, percent cover, and frequency are more definitive measures of rangeland health because these methods have been proven to provide accurate vegetation condition and trend, ease of repetition, and interagency support.

Public Comment: 5a.11
Address non-cattle caused impacts to aspen stands including conifer encroachment, lack of fire, and elk girdling the trees.

Associated Letters: 198

Response: The Forest Service acknowledges that conifer encroachment into aspen stands and lack of fire are two factors affecting aspen stands in many areas of the East Fork Salmon River. However, livestock grazing effects are a factor as well, mainly reducing regeneration of stands and changing understory species composition and vigor.

Public Comment: 5a.12
The negative impacts associated with livestock grazing are overstated while the benefits are only briefly mentioned. Provide a better discussion of impacts and potential impacts of livestock grazing on plant communities and the data supporting these conclusions.

Associated Letters: 218-L

Response: We acknowledge that there may be some benefits to upland vegetation through grazing. However, the negative impacts that have occurred and may continue to occur within riparian, alpine,

subalpine, and TES due to grazing can not be offset by these small benefits. Chapter IV, Plant Diversity, describes the impacts or effects of livestock grazing on plant communities. Assessing the impacts or effects of livestock grazing on plant communities, monitoring for long-term vegetative condition and trend is more appropriate. After a livestock grazing prescription is implemented, monitoring for change in vegetative is a way to assess the sustainability or impacts of the prescription.

Public Comment: 5a.13
Increase the budget for noxious weed control to aggressively treat infestations caused primarily by recreationists and Idaho Fish and Game screen maintenance vehicles.

Associated Letters: 198

Response: Thank you for your comment. The budget for noxious weed treatment is beyond the scope of this document.

Public Comment: 5a.14
Reconsider the correlation being made between the threat of noxious weeds and livestock grazing on these two allotments.

Associated Letters: 218-L

Response: The EIS does acknowledge in Chapter III that as weeds move away from main travel routes invasions increase and the ability to contain becomes more difficult. The tie to livestock vectors has been improved in the FEIS.

Public Comment: 5a.15
Include a discussion in the EIS about the establishment of invasive species, particularly spotted knapweed, and how the Forest Service would control and manage noxious weed infestations associated with livestock grazing.

Commit to a mitigation strategy in the EIS that would be used in the project area to restore and preserve native plant communities

Associated Letters: 223-L

Response: Mitigation for reducing non-native plant invasions was included in the Biological Assessment prepared for U.S. Fish and Wildlife Service and will be implemented.

Public Comment: 5a.16
Include a discussion about the desired plant communities for the project area, including native grasses and shrubs.

Associated Letters: 223-L

Response: Thank you for your comment. The desired condition for plant communities has been added to the FEIS.

Public Comment: 5a.17
Alternative 2 fails to provide protection of aspen clones and aspen grove riparian areas.

Associated Letters: 166

Response: Assuming that livestock grazing use standards are met, aspen conditions should move toward the desired condition with the implementation of Alternative 2. See pages IV 66-67 of the FEIS for further discussion.

Category 5b: Stubble Height / Forage Utilization / Forest Plan Standards:

Public Comment: 5b.1
Consider changing the utilization standard from 40% to 30% should ensure over-utilization does not occur and foster a recovery of bighorn sheep herd size and vigor.

Associated Letters: 2

Response: The old utilization standard for this area was 50%. There is no data reflecting the distribution of use in this area. However, as a general rule, livestock use is less on steep upland slopes than on gentler slopes of lower elevation.

Public Comment: 5b.2
Vary the utilization level according to wet/dry year assessments during the growing season to ensure forage availability for wildlife in the event of a tough winter.

Associated Letters: 2

Response: The 30% utilization standard refers to 30% use of key forage species, not 30% of the bighorn sheep winter range. The standard would be applied to all of the identified bighorn sheep winter range in the Lower East Fork Allotment.

Public Comment: 5b.3
Change the bunchgrass stubble heights to 8" to provide for bird cover and bunchgrass reproduction and survival.

Associated Letters: 5

Response: Thank you for your comment. It has been noted for the Decision-Maker. We don't have any information that supports a specific stubble height for bird cover, and it would certainly vary by species. As a general statement, for most species addressed in the EIS, the higher stubble height and more residual vegetation that remains the better.

Public Comment: 5b.4
Ensure the Upper East Fork Allotment is moving towards properly functioning conditions.

Associated Letters: 84

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment: 5b.5
Ensure cattle grazing on the two allotments are meeting Sawtooth Forest standards and regulations for stubble height along streams, trampling of stream banks and springs, and trespassing into areas closed to grazing.

Cattle grazing in these allotments has consistently violated standards and regulations.

Associated Letters: 92, 94, 100, 162

Response: Although the EIS will analyze and set livestock utilization standards and guidelines for the East Fork Allotments, it does not enforce these standards. Through permit and allotment administration, livestock will be monitored to adhere to Forest Service standards and guidelines.

Public Comment: 5b.6
Ensure cattle grazing on these allotments are not impacting bighorn sheep and wolves.

Associated Letters: 92

Response: Alternative 2 reduces the forage utilization in bighorn sheep winter range from 50% to 30%. Alt. 3 eliminates grazing after 5 years in both allotments.

Public Comment: 5b.7
Implement alternative 2 to make cattle grazing more compatible with the values of the SNRA while still allowing grazing to continue at a reduced level.

Associated Letters: 120

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment: 5b.8
The majority of the area is not suitable for livestock grazing resulting in impacts to fish and wildlife habitat, native plants and water quality.

Associated Letters: 95

Response: The 2003 Forest Plan Revision identified these allotments as suitable for livestock grazing. The alternatives in the EIS were developed to determine the management requirements and direction needed to authorize livestock grazing within the management direction established in the Forest Plan that would also provide for achieving management direction established for other resources and uses including fish and wildlife habitat, native plants, and water quality.

Public Comment: 5b.9
Stubble heights standards have been repeatedly exceeded West Pass Creek and Bowery Creek to East Fork. This overgrazing is impacting riparian vegetation, winter range for elk, and native plant habitat, and increasing invasive weeds.

Associated Letters: 124, 162

Response: Stubble height issues and grazing impacts are discussed in the DEIS. Both Alt 2 and 3 address those concerns. While there is a small infestation of knapweed in lower West Pass, noxious weeds are not a major problem at this time in either drainage. The DEIS addresses effects to riparian vegetation and elk winter range. Although the EIS will analyze and set livestock utilization standards and guidelines for the East Fork Allotments, it does not enforce these standards. Livestock grazing will be monitored to adhere to Forest Service standards and guidelines using permit and allotment administration procedures established by Forest Service Manuals and Handbooks (FSM 2200 & FSH 2209.13).

Public Comment: 5b.10
Re-consider doing a suitability analysis as the one used in the 1987 Forest Plan is out of date and does not incorporate species listed under ESA.

Associated Letters: 181

Response: A suitability analysis was completed as part of the recent Forest Plan Revision effort. While this area was identified as suitable, the Forest Plan does recognize that resource problems related to livestock grazing are occurring on the allotments. The Forest Plan Revision includes several management objectives addressing these concerns. The Alternatives in the EIS were developed to address these and other livestock grazing issues.

Public Comment: 5b.11
Remove Long Tom Creek from the Upper East Fork allotment as the area is incapable of supporting sustainable grazing.

Associated Letters: 182

Response: Thank you for your comment. Conditions in Bowery Creek and Long Tom Creek pasture are addressed in the FEIS and Alternatives 2 and 3 were designed to address these concerns.

Public Comment: 5b.12
Consider measuring rangeland health using plant density and vigor instead of stubble height and percent utilization because these standards are designed to police rather than manage grazing.

Associated Letters: 183

Response: The suggested methods are reliable indicators of range health. Stubble height is an easy and measurable tool that provides the permittees with the necessary information to make herd management decisions.

Public Comment: 5b.13
There is no documentation of overgrazing in the upland areas because the lack of ability to utilize uplands because of the extreme stubble height requirements the uplands are barely used and there is an abundance of forage, hiding and thermal coverage.

Associated Letters: 198

Response: While we agree with the statement in general, there are upland areas with grazing concerns identified in the EIS. These include aspen stands, subalpine ecosystems, and bighorn winter range. Due to the potential for competition for bluebunch wheatgrass, the Forest Service is proposing 30% utilization in identified bighorn sheep winter range to ensure that forage in these areas is adequate after cattle graze the area in order to comply with Forest Plan standard. ["Big game requirements for space and forage have priority in the management of winter range used in common by livestock and big game" WIST07] The main impacts are related to the damage done to sensitive plant species in subalpine ecosystems by trampling and loafing rather than to overgrazing. The new Forest Plan set an upland grazing utilization standard. Page III-45, RAST01 (b).

Public Comment: 5b.14

Re-consider references to the 30% utilization standard not being met as documentation. Monitoring conducted by ISDA and permittees do not support this finding. Much of the damage attributed to livestock grazing is actually created by pack stock.

Associated Letters: 218-L

Response: Correspondence exists regarding monitoring conducted by ISDA and permittees, but there is no data that supported the commentor's claim. Riparian overuse by recreational pack stock is discussed in Chapter III .

Sub-issue 5c: High alpine communities / Railroad Ridge

Public Comment: 5c.1
Consider further protection for the Railroad Ridge area, it is unique and deserves special protection.

Associated Letters: 10

Response: We agree. The Revised Sawtooth Forest Plan includes an objective to designate this area as a Botanical Special Interest Area or as a Research Natural Area. However, these designations are beyond the scope of this decision.

Public Comment: 5c.2
Further reduce cattle grazing because monitoring data shows that streams, high alpine lakes, meadows, and plants are still suffering from overgrazing.

Associated Letters: 21, 32

Response: Alternative 2 includes reduction in grazing use and/or elimination of grazing in many of these areas. Refer to Chapter II of the FEIS for a full description of the alternatives.

Public Comment: 5c. 3
Remove cattle from areas above 9,000 feet in elevation to prevent destruction of alpine and sub-alpine vegetation and habitat and to prevent stream pollution.

At these high altitudes, with such short growing seasons, damage from cattle overgrazing takes a long time to cure.

Remove livestock grazing on Railroad Ridge to reduce impacts to the fragile environment and preserve white bark pine stands.

Associated Letters: 38, 43, 51, 60, 82, 93, 103, 113, 120, 129, 130, 133, 136, 151, 213-L, 214-L, 216-L, 217-L, 220-L

Response: Both alternatives 2 and 3 would remove livestock from these areas.

Public Comment: 5c.4
Further explain why 9,000 feet in elevation was chosen to eliminate livestock and not 8,000 or below.

Associated Letters: 95, 178, 181

Response: Railroad Ridge and surrounding alpine and subalpine habitats support more a wider variety of alpine communities than in any other Idaho areas studied The effects of livestock grazing and trampling in alpine and subalpine plant communities are discussed in Chapter III of the FEIS, which all occur above this 9000 foot limit. Soils supporting these plants are generally poorly developed and highly erosive. Given the short growing season and somewhat infertile and unstable soils found in these plant communities, alpine and subalpine plants are subject to grazing and associated impacts such as trampling or congregation over their entire growth period, unlike plants in lower elevations, which benefit from "range readiness". Impacts to White Cloud milkvetch and slender moonwort (TEPC plant species) are also discussed in Chapter III. This elevation restriction would provide for substantial reduction in impacts from livestock grazing and trampling to TEPC plant species and highly susceptible plant communities within the subalpine and alpine elevations.

Public Comment: 5c.5
Cattle use lower reaches of Railroad Ridge, not the upper reaches. Does the SNRA plan on fencing these areas out of the allotment? Cattle do not impact TES plant species as they trail through the area but do not stay. Recreationists are the ones impacting the plants.

Associated Letters: 198

Response: As discussed in Chapter III, of the FEIS, the Sawtooth NF has documented impacts to TES plant species. Indeed, range monitoring has documented that 44% (4 of 9) of the populations are experiencing moderate to locally heavy livestock use (grazing, trampling, and loafing). These populations are located at the following sites: 1) along jeep trail near head waters of Big Lake Creek, 2) along cut slope and adjacent areas along road to Livingston Mine, 3) along trail to Frog Lake, and 4) on ridge-top directly east of the Bowery Guard Station. These sites are extremely vulnerable to continued degradation and potential loss of viability under the current grazing systems, though under current management all populations are accessible to cattle. Fencing will likely be required as part of the final decision. ORVs, recreational impacts, and threats associated with them have been discussed in the FEIS.

Public Comment: 5c. 6
Determine whether elk or cattle are causing impacts to high cirque basins instead of automatically phasing out cattle grazing.

Associated Letters: 198

Response: Thank you for your comment. As discussed in the EIS there is a potential for forage competition between elk and livestock in these areas. To address these concerns, and to address Forest Plan standard WIST07 (Big game requirements for space and forage have priority in the management of winter range used in common by livestock and big game.), the Forest is proposing the closure of elevations above 9000' to livestock grazing. Where areas are used in common by elk and livestock in both time and space, it can be difficult to differentiate livestock use from elk use. However, monitoring of areas used by elk in other areas of the SNRA where livestock grazing has been removed show general improvement in riparian conditions. Elk use tends to be generally spotty and light relative to livestock use. This is discussed in the FEIS under Wildlife subheading Cumulative Effects to Habitat of Concern in Alt. 1.

Public Comment: 5c. 7
The document misrepresents grazing impacts to forage and soil in subalpine communities. Remove misleading wording on page III-19.

Associated Letters: 169

Response: In context, this statement is referring to livestock overuse in any white bark pine forest and is not specific to the East Fork Allotment. It is not a statement of current conditions on the ground, but is a statement of potential effects if standards are not met.

Public Comment: 5c.8
Closing grazing to areas above 9000 ft. is not going to solve current destructive grazing practices. Cattle should be kept out entirely.

Associated Letters: 126

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Category 5d: Riparian & Wetlands / Seeps

Public Comment: 5d.1
Better assess whether or not alternative 2, if chosen, will move riparian areas toward meeting forest plan objectives. Currently, alternative 3 is the only reasonable, supportable, and legal choice to recover these areas.

Associated Letters:166

Response: Alternative 2, as proposed in the Draft EIS stipulates that standards would be met annually or "permitted numbers and seasons would be modified as necessary to meet standards". The stocking rate per capable acre will be the same in Alternatives 1 and 2. The head month figure proposed for Alternative 2 was derived as a proportion of the Alternative 1 head months, based on the percent reduction in capable acres between the two alternatives. So, it is true that stocking rate per acre will be the same or may increase for those acres designed as "not moving toward" that remain within the allotment boundary. However, those 22 acres (38%) removed from the allotment will have no livestock impact.

Public Comment: 5d.2
Remove statements saying considerable degradation exists along the East Fork Salmon River as no-one from the SNRA has been involved with these assessments and these statements seem to be assumptions that are not based on scientific data, fact, or documentation. There is no mention of the landowners' involvement with Idaho Fish and Game, Model Watershed and other groups that have worked together to enhance the river corridor.

Big Lake Creek, Sullivan Creek and French Creek are also not degraded. Big Lake Creek and French Creek are grassed in and/or armored with woody species bushes and so are very stable. There are only a few areas where there can be crossings because of the brush and boulders or steep slopes, but this use is not just from cattle alone, but is used by elk, deer, moose, antelope and recreationalists.

Associated Letters: 198

Response: Such comments rightly acknowledge the efforts of the landowners working with agencies and groups to repair and protect the East Fork Salmon River. These many projects seem to be beneficial and well intended. However, the very need of these numerous projects indicates the altered state of the East Fork river system. The river is visible from the county road throughout most of its length, and, as

described in the EIS in Chapter IV pages 31, 32, 35, and 36, the appearance of the river suggests a diminished condition.

Although many segments of the streams listed (French , Sullivan, and Big Lake Creeks) do contain habitats that are well armored and vegetated, Forest Service observations suggest that many other segments, on both the mainstems and tributaries, are not. These portions of the total, as well as the patterns of riparian and stream conditions within each drainage, is discussed in Chapter III of the EIS. For example within the Big Lake and French Creek drainages, the EIS describes that it is the conditions within the tributaries and headwaters that are most compromised, rather than along the shrub dominated mainstems.

Public Comment: 5d.3
Monitoring by ISDA staff and permittees indicates limited use of woody species by livestock, though localized areas have experience some use on willows late in the season (mid September or later). Cattle until late in the season when herbaceous vegetation becomes less palatable do generally not select for woody species. Section 7 consultations has resulted in cattle being removed from streams considered as spawning habitat for ESA listed fish species by August 15, and in many cases August 1. Because cattle are not prone to consuming woody vegetation this early in the season, utilization has been negligible.

What has been documented is wide spread heavy use of willows and aspen by elk and moose in the Bowery Creek, Big Lake Creek, and French Creek drainages. Winter utilization of willows by moose in French Creek has been especially heavy, where in places, willows have been hedged uniformly to 4 feet with many stems having being consumed into the third year's growth.

Elk herds in the Pioneer and White Cloud Mountains have exceeded targeted populations of the Idaho Fish and Game Elk Management Plan for years and continue to expand. To fairly analyze the impacts of livestock grazing in the East Fork ecosystem, all herbivory by large ungulates must be analyzed. Has the impact of winter and early spring use of big game on riparian vegetation and regeneration of mahogany and aspen stands been analyzed?

Associated Letters: 218-l

Response: The Forest Service would be interested in seeing the documentation of the studies that the commenter refers to regarding big game winter use in these areas. It is doubtful that the number of moose that occur within these allotments could cause extensive effects to the riparian areas. Bowery Creek and French Creek are not elk wintering areas, so over browsing of willows by elk in these areas is also doubtful. Elk and moose do browse aspen during the growing season, therefore contribute to affects to aspen. However, livestock grazing also affects aspen, which is evidenced by the many observations of cattle grazing and loafing in aspen stands in these allotments by range, wildlife, and botany staff over the past decade. The DEIS acknowledges on page III-64 that elk numbers have increased in the IDFG Hunt Unit that includes these allotments. The allotments are not within the Pioneer Mountains. The Forest Service has not conducted any studies on big game use of willows or aspen in the East Fork Salmon. Mahogany does not occur in these allotments.

Public Comment: 5d.4
Future management should be to permanently eliminate livestock grazing from much of the SNRA, especially higher elevation sites, riparian areas, and other wetland sites.

Associated Letters: 163

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment: 5d.5
Past experience shows that the range damage, especially riparian will not be remedied in a timely manner by consulting with the lessees.

It [Alt. 2] also reportedly closes some streams to grazing. These riparian areas are particularly vulnerable to adverse impact, as you well know. I have seen cattle completely strip the vegetation in a narrow valley within about two days of their arrival. It can take years to restore the fish habitat in these streams. A little foresight for protection is worth years of hard work in restoration

Associated Letters: 5, 151

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment: 5d.6
Because cattle evolved in water-rich environments in northern Europe and the Near East, they invariably concentrate in riparian areas and require a significant daily effort to be kept away from the water and forage they desire. Livestock operators have found that effort a significant cost that they cannot afford.

Associated Letters: 188

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment: 5d.7
Table IV-1 page IV-36 has some unsettling information about Alt #2 and riparian areas not currently moving toward objectives. The table shows that very little reduction is proposed in this alternative for areas, which are grazed by livestock in Big Lake Creek, West Pass and the Upper East Fork and Slate, Mill, Holman, and French Creeks. Because the level of livestock use under Alt #2 in these areas is identical or may even increase in terms of stocking rate per acre as currently taking place under actual use levels of recent years, there is little or no way that the Forest Service can conclude that any progress will be made toward meeting Forest Plan or any other riparian health objectives. This is especially important to note because of the execrable record of the permittees in meeting current terms and conditions of their AOIs. The Forest Service cannot conclude that the permittees performance will be improved under Alt #2; a more likely and very reasonable conclusion is that failures will continue at least at the same rate as under current management, which means every year.

Associated Letters: 166

Response: Thank you for comment. Alternative 2, as proposed in the FEIS II 9-13, stipulates that standards would be met annually or "permitted numbers and seasons would be modified as necessary to meet standards". The stocking rate per capable acre will be the same in Alt 1 & Alt 2. The head month figure proposed for Alt 2 was derived as a proportion of the Alt 1 head months, based on the percent reduction in capable acres between the two alternatives. So, it is true that the stocking rate per acre will be the same or may increase for those acres designated as "not moving toward" that remain within the allotment boundary. However, those 22 acres (38%) removed from the allotment will have no livestock impact.

Issue 6: Soils / Water

Category 6a: Soils / Erosion – Summary of Comments Received:

Public Comment: 6a.1
Encourage the use of genetically engineered plants that are pest resistance and help stabilize soils to provide for long-term sustainable soil health and prevent erosion.

Associated Letters: 6

Response: There are no plans to introduce species for re-vegetation purposes within the allotment. Indeed, proper rest of these over utilized areas should allow for adequate regeneration of native vegetation. The National Forest Management Act requirements and the current Land and Resource Management Plan provides direction for the use of native species and the conservation of native plant communities.

Public Comment: 6a.2
Phase out grazing in the White Clouds because the area's topography and geology do not support grazing and cows impact riparian areas.

Associated Letters: 49, 57

Response: Physical landscape features are presented in Chapter III and the potential effects to these features are discussed in general terms and by drainage and alternative in Chapter IV. Existing geologic conditions are displayed in general terms in Chapter IV and by drainage in Chapter III. It is important to note that we received comments comparing the geology of the area to the geology found in the South Fork Salmon River area. The geology underling the East Fork Allotments is primarily volcanic, while the geology of the South Fork Salmon River, many miles to the northwest, is granitic.

Public Comment: 6a.3
Reduce grazing because of the impacts livestock have had on soil erosion, compaction, and sedimentation.

Associated Letters: 136

Response: Alternatives 2 and 3 would close some or all areas of the current allotments to livestock grazing

Public Comment: 6a.4
Reconsider the reduction of livestock because Chapter III indicates that 73% to 98% of the streambanks are stable and the allotments continue to function well.

Associated Letters: 169

Response: A summary of available stream habitat conditions, and comparable natural conditions can be found in Chapter III. Conditions are also presented, by drainage, in Chapter III.

Public Comment: 6a.5
Reconsider livestock reductions because grazing keeps forbes and grasses healthy, keeps excessive ground fresh and young, not old, dry and decadent therefore reducing fire hazard, and the soil disturbance caused by cattle helps hold rain water and allows moisture penetration.

Associated Letters: 198

Response: The potential effects of livestock grazing on vegetation and hydrologic integrity is provided in Chapter IV.

Public Comment: 6a.6
Consider that the entrenchment in Mill Creek was caused by a cloudburst, not by cattle grazing.

Associated Letters: 198

Response: Chapter IV describes how intensive livestock grazing can create conditions susceptible to uncharacteristic damage from high flow events.

Public Comment: 6a.7
I suspect you will need to cut further or eliminate livestock grazing altogether. Eventually we will all come to the unfortunate conclusion that it is simply impossible to graze livestock both profitable and responsibly in our fragile low precipitation, erosive steep country.

Associated Letters: 59

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Category 6b: Water Quality / Hydrology

Public Comme nt: 6b.1
Measure the effects of fecal coliforms to streams and address the threat to human health.

Associated Letters: 12, 123

Response: The potential effects of fecal coliform in streams are discussed in Chapters III and IV.

Public Comment: 6b.2
Remove cattle grazing from steam areas within the White Cloud allotments and restrict grazing in areas where there are frequent trespass issues.

Associated Letters: 57, 136

Response: Alternative 2 and 3 address this comment. In alternative 3, after four years, no grazing will occur within the allotments by domestic livestock except that associated with recreation use (horses and pack animals). In Alternative 2, allotment boundaries removing livestock grazing from some areas and resting others until recovery of specific resource conditions have been achieved.

Public Comment: 6b.3
Restrict grazing in high elevation environments because it impacts stream ecosystems and it impacts potential RNA designations by destroying the upstream features attempting to be preserved.

Associated Letters: 70

Response: Thank you for your comment. Descriptions of potential effects are provided in the FEIS, pages IV 30-36, and also drainage by drainage (many of which include high elevations), by alternative, in the FEIS, pages IV 38-55.

Public Comment: 6b.4
This section [Hydrology] only briefly discusses shearing and trampling of banks, overuse (overgrazing, grazing more than 30%, leaving less than 4" stubble?) of hydric vegetation, and associated degradation of riparian, soil and plant communities. Hints and allegations are all the substance of this section and have no place in a scientific document and failure in meeting streambank trampling standards or stubble height standards is a surrogate measurement of the functional integrity of the hydrologic processes in a basin.

Associated Letters: 148

Response: The existing conditions of watershed and stream functions is presented in IV-29-32. The DEIS pg IV-30 acknowledges that the effects of various livestock grazing scenarios may be speculative due to the variability of natural systems, and the variability of future compliance with the system. However, the mechanisms of these effects are presented and the relative potential of these effects contrasted in the DEIS IV-29-32, and drainage by drainage, by alternative, in IV-36-54.

Though it is true that some effects of livestock grazing may stimulate a positive response to the physical or vegetative conditions of stream or streamside areas, these alterations are typically only in excess of what native ungulates may provide. In other words, it is assumed that the greatest long-term ecological balance of stream habitats vs grazing ungulates would result from the natural grazing habits and numbers of native ungulates to which they evolved. Most of the native ungulate species present historically remain in the East Fork today. It is doubtful that vast herds of heavy ungulates (such as bison) routinely grazed the headwaters of the East Fork watershed historically. Though some have advocated that intensive but controlled grazing of livestock can benefit streams (Savory 1988), nearly all scientific studies refute this claim (Belsky, Matzke, and Uselman 1999). Range managers concluded that an attempt at time-controlled grazing within the Lower East Fork Allotment in late 1990s was unsuccessful. The current conditions of the watersheds are presented in the DEIS pages III-37-55.

These allotments have not shown a beneficial effect to vegetation and forage species from livestock grazing. This assessment is based on observations by range and botany staff of reduced plant vigor, soil loss, and vegetation trampling that is evident in many areas. It is true that some riparian species may be early seral species. Indeed Spiranthes diluvialis, a threatened orchid species, is an early seral species, however, natural flood events and natural disturbance are necessary for its establishment and survival. Studies conducted on this early seral species with livestock grazing have shown a severe decline in flower and seed production due to trampling and soil compaction.

Public Comment: 6b.5
Protect the Fisher Creek area because the ponds and willows on the east side of the creek are continually degraded by livestock.

Associated Letters: 181

Response: Fisher Creek is a small tributary of the upper East Fork. Existing conditions of these drainages are described in Chapter III. Potential effects, by alternative, are presented in Chapter IV.

Public Comment: 6b.6
Remove cattle from Potaman, Sullivan, Jimmy and Corral Creek in the Lower Eat Fork allotment because the drainages are so narrow, cattle have nowhere else to walk except in and next to the creek causing overuse and trampling.

Associated Letters: 178, 182

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment: 6b.7
The reduction and loss of native salmonids from so many of the West's smaller water systems speaks to the need to protect remaining habitats from the proven negative impacts of livestock. The pervasive downcuts, lowering of water tables, and loss of water quality due to livestock presence clearly indicates the need to remove those impacts to allow the system to begin to recover.

Associated Letters: 188

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment: 6b.8
Address water rights ownership and identify the ownership for every water right with the project area based on the decision in the litigation of Hage v. United States takings case in the US Court of Claims.

Associated Letters: 189

Response: The decision of Hage vs. the United States directed no such obligation. The issue is beyond the scope of this project.

Public Comment: 6b.9
Consider impacts caused by wildlife and recreationists to areas not meeting vegetation management objectives within Slate Creek/Silver Rule.

Associated Letters: 198

Response:
Existing conditions of Slate Creek/Silver Rule are described in Chapter III. The description identifies that non-forested segments have been a "focus of ungulate grazing", which includes both wild and domestic grazing animals. It also describes the shrub dominated lower meadows, and also the high elevation meadows of low graminoids. Recreation use of the drainage is believed to be low and seasonal.

Public Comment: 6b.10
Reconsider East Fork hydrologic integrity statements because the SNRA has not been involved in any of the monitoring or condition analysis studies of the East Fork along private property nor have they been involved in projects by landowners, Model Watershed, Challis Soil Conservation District, NRCS, and Idaho Fish and Game. The SNRA also failed to incorporate these analysis and monitoring efforts into this planning project.

Associated Letters: 198

Response: Comments rightly acknowledge the efforts of the landowners working with agencies and groups to repair and protect the East Fork Salmon River. These many projects have generally appeared to

be beneficial and well intended. However, the very need of these numerous projects indicates the altered state of the East Fork river system. The River is visible from the county road throughout most of its length, and, as described

Public Comment: 6b.11
Re-evaluate the success of current livestock management because the majority of stream reaches, presented in Chapter III, are accessible to livestock but only 14% of the total stream miles within the two allotments are not considered moving towards SNRA desired conditions.

Reconsider the altered conditions of Holman and Mill Creek because the treatment structures installed in the 1970s were unsuccessful, therefore not all the unsatisfactory conditions identified for this area can be attributed to current livestock management

Associated Letters: 218-L

Response: These conditions are discussed, drainage by drainage, in the FEIS pages III-36-56. Note that only a small minority of streams have been assessed with physical habitat inventories, and most of these are main stems. The natural features and existing conditions of the tributaries, where known, are also included in the descriptions referenced above.

The area currently encompassed by the East Fork Allotments has seen well over a century of modern use and development. Many effects to watershed, stream, and streamside conditions persist. Where they are recognized, these effects are presented throughout the drainage by drainage discussions of existing conditions in the FEIS pages III 36-56.

Public Comment: 6b.12
The DEIS states that nearly all segments in headwater areas are not moving towards Forest Plan Management vegetation management objectives. Describe project components and activities designed to improve areas not moving towards Forest vegetation management objectives. Better demonstrate that the proposed management plans contain strategies that would adequately protect and improve water quality in the headwater areas found within the project area as these are critically important bull trout spawning areas.

Associated Letters: 223-L

Response: Alternative 2 described responds to these issues by proposing to remove the current Boulder and Bowery pastures from the allotments. This change would remove by approximately 60 percent the amount of proposed critical habitat for bull trout within the current boundaries of the allotment. These potential effects are presented in Chapters II and IV.

Public Comment: 6b.13
Include a map of impaired water bodies within the project area.

Associated Letters: 223-L

Response: No water bodies within the project area are currently identified as impaired. Chapter III discusses the status of the Salmon River to the north of the project, which is the nearest impaired water body downstream of the project area. For this same segment, on March 19, 2003 EPA approved Idaho Department of Environmental Quality's (IDEQ) recommendation that "a TMDL for this segment is not warranted", since all beneficial uses are currently supported.

Public Comment: 6b.14
Disclose the State's water quality standards and demonstrate that this project will meet these standards.

Associated Letters: 223-L

Response: Idaho water quality standards are published in the state rules at IDAPA 58.01.02 B - Water Quality Standards and Wastewater Treatment Requirements. However, the outdated temperature criteria have long been recognized by IDEQ as problematic (Essig 1998). EPA has recently published guidance for Northwest temperature standards (EPA 2003). Idaho has also published a dissenting opinion regarding these EPA recommendations (Essig 2002). In light of this uncertainty with the standards, and the limited temperature information available for waters within the East Fork, the influence of temperature on salmonids is presented in the life history discussions in Chapter III. Then, by drainage discussions in Chapter III presents existing temperature conditions in those drainages where such information is available. The effect of the action on water temperatures is discussed in Chapter IV.

Public Comment: 6b.15
Some suggested significant issues to be clarified include: Fisheries and Hydrology: Livestock grazing may be impacting functional integrity of hydrologic processes. This issue should incorporate all the information written under the hydrologic comments to be added. Also, any comments on the impacts of livestock grazing under the category of disturbance to functional integrity of hydrologic processes cannot be complete or thorough without adding information about the benefits that planned livestock grazing has had and can have on upland watershed hydrology. This should include the primarily values livestock grazing has on reducing soil crusting, organic matter improvements and reduction of peak discharges and volumes of runoff. Upland watershed hydrologic condition information is paramount to any evaluation of the functional integrity of both uplands and stream channels.

Associated Letters: 148

Response: Though it is true that some effects of livestock grazing may stimulate a positive response to the physical or vegetative conditions of stream or streamside areas, these alterations are typically only in excess of what native ungulates may provide. In other words, it is assumed that the greatest long-term ecological balance of stream habitats vs grazing ungulates would result from the natural grazing habits and numbers of native ungulates to which they evolved. Most of the native ungulate species present historically remain in the East Fork today. It is doubtful that vast herds of heavy ungulates (such as bison) routinely grazed the headwaters of the East Fork watershed historically. Though some have advocated that intensive but controlled grazing of livestock can benefit streams (Savory 1988), nearly all scientific studies refute this claim (Belsky, Matzke, and Uselman 1999). Range managers concluded that an attempt at time-controlled grazing within the Lower East Fork Allotment in late 1990s was unsuccessful.

The current conditions of the watersheds are presented in the DEIS pages III-37-55. The existing conditions of watershed and stream functions is presented in IV-29-32. The DEIS pg IV-30 acknowledges that the effects of various livestock grazing scenarios may be speculative due to the variability of natural systems, and the variability of future compliance with the grazing systems. However, the mechanisms of these effects are presented and the relative potential of these effects are contrast in the DEIS IV-29-32, and drainage by drainage, by alternative, in IV-36-54.

These allotments have not shown a beneficial effect to vegetation and forage species from livestock grazing. This assessment is based on observations by range and botany staff of reduced plant vigor, soil loss, and vegetation trampling that is evident in many areas. It is unclear what is meant by author of this comment in regards to decadence. If decadence is meant to mean no longer reproductive or loss of vigor, it is arguable that decadence is exacerbated by livestock use not prevented. Given that livestock often eat

the annual growth of woody species, they thereby eliminate the production of reproductive structures and decrease vigor within such species.

Issue 7: SNRA

Category 7a: PL 92-400/General:

Public Comment 7a.1
Hikers wading through cow-pies at Frog Lake is not what the term maintaining the "pastoral scene" was meant for.

Associated Letters: 13

Response: Thank you for your comment. Appendix I of the revised Sawtooth Forest Plan provides a description of the Pastoral Values and where they apply. The areas identified here do not fall within the "Pastoral Envelope" and therefore are not expected to contribute to the Pastoral value.

Public Comment 7a.2
Enforce the enabling legislation for the SNRA, which emphasizes wildlife, watersheds, fish, and recreation values as the overarching principles of land management, not cattle or sheep grazing.

The SNRA while embracing in its mission the concept of multiple use, does establish priorities. Recreational use takes priority over grazing. Inherent in the idea of recreation as a "dominant" use is the expectation of experiencing wildlife in their natural habitat. As that habitat is degraded and wildlife populations diminished, the source of those impacts must be removed.

Phase out livestock grazing in these areas.

Associated Letters: 13, 17, 65, 73, 74, 76, 81, 87, 92, 94, 151, 158, 178, 179

Response: PL 92-400, which established the SNRA, requires that the SNRA be managed to best provide (1) the protection and conservation of the salmon and other fisheries; (2) the conservation and development of scenic, natural, historic, pastoral, wildlife and other values, contributing to and available for public recreation and enjoyment; and (3) management, utilization and disposal of natural resources such as timber, grazing and mineral resources insofar as their utilization will not substantially impair the purposes for which the recreation area is established. The FEIS contains information that will be used by the Area Ranger to make a substantial impairment determination based on Appendix I, pages 15-29 of the revised Sawtooth Forest Plan.

Public Comment 7a.3
Implement alternative 2 and after the short period of time reassess the land's condition to determine if it still doesn't meet SNRA criteria and then institute alternative 3 to ensure the SNRA is a place for all people to enjoy.

Associated Letters: 16

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 7a.4

These beautiful lands provide a haven for wildlife and a reservoir for the human spirit that few places can boast. I urge you folks to adopt Alt. 3 and let the SNRA move into a new paradigm of cattle free existence. Most importantly, please take any and all actions that ultimately protect the resources in the long-run.

Associated Letters: 66

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 7a.5
I am writing to urge cutting back or eliminating grazing in the White Cloud Area of the Sawtooth National Recreation Area. There are numerous issues of concern including overgrazing, grazing outside of allotted areas, conflict with other wildlife (including wolves) and conflicts with recreational users among others. It seems to me this is public land and priority should be given to keeping the land healthy and supporting public use and wildlife.

The White Clouds provide more than a western "lifestyle and economic well-being". Beef is produced on many millions of acres of public land that doesn't compare with the natural beauty and wildness of the White Clouds. Protecting these values should be paramount in it's management. You can't walk the White Clouds without deeply sensing awe at the world you've been privileged to experience and reverence for it's creation.

Associated Letters: 108, 136

Response: Alternative II, as described in Chapter II of the DEIS, was designed, in part, to reduce or eliminate grazing effects on fish, wildlife, and recreation on the Upper and Lower East Fork Allotments. The effects of Alternative II are described in Chapter IV of the DEIS.

Public Comment 7a.6
The DEIS places livestock grazing at blame for every problem within the allotment, and places it at odds with the other uses that occur. It seemingly uses grazing as a scapegoat for the problems that arise as a result of other uses or factors. The multiple uses of the land within the SNRA are not mutually exclusive. In fact the Act establishing the SNRA states that the "Secretary shall administer the recreation area ...in such manner as will best provide...the management, utilization, and disposal of natural resources on federally owned lands such as timber, grazing, and mineral resources insofar as their utilization will not substantially impair the purposes for which the recreation area is established."

Associated Letters: 183

Response: Because the focus of this document is livestock grazing and the need to update the allotment management plans, it provides a more detailed description of the resource impacts associated with livestock grazing. However, it does recognize other impacts to the area including those associated with recreation and off-road vehicle use. These other impacts are described in Chapter III of the FEIS. The information in the FEIS will be used by the area ranger to make a determination of substantial impairment based on the measures described in Appendix I, pages 15-29 of the revised Sawtooth Forest Plan.

Public Comment 7a.7
By learning from years of experience and research, it is our strong conviction that grazing does not "impair the purposes" of the SNRA. Rather, grazing is a key factor in enhancing and preserving those purposes. Furthermore, the very term, "pastoral" uses the words "animal husbandry", "herdsman", and "life in the country" in its own definition. Unfortunately, the trend in recent years has been a de-

emphasizing of grazing. This is a big mistake with repercussions that will destroy the very character and nature of the area the SNRA is trying to preserve.

The Forest Service staff that produced this DEIS have misinterpreted the SNRA Act and have failed to properly identify and characterize resource problems, have failed to find practical solutions that meet the requirements of the applicable laws and regulations, and have failed to seek assistance in areas where they clearly lack expertise - range and riparian area management and communicating with the public.

Associated Letters: 183, 212-L, 218-L

Response: According to PL 92-400, grazing is allowed only so long as it does not substantially impair the key values of the SNRA, which includes pastoral. Guidance for determining substantial impairment is provided in Appendix I of the revised Sawtooth Forest Plan. Appendix I provides a description of the Pastoral Values and where they apply. The project area does not fall within the "Pastoral Envelope" and therefore is not expected to contribute to the Pastoral value.

Public Comment 7a.8
Preserving the wild and scenic character of the land takes precedent over recreation, especially motorized travel.

Associated Letters: 17

Response: Management of motorized travel is outside the scope of this decision.

Public Comment 7a.9
Cattle are impacting rare and endangered species like salmon, steelhead, bull trout and westslope cutthroat by overgrazing and miring fish habitat. Bighorn sheep and wolves have also been impacted. On the SNRA, fish and wildlife, and recreation are SUPPOSED to have preference over livestock grazing.

Associated Letters: 22, 94, 100, 102, 177, 179, 192, 201, 222-L

Response: The effects of grazing on fish and wildlife were identified as significant issues in the DEIS and FEIS. The effects of grazing on fish and wildlife have been disclosed in Chapter III. Alternative II, described in Chapter II, was developed in part to reduce or eliminate impacts to fish and wildlife. According to PL 92-400, which established the SNRA, grazing may occur so long as it does not substantially impair the purposes for which the recreation area was established. The FEIS contains information necessary for the area ranger to make a determination of substantial impairment based on the measures described in Appendix I, pages 15-29 of the revised Sawtooth Forest Plan.

Public Comment 7a.10
Flying Triangle's Grazing Permit annually authorizes sheep use inside the Owl Creek, Pole Creek, Champion Creek and Salmon River Allotments and outside the "Central Idaho Gray wolf Recovery Area". My grandfather, my father, and now Flying Triangle have grazed sheep within what is now known as the Owl Creek, Salmon River, Pole Creek, Champion Creek allotments since about 1901. Consider this use historical and I consider this use "pastoral". See The New Lexicon Webster's Encyclopedic Dictionary or the English Language, Deluxe Edition (1992 Edition), which defines "pastoral" as "relating to or characterized by the care of grazing animals, esp. sheep and goats".

Associated Letters: 184

Response: Flying Triangle's grazing permit and the areas mentioned are outside the scope of this analysis.

Public Comment 7a.11
There is enough language in PL 92-400 to ban all grazing where wolves are present.

Since wolves now cover such large areas within the SNRA and occupied areas will continue to grow even larger as packs increase, and since PL 92-400 specifically gives priority to fish and wildlife, it's not unreasonable to ban ALL livestock grazing in the SNRA.

Associated Letters: 47, 49

Response: According to PL 92-400, which established the SNRA, grazing may occur so long as it does not substantially impair the purposes for which the recreation area was established. The FEIS contains information necessary for the area ranger to make a determination of substantial impairment based on the measures described in Appendix I, pages 15-29 of the revised Sawtooth Forest Plan.

Public Comment 7a.12
Implement alternative 3 and phase out grazing based on the judge's ruling giving precedent to recreation and wildlife, to protect threatened and endangered species habitat, and preserve the values for which the SNRA was designated.

Associated Letters: 49

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 7a.13
Over or mis-statements regarding grazing impacts and omission of fundamental benefits of grazing upon range ecosystem cycles should have no place in a high quality, final EIS. Grazing livestock is a valid use on the SNRA, so long as it does not cause substantial impairment of SNRA key values, according to PL 92-400. This public law has the stated intent to achieve livestock grazing in balance with other resource values on the allotment. The writers of the draft EIS seem to want to make the case that grazing is not in balance with other resource values and has caused substantial impairment of the environment (SNRA values), however the proposed action to authorize permitted grazing is what is sought because they must.

Associated Letters: 148

Response: The EIS does not 'suppose' that livestock grazing is substantially impairing any values. It is an analysis document that lays out the existing conditions and effects. Only the Area Ranger can determine if "substantial impairment" is occurring. We recognize that livestock grazing can, under certain conditions, be beneficial. However, in the Upper and Lower East Fork Allotments, the main areas of concern are riparian, where analysis shows the impacts outweigh the benefits.

Public Comment 7a.14
Extending protection of the pastoral values of the SNRA to public lands is simply no longer appropriate. From the outset, SNRA management has been saddled with a policy in direct conflict with the other, more important charges of its management. As the SNRA has become ever more appreciated for these other values, the conflict has been exacerbated. It is time to relegate public lands grazing to the history value, interpreting its former significance thereof. The pastoral value is eminently represented in the Sawtooth Valley and, in fact, has been enhanced with the elimination of tacky real estate development in this all important view corridor.

Associated Letters: 179

Response: Public Law 92-400 requires the conservation and development of, among others, the Pastoral values within the SNRA. It is not within the authority of the SNRA to choose to no longer follow that direction. Actions that substantially impair the pastoral values on the SNRA will not be approved. The FEIS contains information necessary for the area ranger to make a determination of substantial impairment based on the measures described in Appendix I, pages 15-29 of the revised Sawtooth Forest Plan.

Public Comment 7a.15
Thirty years ago I was the SNRA wilderness ranger in the White Clouds. I had to explain to backcountry visitors why grazing impact was an acceptable pastoral value, especially on the East Fork of the Salmon slope from Frog Lake, lower Boulder Chain and Little Boulder Creek. I had to lie, feeling the impact inconsistent with the recreational and wildlife values visitors sought. Thirty years later, an SNRA wilderness ranger would still have to lie. Former Forest Service Chief Jack Ward Thomas points the way when he said, " I believe in a land ethic that is based on ...preservation of the integrity, stability and beauty of the biotic community. Human activity that is consistent with this ethic is properly within the realm of resource management options. That which would violate this ethic should be resisted for all but the most compelling reasons." There is no longer a compelling reason to protect the East Fork allotments. To the contrary, ever more compelling reasons to protect the other human uses and resources values for which the SNRA was established.

Associated Letters: 179

Response: Appendix I of the revised Sawtooth Forest Plan provides a description of the Pastoral Values and where they apply. The areas identified here do not fall within the "Pastoral Envelope" and therefore are not expected to contribute to the Pastoral values. According to PL 92-400, which established the SNRA, grazing may occur so long as it does not substantially impair the purposes for which the recreation area was established. The FEIS contains information necessary for the area ranger to make a determination of substantial impairment based on the measures described in Appendix I, pages 15-29 of the revised Sawtooth Forest Plan.

Public Comment 7a.16
Maintaining livestock on the SNRA is essential to achieving the "preservation of. ..historic, pastoral" values. Cattle have been on the land for well over 100 years. This has benefited both the resources within the SNRA, but is the root of the entire economy that has developed in Custer County. Reducing the number of cattle left on the range will force these historic and pastoral values into non-existence.

Associated Letters: 183

Response: Appendix I of the revised Sawtooth Forest Plan provides a description of the Pastoral and Historic Values and where they apply. The areas identified here do not fall within the "Pastoral Envelope" and therefore are not expected to contribute to the Pastoral value. The Area Ranger will make a determination of Substantial Impairment as part of the Record of Decision based on the criteria provided in Appendix I and the analysis provided in the EIS.

Public Comment 7a.17
Identify the Organic Act.

Associated Letters: 189

Response: The "Organic Act," referred to is Public Law 92-400, which is identified on page I-1 of the DEIS. A copy of PL 92-400 will be included in the FEIS as Appendix F.

Public Comment 7a.18
Pg III- I Sawtooth National Recreation Area Goals. The first sentence needs clarified as follows: "Manage public lands within the SNRA boundaries to ensure the preservation and protection of the natural, historic,..." Private lands should not be mentioned here. If private lands are to be included in this sentence, then it needs to read "on those private lands inside the SNRA boundaries through conservation easements in which land owners are compensated for those restrictions" The private lands on the East Fork are not within the SNRA boundaries and therefore the SNRA has no right trying to enforce any regulations on these lands.

Associated Letters: 198

Response: The point that private lands in the East Fork are not within the SNRA and therefore not subject to the SNRA's private land regulations is accurate.

Public Comment 7a.19
It appears that a part of the anti-grazing agenda is based on Public Law 92-400 establishing the Sawtooth National Recreation Area, which was passed in August of 1972. Why is it that after 29 years has it been determined that livestock should be removed from the area.

Associated Letters: 189

Response: The DEIS analyzes three alternatives, with varying levels of grazing in each. A final decision on how or if grazing should proceed will be made after completion of the FEIS.

Public Comment 7a.20
Support Alternative 2. At present, the rights of grazing permittees are overshadowing the greater SNRA mission to preserve the natural resources, wildlife, and historic value of the area.

Associated Letters: 204

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 7a.21
The objectives stated for the SNRA are very broad and non-specific. Generally, objectives are to be specifically defined and must be measured. As they are, the objectives are broad and open to a great deal of interpretation and bias by the observer. This is particularly troubling in that "Substantial Impairment" will be evaluated against these objectives.

Associated Letters: 218-L

Response: The objectives for the SNRA cited in the DEIS were developed in the Sawtooth National Forest Land and Resource Management Plan, issued in 1987. With the recent release of the revised Forest Plan, these objectives have been updated. Likewise, the Revised Forest Plan includes direction specific to substantial impairment determinations. The Area Ranger will make a substantial impairment determination based on guidance described in Appendix I, pages 15-29 of the revised Sawtooth Forest Plan. This determination will be disclosed in the East Fork Record of Decision.

Category 7b: Substantial Impairment:

Public Comment 7b.1
The Sawtooth National Recreation Area was established "…to protect the area's primary values of scenic, natural, historic, pastoral, and fish and wildlife values, and to provide for the enhancement of recreation attributes." Consumptive uses such as livestock grazing are to be provided for "…so long as these uses do not substantially impair the recreational associated values for which this recreation area was established." Values are being substantially impaired by grazing in the East Fork of the Salmon River.

Associated Letters: 43, 62, 140, 181, 205, 215-L

Response: The FEIS contains information necessary for the Area Ranger to make a substantial impairment determination based on guidance provided in the revised Sawtooth Forest Plan, Appendix I. The Area Ranger will determine if the grazing system for the Upper and Lower East Fork Allotments that comes out of this planning process will substantially impair the values the SNRA was established to protect.

Public Comment 7b.2
Consider the fact that grazing on the SNRA is a historical use that continues to contribute, rather than substantially impair, the key values of the SNRA. Grazing is an active management tool that can be used by resource managers to diminish the risk of catastrophic fire, limit the spread of noxious weeds, improve plant health and vigor, and maintain the diversity of flora.

Associated Letters: 8

Response: There is no determination in the EIS that grazing substantially impairs the key values in the SNRA. The Area Ranger will make that determination from the information provided in the FEIS and disclosed in the Record of Decision. The analysis will be based on guidance contained in Appendix I of the revised Sawtooth Forest Plan, pages 15-29. While we acknowledge that livestock grazing can be used to manage vegetation, specifically within the Upper and Lower East Fork Allotments, grazing has resulted in vegetation conditions that do not meet Forest Plan vegetation management objectives in several areas.

Public Comment 7b.3
Grazing is substantially impairing wildlife and recreation values by cows being present in high mountain lakes and overgrazing meadows.

Associated Letters: 43

Response: Based on guidance provided in the revised Sawtooth Forest Plan, Appendix I, the Area Ranger will determine if livestock grazing has impaired the Upper and Lower East Fork Allotments, and if grazing can occur without substantially impairing the primary values in these areas.

Public Comment 7b.4
Two wolf packs have been eliminated by lethal control (shooting) due to conflicts with cows -- the White Cloud Pack (5 wolves) in April 2000, and the Whitehawk pack (11 wolves) in April 2002. According to the SNRA management plan, cattle would be allowed to graze in the SNRA as long as they did not cause substantial impairment of the SNRA key values. The elimination of two wolf packs constitutes substantial impairment of the SNRA key values.

The analysis of the impacts of Alternative #2 on wolves (page IV-68) is especially misleading in that the Forest Service fails to determine if continued livestock grazing under this alternative will substantially impair wolves in the SNRA. Notwithstanding the Reintroduction Rule, the Forest service is obliged to identify whether the continued presence of livestock will substantially impair wolves in the SNRA. This has not been done.

Associated Letters: 94, 156, 166

Response: The determination if continued livestock grazing will substantially impair wolves on the SNRA is not made in the EIS, rather, in the Record of Decision, based on information contained in the FEIS and guidance from Appendix I of the revised Sawtooth Forest Plan. Appendix C in the FEIS contains information specific to the status of gray wolves on the SNRA including Desired Condition and Rationale, Habitat Factors, Pack History and Livestock Depredations and Lethal Control of Wolves. No livestock depredations by wolves have occurred within the Upper or Lower East Fork Allotments to date. Control of wolves would continue on the adjacent Salmon-Challis allotments, the BLM allotments and on private land whether or not livestock occur in the Upper and Lower East Fork Allotments on the SNRA.

Public Comment 7b.5
The special management regulations for the SNRA require that grazing may not substantially impair wildlife and recreation values. Alt. 2 is an appropriate and badly needed measure to meet this standard.

Associated Letters: 120

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 7b.6
Livestock grazing is substantially impairing the SNRA's primary values. Alternative 3 is the only solution for eliminating substantial impairment.

Associated Letters: 156, 178

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 7b.7
Note that the "…final determination of 'Substantial Impairment'…, below in the DEIS, may be only via a simple statement about "cooperation" with the FWS. If it is meant that "cooperation" in fact constitutes the determination process for substantial impairment then I have a comment on that. It is not an analytical process. Nor is it a process at all. I must disagree with the outcome if it is that there is no substantial impairment to wolves from the federally permitted action that allows grazing on public lands of the SNRA.

Suggest that it is a requirement of the Forest Service to demonstrate that there is no substantial impairment to fish, wildlife, and other resource values on the SNRA, and that law requires this. Moreover, I would add that the Forest Service uses a repeatable and quantitative approach that will withstand peer review and challenges.

Associated Letters: 156

Response: The substantial impairment determination is not made in the DEIS, rather it will come after the FEIS is issued. The FEIS contains information necessary for the Area Ranger to make a substantial impairment determination based on guidance provided in the revised Sawtooth Forest Plan, Appendix I.

The Area Ranger will determine if the grazing system for the Upper and Lower East Fork Allotments that comes out of this planning process will substantially impair the values the SNRA was established to protect and disclose the determination in the Record of Decision.

Public Comment 7b.8
Nowhere in the DEIS does the document actually provide a clearly stated conclusion as to whether livestock grazing substantially impairs the primary values of the SNRA on these allotments. While this mandate is mentioned on page I-6 of the DEIS, it is not followed up with any conclusion. This is especially important in regard to the proposed level of grazing by livestock in Alternative #2 which is listed in the DEIS as the "Proposed Action", but which will continue livestock grazing in the remaining areas mapped for each allotment at the same level as the current stocking rate which has been shown to be in non-compliance with the Forest Plan as well as the terms and conditions of the grazing permits and the annual operating instructions (AOIs) for livestock grazing.

Associated Letters: 166

Response: As described in the Decision Framework in Chapter 1 of the EIS, the Area Ranger must use information provided in the FEIS to decide if the primary values will be substantially impaired by livestock grazing. This decision will be identified in the Record of Decision and based on the definition of substantial impairment found in 36 CFR 292.17 (b) (10).

Public Comment 7b.9
So, what exactly does the Sawtooth National Forest Plan say as to "substantial impairment, and wouldn't it be useful to quote here?"

There is no protocol identified in the DEIS which shows how "substantial impairment" of primary SNRA values by livestock is to be determined. If the non-compliance is determined by whether authorized use is in keeping with the Forest Plan that should be so stated and explained in some detail. The final EIS also needs to identify what level of non-compliance with the primary values constitutes substantial impairment of those values. The SNRA did develop a protocol for this kind of analysis in the 1970's, but apparently the Forest Service prefers not to refer to that document or to provide any understanding of how substantial impairment is being determined. This failure is a major flaw in the DEIS.

Associated Letters: 156, 166

Response: The 1987 Sawtooth Forest Plan defines substantial impairment on page IV-92, as "that level of disturbance of the values of the SNRA which is incompatible with the standards of the General Management Plan. The proposed activities will be evaluated as to (1) the period of impact, (2) the area affected, and (3) the importance of the impact on the SNRA values. The final determination of "Substantial Impairment" will be through the NEPA process." Appendix I in the Revised Sawtooth Forest Plan updates this information and provides a more comprehensive description of how to determine substantial impairment. This information has been incorporated into the FEIS and Appendix C.

Public Comment 7b.10
Did the determination of grazing suitability include an analysis of substantial impairment The determination of grazing suitability needs to be updated to include an analysis of substantial impairment, particularly as it relates to wolves .

Complete a suitability analysis to incorporate changes in direction as related to ESA, wolf reintroduction, sage grouse, and bighorn sheep since the 1987 Forest Plans and to incorporate new information about recreational conflicts and livestock grazing impacts not anticipated in the Forest Plan.

Associated Letters: 156

Response: Determination of grazing suitability is made by the Forest Plan. It does not include an analysis of substantial impairment. The determination of suitability does not authorize livestock grazing on the Upper and Lower East Fork Allotments. Authorization of grazing on the allotments will be made in the Record of Decision (ROD) for this EIS. The substantial impairment determination will be made in the Record of Decision by the Area Ranger based on guidance provided in Appendix I, pages 15-29 of the revised Sawtooth Forest Plan.

Public Comment 7b.11
Redo the Organic Act Analysis for Gray Wolf on Eight Grazing Allotments, found in Appendix C, as it is cursory, arbitrary, irresponsible, does not keep with the Order of the District Court, and was not completed under a reasonable substantial impairment determination protocol.

The Organic Act Analysis for Gray Wolf (Appendix C) seems very incomplete and inconclusive as far as addressing the key issue. The DEIS really has little to offer on the question of whether grazing is "substantially impairing" the wolf populations in the SNRA. The recovery plan and the de-listing goal for the wolves would appear to most people to be in direct conflict with the Nonessential Experimental Population Rule which permits lethal control. How such activities will lead to the desired condition where management activities will "support the reproduction and survival of wolves in order to contribute to the maintenance of viable and sustainable populations" is certainly not explained.

At the heart of the matter is the incomprehensible refusal of the Forest Service to make any changes in grazing management or to communicate regularly with USFWS to determine where wolves are, in order to try and keep sheep and wolves apart and prevent their impairment.

Associated Letters: 140, 166, 168, 181, 182

Response: Comment noted. The FEIS, including Appendix C, contains information necessary for the Area Ranger to make a substantial impairment determination, based on guidance in Appendix I of the revised Sawtooth Forest Plan. The final determination will be disclosed in the Record of Decision. Under current management of sheep grazing, numerous non-lethal measures have been implemented to reduce wolf depredation on sheep. Those measures include temporary electric fencing of sheep bedding areas, fladry, providing herders with telemetry equipment to alert them of the wolves presence, noise aversion, and requesting bands be moved to avoid areas know to be occupied by wolves.

Public Comment 7b.12
Consider other uses and the benefits of grazing on rangeland ecosystem health prior to making the case that livestock grazing is causing substantial impairment.

Associated Letters: 183

Response: The DEIS does not make a substantial impairment determination. A substantial impairment determination will be made based on information in the FEIS. That determination will be disclosed in a Record of Decision. The effects of grazing have been disclosed in Chapter III.

Public Comment 7b.13

The language within the draft EIS leads the reader to support the supposition that livestock grazing produces substantial impairment of purposes for which the SNRA was setup, without however, providing enough solid information to reach this conclusion. It does this by: 1) overstating or misstating the impacts of grazing on some resources and some wildlife species and 2) omission of issues that are, in fact, fundamental to well functioning, healthy ecosystem cycles.

Associated Letters: 148

Response: The EIS does not 'suppose' that livestock grazing is substantially impairing any values. It is an analysis document that displays the existing conditions and effects. The Area Ranger is authorized to determine if "substantial impairment" is occurring. We recognize that livestock grazing can, under certain conditions, be beneficial. However, in the Upper and Lower East Fork Allotments, the main areas of concern are riparian, where analysis shows the impacts outweigh the benefits.

Public Comment 7b.14
As to "risk of morality of wolves", Flying Triangle disagrees that the "(p)resence of sheep in the allotments would maintain the current risk for morality of wolves from predator control efforts" and disagrees that "due to the high number of depredation incidences within these allotments, the risk of depredations would likely be lower without sheep grazing in these allotments". The presence or absence of sheep is no different than the presence or absence of small animals, deer, elk, humans, domestic dogs, livestock on private land, etc. All of these critters maintain the "current risk of morality of wolves from predator control efforts"; however without any of these critters, wolves could not exist within the SNRA. Wolves should not be managed over sheep. If wolves are outside their management area, they should be immediately subject to control efforts; if wolves are beyond their numbers, they should be immediately subject to control efforts.

Associated Letters: 184

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Public Comment 7b.15
The Idaho State Department of Agriculture's (ISDA) range staff has visited the lake [Frog & Little Redfish] on a number of occasions, and though there was evidence of livestock having been in the vicinity of the lake, it was clear livestock had been present, but only for a very limited time period and that they were removed immediately. By far, the greatest evidence of use in the area was trampling, refuse, and excrement from people camping in the area. This issue comes down to the definition of "Substantial Impairment." The definition of "Substantial Impairment" in the DEIS is very broad and open to the interpretation and bias of the individual at the time of investigation.

Associated Letters: 218-L

Response: Guidance for determining substantial impairment, including Desired Conditions, Measures, Scope and Scale, Supporting Rationale, When to Invoke the process, and how to document analysis is included in the revised Sawtooth Forest Plan in Appendix I, pages 15-29. That guidance will be used by the Area Ranger to make a determination of substantial impairment based on information in the FEIS, which will be disclosed in the Record of Decision.

Public Comment 7b.16
Apparently there is no monitoring proposed that would allow for real, within-season adaptive management. I think that would be needed, as a minimum, to avoid substantial impairment to wolves. If

the DEIS alternatives lack a significant and viable mechanism for within-season changes in herd management, I fear that there is no mechanism to avoid substantial impairment to wolves.

Associated Letters: 156

Response: Appendix D – Monitoring, has been added to the FEIS. This includes a section on monitoring for wildlife.

Public Comment 7b.17
Comments to Organic Act analysis - Gray Wolf on eight Livestock Grazing Allotments on the Sawtooth National Recreation Area
(1) Sheep grazing is one of the protected uses within the SNRA, being historical, natural and pastoral in nature.

Flying Triangle does not agree with the "ruling issued on June 11, 2002" relative to allotments grazed by Flying Triangle, due to comment (1) herein, and due to the fact that the substantial impairment analysis previously occurred in the NEPA documentation discussed herein. Such "ruling" is without legal and/or factual basis.

Associated Letters: 184

Response: The U.S. District Court determination that an Organic Act analysis is necessary on allotments that already have NEPA analyses complete pertains only to wolves. There has not been an analysis to help determine if sheep grazing substantially impairs the other values the SNRA was designated to protect and that question is outside the scope of this document. The commentors disagreement with the District Court's ruling notwithstanding, the SNRA must comply with the court's direction to complete an Organic Act Analysis for the required allotments until and unless a subsequent decision to the contrary is issued by a superior court.

Category 7c: Multiple Use:

Public Comment 7c.1
The mission is for multiple use of these lands, and this includes grazing as well as recreational, timber, oil and gas exploration, and mining and hiking and hunting.

Associated Letters: 6

Response: PL 92-400, which established the SNRA, allows for uses such as timber, grazing and mineral resources insofar as their utilization will not substantially impair the purposes for which the recreation area is established. PL92-400 withdrew the lands within the recreation area from oil and gas exploration and new mining claims.

Public Comment 7c.2
We write to express concern over the multiple use activities in the SNRA. Congress established the SNRA with the intent that all historical uses of the area would be managed in a manner in which no one use is put above the needs of another.

Associated Letters: 8

Response: According to PL 92-400, the SNRA was established to protect the area's primary values of fish and wildlife, and the natural, scenic, pastoral, and historical values, and the recreation values associated therewith. The utilization and disposal of resources such as timber, grazing and minerals can occur only so long as they do not substantially impair the primary values aforementioned.

Public Comment 7c.3
The draft EIS begins blaming livestock grazing on everything from destruction of fish to eliminating sensitive plant species that in reality never existed in the area, but had they existed, they would be negatively impacted by livestock. Conflicts with recreationists seem to be more the core Issue that USFS tries to overcome with the EIS, but such conflicts will remain, for the environmentalist (sometimes tailed recreationists) will not be placated with removal of some of the livestock, they will demand that they all be eliminated and will continue to agitate until they achieve their goal of elimination of multiple uses.

Associated Letters: 169

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Public Comment 7c.4
The concept of multiple use does not include several simultaneous uses, especially when they are so opposing. There shouldn't be cows in the Frog Lake and above area. There isn't enough feed for them and the waste they leave behind makes it less than comfortable to be hiking there.

If cattle grazing is harming this special area in any way, then I urge you to make a decisive stand against any grazing at all. Public interest must be given a higher priority than private interests.

Associated Letters: 108, 111

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Issue 8: Recreation

Sub-Issue 8a: Impacts / Enjoyment

Public Comment 8a.1
Plan for and install primitive recreational airstrips.

Associated Letters: 6

Response: Provisions for recreational airstrips is beyond the scope of this decision.

Public Comment 8a.2
I have never talked to a tourist (and I had a business here in Clayton) that minded seeing a cow on a grazing allotment. The wolves might be another story as no one in their right mind would take their family camping where there are as many wolves as on the East Fork.

Associated Letters: 7

Response: Public comment received on the Upper and Lower East Fork Allotments revealed substantial concern with the effects of cattle grazing on recreation. Most comments centered around the impacts to trails, campsites, and recreationists' experience due to the presence of livestock and manure. The effects of grazing on recreation are described in Chapter III of the FEIS.

Public Comment 8a.3
Prohibit cows in campsites and in high elevation areas, particularly in the 4th of July Lake area as cow manure everywhere is disgusting, outrageous, and inexcusable.

Cattle use at high mountain lakes has not been compatible with recreational use. Campsites have been despoiled with fecal waste at places like Frog Lake, Little Redfish Lake (in Big Boulder Creek), Baker Lake, Sullivan Lake and on Railroad Ridge

Cattle use is absolutely contraindicated here. Cattle foul streams and lakes, spoil what few campsites are available for visitors, trample foot trails, introduce noxious weeds, and simply spoil in the experience of human visitors.

Close high-value recreation areas to cattle grazing, particularly in high elevation areas and in places where cows repeatedly trespass.

I remember vividly climbing the steep trail to Little Redfish Lake off of the Big Boulder Creek trail on the way to Frog Lake and having to clear hundreds of cow pies in order to set up a camp. The cows had damaged the entire lake shore right up to the waterline and hoof prints could be seen in the mud. It was a disappointment to say the least.

Cows cause damage to trails and campgrounds. Some visitors find cows to be intimidating. Cow pies also do not make for interesting scenery nor do they smell nice on my hiking boots.

Conflicts are increasing with visitors to the area. Cows cause damage to campgrounds and trails and intimidate some visitors. Cow manure makes meadows and lakeshores less desirable for campers.

With as much work those goes into building and maintaining the trails, the awareness and education about treading lightly and soft camping practices. Grazing just seems out of place. Especially in an area that is under study to possibly become a wilderness area.

Prohibit grazing in the Germania Creek allotments because the impacts caused by grazing do not accommodate any other uses. Dodging cowpies interrupts wilderness experience and cattle are defecating in the streams.

These two allotments include some of the wildest country in the Boulder-White Cloud Mountains. Cattle use at high mountain lakes has been a sore point for decades as recreationists must contend with campsites littered with cowpies at places like Frog Lake, Little Redfish Lake (in Big Boulder Creek), Baker Lake, Sullivan Lake and on Railroad Ridge. Trespass of cows out of the allotment is common. Just last summer there were cattle at Fourth of July Lake at 9,400 feet! The lake is MILES out of the permitted allotment.

Cattle grazing conflicts with the all recreation uses and the primary mission of the SNRA.

> Associated Letters: 10, 12, 24, 27, 29, 30, 31, 32, 34, 36, 51, 61, 65, 67, 70, 79, 85, 88, 94, 100, 103, 111, 113, 126, 132, 133, 134, 135, 144, 147, 155, 158, 160, 163, 165, 172, 178, 181, 182, 186, 193, 195, 201, 220-L, 222-L

Response: Public comment received on the Upper and Lower East Fork Allotments revealed substantial concern with the effects of cattle grazing on recreation. Most comments centered around the impacts to trails, campsites, and recreationists' experience due to the presence of livestock and manure. Alternatives II and III reduce the likelihood of this kind of impact on campsites. The effects of grazing on recreation are described in Chapter III of the DEIS.

Public Comment 8a.4
A survey performed by the University of Idaho showed support for the continued grazing of the public lands by cattle and the continuation of the custom and culture that goes with it. People who have appreciated our use of the public lands and our management of that and our private lands that we own and lease have approached us over the last couple of years to let us know they wish we would continue with what we are doing. People want to see ranches and ranges kept in a productive state, not burnt up and bare and dry barren ground left.

Associated Letters: 198

Response: The fact that some people may feel the presence of cows enhances their recreation experience is noted in the EIS on page III-91. The majority of comments received in public scoping noted effects of livestock grazing such as the presence of manure at campsites and impacts to trails. The opportunity to witness livestock grazing on public lands received little mention.

Public Comment 8a.5
I personally witnessed cows in Frog lake, cattle manure along the shore of the lake and in every imaginable camping area and trail away from the lake. The next year, even after I called the Forest Service to complain about the cattle, the area around the lake looked the same. This condition is unhealthy, unsightly and not conducive to recreation.

Associated Letters: 43, 49, 51, 141, 171, 182, 186, 190

Response: Cattle grazing at Frog Lake is identified as an area of particular concern in the DEIS on page I-3, and again on page III-83. Alternative II, as described in Chapter II of the DEIS, was developed, in part, to reduce the likelihood of livestock impacting the Frog and Little Redfish Lakes area. The effects of Alternative II are described in Chapter IV of the DEIS.

Public Comment 8a.6
Pg III-85 The survey of Custer County Residents Concerning Community Issues, Facilities and Services through the University of Idaho by Aaron J. Harp dated May 28, 1998 show our community supports the custom and culture that is associated with the ranches in Custer County. 72.7% strongly agree that we need to maintain our agricultural land base. They also show that 57.2% strongly agree that we have enough land set aside for recreation. We know of numerous letters sent by individuals supporting continued grazing on the SNRA and yet there is no mention of this support in the EIS.

Associated Letters: 198

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 8a.7
The DEIS has a major information gap on recreation use. On page III-84 the DEIS says that recreation use figures for trails are compiled from voluntary registration boxes. Voluntary registration boxes at

trailheads are notoriously inaccurate method of gathering recreation use information. Trail counters are a more accurate way of gathering use information.

Associated Letters: 83

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 8a.8
Replace the word "hiking" with "system" in Chapter I ["Cattle may be impacting recreation values by damaging hiking trails"] as these trails are used by motorized and non-motorized recreationists and using "system" does not place emphasis on one recreation group over another.

Associated Letters: 83

Response: This change will be made in the FEIS.

Public Comment 8a.9
Show the amount of trail miles open to grazing compared to the total trail miles within the allotments and the number of solitary dispersed sites open and not open to grazing in the table found in Chapter II to provide a better picture of the area.

Associated Letters: 83

Response: Trail miles and solitary dispersed sites in Alternative I reflect the total in the allotment. Some areas are currently off-limits to grazing but are still in the allotments so are included in Alternative 1.

Public Comment 8a.10
Consider placing trail cattle guards in areas regularly used by recreationists to reduce the likelihood of gates being unintentionally left open.

Associated Letters: 83

Response: Trail cattle guards proposed for all new fences in Alternative 2, described in Chapter II, pages 9-12. We will consider you other recommendations.

Public Comment 8a.11
Consider establishing an education program targeted at informing recreationists about the importance of closing gates. We would be willing to work with the SNRA on this project.

Associated Letters: 83

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 8a.12
Outdoor recreation is growing faster than the current areas can support. Campgrounds in the Sawtooths are crowded, both front country and back.

Associated Letters: 161

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 8a.13
Draft alternatives comparison charts on pages II-16 through II-18 do not include some of the most important aspects of the identified significant issues (outlines on pages I-8 & 9) and even then, they contain some questionable conclusions. Firstly the chart on Recreation and Aesthetics, Visual Quality Objectives concludes that discontinuation of grazing (Alt. 3) will attain objectives, the others will not. There are perhaps millions of Americans and foreign tourists that find the thought and the experience of seeing cowboys herding cattle in the American West and enthralling sight and many pay thousands of dollars each for the cultural experience of seeing or being a part of it.

Associated Letters: 148

Response: The fact that some people may feel the presence of cows enhances their recreation experience is noted in the EIS on page III-91. However, the overwhelming majority of comments received in public scoping noted negative effects of livestock grazing such as the presence of manure at campsites and impacts to trails.

Public Comment 8a.14
Acknowledge the braided trail impacts from motorcycle travel in the Little Boulder Creek area.

This "recreational trail system" was first established by wildlife trails that wildlife used in traveling from one grazing area to water sources and on to other grazing areas. When cattle were brought into this area 100 + years ago, they too found the trails established by wildlife to be the most efficient way to move from one grazing area, to water sources and on to other grazing areas. Recreationalists then started using these already established trails to get to lakes and streams. There is no reason these trails cannot be used by everyone and every animal. These trails are a part of our heritage as ranchers and miners and we have ownership in them and their use. We not only know where one trail leads to, but also, where old cabins are found along these trails, who had cabins in those areas at one time and for what purpose. We find the trash, beer and pop cans, human waste and toilet paper left by the recreationalists along these wildlife and cattle trails to be offensive. The SNRA also needs to monitor recreationalists' resource damage to the trails.

Associated Letters: 197, 198

Response: The braided trail in Little Boulder Creek referred to in the EIS leaves the system trail to enter a meadow that is heavily grazed by livestock. There is no evidence of motorcycle use on the trails and the trails do not access any site that is known to be used by motorcyclists. It is the opinion of trail experts on the SNRA that the braiding was caused by livestock, not motorcycles.

Recreation impacts to the trail system in the allotments is monitored regularly. Some resource damage to trails is caused by recreation use. Addressing that damage is outside the scope of this document.

Public Comment 8a.15
Despite reductions in cattle use for the past 3 years, which we have already noticed, monitoring data shows that streams, high alpine meadows, and plants are still suffering from overgrazing by cows. Cow manure makes meadows and lake shores less desirable for all of us. The Forest Service wants people to "pack it in and pack it out," but what about what these cattle leave behind?

Associated Letters: 126

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Public Comment 8a.16
As a professional botanist, a father, and an avid mountaineer, I value the White Cloud and Sawtooth mountains and the Stanley basin as a unique spot. Botanically interesting and still quite unexplored, it would be a travesty to continue to graze the area. I continue to take my children to these areas and would hope that they will be able to experience these areas as unspoiled as possible.

Associated Letters: 57

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Public Comment 8a.17
Closing areas over 9000 feet and some of the critical drainages to grazing better balances traditional grazing in appropriate areas with recreation and conservation needs. Alternative 2 is a common sense approach.

Associated Letters: 63, 64

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Public Comment 8a.18
The DEIS claims that under Alternative #2 (page IV-86) that recreational conflicts in the Upper East Fork allotment would be decreased because of the reduction in "grazing pressure" even though the stocking level per acre of available lands is the same as before. This conclusion is unsupported by fact. In all likelihood the pressure of livestock use would remain the same in those areas open to livestock grazing including CUAs and dispersed sites open to cattle.

Associated Letters: 166

Response: The citation referred to addresses the Upper East Fork Allotment only. Fencing the East Fork dispersed camping area to keep livestock from campsites, along with reduced numbers of Head Months and smaller area for the permittee to track livestock over will lead to improved herding and reduced effects to recreationists.

Public Comment 8a.19
We are concerned with the descriptions of Frog Lake being severely impacted by livestock, but in another area the description includes the fact that this is a very popular recreation destination. Nothing is said about the recreation impacts on Frog Lake, only that all bad situations at the lake are livestock caused. We find this hard to believe, for our members can document the damage done by people. It would appear to us that this document simply eliminates the recreation trampling, camping, burning, digging etc. and tries to blame everything on grazing.

Associated Letters: 169

Response: The Forest recognizes that recreation use in additional to livestock use at Frog Lake is resulting in resource damage. The EIS specifically addresses impacts due to recreation use on page III-83 as well as measures already taken to reduce those impacts.

Public Comment 8a.20
The chance to see wildlife such as elk, bighorn sheep and wolves is very important to me. I understand that cattle degrade their habitat or (in the case of wolves who depredate on domestic livestock), may lead to their death.

Associated Letters: 65, 178

Response: The effects of grazing on wildlife are disclosed in Chapter III of the EIS. Alternative II, as described in Chapter II of the EIS, was developed, in part, to reduce or eliminate impacts to wildlife from livestock. The effects of Alternative II are disclosed in Chapter IV of the EIS.

Public Comment 8a.21
Cattle grazing desecrates the natural flora and wetland areas… pushing out natural species and destroying habitat for indigenous animals. Also…. It destroys the beauty of the land for those of us who enjoy hiking and other wilderness sports.

Associated Letters: 174

Response: The effects of grazing on plants and recreation are disclosed in Chapter III of the DEIS. Alternative II, as described in Chapter II of the DEIS, was developed, in part, to reduce or eliminate impacts to recreation from livestock. The effects of Alternative II are disclosed in Chapter IV of the DEIS.

Public Comment 8a.22
The Idaho Conservation League recognizes the resource, scenic and vegetative problems and damage caused by recreation in the White Clouds and the Upper and Lower East Fork Allotments. We discuss some of our concerns about recreation below and request that the Forest Service take action to remedy some of the more obvious problems, followed by a NEPA analysis to see where further action is warranted.

Associated Letters: 182

Response: The Forest recognizes that recreation use is causing resource damage in these areas. These impacts are addressed on page III-83, as well as some of the actions already taken to reduce those impacts. Any further action is outside the scope of this decision.

Public Comment 8a.23
I enjoy hiking along streams, and watching wildlife. Degradation of riparian zones by cattle lessens the enjoyment of this activity. The argument could also be made that hiking trails along streams also degrade this same wildlife habitat. The multiple purpose designation places a balance between grazing and recreational usage of these public lands. The argument that grazing in this area produces more concentration in other areas (Sawtooths) I do not agree with. I think concentrated areas such as the Sawtooths will remain heavily used regardless of this decision.

Associated Letters: 200

Response: The Forest recognizes that concentrated use, whether from recreation or livestock, is resulting in resource damage. The effects of the concentrated use is noted in Chapter III of the EIS. We do not know if livestock grazing is causing displacement of recreationists to other areas. We simply point out that the increase in use has been less in this area than in adjacent areas without grazing, which may indicate a preference for ungrazed areas by recreationists.

Sub-Issue 8b: Hunting

Public Comment 8b.1
Incidentally, I am a hunter who enjoys seeing other predators in the wild and I look forward to a time in the not-too-distant future when I can hunt elk in the presence of a full complement of native carnivores.

Associated Letters: 180

Response: Thank you for your comment. It has been noted for the Decision-Maker.

Public Comment 8b.2
I have been hunting the West Pass Creek drainage for over 20 years and I have to say I find your findings quite hard to believe. It sounds to me like a bunch of smoke and mirrors to promote a hidden agenda.

Starting with the closing of the West Pass road at mid-point some ten years ago to "protect the fish". If I had to guess I would say that you are an anti-hunter - - correct?

If your "findings" were true, I would surely see a difference from year to year, instead I see game numbers growing from year to year - especially the elk. The deer seem to be bouncing back quite nicely from the 1992-93 winter die off - - or was that due to the cattle "over-grazing"?!

Your tactics are a disgrace, you people think that we don't notice things like road closures and wolf reintroductions but we do. What is next - problem bears from Yellowstone Park to scare away future generations of hunters? Isn't that what this is really all about?

I have been hunting the West Pass Creek drainage for over 20 years. The fishing in this area according to the fisherman I have spoken to hasn't changed and is still excellent. The elk hunting is excellent and keeps getting better. It is very obvious to me what your intentions are. First you closed the road (10 years ago). Now you want to run the ranchers out of business. You are obviously on the side of the anti-hunters. This whole thing reeks of the Anti-Hunter. Based on what I have seen in the last 20 years of hunting West Pass Creek, I find your findings to be nothing short of B.S. If you think we can't see your ultimate goal is to close this entire area to hunting and fishing, you are crazy.

Associated Letters: 18, 159

Response: The SNRA recognizes hunting as a legitimate use of public lands that is enjoyed by many visitors each year. Hunting regulations are established by the Idaho Department of Fish and Game and outside the scope of this document. It is worthwhile to note that the SNRA has never proposed to end or restrict hunting, except in the immediate vicinity of developed campgrounds for the protection of public health and safety. The effects of livestock grazing on elk habitat are discussed on page III-64 of the DEIS.

Public Comment 8b.3
Please end high-country grazing in the White Clouds. As an elk hunter, I hate seeing cow pies and no elk sign.

Associated Letters: 69

Response: Thank you for your opinion. It is noted for the Decision-Maker.

Sub-Issue 8c: Wild Landscape / Wilderness Character

Public Comment 8c.1
It is well known that cattle have a detrimental impact on the wilderness where they graze. From wiping out vegetation and introducing invasive plants to degrading water sources, cattle negatively impact the environment.

The Upper and Lower East Fork allotments are located on the east side of the White Cloud Mountains in the 750,000 acre SNRA and include some of the most scenic and important wildlife habitat areas in central Idaho. It would be a shame to allow grazing of livestock to continue to despoil this magnificent area.

We need to not only "tread lightly" for ourselves, but for the habitat that lives in the areas that we explore. Turning the White Cloud wilderness into a grazing field is an embarrassment to Idaho... it's as if we're literally trampling and crapping all over the gems of our state.

Associated Letters: 23, 110, 113

Response: Thank you for your opinion. It is noted for the Decision-Maker.

Public Comment 8c.2
The importance of maintaining the natural environment and wildlife habitat of this beautiful area far outweighs the possible benefits of allowing ranchers to continue to use this area in the manner that they have in the past, which has degraded the land and the water resources in the area. We must take steps to protect this area!

Associated Letters: 31

Response: Thank you for your opinion. It is noted for the Decision-Maker.

Public Comment 8c.3
This area should be managed as wilderness also as it has been proposed as such for 30 YEARS! Let's get back to a real planning process instead of the" which way is the wind blowing" we have experienced since 1980.

Designate the Boulder-White Clouds Wilderness and promote solitude.

Associated Letters: 42, 196

Response: Wilderness classification is outside the scope of this decision.

Public Comment 8c.4
Fully preserve all Roadless Area and to preserve the following drainages: Slate, Mill, Holman, Sullivan, Big Lake, Big Boulder, Little Boulder, Wickiup, Germania, West Pass, East Fork.

Associated Letters: 196

Response: Roadless Area management standards are outside the scope of this decision.

Issue 9: NEPA Process / DEIS / Laws

Category 9a: Purpose & Need

Public Comment 9a.1
We note in the opening page that the purpose and need of the document focuses on riparian impacts including reduced riparian vegetation vigor and productivity and altered plant species as a reason to eliminate livestock. We would remind USFS that overuse by recreationists will create exactly the same scenario, but that is not a part of this consideration. When the livestock are gone and the impacts remain from recreation, we presume this too will be eliminated in favor of lock down and shut out to (of course) correct the "compromised integrity" of streamside habitats where humans habitually concentrate.

Our point being, that the USFS is using subjective, unmeasurable terminology that can easily be shifted from one species to another and justify almost anything as a "Purpose and Need for Action."

Associated Letters: 169

Response: The Purpose of and Need for Action discusses the relationship between the desired and existing condition. Since the proposed action is to update the allotment management plans to allow for permitted livestock grazing that meets or moves towards desired resource conditions, livestock impacts are appropriately considered. Recreation impacts (and all other relevant impacts) are considered and displayed as "cumulative effects" in Chapter 4 - Environmental Consequences. These effects are displayed for the decision-maker. Making decisions about recreation activities or other uses is outside the scope of the decision to be made.

Public Comment 9a.2
We suggest that the two bottom paragraphs [p. 1-5] are simply narrative trash thrown in to create a need for action. Such things as livestock keeping people from comfortably enjoying dispersed recreation sites could be used for other people keeping people from enjoying dispersed recreation sites. It is subjective nonsense. Altering natural appearing landscape certainly can occur but must the USFS be reminded that cattle do not create campfires, cut wood, move rocks, erect tents or dig holes that humans do. When humans concentrate in one area for long periods the damage is much more severe than cattle, and of course cause considerable trail damage, drainage structure damage, increased erosion, braided trails and negatively affect the aesthetic quality of the landscape.

Associated Letters: 169

Response: Per Public Law 92-400, consumptive resource uses such as livestock grazing are permitted as long as the primary values are not substantially impaired. The Sawtooth Forest Plan grants recreation preferred status when conflicts between grazing and recreation occurs. Recreation impacts are displayed in Chapter 4.

Public Comment 9a.3
In general, it appears to us that the draft EIS was created with a goal in mind of permanently cutting grazing in these allotments by 35% which is about standard for ail USFS allotment management plans we have been reviewing in the West. Unfortunately, this 35% cut is on top of cuts given these allotments, in recent years, and results in actual 50 to 70% cuts in AUMs from actual permitted uses. It is a solution begging a problem and the EIS attempts to establish a problem sufficient to justify the cut.

Associated Letters: 169

Response: Thank-you for your comment. The DEIS was written to address the Purpose and Need for Change. There is a gap between the existing and desired conditions on the ground. The proposed action is to update the allotment management plans to allow for permitted livestock grazing that meets or moves towards desired resource conditions.

Public Comment 9a.4
Purpose and Need for Action: The impacts associated with grazing livestock are centered on the negative aspects and potential detriment to the environment while the benefits of resource monitoring range improvements that benefit wildlife, and other associated impacts of having livestock on the allotment are only briefly touched upon, if mentioned at all. Range improvements for livestock grazing also benefit wildlife through distribution of water to non-riparian areas making additional habitat available for use by non-game wildlife as well as big game species.

Associated Letter #: 218-L

Response: The Purpose of and Need for Action discusses the relationship between the desired and the existing conditions. There is a gap between the existing and desired conditions on the ground as demonstrated in the Purpose and Need section of the EIS.

If the desired condition is being met or enhanced, then there is no need for change, thus no need to discuss it in the Purpose and Need. However, impacts (positive, neutral, and negative) are discussed in Chapter 4 - Environmental Consequences.

Public Comment 9a.5
In the Purpose and Need for Action, it is stated that “excess” grazing frequently occurs in closed areas inside and outside the allotment boundaries. Statements like "large quantities of fresh cow manure" are not quantifiable and have little meaning to readers.

Associated Letters: 218-L

Response: Both quantifiable and descriptive terms are frequently and commonly used in analysis documents. It is not always desirable or even possible to quantify every single impact. In such cases descriptive terms are used.

Public Comment 9a.6
EPA supports the overall purpose of the project to reduce grazing in order to move riparian areas and vegetation towards a healthy system of native plants, soils, aquatic and terrestrial resources.

Associated Letters: 223-L

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Public Comment 9a.7
It is unclear whether the underlying Purpose and Need for the project is to provide for permitted livestock grazing or move the area toward the desired conditions. If the Purpose and Need is to allow for permitted livestock grazing then it appears that Alternative 3 would not meet this criterion. On the other hand, if the Purpose and Need is primarily environmentally driven and the goal is to restore the high level of degraded habitat, then Alternative 3 would meet this criteria. EPA recommends that the EIS clarify this discrepancy by discussing the “underlying purpose and need to which the agency is responding in

proposing the alternatives including the proposed action," stated in 40 CFR 1502.13. EPA also recommends that if Alternative 3 would clearly not meet the Purpose and Need or cannot be implemented, then the EIS should consider a broader range of alternatives that would provide for greater environmental benefit then Alternative 2 while still meeting the stated Purpose and Need for the project.

Associated Letters: 223-L

Response: The Purpose of and Need for Action discusses the relationship between the Desired Condition (Forest Plan Goals & Objectives) and the Existing Condition. There is a gap between the existing and desired conditions on the ground, which we wish to address and correct. A Proposed Action is a proposal by the Forest Service to authorize, recommend, or implement an action to meet a specific purpose and need. In order to correct the gap in our existing and desired conditions, the Proposed Action is to update the allotment management plans to allow for permitted livestock grazing that meets or moves towards desired resource conditions. The two goals of meeting Forest Plan standards and permitting livestock grazing are compatible and can be achieved as demonstrated by the Proposed Action.

All alternatives (with the exception of the No Action) must meet the objectives of the Purpose & Need and respond to a significant issue. All three alternatives in the DEIS fulfill that requirement to varying degrees and with different outcomes, thus there is no need for additional alternatives. The no action alternative provides a benchmark, enabling decision makers to compare the magnitude of environmental effects of the action alternatives (Forest Service Handbook (FSH) 1909.15, Section 65.12 – CEQ 40 Most-Asked Questions, #3).

Public Comment 9a.8
Noxious weeds are mentioned throughout the document and in Purpose & Need as one of the prime beneficiaries of reduced monitoring. With livestock grazing, noxious weeds are monitored more effectively and control efforts are maintained.

Associated Letters: 218-L

Response: Thank-you for your comment. It has been noted for the Decision-Maker.

Category 9b: Issues

Public Comment 9b.1
The significant issues listed in the draft are also only a subset of the issues that should be listed in the final EIS. Existing issues in the draft are insufficient because they omit some of the most crucial indicators of the foundations of rangeland ecosystem health and which can be strongly correlated to livestock grazing. The proper perspective on analyzing issues is to not focus on parts and pieces of the range resources but instead looking at the range ecosystem as functioning in whole cycles and then the health or functioning of these cycles is analyzed. This narrow focus and perspective, combined with omissions; can lead to a misdiagnosis of the cause of the concerns seen in the field. Also, many segments only indicate the concerns even exist in the field, much concern about grazing impacts to wildlife, hydrology, plant diversity and insects seems highly speculative and more information is needed to suggest whether the concerns are real or perceived.

Associated Letter #s: 223-L

Response: An "Issue" is defined as a point of discussion, debate, or dispute (about environmental effects) regarding the proposed action. If there is no debate about the proposed action, it is not an issue. Many of the elements referred to in the comment were not raised as a point of dispute about the proposed action.

Public Comment 9b.2
None of the stated significant issues contains much regarding the positive aspects that grazing has had upon the Upper and Lower East Fork ecosystem cycles, only the negatives are listed for evaluation. Many of these negative comments could appear as opinion because there is a lack of lack of supporting statements with which to backup the apparent viewpoint, it seems.

The summary of issues (beginning on I-8) must therefore contain adequate evaluations with which to develop sound alternatives and the list of issues must be complete so that crucial foundations of range ecosystem function is properly analyzed. Alternatives must be developed which have some promise of reaching stated purposes or mandates. A set of issues therefore must developed that is complete and accurately analyzed in order to form sound alternatives. Conclusions regarding impacts of alternatives cannot be reached based upon supposition or opinion or should not be reached without stating the level of uncertainty or opinion used to reach them.

Associated letters: 148

Response: An "Issue" is defined as a point of discussion, debate, or dispute (about environmental effects) regarding the proposed action. If there is no debate about the proposed action, it is not an issue. Many of the elements referred to in the comment are not a point of dispute about the proposed action. Alternatives are developed to address significant issues. The DEIS was prepared in accordance with NEPA and CEQ regulations and other applicable laws & regulations.

Public Comment 9b.3
All significant issues that are relevant to the purpose of this EIS should be included in the final EIS. Some suggested significant issues to be added might include:

- Livestock grazing may be affecting soils health (soil organic matter percent, soil crusting and air infiltration into the subsoil and soil erosion). Monitoring shows that grazing is markedly maintaining or enhancing soils health on these allotments.

- Livestock grazing may be affecting rangeland hydrologic cycles. Grazing is contributing positively to maintenance and enhancement of watershed (catchment) functions and values that cannot be replicated by rest, fire or technology.

- Livestock grazing may be affecting the incidence of wildfire and affect the severity of wildfires that do occur. Livestock grazing removes the top-growth of perennial grasses and many forbs and substantially reduces the risk for the development of serious wildfires by reducing the level of fine fuel accumulations.

Associated letters: 148

Response: An "Issue" is defined as a point of discussion, debate, or dispute (about environmental effects) regarding the proposed action. If there is no debate about the proposed action, it is not an issue. Many of the issues identified in the comment were not identified during scoping as a point of dispute about the proposed action.

Public Comment 9b.4
The planning through the EIS process is incomplete because there is no fourth alternative. This would be to discontinue grazing and buy the private holdings in the East Fork Valley where cattle and horses continue to damage water quality, fish or wildlife, or detract from the area's natural beauty. Like the Madison River Valley in Yellowstone, this is the gateway to the gems of the White Clouds.

Associated letters: 136

Response: Permit buyouts and private land purchases as options are beyond the scope of this project.

Category 9c: Proposed Action & Alternatives

Public Comment 9c.1
The proposed action is to "authorize grazing… Yet in the Decision Framework, it is implied whether "livestock grazing should continue to be authorized". [Discrepancy]

Associated letters: 140

Response: There is not an inherent discrepancy with the Proposed Action to authorize grazing and the Decision Framework, which indicates grazing may be authorized. The Proposed Action is a solution to a need as identified in the Purpose and Need. The Decision Framework outlines the conditions under which the decision can be made. Decision-Maker may select from the range of actions proposed while considering the impacts and trade-offs.

Public Comment 9c.2
Alt. 2 will also result in disappointment and realize much wasted time, effort and expense when the proposed action fails to achieve the expected resource improvements.

The stated proposed action (purpose?) of this draft EIS is to bring management of the allotments into compliance with the FLRMPs and PL 92-400 by authorizing grazing that meets or moves toward desired resource conditions (page i). This being so, the EIS should evaluate alternatives which support the stated proposed action (purpose) of the draft EIS action, which is to authorize grazing. None of the alternatives stated in the draft EIS contain alternatives which would support or even allow continued grazing operations because livestock numbers, range acres and the grazing season is being cut to a level which is not economically viable. The no action alternative, although required in every EIS, does not support livestock enterprises at an economically sustainable level and is actually not an alternative because the whole slant of this EIS (and current administrative actions) and a stated purpose is to change grazing management to meet the Forest Plan Guidelines (address issues).

Associated Letters: 140, 148

Response: The FS respectfully disagrees. We believe the Proposed Action is a viable alternative that can be successfully implemented to achieve the desired conditions in the project area. If the "No Action" (No Change) alternative is selected, it would require a Forest Plan amendment.

Public Comment 9c.3
All this aside, none of the alternatives support any kind of viable ranch operation as they modifies livestock numbers and allotment acres to an entirely non-sustainable level for the ranch families involved. I am persuaded that this fact is well understood by the writers of the draft, raising some concern regarding

Environmental Justice perhaps. Without nearby ranching operations it is obviously pointless to authorize or permit grazing.

Associated Letters: 148

Response: During the course of this analysis, none of the alternatives considered resulted in any identifiable effects or issues specific to any minority or low-income population or community. The agency considered all public input from persons or groups regardless of age, race, income status, or other social/economic characteristics. Examination of community composition, as required under E.O. 12898 [Environmental Justice], found no minority or low-income communities to be disproportionately affected under any of the alternatives. This was not raised as an issued during scoping.

Public Comment 9c.4
Alternative 3, the preferred environmental alternative, eliminates all grazing, which does not support the proposed action and therefore readers of the draft EIS might infer that the only reason for its inclusion is allow the writers to portray their anti-grazing opinions. However, if any of the writers support planned grazing or recognize any of the values of grazing, little mention of it appears. Therefore, the only "alternative" which allows for grazing is alternative 2. Having only one alternative means it is not an alternative, leaving little purpose in the evaluation of alternatives or perhaps in the writing of this EIS.

Associated Letters: 148

Response: The FS respectfully disagrees. We believe that all the alternatives are viable alternatives that can be successfully implemented. Alt. 3 was included to address the point of discussion or debate that grazing "substantially impairs" SNRA key values and/or causes recreation-livestock grazing conflicts. Since this was a point of dispute about the proposed action, Alternative 3 was developed in order to resolve those conflicts. If Alternative 1 is selected, it could be implemented after amendment of the Forest Plan.

Public Comment 9c.5
The final EIS should be revised and could include at least four viable management alternatives including at least some which support the purpose of the draft EIS action. Two alternatives could be a no action alternative and the total removal of livestock alternative since the no action alternative is required and the no action alternative could show the readers what happens when range is long rested. Two of the four alternatives should be enhanced range and livestock management plan proposals.

These alternatives should include:
1) Livestock distribution and management -Monitoring shows that this range is not overstocked. There may be the potential to improve livestock distribution through a number of avenues that could adequately address livestock distribution (proportion of plants grazed and avoidance of areas livestock are desired to be excluded from).

2) Plant and bio-diversity. Management plans could incorporate maximum use of livestock to maintain or enhance the diversity of plants in order to consider the whole environment.

3) Fisheries and hydrology. Effects of livestock on upland and riparian hydrology, dependent upon management, are variable. Some strategies of management produce profoundly positive effects on the proper functioning of the water cycle, and can be incorporated into range plans to improve fisheries habitat and produce bio-diversity (productivity and abundance of range plants and wildlife habitat).

4) Listed species. There are many positive impacts from grazing on listed species, there are some potentially negative also, depending upon the management plans and level of monitoring. These affects should be analyzed more in depth so that grazing plans can maximize the positive and minimize the negative.

5) Recreation and aesthetics. Livestock grazing may affect recreational experiences. Many recreationists enjoy and seek the experiences associated with livestock management on allotments. Some find livestock a nuisance due to manure on roads and campgrounds. Grazing plans can be managed to help minimize the negative affects to recreationists not wanting stock around and perhaps some opportunities exist to enhance the experience of those who do.

6) Social and economic consequences. Livestock grazing administrative actions may have economic affects to permittees, and some strategies may not be cost effective for the government to administer. This issue requires thoughtful and inclusive information because the ramifications of the economic impacts of grazing reductions are very widespread. The benefits to the public of grazing extend far beyond the direct affects because livestock grazing can reduce the wildfire potential and improve watersheds and wildlife habitat. This should be evaluated carefully.

Associated Letters: 148

Response: NEPA requires analysis of alternatives in order to display a range of environmental consequences sufficient to support an informed decision (NEPA, Section 102.E; 40 CFR 1508 (b)). There is no requirement to analyze an infinite range of slightly different alternatives. What constitutes a reasonable range of alternatives depends on the nature of the proposal and the facts in each case [Forest Service Handbook (FSH) 1909.15, Section 65.12 – CEQ 40 Most-Asked Questions, #1b.]

During the alternative development process, significant issues were identified through scoping, which then formed the basis for the alternatives. Significant Issues are a point of discussion, debate, or dispute about the environmental effects of the proposed action. Issues are significant because of the extent of their geographic distribution, the duration of their effects, or the intensity of interest or resource conflict.

Based on significant issues, the EIS considered three alternatives. Under Alts. 1 and 2, a wide variety of management grazing systems (grazing plans) could occur including elements from those suggested in the comment above, thus there is no need to develop separate alternatives solely for grazing strategies.

Public Comment 9c.6
I think that it is commendable that the Forest Service is considering this range of alternatives considering the amount of political pressure that I understand may be exerted on the agency based on the recent comments of Congressman Simpson on the matter. This is good information upon which a change in management direction should be designed to obtain a desired outcome. Selection of the final alternative should be with achievement of standards as the management goal.

Associated Letters: 156

Response: Thank-you for your comment. Your opinion is noted for the Decision-Maker.

Public Comment 9c.7
From the DEIS: "This alternative would eliminate permitted livestock grazing from both the Upper and Lower East Fork allotments in their entirety. This alternative was developed to respond to the issues and concerns of those who believe that livestock grazing on the National Forest Lands conflicts with other resources to the degree that total elimination of the livestock is needed to adequately resolve conflicts."

I don't think that the last statement is precise. It is not so much that the alternative was developed in response to "… the issues and concerns of those who believe that livestock grazing on the National Forest Lands…" Alternative 3 was developed in response to the issues and concerns of those who believe that livestock grazing on SNRA lands administered by the Forest Service conflicts with other values protected by the SNRA organic act.

Associated Letters: 156

Response: Incorporating the SNRA Organic Act into the rationale for inclusion of Alternative 3 will be done.

Public Comment 9c.8
Alternative 3 (Discontinue Grazing) If the final EIS fails to analyze additional alternatives, this must be the chosen alternative. Alternative 3 is the only alternative that meets the requirements of the Forest Plan, PACFISH/INFISH, the Organic Act, and other regulations that govern the management of the public lands associated with the Upper and Lower East Fork Cattle and Horse Allotments.

Associated Letters: 157

Response: Thank-you for your comment. The Responsible Official may select any alternative, parts of one or more alternatives, or a combination of features from various alternatives described in the FEIS. If Alternative 1 is selected, it would require a Forest Plan amendment.

Public Comment 9c.9
The Wilderness Society would like to propose that a combination of alternatives 2, 3 and some other ideas be incorporated into a final proposed action. Alternative 2, the proposed action does not seem to provide adequate protection of the natural resources in these allotments. Specifically, wildlife concerns do not seem to be adequately addressed through alternative 2. A new alternative should look at closing the Lower East Fork Allotment all together. This would provide greater critical habitat to at-risk populations of mountain goats, bighorn sheep, greater sage grouse, and other species, many of which are management indicator species.

We would request that the SNRA reopen the EIS process to include the Alternative 4 that is currently being drafted by ISDA and USDA. Rather than continuing the aforementioned adaptive management approach, as suggested in the DEIS, the State [of Idaho] encourages the FS to explore additional alternatives that address conservation of riparian habitat through other means, none of which should exclude grazing.

Future federal efforts in the SNRA should encourage conservation rather than decrease land uses. Simply reducing numbers and area allotted for cattle ignores the overall need to preserve riparian habitat.

The FS must reanalyze the current proposed alternatives and develop a fourth option or modify an existing option to adequately address riparian concerns and species conservation without further excluding land uses like grazing.

The Sawtooth National Recreation Area of the Sawtooth National Forest proposes to authorize grazing through updated Allotment Management Plans (AMPs) for the Upper and Lower East Fork Cattle & Horse Allotments." Also "The proposed action of this EIS is to authorize grazing; to update the AMPs; and to allow for permitted livestock grazing that meets or moves toward desired resource conditions."

Therefore, there is only 1 alternative in this EIS that will be considered so there is no range of alternatives.

We propose that an additional alternative be developed that reflects the 2003 proposed Annual Operating Plans for the Upper and Lower East Fork Allotments. Numerous changes have been made to specifically address the concerns identified by the SNRA in this draft EIS. We propose that ISDA and USDA Natural Resource Conservation Service staff work with the permittees and SNRA staff to draft an Alternative 4 that will address issues of concern to the SNRA that are directly attributable to current livestock grazing and management.

Associated Letter: 168, 169, 185, 203, 212-L, 218-L

Response: The Responsible Official may select any alternative, parts of one or more alternatives, or a combination of features from various alternatives described in the FEIS. The new alternatives or revision to existing alternatives described in the above comments could be selected by the Decision-Maker. Re-opening the EIS process would not meet the intent of the recent Court order to have the EIS completed by September, 2003.

Public Comment 9c.10
Any grazing that is allowed to continue under a new alternative must be strictly enforced. There must be a detailed monitoring and enforcement plan with consequences laid out in the proposed action. No more relying on lax permittees to get their cows out of places they don't belong. If the SNRA is going to allow grazing in any area, they must be prepared to remove any trespass cows themselves, immediately. If the terms and conditions of such use are violated by the permittee, there must be no second chances. The DEIS provides plenty of information about year after year of failing to meet the terms and conditions of livestock grazing permits and still another season comes around with little or no action.

Associated letters: 168

Response: The EIS is an analysis document, not an enforcement document. It displays the consequences of a proposed action and other alternatives to a Decision-Maker. The allotment management plan will identify rehabilitation of damaged resources through specific management practices and a monitoring program.

Public Comment 9c.11
On page ii it said that the proposed action of this EIS is to authorize grazing; to update the AMPs; and to allow for permitted livestock grazing; however, this Draft has put forth nothing but negativity on cattle and their grazing impact.

Associated letters: 197

Response: Thank-you for your opinion. It will be noted for the Decision-Maker.

Public Comment 9c.12
Pg II-7 Alternative 2 - This is not an alternative and the SNRA managers know this. If we are having problems complying with the managers' standards now imposed, how do they expect to do so when they remove one unit and combine two grazers? Domestic livestock grazing is the cause of the less than desired condition, removal of livestock is clearly the most effective route to the objective. There is no evidence that any updated AMPs will attain the objectives.

Associated Letters: 198

Response: Thank-you for your opinion. It will be noted for the Decision-Maker

Public Comment 9c.13
Alternative 2 is based on "wishful thinking" that a "responsible official" can determine "if and where grazing by domestic livestock will occur", "at what intensity (timing and duration)", and "what structural range improvements (fences, water troughs, etc.)" are needed. There is no basis for predicting what, if any, effect such unspecified changes would have on obtaining improvement toward desired conditions. For example, structural range "improvements" have been shown in many cases to increase degradation in new areas, thereby not resulting in overall improvement and possibly increasing degradation with overall movement away from desired conditions.

Associated Letters: 199

Response: Thank-you for your comment. Your opinion has been noted for the Decision-Maker.

Public Comment 9c.14
This is not a full range or alternatives as required by NEPA. There is no alternative that allows for the removal of livestock in a timely manner due to changing range conditions, conflicts with other users, conflicts with wildlife, adverse conditions of weather and forage conditions on wildlife or other users (including recreational livestock).

Associated Letters: 199

Response: Both Alt. 1 and Alt. 2 allow for adaptive management. An adaptive management strategy, which would allow for flexibility during the implementation of the grazing strategy, would allow permittees to respond to changing conditions and unexpected results. Permitted numbers and seasons would be modified as necessary to meet standards, based on monitoring results of the previous season.

Public Comment 9c.15
Alt. 1 is not a “no action alternative” but solely a “no change of management alternative” that clearly does not meet the Purpose and Need Statement. It is included for information only and would not be considered an implementable alternative.

Associated Letters: 203

Response: 40 CFR Section 1502.14(d) requires the alternatives analysis in the EIS to "include the alternative of no action." There are two distinct interpretations of "no action" that must be considered. The first situation is "No change from current management, or level of management intensity". To construct an alternative that is based on no management at all would be a useless academic exercise. The "no action" alternative may be thought of in terms of continuing with the present course of action until that action is changed. The second interpretation is that the proposed project does not take place. The effects from taking no action would be compared with the effects of permitting the proposed activity to go forward. The regulations require the analysis of the no action alternative even if the agency is under a court order or legislative command to act. This analysis provides a benchmark, enabling decision-makers to compare the magnitude of environmental effects of the action alternatives and is required by Section 1500.1(a). Selection of the no-action alternative (Alt. 1) is available only with a change to the Forest Plan (Forest Plan amendment).

Public Comment 9c.16
There is a need for a true no-action alternative as Alt 3, although it discontinues grazing it includes action "removal of fences" and as such has an economic cost. Other forests have removed fences through cooperative efforts resulting in little cost to the agency. There also must be additional alternatives as the Summary has precluded any alternative that removes grazing.

Associated Letter: 203

Response: Alt. 3 is a "true" no action, as defined by 40 CFR Section 1502.14(d). (See answer to Comment 9c15). Domestic Livestock grazing would be discontinued. It is not clear why you believe the Summary precludes Alt. 3.

Public Comment 9c.17
Alternative 2 will not meet the Purpose and Need. The section on Major conclusions include: The analysis indicates that riparian areas are at less than desired condition and may be improved through improved grazing management. While Alt. 2 would "provide the opportunity to meet the desired condition and utilization levels" it would not ensure desired conditions would be met.

Associated Letters: 203,

Response: The purpose of the proposed action is to update the allotment management plans to allow for permitted livestock grazing that meets or moves towards desired resource conditions. The need for the proposed action is to comply with desired resource conditions as described in FLRMP Standards. Alternative 2 would result in movement towards the desired resource conditions, albeit at a slower rate than Alt. 3, thus will meet the stated Purpose and Need.

Public Comment 9c.18
Due to unregulated overstocking, trespass, and use conditions the only alternative that will reach the stated goals is removing livestock grazing from the entire SNRA, an alternative that the P&N states it will not implement.

If this choice [Alt. 3] is precluded, as the Purpose and Need states "The proposed action of this EIS is to authorize grazing," then there needs to be a full range of alternatives with the proposed alternative in the middle of the range.

Associated Letters: 203

Response: Thank-you for your comment. Alternative 3 is not precluded from being a viable alternative and may be selected by the Decision-Maker. It is unclear why you have formed this belief. Alternatives are developed based on addressing significant issues.

Public Comment 9c.19
Alternative 1 (No Change): This alternative is described as the current management on the two allotments. However, discussion of permitted Head Months is either incorrect, or is a proposed reduction. The Administrative Grazing Capacity Determinations and Allotment Area Reductions Proposal for the Upper and Lower East Fork Allotments (March 2003) states that permitted use is 1,016 HM, and the average actual use is 777 HM for the Upper East Fork Allotment (UEF). For the Lower East Fork Allotment (LEF) the permitted use is 1,993 HM and average actual use 1,463 HM. However, Table II-1 and II-3 show head months (HM) for the UEF and LEF allotments as 553 and 962 respectively. There is some inconsistency here that needs to be clarified. If indeed a reduction is proposed in this alternative, it is then invalid as the "No Action Alternative."

Associated Letters: 218-L

Response: The discussion on the permitted head months is consistent with the cited Administrative Proposal. The 777 head months (HM) and 1993 HM figures cited in the Administrative Proposal for the Upper and Lower East Fork Allotments, respectively, are average grazing use figures for the years where actual use data was available. The Administrative Proposal used this information along with monitoring data to estimate of when allowable use would have actually been achieved (consistent with existing grazing standards) to set a proposed grazing use level of 553 HM and 962 HM respectively. The estimated grazing use in alternative 1 is identical to the use proposed in the Administrative Grazing Capacity Determinations and Allotment Area Reductions Proposal (without excluding portions of the allotments from grazing).

Public Comment 9c.20
Alternative 2 (Proposed Action): Elimination of the Upper Bowery Creek pasture is not warranted nor justified by analysis presented in this document. The Bowery Creek Drainage is outside of the Sawtooth National Recreation Area; therefore, it should not be managed for the values or objectives of the SNRA. This land should be managed as per any other National Forest allotment, with the emphasis of multiple uses, rather than the values stated in the EIS. This area is of critical importance to the sustained economic viability of the ranching operation that utilizes the Upper East Fork Allotment, with trickle down effects running through the East Fork Valley and surrounding communities. The removal of this pasture would create a situation whereby running livestock on the allotment would become uneconomical and reduce the economic viability of the ranch to the point of nonexistence.

Associated Letters: 218-L

Response: Bowery Creek is part of the National Forest System. Management of this area is subject to direction established in Forest Plans and laws and regulations governing their use. Livestock grazing in this area is also subject to management requirements established during consultation with the regulatory agencies under the Endangered Species Act. We recognize that removal of this area from the allotment will result in an economic impact to the permittee. Economic impacts to the Challis – Stanley area are discussed in the EIS.

Public Comment 9c.21
The addition of the 290 acres in Deer Creek and the Bowery Cut-off Trail Basin is logical, but fails to compensate for the loss of 11,000 acres in the Upper Bowery Creek pasture and 12,000 acres in the West Fork drainages of the East Fork of the Salmon. The permittee has voluntarily made adjustments to his grazing schemes, including complete rest, following identification of concerns by the SNRA in this unit. These standards have been met the last two years. These efforts have not been adequately acknowledged, and actually appear to be discounted in the analysis. The removal of the Upper Bowery Creek Pasture will further reduce the limited options and flexibility presently available to the permittees, and increase the pressure and difficulty of properly managing livestock in the remainder of the allotment.

Associated Letters: 218-L

Response: We recognize that the economic impacts to the permittee from implementing alternative 2 will be severe. We also recognize that the permittees are dedicated to achieving resource management objectives and that they have made a dedicated and conscientious effort to resolve grazing problems on the allotment. Additionally they have made significant contributions and investments on their private lands to support recovery objectives for anadromous fish. The permittee's contributions have been and continue to be significant to achieving management objectives on the allotments.

Public Comment 9c.22
The explanation of how maximum permitted Head Months (HM) was determined is not clear. The proposed alternative initially imposes a 54 percent reduction of permitted use from 1016 to 553 HM to account for the adjustments in the allotment boundary, but continues on with an additional reduction to 349 HM. How these figure were derived is unclear and does not correlate to the "Administrative Grazing Capacity Determinations and Allotment Area Reductions Proposal for the Upper and Lower East Fork Allotment."

Associated Letters: 181

Response: The estimated grazing use identified as a result of implementing alternative 1 was developed based on a comparison of actual grazing use (number of cattle and season grazed) on the allotments over the past several years with grazing use monitoring results. This was also done for Alternative 2, In addition, estimates of available capacity based on amounts of available range removed from grazing were used to determine an estimate the total grazing capacity remaining for alternative 2. These capacity adjustments are consistent with those portrayed in the administrative determination cited.

Public Comment 9c.23
Lower East Fork Allotment. The adjustments in allotment boundaries are not justified in this analysis. There appears to be little thought in how these adjustments will affect the manageability of the remainder of the allotment. To effectively limit livestock access to the proposed closed areas will require a significant amount of additional fencing and riding, both of which increase the workload placed on the permittee. The need for eliminating areas such as Railroad Ridge and Upper Silver Rule from the allotment is questionable in that much of these areas receive very limited use as it is, so very little will be accomplished for this potentially expensive and labor intensive action.

Associated Letters: 218-L

Response: The rationale for the adjustment of the allotment boundaries in Alternative 2 is described in the EIS. Estimates of additional fencing needs are also described. However, a decision to implement Alternative 2 would not preclude construction of additional fences or other improvements if the proposed amount of fencing and other improvements is not adequate. Reducing the area within the allotments will have economic impacts to the permittees. While it may reduce the total area for riding and herding, it will result in increased costs for improvements and reduced returns as a result of running fewer livestock.

Public Comment 9c.24
Alternative 3 (Discontinue Grazing): This alternative has no merit ecologically or politically, and should not have received consideration at all. It is incomprehensible how this alternative could be deemed viable while Alternative 4 was not even evaluated. The SNRA has to be realistic in its attempt to develop and evaluate viable alternatives for livestock and rangeland management in the East Fork grazing allotments. Consideration of this alternative discredits the sincerity of this EIS.

Associated Letters: 218-L

Response: Alternative 3 was included to respond to the issues and concerns of those who believe that livestock grazing on the National Forest Lands causes substantial impairment and/or conflicts with other resources to the degree that total elimination of the livestock is needed to adequately resolve conflicts.

Public Comment 9c.25
Alternative 4 (Rest System with added East Pass pasture): Alternative 4 is the most practical alternative for the Upper East Fork Allotment. It is significantly different than what is analyzed in Alternative 1 and should have been further analyzed within this draft EIS. The addition of the East Pass Allotment would greatly improve the flexibility and options available to the permittee to address issues identified by the SNRA as needing improvement, including the debatable claims of overstocking and chronic overuse of certain riparian areas. The addition of one pasture would allow the permittee to maintain stocking numbers while decreasing the length of the grazing period in each of the original pastures. Shortening of the grazing period is the most effective means of improving compliance of stubble height and stream bank trampling standards.

Associated Letters: 218-L

Response: This was an alternative considered but dismissed from receiving detailed analysis for the following reasons:

- It is similar to the existing current grazing strategy, which is being analyzed as Alternative 1.
- Current requirements for the restriction of livestock access to spawning reaches for threatened bull trout after August 15 preclude the viability of this alternative.
- This alternative does not address the issue of overstocking and chronic overuse of certain riparian areas.
- East Pass currently provides undisturbed bull trout habitat.
- This alternative would require use of Bowery Creek, an area proposed for rest, to both access and leave the East Pass area.

Public Comment 9c.26
As much as I would like to see you implement Alt. 3, I think you should give the permit holders yet one more chance and implement Alt. 2 for two years. Within that timeframe we can see if the results are what we are seeking. If the permit holders cannot comply with these new rules, then they should not be allowed in the Forest.

Associated Letters: 222-L

Response: Thank-you for your comment. It will be noted for the Decision-Maker.

Public Comment 9c.27
EPA is also concerned with what appears to be a limited range of alternatives evaluated in the DEIS. The EIS states that the Purpose and Need of the proposed action "is to update the allotment management plans to allow for permitted livestock grazing that meets or moves towards desired conditions." Our concerns are that Alternative 3 would not appear to meet the stated Purpose and Need because it would not allow for permitted livestock grazing. As a consequence, the DEIS appears to present only a single action alternative that is available to the decision maker. This seems inconsistent with the direction of the NEPA regulations to evaluate a range of alternatives that provide a clear basis for choice. (see 40 CFR 1502.14). EPA recommends that additional alternatives be considered that move the project area towards "desired resource conditions" differently from those currently being considered. Such alternatives would reflect differing levels of grazing and restoration activities.

Associated Letters: 223-L

Response: Additional actions that would meet or move the allotments towards the desired condition are generally found in the many possible grazing strategies. These include items such as season of use, numbers of livestock, rotation throughout the pastures, etc. A grazing strategy can be implemented under

either Alt. 1 or Alt. 2 without needing to develop a new alternative and this would be done in the Annual Operating Plans. This provides for flexibility to adapt to changing conditions. Different standards (e.g. percent utilization) are the most logical significant issue the would drive a new alternative (and Forest Plan Amendment). However, there is no evidence to indicate we have proposed the wrong standards. We are unable to develop any new alternatives just for the sake of alternative development when most proposals can be implemented under existing alternatives.

Public Comment 9c.28
EPA also supports the elimination of alternatives that proposed grazing in areas that are pristine bull trout habitat and grazing above 9,000 feet in order to restore degraded alpine areas.

Associated Letters: 223-L

Response: Thank-you for your comment. It will be noted for the Decision-Maker.

Public Comment 9c.29
Second, it appears Alternative 5 (which has been eliminated from further consideration) would generate more revenues than Alternative 3 and therefore may be economically feasible. EPA recommends reconsidering Alternative 5 or consider an alternative that reflects grazing levels less than those proposed in Alternative 2.

Associated Letters: 218-L

Response: We agree that Alt. 5, may be economically feasible. It falls within the range between Alts. 1 & 2. The Responsible Official may select any alternative, parts of one or more alternatives, or a combination of features from various alternatives described in the FEIS. It is possible for a final decision to reflect portions of Alt. 1 and Alt. 2.

Public Comment 9c.30
IV-3 The DEIS states for Alternative 2 that reduced grazing, adaptive management, and changes in allotment boundaries would create a difficult economic situation for permittees since grazing allotments would be significantly reduced. The DEIS also states that "there is a strong likelihood that management standards and objectives would be met, grazing would be at a sustainable level, and permitted use would remain stable over the long-term." This discussion is confusing. The EIS should (1) reconcile the contradictory statements that grazing will be reduced and remain stable over the long-term; and (2) define what "management standards and objectives" would be met while grazing would continue.

Associated Letters: 223-L

Response: We respectfully disagree that "grazing will be reduced and remain stable over the long-term" is a contradictory statement. There is not an inherent conflict with reducing grazing allotments size while remaining stable over the long-term. "Management standards and objectives" to be met are the Sawtooth Forest Land and Resource Management Plan (2003) standards as was frequently referenced throughout the DEIS.

Category 9d: NEPA - Miscellaneous

Public Comment 9d.1
New issues and alternatives need to be forwarded and added to the final EIS, in order to meet the requirements of NEPA (40 CFR 1502.16), Short term Uses and Long Term Productivity where the

general welfare is promoted by creating and maintaining conditions under which man and nature can exist in productive harmony. The proposed action in the draft EIS appears not to promote conditions, which maintain productive harmony and it should, under (NEPA Section 101), I believe.

Associated Letters: 148

Response: The DEIS was prepared in accordance with NEPA and CEQ regulations. Productive harmony cannot be achieved with 100% of all people. However, the decision-maker will ensure productive harmony is promoted, as required by 40 CFR 1502.16. One important aspect of an Environmental Impact Statement is that it clearly reflects the many trade-offs of different alternatives.

Public Comment 9d.2
This draft needs substantive editing in order to be considered a valid scientific evaluation and to be of high value in formulation of revised plans or in monitoring the effectiveness of existing management. Much additional evaluation (of issues especially) needs to be included in the final EIS in order for the writers to be able to conclude that all probable adverse environmental impacts that cannot be avoided have been identified in the analysis. Severe reductions (Alt. 2) or removal of livestock from the allotments (Alt. 3) will have a significant negative affect on the long term productivity of soils and will affect the long term productivity of forages and indirectly, so will the no change alternative because grazing operations cannot be economically sustained under existing constraints.

Associated Letters: 148,

Response: Thank-you for your opinion. It will be noted for the Decision-Maker.

Public Comment 9d.3
I find no mention of wolves and of substantial impairment analysis requirements in this summary to be a gross deficiency, in that wolves and substantial impairment are major legal issue. That it is left unmentioned in the summary seems strange.

Associated Letters: 156

Response: Substantial Impairment is a determination that only the Area Ranger of the Sawtooth National Recreation Area can make. Information about wolves and Substantial Impairment elements are found throughout the document and in the Appendices.

Public Comment 9d.4
The Forest Service failed to complete a required Civil Rights Impact Analysis (CRIA). The Forest Service Handbook also mandates the agency to complete a Civil Right Impact Analysis or Civil Right Impact Statement (CRIS) describing the range of actions having potential civil right impacts on local citizens. It appears that the Forest Service is instituting a policy regarding (1) very limited livestock use and general livestock removal from the Sawtooth National Forest resulting in destruction of community stability and (2) decision making without adequate involvement of potentially affected allotment holders. These policies will detrimentally impact the permittees and disrupt the economy, social stability, and community structure of the counties.

Associated Letters: 189

Response: A Civil Rights Impact Statement is required for the following actions:

1. Legislative proposals, policies, programs, and projects for which an environmental impact statement is required.

2. Changes in or new rules, regulations, or policies to be published in the Federal Register and not requiring an environmental impact statement.
3. Decisions affecting program delivery, which will not be published in the Federal Register.
4. Proposed locations or relocations of field installations involving permanent employees; organization redesign/reinvention/reorganization or downsizing/rightsizing; and staff or program consolidations;
5. Revisions of the Forest Service Directive System.

Since none of the actions in the East Fork AMP revision DEIS fall into any of these categories, A CRIS is not required. However, Environmental Justice (E.O. 12898) was considered - P. IV-99 of the DEIS addresses "Environmental Justice" as is required by law & regulation. In addition, economic elements impacts were displayed throughout the EIS.

Public Comment 9d.5
The Draft EIS should include and clearly define all actions and decision that are or might be made and implemented in the management of the grazing allotments. I have been told that once the EIS or EA is complete, it is usually put on the shelf and the agency personnel continue to place requirement on the ranchers through the grazing permit or allotment management plan that are not included in the EIS. If this is fact, this is wrong.

Associated Letters: 189

Response: The FEIS will ultimately result in amended AMPs and a revised grazing permit. The Decision Framework outlines the constraints under which a decision can be made and each alternative clearly defines the elements of what would occur should it be implemented. The information is not shelved and is indeed critical to the future management of the East Fork allotments.

Public Comment 9d.6
We disagree with the following: " Irreversible and Irretrievable Commitments of Resources. No resources would be irreversibly committed under the proposed action. The main resource involved is forage, which is used by both wildlife and domestic livestock. Forage is renewable and when managed under FLRMP standards and guides, adequate amounts of forage would return the following growing season." Within the SNRA allotments are grazing impacts that are irreversible by any reasonable action, at a reasonable cost, within any reasonable timeframe. Therefore, the effects are irretrievable. Introduced noxious weeds, permanent streambank damage, drained wetlands, loss of species viability, and continued impairment of wolf recovery are only a few.

Associated Letters: 203

Response: We respectfully disagree with your conclusion. Irreversible commitments of resources are those that cannot be regained, such as the extinction of a species or the removal of mined ore. Irretrievable commitments are those that are lost for a period of time such as the temporary loss of timber productivity in forested areas that are kept clear for use as a power line rights-of-way or road. No resources would be irreversibly committed under the proposed action. Forage is renewable and when managed under FLRMP standards and guides, adequate amounts of forage would return the following growing season. Impacts from livestock grazing can be reversed.

Public Comment 9d.7
EPA also recommends that the EIS should have a list of acronyms.

Associated Letters: 223-L

Response: The FEIS will include a list of acronyms.

Public Comment 9d.8
The DEIS states that monitoring would occur as funds become available. EPA supports developing a monitoring strategy and including it in the EIS. EPA recommends that the Final EIS and Record of Decision make a commitment to a monitoring strategy that includes an element that describes how information would be used in guiding future management activities.

Associated Letters: 223-L

Response: We should have been more clear in the DEIS on the monitoring that has occurred and will occur in the project area. Considerable monitoring will occur and this will be attached as Appendix D to the FEIS.

Category 9e: Supporting Data and Bias

Public Comment 9e.1
Thank you for having the courage to present science which I'm sure local and national politicians will try and have suppressed. Thanks again for making a science-based decision.

This in-depth DEIS section shows that the SNRA has more than enough scientific evidence that rare plants need protection from livestock grazing (as well as other harmful use such as ATVs, ORVs, packstock, etc. which are out of the DEIS scope).

My compliments to you and your staff for an excellent document. Facts are well documented and easily understood. So much more is known about the flora and fauna in the area since the time I was the Assistant Superintendent - Project Design-Planning from 1978-1988.

Associated Letters: 59, 132, 132, 181, 186

Response: Thank you for your opinion. It has been noted for the decision-maker.

Public Comment 9e.2
The draft EIS portrays some conclusions regarding impacts by livestock on the Lower and Upper East Fork to wildlife and other range resources that appear not scientifically defensible (unless supporting data is revealed) and therefore potentially perceived by readers as opinion or perhaps bias. This is because discussions often portray the impacts of grazing as may, or might or potentially affect, however conclusions regarding reductions in numbers or the phased out grazing alternative reaching concludes a definite positive effect.

The draft EIS is full of speculation, supposition and generalization and has little or nothing to do with actual on the ground conditions. We are disappointed that the USFS would be so callous in abandoning management goals for regulatory controls that place permittee's livelihoods in jeopardy, upset regional economies and do so to placate so-called environmentalists that sometimes recreate and who will not be placated until the SNRA is locked up, closed down and recreated in an image that is pre-historical, pre-settlement and probably never ever existed.

The DEIS displays an apparent bias against livestock grazing that occurs throughout from the first few words in the abstract down to the last page.

This was a very hard document to review as we could have disputed nearly every sentence in the document. To our frustration, this draft EIS completely lacks of any positive input or direction in management options for continued grazing and this was confirmed by many others who have also read the document. An EIS should be based on sound scientific and factual data and should have viable range management alternatives based upon reasonable and rational issues. Instead the writer(s) of this document used their own opinions and theories. This document is no more than opinionated supposition and will not give the general public fair, accurate and scientific information to comment or evaluate livestock grazing on the Lower East Fork Allotments (LEFAs).

Assumptions should not be in a draft, let alone final EIS and the draft EIS was completely void of fundamental benefits of livestock grazing upon range ecosystems cycles which shows bias by the writer(s) and a lack of education and understanding of those hired to manage grazing on public lands. Their job should not be to find ways to eliminate grazing, but to find ways to insure grazing can be compatible with other uses and that grazing will help with the continued improvement and the health of the resource. The EIS should be based on facts and scientific documentation.

The Purpose and Need for Action section sets the tone for the whole document expressing an agenda against livestock grazing and using every means possible to cast a negative light on management of the East Fork grazing allotments while downplaying the positive aspects of having livestock on the allotment. Where is the discussion and photos of the 86 percent of the remaining stream reaches meeting or moving towards SNRA objectives?

Associated Letters: 148, 169, 194, 198, 212-L, 218-L

Response: The DEIS was prepared in accordance with NEPA and CEQ regulations. The terms "may" and "might" are used because natural resource effects cannot be 100% guaranteed. This is consistent with all environmental documents written in the Forest Service. The effects are an estimation based on the best available science, monitoring, and knowledge of local conditions. The number of studies, amount of public interest, and the amount of time that has been dedicated to taking action to resolve conflicts certainly does not indicate a lack of information, preconceived viewpoints, or bias.

Public Comment 9e.3
It is relevant, therefore, for a final EIS to address any and all erroneous conclusions, and for editors to suggest the inclusion of additional pertinent resource issues and promote consideration of viable alternatives within the final EIS. This will help achieve not only the resource conditions desired in the SNRA General Management Plan (SNRA key values) but help support the welfare of the families and resources within the East Fork Valley, which should not be evaluated nor considered separately from the Upper and Lower East Fork Allotments.

Associated Letters: 148

Response: We are unaware of any “erroneous conclusions”. If the commentor would be more specific, we could address that concern.

Public Comment 9e.4
In general, when mentioning grazing impacts to upon wildlife species, there is a strong tendency of the writer(s) to repeatedly state the fact that grazing reduces cover and forage for wildlife and to infer this is negative. The fact that large ungulates reduce the vegetative cover and forage and trample soils and vegetation is very true. It might be prudent to realize however that so did the bison, which roamed the West in uncountable numbers, reducing vegetative cover and forages and trampling the land on a vast scale. Evidence, based upon written accounts from trappers and the US Army, indicates that bison grazed

in fairly large herds all the way from the Idaho Falls area to Challis and North, and impacts to the amount of cover and forage were quite severe on some allotments, such as Pass Creek, near Mackay. These bison also grazed up quite high, with skulls and wallows found about 9,000 ft. The loss of the viability of ranching operations, such as the Bakers, may have serious resource implications for the East Fork River Valley, wildlife species such as the bighorn, elk and deer and more. The draft EIS proposed action will likely cause a perhaps hard to manage increase in grazing pressure on private lands in and near the East Fork river valley. The increased grazing pressure produced by earlier removal of stock from public lands and shrinking the area of grazing public lands may well cause conservation concerns on an area highly valuable to some the wildlife species the draft EIS writers are concerned about. The proposed action may well lead to increased conservation concerns with some of the plant species the draft writers are concerned about.

Associated Letters: 148

Response: Thank you for your opinion. It has been noted for the decision-maker.

Public Comment 9e.5
WWP commends the analysis of existing conditions on the allotments and only recommends that the SNRA include color photographs in the final EIS. These photos clearly show the level of unacceptable impacts by livestock on the allotments, and the addition of color will enhance the evidence supporting the selection of Alternative #3. WWP has not previously seen analysis in any livestock grazing NEPA document, which included an assessment of the role of pollinators and the negative impacts to this important natural population, by livestock grazing. Analysis of fisheries, other wildlife like amphibians, and rare plants is also excellent and deserves commendation.

Associated Letters: 166

Response: Thank you for your comments. Color photos may or may not be part of the FEIS due to cost considerations of printing. However, all original photos used in the DEIS are available for viewing at the SNRA office and the majority of these are in color.

Public Comment 9e.6
The document is not in compliance with the Federal Data Quality Legislation (Act). Federal Register: February 22, 2002 (Volume 67, Number 36) which states that agencies are required to ensure and maximize the quality, objectivity, utility, and integrity of information (The Data Quality Act, Public Law 106-554). ``Objectivity" as defined in the Data Quality Act is having two distinct elements, presentation and substance. ``Objectivity" includes whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner (definition of unbiased - free from bias; especially : free from all prejudice and favoritism : eminently fair).

The content of the total Draft EIS shows the bias the USFS have against ranching with such statements as "other impacts include damage from cattle frequenting recreation sites, alteration of the natural-appearing landscape, livestock droppings and associated smell." To me and most people in the west, a natural-appearing landscape is a landscape with cattle in it.

The information must be presented within a proper context. The agency must identify the sources of the disseminated information (to the extent possible, consistent with confidentiality protections) and, in a scientific or statistical context, the supporting data and models, so that the public can assess for itself whether there may be some reason to question the objectivity of the sources. Where appropriate, supporting data should have full, accurate, transparent documentation, and error sources affecting data quality should be identified and disclosed to users.

Associated Letters: 189

Response: The DEIS was prepared in accordance with NEPA and CEQ regulations and other applicable laws & regulations such as the Data Quality Act. Public meetings, range tours, committee work, etc., were used to develop and resolve issues and concerns surrounding management of the East Fork allotments. The number of studies, amount of public interest, and the amount of time that has been dedicated prior to taking action certainly does not indicate a lack of good faith or a pre-conceived viewpoint.

Public Comment 9e.7
As Commissioners representing the citizens of Custer County we have read with great interest the above mentioned draft. We find it interesting that there is little if any positive language in the Draft EIS that reflects the work that the involved permittees have accomplished on the ground or that is reflected in on-the-ground visits to the affected allotments. Our observations and those of others do not reflect the negativity portrayed in the Draft EIS. If the intent of the authors was to paint a picture of negativity they have accomplished their goal. Our first comment then would be to go back to the drawing board with a more professional unbiased attitude and rewrite the Draft EIS to reflect what is actually happening on the ground, both positive and negative.

Associated Letters: 194

Response: Thank you for your comments. The DEIS was prepared in accordance with NEPA and CEQ regulations. The number of studies, amount of public interest, and the amount of time that has been dedicated to taking action to resolve conflicts certainly does not indicate a lack of information or preconceived viewpoints.

Public Comment 9e.8
You quote the Upper Columbia River EIS in several places. That same document lists this part of the Columbia River Basin as being as close to pre-European as anywhere in the entire basin. If you are going to use all the science use all the science! Others will talk more specifically about the range issues raised in the Draft EIS. We will, for now, limit our comments to the economic sections of the Draft EIS. Our numbers do not necessarily agree with those in the document as to employment and income numbers but are probably due to the differences in methods used and will not be debated here.

Associated Letters: 194

Response: Thank you for your comment. If you have differing information, we would welcome receiving it.

Public Comment 9e.9
A number of years we attended a grazing tour in the Stanley Basin on Marsh Creek we observed a number of salmon spawning the area in which cattle grazed and just a little way up stream in a sheep allotment that had overhanging stream banks there was not one salmon spawning. We feel that you are just wanting to get the cattle off from the range. And really do not care for the resource.

Associated Letters: 212-L

Response: Grazing is a valid use of National Forest lands and PL 92-400 states that grazing may occur so long as it does not substantially impair the key values of the SNRA. The Sawtooth Forest Plan grants

fisheries preferred status when conflicts between grazing and fisheries occurs. The proposed action is to authorize livestock grazing on the East Fork allotments.

Category 9f: Effects & Monitoring

Public Comment 9f.1
The omission of the effects of grazing on some of the crucial ecosystem foundations (whole ecosystems functions) as significant issues and lack of proper evaluation could and probably will result in some drastic and very negative effects to the land in the long term, should any of the existing draft alternatives be implemented. Evidence on the results of no grazing alternative, for example, can be readily interpolated by evaluating the conditions on parts of Zeigler Basin where long-term rest conditions exist. The range conditions have been documented on film by USDA-NRCS. A USDA plant material demonstration plot, containing undisturbed rangeland adjacent to the allotment shows much of the same things.

Associated Letters: 148

Response: Removing permitted livestock grazing does not eliminate ungulate grazing. Grazing by bighorn sheep, elk, and moose will continue. The levels of use will depend on the population levels of these species and preferred habitats. Recreation livestock use will also continue. The EIS discusses the effects of removing livestock grazing from the rangelands and portions of the rangelands on the two allotments. Some effects will be noted in changes in diversity, vigor and composition of plant communities and associated soil stability. Changes will be most pronounced in riparian areas and other plant communities that have received heavy livestock grazing on an annual basis. We recognize that positive and negative changes will occur in rangeland plant communities that are no longer grazed by permitted livestock. If the NRCS data conflicts with conclusions presented in the EIS, we would welcome receiving copies of that information.

Public Comment 9f.2
You should tour the Greenfire Preserve and see what the elimination of grazing can do on the bottomland. Of course, this is private property, but I would expect a similar rebound in the moister areas of the allotments. The xeric sites and some riparian zones will take more time.

Associated Letters: 162

Response: Thank you for your comment. It has been noted for the decision-maker.

Public Comment 9f.3
It appears that beginning on page 1-4 that the USFS has done absolutely nothing since 1972 to document conditions on these two allotments. USFS uses the term "may" as a definitive term when in fact, all of the statements where the tem is used indicates a total uncertainty by the writers.

On page 1-8 we again run into impacts on potential vegetation groups. Again what is a potential vegetation group? On the same page regarding fisheries, grazing MAY be disturbing the functional integrity of hydrologic processes, May impact key habitats and direct impacts on spawning and incubation MAY be occurring. Our question is, are they or are they not and if the USFS doesn't know why. With massive yearly expenditures and years of monitoring we would think that USES might know something about impacts.

Associated Letters: 169

Response: The terms "may" and "might" are used because natural resource effects cannot be 100% guaranteed. This is consistent with all environmental documents written in the Forest Service. The effects are an estimation based on the best available science, monitoring, and knowledge of local conditions. "Potential vegetation group" (PVGs) share similar environmental characteristics, site productivity, and disturbance regimes. Eleven PVGs are identified Appendix A of the revised Forest Plan (2003).

Public Comment 9f.4
We note on page III-11 that the USES seems to be telling us that they believe in global warming when in fact it is still an unproven theory. We would suggest that all references to global warming be removed from this document, that is unless the USFS can prove the theory.

Associated Letters: 169

Response: Page III-11 cites the reference used for climatic change and does not indicate that the global warming theory is the only cause for climatic change. Many other factors might cause climatic change.

Public Comment 9f.5
Typical monitoring on the East Fork Allotments has consisted of evaluating key areas located on riparian areas and occasionally checking adjacent upland slopes or benches. If utilization pattern maps had been developed during annual allotment monitoring, it would likely have shown less than 10 percent of the area within the allotments exceeding utilization standards. This is not a case of over utilization - it is a case of incomplete rangeland monitoring.

Associated Letters: 218-L

Response: Riparian areas on the allotments make up a small percentage of the total available rangeland. We recognize that management of the riparian systems on the allotments is limiting to grazing use on the rest of the available rangelands. However, there has been extensive monitoring of riparian rangelands on the allotments over the past several years. Results of this monitoring show that there is a substantial need to change management practices to meet direction established in the Forest Plan and through consultation under ESA.

We recognize the need for additional monitoring of annual grazing use and long-term rangeland trend. The monitoring plan (Appendix D) will provide guidance for future monitoring of livestock grazing activities and uses.

Public Comment 9f.6
Throughout the Effects Environment chapter there are great generalizations made to the management and what effects that grazing is or may be having on riparian and upland vegetation, and fish and wildlife habitat. In each case where evidence is lacking or inconclusive, it appears that benefit of the doubt is given to the opinion that grazing is detrimental to resource values on the SNRA.

Plants/Wildlife. There are a number of claims of impacts of livestock grazing on wildlife and plant species that are not substantiated by documentation but merely because these species occupy habitat adjacent to grazing areas. Competition by cattle for winter forage for bighorn sheep and elk is not documented but is assumed merely because their habitats overlap. Because northern sagewort occupies habitat associated with Ute's Lady Tress, it is assumed livestock will have a negative impact though

authors of this document admit that impacts are unknown (page III-18). These are but two examples, but the same inferences are made for pollinators and silvery/Jones primrose. The impacts of livestock grazing on wildlife again are overstated, particularly for elk, bighorn sheep, moose, bald eagle, sage grouse, wolverine and fisher. In each case, it is suggested that livestock grazing "may" be negatively affecting habitat critical to winter survival, or prey species without data to support the statements. This inflammatory language is not conducive to meaningful analysis.

Associated Letters: 218-L

Response: The DEIS was prepared in accordance with NEPA and CEQ regulations. Public meetings, range tours, committee work, etc., were used to develop and resolve issues and concerns surrounding management of the East Fork allotments. The number of studies, amount of public interest, and the amount of time that has been dedicated prior to taking action certainly does not indicate a lack of good faith or a pre-conceived viewpoint. The FS respectfully disagrees that inadequate data was used. Indeed, several years of documented livestock impacts were presented for White Cloud Milkvetch and Silvery/Jones primrose. Ute's ladies-tresses is not currently known to occur on the Sawtooth National Forest and does not co-occur with northern sagewort in any of portion of its distribution. The DEIS acknowledges that for several sensitive and proposed sensitive plant species impacts, livestock or otherwise, are unknown and that inventory and monitoring is needed to determine threats and trends of these populations.

Public Comment 9f.7
In the descriptions of the Current Conditions section, a summary of characteristics of streams within the major hydrologic drainages is given in Table III-3 on page III-35. The statement that methods vary, as do sample size and observer variability, and also that results are presented as general indicators of stream health rather than absolute condition status qualifies data contained in the table. Yet decisions and conclusions that significantly affect grazing are derived from this data.

Associated Letters: 218-L

Response: The data contained in Table III-3 are as described – that is, resource inventories of natural stream conditions in uncontrolled settings rather than rigorous scientific research. The FEIS describes and treats the data accordingly. The generalized conditions in Table III-3 are but one of numerous sources of information used to compare and contrast the Alternatives and their potential effects within the FEIS.

Public Comment 9f.8
Chapter 4 Environmental Consequences: Issue - Livestock Distribution & Management Alternative 1: We disagree with the assessment that grazing under Alternative 1 will not allow achievement of SNRA goals and objectives. This analysis does not properly acknowledge the effects of the prolonged drought or changes that have been made in historic management, but assumes that conditions are going to continue indefinitely.

Associated Letters: 218-L

Response: We agree that the drought will not continue indefinitely. Weather fluctuates in cycles. The drought was factored into estimation of effects. Past records show that meeting Forest Plan standards at the higher stocking numbers (under non-drought conditions) was problematic.

Public Comment 9f.9
IV-95 The DEIS states that Alternative 3 may result in permittees no longer being able to sustain viable livestock operations. The EIS should clarify whether the discussion refers to economic viability, environmental viability, or both.

Associated Letters: 223-L

Response: This particular point refers to economic viability of the permittee's operations.

Issue 10: Wildfire/Fuels

Summary of comments received:

- Ensure the Forest is implementing the National Fire Plan and reducing fuel loading by allowing grazing in this area, particularly on East Pass, Big Boulder, Little Boulder, and Wickiup.
- Consider the benefits of livestock grazing, including fire hazard reduction for recreationists and threatened and endangered species, and the habitat livestock create for wildlife.
- Consider using livestock to restore burned areas.

Response:
The role of livestock grazing in fire management is complex and controversial. Grazing can both decrease fine fuels (grasses) during the grazing period reducing the immediate fir potential and also increase the potential for fire over the long-term by altering the natural vegetation to include higher densities of brush, cheatgrass, weedy annuals and conifers. The amount and health of aspen stands, the density of conifer stands, and the encroachment of conifers into meadows and open areas are the result of a reduced frequency of fire over the long-term.

Catastrophic or un-characteristic fire is typically associated with vegetation condition classes that have been altered from historical ranges. The East Fork analysis area has been moderately altered from historical ranges which suggests a low likelihood that fire would be un-characteristic or detrimental to plant and animal life. Being as this area is fairly unpopulated and the threat of structure loss is low it is unlikely a fire would be classified as un-characteristic.

Grasses and forbs eaten by livestock constitute a small percentage of the biomass in the analysis area. While grazing grasses and other fine fuels will have some effect on reducing the potential for wildfires, the fuel loading of most concern is the density of brush, small trees and other “ladder fuels” and down woody debris, which make wildfires difficult to contain and extinguish and have little effect on the probability of a fire. Grasses and forbs consumed by cattle create less competition with other species such as sage and conifers. By reducing grasses and forbs, sagebrush canopy can increase thereby potentially creating a greater fire hazard.

Using livestock to restore burned areas is outside the scope of this project.

Letters addressing this issue: 7, 8, 84, 183, 185, 189, and 197

Issue 11: Access/Motorized Concerns

Public Comment 11.1

The access to the lands by the public must be preserved – I am against closing of roads and trails. Furthermore, trails and roads will allow for the public to enjoy and use the lands, this is great for the local economy.

Associated Letters: 6

Response: Road and trail closures are outside the scope of this decision.

Public Comment 11.2
Cattle are not the only cause of negative impacts to Railroad Ridge. Cross-country ATV and motorcycle use destroys fragile vegetation as well. Federal agencies and the state of Idaho have identified cross-country travel and trail-pioneering by ATVs, as well as motorcycles, as their biggest management concern.

Associated Letters: 182

Response: We agree that impacts from off-trail and off-road vehicle use are occurring on Railroad Ridge, and this has been added to the cumulative effects section in Chapter IV of the FEIS.

Public Comment 11.3
For environmental concerns and the increased use of the area for recreation I think it's time to reevaluate the grazing laws, and probably restrict more of the motorized use of the area.

Associated Letters: 147

Response: Grazing laws and motorized vehicle management is outside the scope of this decision.

Public Comment 11.4
The DEIS notes, when discussing impacts to Slender Moonwort, that "Under implementation of the anticipated conservation strategy, every effort will be made to ensure that noxious weeds do not move up to Railroad Ridge . . ." (p. IV-15). The DEIS also states that there may be a high risk of spread of some invasive and aggressive species by vehicles, as well as livestock. Railroad Ridge should be closed to OHVs, and if damage continues, closed to all vehicles.

Associated Letters: 182

Response:
Road and trail closures are outside the scope of this document. Noxious weeds on Railroad Ridge are of great concern and comments regarding OHV closures are noted.

Public Comment 11.5
Resource abuse from ATVs and ORVs: In the interest of national security and protection of watersheds and wildlife habitat, it is entirely appropriate to eliminate the use of ATVs and ORV's of any type on all public land at any time, except by NF personnel (who stay on maintained roads). Using and transporting these vehicles perpetrates damage to our national security because of the waste of oil and other resources, including the fouling of air, water, aural, smell, and wildlife quality - damaging our security and our future.

Associated Letters: 192

Response: Motorized vehicle management is outside the scope of this decision.