



Final Environmental Impact Statement for the Land Management Plan

Appendix M: Response to Comments

Nez Perce-Clearwater National Forests



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Final Environmental Impact Statement for 2023 Land Management Plan for the Nez Perce-Clearwater National Forests

Idaho, Clearwater, Lewis, Latah, Shoshone and Benewah Counties, Idaho

Lead Agency:

United States Department of Agriculture (USDA)- Forest Service

Cooperating Agencies:

Idaho County, Idaho
Clearwater County, Idaho
State of Idaho

Government to Government Consulting Agency:

Nez Perce Tribe

Responsible Official:

Cheryl Probert
Forest Supervisor
USDA Forest Service
Nez Perce-Clearwater National Forests
1008 Highway 64, Kamiah, Idaho 83536

For More Information Contact:

Zach Peterson
Public and Government Relations Staff Officer
1008 Highway 64 Kamiah, ID 83536
208-935-4239 or zachary.peterson@usda.gov

Sara Daugherty
Forest Planner
1008 Highway 64, Kamiah, Idaho 83536
208-963-4206 or sara.daugherty@usda.gov

Abstract: This Final Environmental Impact Statement documents the analysis of the Preferred Alternative and four additional action alternatives developed for programmatic management of the four million acres of National Forest system lands administered by the Nez Perce-Clearwater National Forests. The purpose is to provide land management direction for the Nez Perce-Clearwater National Forests, combining the 1987 Nez Perce National Forests Land Management Plan and the 1987 Clearwater National Forest Land Management Plan into one plan for the Nez Perce-Clearwater National Forests, now managed as one administrative unit.

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Introduction

This appendix describes the process used for content analysis of the comments received during the 120-day public comment period of December 20, 2019 to April 20, 2020, and includes public comments by individuals and organizations and Forest Service responses to the substantive comments received. A variety of methods were used to inform the public about the draft environmental impact statement (DEIS). These included emails to subscribers to the plan revision website, news releases, open houses, contacts with other Federal and local agencies, publication of the notice of availability in the Federal Register, and website

<https://www.fs.usda.gov/detail/nezperceclearwater/landmanagement/planning/?cid=fseprd682962>.

The Forest Service received a total of 19,037 comment submission; 1,329 of which were considered unique. Comment letters were received from 95 organizations. Three organizations prompted 14,231 form letters (or campaign letters); most of which were identical to the master letter. Modified letters with unique comments were given their own submission number and were coded appropriately. 314 form letters with additional information (form plus letters) were received. In the response to comments section, individual or representative comments are paraphrased or are quoted from directly.

Content Analysis Process

The content analysis of the comments was conducted using a systematic process of reading, coding, and summarizing all of the comments that were submitted. This process ensured that every comment was read, analyzed, and considered. The most helpful comments were those that were unique and specifically related to the plan and analysis in the DEIS. Each submission was assigned a letter number. Each unique comment was numbered sequentially and coded by topic in a database. Similar comments were grouped, and nearly identical comments were combined. The interdisciplinary team prepared responses for each comment based on its merits, regardless of the source or whether the comment was expressed by one person or by many.

This appendix documents the Forest Service responses to the substantive comments, which have been addressed, as prescribed in 40 CFR 1503.4, in the following ways:

- modifying the forest plan and alternatives;
- developing or analyzing alternatives not given detailed consideration in the DEIS;
- supplementing, improving, or modifying the analysis than what was in the DEIS;
- making factual corrections; and/or
- explaining why the comments need no further agency response.

Content analysis is a method commonly used by the Forest Service to gather information about comment letters. Each unique letter was read and substantive comments were identified and coded by major topic. Once the unique and substantially different comments had been coded, the concerns raised by different commenters on the same subject and with the same intent were grouped by subject and category code, which captured the essence of similar concerns. The content analysis process ensured that every comment was read, analyzed, and considered. The substantive comments and their coding were entered into a database, which enabled reports to be run listing all substantive comments by topic. Resource specialists on the Nez Perce-Clearwater National Forest then combined similar comments into statements that capture the intent of the commenter(s). These statements are the “comments” in the response to comments section. Thus, even though not every comment is quoted in this appendix exactly as written by each

respondent, each comment was considered individually. The comment statements are followed by the responses prepared by the Nez Perce-Clearwater National Forests planning team. Comments and responses are arranged alphabetically according to resource or topic.

In considering the comments, it is important for readers and decisionmakers to understand that this process makes no attempt to treat comments as if they were votes and therefore give more weight to similar comments made by many different people. Instead, the content analysis process focuses on the content of the comments and ensures that every substantive comment is considered in the decision process.

Resource specialists reviewed all attachments included with comments, and relevant information was considered in the final EIS analysis and plan component development. References to literature have all been reviewed by resource specialists and, where appropriate, citations to the relevant literature have been included in the final EIS and reference sections.

Individual letters are not included in this report but can be viewed online in the Content Analysis and Response Application (CARA) public reading room for this project. Go to <https://cara.fs2c.usda.gov/Public/ReadingRoom?project=44089>.

Demographic Information

Table 1 through Table 5 display the demographics of the comments received for the Nez Perce-Clearwater National Forests draft forest plan, DEIS during the public comment period.

Delivery Type

Comments were delivered from the interested parties in various ways, including electronic deliveries as well as postal and private courier services. Table 1 captures the delivery type for comments on the DEIS.

Table 1. The type of delivery of comment letters

Delivery Type	Letter Count
Content Analysis and Response Application Web portal (CARA)	1121
Carrier: USPS, UPS, FedEx, etc.	58
Email	17,855
Other	3

Letter Type

The comments in response to the DEIS were categorized based on the type of letter. The Nez Perce-Clearwater National Forests is keeping all letters that were received as part of the planning record.

Table 2. Type of comment letters received

Letter Type	Letter Count
Unique	1,329
Form	14,231
Form Plus*	314
Master Form**	58

* Form plus refers to form letters with one or more additional unique and substantive comments.

** Master form letters are letters determined to be representative of a set of form letters.

Responding Organizations

A large number of organizations responded to the DEIS. Table 8- 3 provides a list of these organizations as well as the respective Content Analysis and Response Application letter number(s) and contact name listed on the letter.

If you are looking for the responses in this document to a particular letter from an organization, find the organization name and its letter number in Table 3 and then go to the sections under Responses to Comments by Topic that cover the topics addressed in the letter. These topics are listed alphabetically. If you are reading an electronic copy of this document, you may also search by the letter number to find the responses.

Table 3. List of responding organizations and corresponding letter number(s) in the Content Analysis and Response Application (CARA)

Organization	Letter Number	Contact Name
RAF	9	Ron Keller
North American Packgoat Association	11	Theresa Mercer
Idaho Wildlife Federation	68 938	Lizzy McKeag
Animal Advocates	75	
Backcountry Sled Patriots	88	Stan Spencer
Boone and Crockett Club	133	Garrett Durst
Northwest Gold Prospectors Association - Clearwater Chapter	278	Gary Wutzke
RMSHA	289	Luke Bledsoe
Powell QRU and SAR	290	Leigh Ann Bledsoe
Montana Chapter of Backcountry Horseman Association	321	Greg Munther
Snodrifters of Latah County	352	Bernie Hermann
Clearwater County Economic Development	356	Christina St Germaine
McCall Area Snowmobile Club	395	Mark Wood
Arts Missoula	409	Melissa Blunt
Northern Idaho Whitetails Forever	412	William Samuels
The Walton Works	432	Todd Walton
Boone and Crockett Club	434	Steve Cowles
The Pew Charitable Trusts	436	Blake Busse
Idaho state Snow Mobile Association	443	Larry Laxson
West Mountain Snowmobile Club	462	Mike Blessing
Big D Ranch	473	Richard Durrant
Winter Wildlands Alliance	529	Hilary Eisen
Ida-Lew Economic Development Council	530	Gavin Lewis
Donnelly Snowmobile Club	531	David Bunker
Yellowstone to Yukon Cons. Init.	563	Hannah Rasker
Advocates for Multi-Use of Public Lands	564	Amy Edmonds

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Organization	Letter Number	Contact Name
CTVA Action Committee	567	
Montana Wilderness Association	570	Erin Clark
WILDERNESS & WILDLIFE	574	John Shellenberger
Center for Large Landscape Conservation	577 578	Laramie Maxwell
Team Lochsa LLC	581	Scott Bledsoe
Idaho Recreation Council	587 671	David Claiborne
Backcountry Hunters and Anglers	629	Hunter Johnstone
Committee for Idaho's High Desert	663	Steve Jakubowicz
Sierra Snowmobile Foundation	664	Kevin Bazar
The Lands Council	672	Mike Peterson
Backcountry Sled Patriots	684	Rick Shaw
Maryland Ornithological Society	687 951	Kurt Schwarz
Clearwater Basin Collaborative	701	Tera King
Idaho Conservation League	717	Brad Smith
CITRA	720	Jeffrey Baker
National Marine Fisheries Services	721	Michael Tehan
Rocky Mountain Goat Alliance	723	Peter Muennich
The Nature Conservancy in Idaho	673 764	Robert Harrington
Elk City Ambulance	776	Michael Edmondson
Idaho Office of Energy and Mineral Resources	805 17357	Marde Mensinger
American Forest Resource Council	873	Tom Partin
Alpha Gamma Rho Fraternity	876	Brian Johnson
Friends of the Clearwater	877	Katie Bilodeau Jeff Juel
Montana Fish, Wildlife & Parks	914	Sharon Rose
Trout Unlimited	939	Eric Crawford
Nimiipuu Protecting the Environment	947	Elliot Moffett
North American Packgoat Association	953 1057	Andrew Irvine
Magic Valley ATV Riders INC	960	Kent Oliver
Wildearth Guardians	962	Adam Rissien
American Whitewater	974	Kevin Colburn
Associated Logging Contractors of Idaho	979	Shawm Keough
Advocates for Multi-Use of Public Lands	981	Amy Edmonds
Elk City Hotel & Gift Shop	1040	Jamie Edmonson
MTB Missoula	1041	Benjamin Horan
Rocky Mountain Elk Foundation	1050	Blake Henning
Idaho Forest Group	1051	Tera King

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Organization	Letter Number	Contact Name
Idaho Rivers United	1052 1061	Nic Nelson
Montana Wildlife Federation	1054	Alec Underwood
Nez Perce Tribe	1060	Honorable Shannon Wheeler
Defenders of Wildlife	1065	Peter Nelson
Public Land Access Year round Inc.	1076	David Galantuomini
Outback	1112	Jeremiah Nuttall
Backcountry Hunters and Anglers	1115	Ace Hess
Bikepacking Roots	1120	Kurt Refsnider
Idaho County Commissioners	3110	
Nez Perce County Board of Commissioners	3637	Stephanie Cuddihy
Benewah County Commissioners	3740	
University of Idaho	16853	William Warren
Montana Wilderness Association	16853	Erin Clark
Mineral County Board of Commissioners	16854	
Montana Backcountry Alliance	16855	Greg Peters
Efficient Public Collaboration	16856 17361	
Montana Wildlife Federation	17347	Alec Underwood
Environmental Protection Agency - Policy & Environmental Review Branch	17348	Theo Mbabaliye
Theodore Roosevelt Conservation Partnership	17349	Rob Thornberry
Associated Logging Contractors, Inc - Idaho	17350	Shawn Keough
Montana Fish Wildlife & Parks	17352	Sharon Rose
PLAY	17871	David Galantuomini
Mineral and Sanders County Commissioners	17872	
Idaho Environmental Council Inc	17879	Dennis Baird
Evergreen Forest	17882	James Wassmuth
Lewis Clark Valley Chamber of Commerce	17883	Kristen Kemak
Ten Lakes Forestry	17886	Wayne Finch
Bennett Lumber Products Inc	17887	Dan Smith
Gill Family Ranches, LLC	17889	O. Michelle Neal
Bennett Lumber Products Inc	17890	Tom Biltonen
Team Lochsa LLC	17891	Scott Bledsoe
Finke Logging Co Inc	17894	Cody Finke
Heckman Cattle Company	17895	Donovan Heckman
Backcountry Sled Patriots	17902	Stan Spencer
M. John Larson Logging	17907	John Larson

Organization	Letter Number	Contact Name
Bruce Johnson Trucking LLC	17909	Bruce Johnson

Organized Letter Campaign

An organized letter campaign is a set of form letters that have been identified as such based on overlapping content and comments.

Table 4 lists the Content Analysis and Response Application form set name, master form letter number, number of form letters per form set, quantity of form plus letters per form set, and then the total number. The total number is a summary of the form and form plus columns plus the master form letter. The form set numbers that are not assigned to an affiliated organization represent form letters from groups of commenters who did not indicate the organization they were affiliated with.

Table 4. Number of letters received from organized letter campaigns.

Form Set Name	Master Form Letter Number	Number of Form Letters	Number of Form Plus* Letters	Total Number (Includes master Letter)
Hopkins	16	20	9	30
Gary	28	1	0	2
Bistline	47	1	0	2
Saphra	117	1	0	2
Hawley	62	1	1	3
Walton	122	0	1	2
Priebe	124	0	1	2
Babcock	139	1	0	2
Hawley	143	31	2	34
Hoversland	184	11	1	13
Berria	135	12	4	17
Walton	215	5	3	9
Gibbons	147	7	1	9
Olsen	393	0	1	2
Ullrich	441	0	2	3
Big D Ranch	473	0	9	10
Gravance	327	2	0	3
Hobbs	492	2	1	4
Mills	554	0	1	2
Frishman	636	1	0	2
Busby	724	71	2	74
Motsco	815	0	2	3
Lindler	813	0	1	2
Elk City Ambulance	776	0	1	2
North American Packgoat Association	953	0	1	2
Boe	1096	0	1	2
Pennington	26	21	30	52

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Form Set Name	Master Form Letter Number	Number of Form Letters	Number of Form Plus* Letters	Total Number (Includes master Letter)
Hinds	15	0	1	2
Mandler	46	671	2	674
Crosson	156	54	18	73
Pesanti	100	14	0	15
Eldridge	121	11	0	12
Gulseth	606	2954	34	2989
Fraser	2523	0	1	2
Ridenhour	3675	10326	165	10492
Millbrooke	8492	0	1	2
Boehm	12985	1	1	3
Frohlich	16915	0	2	3
Pyron	16974	3	0	4
Alastra	14181	1	0	2
Sorensen	16945	1	0	2
mtmaiden2017@aol.com	17337	0	2	3
Harbour	17283	0	1	2
Gates	17180	0	1	2
Crosby	17362	0	1	2
Shaw	17399	0	0	1
Buren	17601	2	0	3
Priebe	17358	0	1	2
Saunie	7602	0	1	2
Rowley	17679	0	1	2
Bilodeau	17790	0	1	2
Caldwell	17821	0	1	2
fran@bresnan.net	17816	1	0	2
Rector	17875	0	1	2
Schrock	17881	1	0	2
Bowling	17892	0	1	2
Ten Lakes Forestry	17886	3	0	4
Back Country Sled Patriots	88	0	1	2

* Form plus letters are form letters with one or more additional unique and/or substantive comments.

List of Individual Commenters

The table below gives the names of individuals who submitted a letter regarding this project. The list is organized alphabetically by last name. Letters sent anonymously or sent with contact information that was not legible are not included in this list. Letters from commenters who indicated they were associated with a particular organization are included in the count in the organized letter campaign (see Table 4). The last column contains the letter number that was assigned to each individual’s letter.

If you are looking for the responses in this document to a particular letter from an individual, find the person’s name and letter number in Table 5 and then go to the sections under Responses to Comments by

Topic that cover the topics addressed in the letter. These topics are listed alphabetically. If you are reading an electronic copy of this document, you may also search by the letter number to find the responses.

Table 5. List of individuals who provided a comment letter

Last Name	First Name	Letter #
Putnam	Nathan	1
Peterson	Ryan	2
Charly	-	3
Suisse	David	3
Jageman	Harry	4
Hammer	Keith	5
Lyon	Matt	5
Baldwin	Luke	7
Kueffler	Matthew	8
Martin	Branch	8
Mciver	Jim	10
Worthy	Crista	10
Gould	Richard	12
Byers	Casey	13
Morton	Rychael	14
Hinds	Jennifer	15
Hopkins	Sam	16
Wood	James	17
Hodges	Reese	18
Harjes	Christopher	18
Warnke	Marc	19
Young	Karen	20
Dennis	-	23
Irby	Kyle	23
Oxford	Rex	24
Wuerthner	George	24
Oxford	Rex	24
Curiak	Mike	25
Pennington	Mary	26
Mbader7@Charter.Net		28
Conklin	Jay	29
Dog	Mad	31
Thomson	William	32
Ownbey	Logan	33
Knupp	Robin	34
Devino	Jonathan	35
Rivers	William	35
Shotwell	Vicki	36
Vidal	Monique	36

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Last Name	First Name	Letter #
Krebs	John	39
Diessner	Rhett	41
Dee	Sean	41
Fairley	David	42
Chinn	Douglas	43
Merifield	James	43
Mandler	Bill	46
Heym	Douglas	46
Branch	Charles D.	47
Richardson	Gay	48
Hale	Shireene	49
Jackman	Jarred	49
Wimer	Phil	50
Hathaway	Sandy	51
Houghton	Carolyn	52
Parks	Roderick	53
Jennings	Charles	55
Cannon	Jessica	56
Ullrich	Mary & Steve	58
Keele	Van P.	60
Bockino	Alida	61
Gallipoli	David	62
Hawley	Helen	62
Bauer	Jerry	63
Metcalfe	Joel	63
Gullette	Jim	64
Ownbey	Loren	65
Yount	Larry	66
Harper	Daniel	67
Collis	Robert	67
Smallwood	Gail	70
Ingalls	Nicholas	70
Cochrell	Kody	71
Shenk	Kevin	72
Fleisher	Marc	73
Haagensen	H. Lynne	74
Walbridge	Charles	75
Byrd	Regan	76
Mcguire	Robert C.	77
Poxleitner	Jean	78
Schlegel	Mike	78
Mciver	Jim	80

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Last Name	First Name	Letter #
Walsh	Justin	80
O'Keefe	Dan	83
Mahuron	Nashua	83
Johns	William	84
Kircher	Douglas	84
Fischer	Christopher	89
Pierson	Ron And Lilly	89
Mcfarland	Robert	90
Dugger	Marvin	91
Athow	Kathryn	92
Summerfield	Abram	93
Mcbroom	William	94
Rabe	Fred	95
Rathmann	Pat	96
Charpentier	Paul	97
Mcfarland	Barbara	98
Nelson	Lynne	99
Floyd	Jonathan	100
Pesanti	Dameon	100
Butts	Todd	101
Gale	Tanya	102
Anon	Anon	103
Van Tassel	Dale	104
Ullman	Kim	105
Jackson	Gregory	107
Jones	Howard	108
Manning	James	109
Mclean	Monica	110
Crawford	Alonzo	112
Price	Kevin	113
Brown	Dylan	115
Sausser	Megan	116
Saphra	Irene	117
Hoversland	David	119
Eldridge	Tucker	121
Walton	Todd	122
Nilsen	Lou	123
Priebe	Rick	124
Mesenbrink	Mark	125
Bieker	Dan	126
Zlock	Gregory	127
Heimbigner	Michael	128

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Last Name	First Name	Letter #
Petersen	Taite	129
Robinson	Amy	130
Bristow	Steve	131
Henderson	Kenda	132
Berria	Mark	135
Deborah	Harsh	136
Stubblefield	Robert	137
Jones	Ryan	138
Babcock	Sady	139
Porter	William	141
Hawley	Helen	143
Silliman	Lee	144
Fulton	Trevor	146
Turner	Logan	148
Carla	-	150
Walters	Cathrine	151
Kloote	John	152
Orr	Taylor	153
Van Berkum	Rickie	154
Crosson	Reed	156
Harmon	David	156
Gunderson	Dr.	157
Vernon	Suzanne	158
Sieges	Mason	159
Trebesch	Loren	160
Ellison	Julia	161
Velin	Randy	162
Hartig	Ronald	164
Reed	Anthony	164
Seiler	Nancy	165
Palm	Eric	166
Withnall	Emily	167
Merrell	Scott	168
Knight	Ellen	169
Farron	Kevin	170
Palmer	Christopher	173
Bertram	Aubrey	175
Lesica	Peter	176
Cleveland	Emily	178
Morrison	James	181
Schroeder	Sara	182
Boughner	Forrest	183

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Hoversland	David	184
Sheets	Karen	185
Boman	Lee	188
Lund-Andersen	Finan	189
Herling	Daphne	189
Angstead	Zach	190
Ducklow	Jeff	191
Clevenger	Matthew	192
Triesmann	Scott	197
Vazquez	Teri	198
Collins	Kyle	206
Mazzullo	Sonny	207
Bryan	Robert	211
Walton	Todd	215
Smith	Roseann	217
Mcdougal	Suzanna	218
Moore	Scott	219
Mues	John	220
Benson	Tom	230
Ols	Clare	231
Hummel	Lance	232
Suisse	David	237
Murphy	Brianna	239
Lagenderfer	Mary	240
Lewis	Nancy	241
Ulev	Elena	243
Jindrich	Abraham	244
Robertson	Lisa	245
Steinmuller	Patti	246
Miller	Susan	247
Burk	Rachel	252
Young	Michael	254
Featherman	Hannah	256
Casbara	Bp	259
Butler	Josh	260
Greiser	T Weber	261
Chamberlin	Wayne	262
Hummel	Lance	263
Ferrell	Doug	264
Grener	Nicholas	267
Bockino	Alida	272
Donally	Kevin	273

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Last Name	First Name	Letter #
Portela	Bea	275
Giese	Mark M	276
Wuerthner	George	277
Conklin	Joell & Gene	281
Glenn	Jason	282
Isbell	Rory	283
Bishop	Norman	286
Thornton	Steve	288
Weiler	Holly	297
Farron	Kevin	301
Swidler	Cindy	302
Jageman	Harry	307
Yurgel	Danae	308
Gaines	George	309
Millbrooke	Anne	311
Funke	Kyle	313
Clough	Nancy	314
Clampet	Nancy	315
Degrandpre	Mike	316
Rott	Noah	317
Swanson	Fred	318
Breinholt	Michelle	320
Crosby	Ann	323
Wells	Sam	324
Linneman	Dennis	325
Bailey	Mike	326
Gravance	Rochelle	327
Elliott	Joshua	328
Pinson	Luan	331
Smith	Oliver	332
A.	Nick	335
Gravance	Rochelle	338
Mattert	Josh	340
Boyd	Susan	342
Roberts	Ron	346
Cramer	Reed	347
Shields	Amelia	350
Vandewater	Tom	351
Cawthorne	William	358
Macneil	Ted	359
Flory	Caleb	361
Murray	Lynn And Vince	362

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Last Name	First Name	Letter #
Dykstra	Jack	363
De Jong	Allison	364
Elings	Mary	367
Kolesar	Anne	367
Barker	Rachele	369
Egan	Riley	370
Buchholz	Thomas	371
Andrew	Matthew	372
Fischer	Glenn	376
Osborne	Stephen	379
Jaeckel	Brad	380
Uhlich	Bret	383
Mcknight	Beth	387
Irving	Loren	388
Oswald	Gene	390
Berglund	Erika	391
Williams	Theresa	392
Olson	Amy	393
Moore	Michael	394
Buzzard	Simon	397
Nikonow	Hannah	398
Smolen	Mark	399
Hartman	Candice	402
Healy	Joshua	406
Boyce	Chet	408
Sharp	Coleen	410
Sharp	Martin	411
Russell	Sadie	414
Weltzien	Joel	415
Haslett	Michael	417
Sharp	Timothy F.	420
Frish	Kristin	422
Smith	Jack	423
Solomon	Glenn	424
Shaw	Rick	426
Furlong	Roger	427
Dent	Justin	430
Oliver	Eric	433
Ristow	Terral	435
Pietarinen	Linda	437
Pipp	Andrea	440
Ullrich	Steve And Mary	441

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Last Name	First Name	Letter #
Box	Sam	442
Hildesheim	Marc	445
Whipple-Kilmer	Zachary	446
Pierce	Dan	447
Fascilla	Lori	448
Guderian	Guyle	449
Coon	Tanner	450
Klanderud	Terri	451
White	Tam	452
Murray	Vince & Lynn	455
Dillon	David	455
Hood	Jeff	456
Wood	Mark	459
Gutknecht	Jerry	461
Dothsno		463
Uptmor	Kevin	464
Paulson	Steve	465
Fretwell	Josie	466
Hart	John	468
Otey	Paul	470
Howell	Arlene	471
Nuxoll	Sheryl	474
Dixon	Annie	475
Little	Dwight	478
Riggs	Gene	491
Hobbs	Joan	492
Clovis	Greg	494
Slaugh	Justin	497
Hodges	Randy	498
Bakken	Dale	500
Frates	Elizabeth	502
Jones	Ray	503
Watson	Kent	506
Harry	Liam	507
Clark	Ott	508
Grove	Paul	509
Scofield	Mark	510
Smith	Troy	513
Yonker	Clement	516
Getts	Lori	518
Gilbert	Geoff	521
Glickman	Monica	523

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Last Name	First Name	Letter #
Ryan	Chris	525
Hockett	Corey	526
Hardison	Justin	526
Hemingway	Halli	528
Mai	Stan	534
Tsairis	Greg	539
Callihan	Robert	543
Johnson	Sherri	544
Tsairis	Greg	547
Williams	Zachary	549
Kroll	Jeff	553
Mills	Andrew	554
Voxman	William	556
Morkert	James	557
Thiel	Colten	558
Mandella	Margo	560
Nelson	Nate	561
Nagel	Clinton	562
Barlow	Linda	563
Rasker	Hannah	566
Schoeffler	Marsha	568
Ellis	Brandon	569
Grossman	Jessie	572
Urbat	Krystal	573
Aengst	Peter	575
Chaney	Nancy	578
Cox	Chet J	582
Wadsworth	Galyn	589
Koerner	Timothy	590
Patterson	Ted	591
Ronald	Lisa	594
Fuller	Richard	596
Porter	William	597
Brockman	Lawrence	598
Blank	D. L.	602
Chapman	Scott	603
Schonefeld	Bonnie And Alan	604
Conner	Larry	605
Gulseth	Geralyn	606
Williams	Karen	607
Loboda	Pavel	609
Wadsworth	Nancy	910

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Last Name	First Name	Letter #
Wood	Robert	611
Gullette	Michael	612
Shan	Olivia	621
Baskin	John	621
Defries	Elizabeth	624
Triolo	Nick	625
Mcclain	John	627
Christianson	Brian	628
Johnstone	Hunter	629
Rich	Rob	630
Uptmor	Steve	631
Loge	Mt. State Representative Denley	632
Richmond	William	635
Frishman	Andrew	636
Taggart	Karrie	637
Devlin	Laurie	638
Rister	Richard	639
Kappes	Randall	640
Devlin	Alyssa	644
Tilly	Kathryn	645
Lish	Christopher	646
Papesh	Bill	647
Oliver	Adam	649
Anderson	Kristine	651
Kappes	Christina	652
Dibrito	Anthony	653
Thommen	Jason	654
Robertson	Yana	655
Kowalski	Gerald	657
Wells	John	659
Hogan	Glen	660
Stiegler	John Scott	661
Lindler	Bert	662
Beck	William	666
Bergeson	Lee	667
Keck	John	668
Benton	Kathleen	669
Carlson	Tom	674
Vigil	Shane	676
St Tourangeau	Patricia	677
		678
Littman	Jeremy	679

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Last Name	First Name	Letter #
Connolly-Newman	Hayley	680
Wuest	Joseph	681
Littman	Nicholas	682
Boden	David	683
Shaw	Rick	684
Lafleur	Joel	685
Anderson	Eric	686
Treadaway	Sandra	688
Marek	Stoney	690
Rhodes	Mark	694
Bischke	Scott	696
Morkert	Howard	697
Zook	Bailey	698
Withnall	Emily	704
Shryer	Jeff	705
Whitman	Rick	707
Webster	Valerie	709
Oettinger	Bob	710
Robertson	David	712
Strainer	Margaret	715
Nirider	Tom	716
Busby	Michael	724
Ames	Patricia	747
Ellers	Debra	780
Frederickson	Michael	789
Radlowski	Matt	794
Seiler	Jonas	804
Lindler	Bert	813
Jones	David	814
Motsco	Stephen	815
Mclaughlin	Roxanna	817
Devos	Ellie	818
Hopkins	Bill	821
Garnsey	Ryan	824
Philips	David	825
Cardosi	Zachary	826
Franklin	Richmond	830
Hudson	Hank	832
Evans	Bronwen	834
Kilmer	Thomas	839
Wethington	Caitlin	840
Austin	Doug	841

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Last Name	First Name	Letter #
Schaefers	Maggie	843
Sheriff	Steven	847
Rasmussen	Robert	848
Moore	Chris	852
Oleson	Elizabeth	853
Rasch-Hall	Maryellen	855
Merrell	Scott	857
Pfund	Mike	863
Heckel	Jim	865
Rivera	Henry	866
Guynn	Dwight	867
Littman	Patricia	872
Hart	Matthew	883
Jorgensen	Carole	887
Mills	Richard	888
Williamson	Norm	889
Davies	Denise	986
Richardson	Gail	899
Shannon	Matthew	900
Grainger	David	901
Stock	Patricia	903
Jochem	Nancy	906
Wheeler	Bob	912
Ferren	Glenn	915
Jungerman	Mark	918
Fauconnier	Jean-Francois	921
Dusek	Russ	924
Williams	Robert	925
Weber	Sas	929
Foster	Ian	930
Ogdin	Dustin	931
Mckeon	Lisa	932
Prorak/Poplawsky	Diane And Al	941
Thompson	Lawrence	942
Dennison	Jed	943
Sundy	Benjamin	944
Barnes	Matthew	945
Knight	Phil	946
Gillespie	Annie	948
Nielsen	Michael	950
White	Ildi	952
Grussing	Luverne	954

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Last Name	First Name	Letter #
Gardes	Aaron	955
Heuwinkel	Ryan	957
Baker	Trent	959
Catir	Stephen	964
Rifkind	Michael	966
Knight	Phil	968
Wilcox	Andrew	970
Southall	Chris	971
Swaffar	Wes	972
Kelly	Michael	973
Dayton	Shari	976
Beighle	Bruce	977
Foster	Jacob	978
Cronin	Margaret	981
Jokela	Mary And Brian	985
Booker	Kayje	986
Smith	Rhett	992
Musegades	Michael	993
Gravance	Rochelle	996
Braun	Rita	1007
Sophia	Tristan	1008
Baldwin	Aaron	1009
Pendergrass	Albert	1011
Opperman	Fred	1015
Musegades	Jenneane	1016
Ottersen	Kimberly	1017
Wardensky	Luke	1020
Musegades	Lila	1021
Decker	Mary	1024
Retz	Kaleb	1029
Little	Jed	1029
Stegmaier	John	1031
Musegades	Michael	1033
Shimizu	Gen	1034
Doel	Michele	1035
Carnes	Holly	1036
Doel	Brian	1039
Maguire	Andrew	1042
Henling	Molly	1044
Rutherford	Jay	1045
Metcalf	Peter	1049
Flather	Dylan	1055

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Last Name	First Name	Letter #
Dieterich	Michele	1056
Eames	Cliff	1062
Stone-Manning	Tracy	1064
Corn	George	1066
Henson	Chad	1067
Ricketts	Jason	1068
Rockhold	Anne	1072
Jensen	Braden	1077
Frost	Claire	1078
Irey	Benjamin	1080
Dolan	Andrew	1082
Buley	Sara	1084
Koller	Robert	1086
Lipscomb	Ashley	1089
Wood	Edward	1090
Koster	Katherine	1091
Randzio	Kassia	1092
Dupree	Beverly	1093
Nelson	Lynne	1095
Boe	Ryan	1096
Connell	Mark	1097
Buchanan	Lisa	1098
Lonn	Jeff	1099
Henson	Brandy	1100
Dunlap	Tristan	1101
Kennedy	Kathleen	1103
Cantwell-Frank	Caleb	1104
Porter	Zack	1105
Buhl	Cassie	1106
Buhl	Tim	1108
Robison	John	1109
Dubois	Kristi	1110
Kern	Jeff	1111
Nuttall	Jeremiah	1112
Westenfelder	Lori	1113
Westenfelder	Karl	1114
Nelson	Cory	1116
Harding	Rita	1118
Simpson	Neil	1119
Schmidt	Jacob	1121
Sweetman	Davy	2300
Fraser	Evelyn	2523

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Last Name	First Name	Letter #
Schmidt	Jacob	2764
Bennett	Lee Ann	3112
Peterson	Tom	3541
Scott		3609
Feathers	Jesse	3631
Norden	Chris	3653
Fuerst	E.	3662
Ridenhour	Rod	3675
Edinst@Tds.Net		3686
Towing	Elite	3724
Fairley	Steve	4261
Fairley	Selma	4657
Škalic	Dita	4767
Puc	Rob	5326
Vyhnal	Kristin	5742
Tenenbaum	Danny	5991
O'Connor	John	6106
Roe	Teddy	6887
Taylor	Nancy	6945
Wyberg	Bryan	7009
Fried	Rona	7098
Rosenberg	Barry	7176
Ruana	Bud	7321
H.	Saunie	7602
Potter	Dave	8692
Millbrooke	Anne	9492
Proescholdt	Kevin	12735
Anderson	Amy	12883
Stowers	Molly	12936
Mone	C	13498
Jayne	Jerry	14121
Alastra	John	14181
Gagliardi	Dick	14789
Watts	Elise	15367
Scott		15386
Anderson	Carrie	16316
Smith	Martin	16858
Spotts	Richard	16859
Smathers	Bob	16860
Munther	Greg	16861
Mcmullin	William	16862
Spencer	Stan	16863

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Last Name	First Name	Letter #
Allen	Brett	16874
Degiovanni	Tanner	1684
Rugh	Dave	16894
Stuurmans	Lee	16914
Frohlich	Eric	16915
Rocke	Eva	16923
Sorensen	Jeri	16945
Soeldner	W.	16962
Pyron	Darrell	16974
Dalton	Eric	16981
Hendrickson	Marc	16983
Mbader7@Charter.Net		17012
Hardison	Justin	17018
Corrigan	Leah	17044
Kelmstrom@Blackfoot.Net		17122
Dupree	Mary	17175
Gates	Bob	17180
Liddell	Chelsea	17181
P	Scott	17224
Fodor-Davis	Ian	17238
Reynolds	Chase	17258
Harbour	Tyler	17283
Reinsel	Mark	17288
Torline	Janet	17297
Woods	Lora	17299
Hendrickson	Borg	17304
Metz	Jim	17309
Marshall	Colter	17331
Johnson	Jeff	17337
Swaffar	Wes	17351
Brandt	R. Skipper	17353
Morris	Randall	17354
Brandt	R. Skipper	17355
Partin	Tom	17356
Priebe	Colin	17358
Sweeney	Sharon	17359
Crosby	Karen	17362
Olson	Johan	17363
Gehrke	Craig	17374
Campbell	Bruce	17382
Myers	Karen	17389
Shaw	Rick	17399

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Last Name	First Name	Letter #
Randzio	Kassia	17443
Randzio	Kassia	17443
Campbell	Bruce	17446
W	J	17452
Borges	Kent	17453
Schultz	Nancy	17462
Finnegan	Pat	17473
Campbell	Bruce	17500
Prorak	Diane	17507
Personal		17508
Narcisco	Claudia	17509
Peterson	Lisa	17537
Laurie		17543
Houston	Doug	17549
Van	Buren	17569
Russell	Chason	17570
Vanderzwaag	Dan	17581
Gatchell	John	17588
Rosenau	Mitch	17494
Scott	Allan	17595
Campbell	Bruce	17598
Buren	Ron	17601
Mummert	Ben	17603
Wiech	Charles	17604
Daveruana@Aol.Com		17610
Ostlie	Nancy	17620
Gehrke	Craig	17628
George7096@Verizon.Net		17639
Westervelt	Susan	17645
B.	Johanna	17646
Haffner	Pat	17649
Singley	Normj	17658
Kelly	Josh	17671
Rice	Bonnie	17673
Rowley	Tracy	17679
Schlegel	Mike	17688
Oliver	Mike	17691
Anderson	Luke	17726
Bjander		17732
Ray	Charles	17733
Radlowski	Matt	17746
Duley	Amanda	17747

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Last Name	First Name	Letter #
Olson	Lauren	17762
Hykabyk@Gmail.Com	Anon	17785
Woods	Preston	17808
Connors	Patrick	17814
Fran@Bresnan.Net	Anon	17816
Lauriekerr@Pacifier.Com	Anon	17820
Jackson	Don	17826
Loomis	Ashton	17830
Pearce	Cory	17831
Personal		17835
Hall	David	17844
Bosse	Scott	17862
Behm	Pat	17868
Rector	Joe	17875
Lindler	Bert	17876
Graham	Roberta	17877
Schrock	Walter	17881
Gullete	Mike	17884
Clarkson	Pete	17885
Ryan	Chris	17888
Bowling	Gary	17892
Chinn	Brad	17893
Rosenberg	Barry	17898
Musselman	Dan L.	17899
	Turns To The East	17900
Rabe	Fred W	17901
Seever	Victoria	17903
Campbell	Dale	17904
Pierson	Ron & Lilly	17905
Taylor	Robert & Debbie	17906
Williams	Karen & Marvin	17908
Willmes	Cathryn	17910
York	Randy	17911
Campbell	David	17914
Jones	Scott	17916

Responses to Comments by Topic

As the comments were analyzed, they were grouped into public concern areas (or topics) and given general titles summarizing the common concern of the comments in the group. The section headings below list the public concern areas that were developed for this project. Analysis of the comments was done in phases to allow for quick review by Forest resource specialists. The first phase was giving titles to each group of comments; the second phase was further grouping or splitting of the response areas; the

third phase was writing the public concern statements; and the fourth phase was writing the responses to the concerns.

In this appendix, all comments and responses that refer to “the Forest” are referring to the Nez Perce-Clearwater National Forests. Note that the DEIS considered alternatives W through Z for the Nez Perce-Clearwater National Forests land management plan.

Access

Concern 1 and 2:

These comments expressed the desire to maintain or increase motorized and non-motorized road and trail access to the forest for a variety of uses including wood cutting, hunting, fishing, mining and general recreation.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
342	1	627	1	17349	25
589	1	685	1	17906	3
610	1	1050	13, 21	17916	33,34

Response to comment

The Planning Rule (36 CFR 219.10(a)) requires that a plan include plan components including standards or guidelines for integrated resource management to provide for ecosystem services and multiple use including outdoor recreation. 36 CFR 219.10(b)(1)(i) states “Sustainable Recreation; including recreation settings, opportunities and access; and scenic character...”

Forest Service Handbook 1909.12, Chapter 10, 13.41 directs the agency to identify and evaluate; a. the types of recreational opportunities including both motorized and non-motorized opportunities, and; d. the nature, extent, and condition of trails, roads, facilities, and other transportation and other infrastructure to provide recreational access. FSH 1909.12, Chapter 20, 23.23a, 1(a) directs the agency to review information from the assessment, the need for change and distinctive roles and contributions related to recreational settings, opportunities, and access in the plan area. And, to consider public preferences or demand for recreational opportunities.

Land Management Plans do not make site specific decisions regarding motorized access which are appropriately addressed through travel management planning. However, suitability for motorized and non-motorized opportunities and access is provided in the Land Management Plan through identification of Recreation Opportunity Spectrum classes. Suitability of lands for motorized and non-motorized opportunities and access vary by ROS class, by alternative. This can be found in the FEIS, 3.2.1– Recreation Settings and Opportunities and 3.2.1 - Effects from the Action Alternatives. The Preferred Alternative identifies an ROS configuration across the Nez Perce-Clearwater landscape that provides a spectrum of opportunity and access to meet current and anticipated recreational uses, while providing for the social, economic and ecological health of the forest and surrounding communities. Any subsequent travel management planning will include analysis and decision regarding access infrastructure consistent with Land Management Plan direction as per the appropriate ROS class.

Concern 3:

Anticipate new and unforeseen forms of recreation by establishing clear standards regarding recreation access, without using suitability language or substituting guidelines, about what types of uses are allowed on specific trails.

Letter #	Comment #
1105	4
3110	12

Response to comment

The Planning Rule at 36 CFR 219.7 requires that a land management plan include plan components and other plan content. As stated, those plan components include desired conditions, objectives, standards, guidelines, and suitability of lands, with goals as an optional component. Forest Service Handbook 1909.12, Chapter 20 provides direction for the development of plan components. It states, among others, that plan components must be written clearly, with clarity of purpose and without ambiguity. And, they must have clear geographic applicability and guide the development of future projects and activities. Standards and guidelines serve to constrain future projects and activities.

Forest Service Handbook 1909.12, Chapter 20, 22.1 – Plan Components, identifies required plan components, as per 36 CFR 219.7, which includes the “suitability of lands” to guide future agency projects and decision making. As such, suitability has the same consistency requirement and regulatory authority as any other plan component. FSH 1909.12, Chapter 20, 22.15 – Suitability of Lands, further directs the Forest Service to identify specific lands for suitability for a variety of multiple uses or activities based on the desired conditions applicable to those lands. This indicates that suitability plan components are an appropriate component to use when a plan is guiding what activities a forest can or cannot authorize the public to do. The FEIS, section 3.4.2 – Sustainable Recreation, Table 319, includes Recreation Opportunity Spectrum classes and definitions. These definitions describe whether motorized and non-motorized uses are suitable in each class. The Land Management Plan at section 4.3 addresses sustainable recreation management and contains the plan components related to this resource. This includes:

- **FW-DC-REC-01.** Recreation opportunities are available across a variety of settings that foster quality year-round developed and dispersed experiences, as well as motorized and non-motorized opportunities consistent with the applicable recreation opportunity spectrum (ROS). These settings reflect the integration of other resource values in a sustainable manner with the desired recreation opportunities, facilities, infrastructure, and access provided within those settings.
- **FW-DC-REC-03.** Recreation opportunities adapt to the changing social and cultural needs of the Nez Perce-Clearwater to foster a sense of place and societal relevance to natural and cultural landscapes.
- **FW-DC-REC-04.** The type and level of infrastructure, visitor services, and information are sustainable and consistent with the desired recreation opportunity spectrum settings.
- **FW-DC-REC-06.** Recreation activities are available that contribute to the local economy, community stability, quality of life and diverse lifestyles in the area throughout the year.
- **FW-DC-REC-07.** Recreation sites and facilities are accessible, sustainable, and complement the natural setting. They are adaptable to new recreation demands.

After final approval of the Land Management Plan and site-specific recreation planning, forest orders will be put in place that describes prohibited activities for each ROS class. Site specific or trail specific decisions are not part of Land Management Planning.

Concern 4:

Describe which alternatives provide the greatest opportunities for solitude, quiet, self-reliance, primitive and unconfined recreation, values which are inherent to wilderness.

Letter #	Comment #
674	10

Response to comment

Forest Service Handbook 1909.12, Chapter 70 provides direction for the recommended wilderness area process. Section 73 discusses the analysis process and includes direction to describe an area’s characteristics that provide the area’s suitability for inclusion in the National Wilderness Preservation System.

The FEIS Appendix E provides information for each Idaho Roadless Area. Included in that information are descriptions for the wilderness characteristics of apparent naturalness; opportunity for solitude or primitive and unconfined recreation; sufficient size; ecological, geological, or other features of scientific, educational, scenic or historical value, and; manageability.

The FEIS, Chapter 3.6.2 – Recommended Wilderness, provides the results of the analysis process for recommended wilderness. Included is a discussion of the effects on wilderness characteristics, by alternative, as well as the indicators developed to address the Land Management Plan Issue regarding recommended wilderness. Each alternative has different roadless areas considered for recommended wilderness, therefore the opportunity for solitude or primitive and unconfined recreation is different in terms of location and acres available. The number of acres differs between alternatives so one might assume that the alternative with the most acres of recommended wilderness would provide the greatest opportunity for solitude. However, there is not necessarily a direct relationship between number of acres and opportunity for solitude as intrusions of sights and sounds from external forces, or opportunity or frequency of contact with others can vary with each area. Therefore, it would be difficult to say with certainty that one alternative clearly provides the greatest, or least, opportunity for solitude. The Revised Land Management Plan provides further discussion for the Preferred Alternative.

Adaptative Management

Concern 1:

The Forest Service should incorporate adaptive management into the Forest Plan, because it is necessary to manage Forest Service lands responsibly and verifiably.

Letter #	Comment #
1060	26

Response to Comment

The monitoring program (Appendix 3 of the LMP) includes monitoring, or the collection of data and information, followed by the evaluation of that information. Monitoring and evaluation are separate,

sequential activities required by the National Forest Management Act to determine how well objectives have been met and how closely management standards and guidelines have been applied. Effective land management plan monitoring fosters adaptive management and more informed decisions. Monitoring provides the feedback for the planning cycle by testing assumptions, tracking relevant conditions over time, measuring management effectiveness, and evaluating effects of management practices. Monitoring information should enable the national forest staff to determine if a change in plan components or other plan management guidance may be needed, forming a basis for continual improvement and adaptive management.

Alternatives

Concern: 1

To provide a reasonable range of alternatives, as required under NEPA, the Forest Service should modify existing alternatives to analyze minimum and maximum recommended wilderness and roadless areas and levels of timber harvesting.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
16	2	526	1	17181	1
24	2	578	1	17238	1
34	2	636	3, 4	17304	10, 11
46	1, 2	663	5	17351	2
56	2	666	1	17354	5
76	2	717	33, 34, 35, 36, 39	17537	1
107	2	877	38, 39, 40	17570	1
121	1	974	3, 4, 15, 17	17671	1
156	1	1052	3, 7, 28, 29, 30, 31, 33, 34	17673	16
197	1	1065	65	17862	9, 10, 11
307	2	3112	1	17879	1
465	7	16915	1		

Response to comment

Much of the plan direction for desired conditions, standards, and guidelines remains constant for all action alternatives.

Under the NEPA, the Forest Service must consider appropriate and reasonable alternatives sufficient to permit the responsible official a reasoned choice. The Council on Environmental Quality has indicated the “range of alternatives” referred to in 40 CFR 1505.1(e) includes all reasonable alternatives, which must be rigorously explored and objectively evaluated, as well as those other alternatives, which are eliminated from detailed study with a brief discussion of the reasons for eliminating them. In addition, they indicate that a reasonable range of alternatives depends on the nature of the proposal and the facts in each case (Council on Environmental Quality Forty Most Asked Questions). Agencies are to focus on significant environmental issues and alternatives (40 CFR 1502.1).

The preferred alternative and need to change is described in chapter 1 and 2 of the final EIS and are based on a preliminary evaluation of the information gathered from public and internal comments and the purpose and need for the project. The purpose and need identified the need to administratively consolidate the Nez Perce and Clearwater National Forests. While all alternatives provide a wide range of ecosystem services and multiple uses, some give slightly greater emphasis to select resources based on the theme of the alternative and response to revision topics.

Alternative W proposed the most recommended wilderness, while Alternative X proposes no recommended wilderness. An alternative considered but eliminated from detailed study was proposed to maximize the amount of recommended wilderness. Wilderness advocacy groups asked for an alternative in which all Idaho Roadless Areas were added as recommended wilderness. Thirty-three out of the 34 Idaho Roadless Areas went through a wilderness evaluation. Appendix E documents the wilderness evaluation worksheet and narrative for each area. Through this process it was determined that some Idaho Roadless Areas did not fully satisfy one or more wilderness characteristic to warrant consideration or recommendation as wilderness.

Alternative Z proposes the least amount of timber harvest, while alternative X proposed the most amount of timber harvest. The maximum timber target for every alternative is the sustained yield limit, unless in a departure alternative, and harvest may occur up to that level as funds become available.

Concern: 2

The Forest Service should incorporate elements of the action alternatives into one alternative to better balance varying uses on the forests.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
108	6	663	19	17356	34
109	2	873	49	17688	52, 53, 55
307	61, 62	877	42		

Response to comment

The preferred alternative provides a balance of elements of the action alternatives. The responsible official considered all points of view and strived for an appropriate mix of multiple uses for the Forests when making the decision.

Concern: 3

A new conservation alternative should be analyzed to comply with NEPA that recommends all evaluated wilderness areas and decreased timber harvest levels.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
60	3, 6	877	100	17354	10
276	3	941	4	17507	4
307	110	946	9	17509	1
423	8	974	16	17673	15, 20
594	1	16962	4		
663	18	17012	1		
747	7	17297	8		

Response to comment

Alternatives considered but eliminated from detailed study were proposed by the public that emphasized ecological processes over anthropogenic vegetation management, make all Idaho Roadless Areas as well as other areas as recommended wilderness. Under the NEPA, the Forest Service must consider appropriate and reasonable alternatives sufficient to permit the responsible official a reasoned choice. The Council on Environmental Quality has indicated the “range of alternatives” referred to in 40 CFR 1505.1(e) includes all reasonable alternatives, which must be rigorously explored and objectively evaluated, as well as those other alternatives, which are eliminated from detailed study with a brief discussion of the reasons for eliminating them.

Timber outputs are projected to be as low as eight million board feet in Alternative Z, well below the current direction (the no action alternative) timber outputs of fifty to sixty million board feet annually. Alternative W proposes over four times the Recommended Wilderness Area acreage as the current situation, without motorized and mechanized access, while alternative Z proposes more Wild and Scenic Rivers than the current situation. The plan includes additional proposed Research Natural Areas that do not vary by alternative.

Concern 4:

The Forest Service should reconsider the Friends of the Clearwater Citizen Alternative in the revised Forest Plan or explain why it was dismissed from detailed analysis.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
41	1	985	1	16981	1
60	7	1052	27	17297	11
241	1	1056	3	17453	1
308	1	1089	4	17620	1
465	2, 3	1095	1	17869	3
607	1	1099	4	17893	3
637	1	4767	1	17898	2
663	11	6106	1	17900	1
666	5	7098	1	17903	1
747	8	7176	2	17908	1
877	27, 34, 35, 36, 37	14121	1		
946	1	16962	1		

Response to comment

Chapter 2 of the FEIS provides the explanation on why this alternative was considered by eliminated from detailed study. Concepts of this alternative do not meet the purpose and need, are not within the scope, or are not within the legal authority of the agency for example, plan direction regarding privatizing the management of public resources or giving the National Forests to the State of Idaho to own or manage. Some proposed plan components are not appropriate, such as standards prescribing NEPA analysis processes. See the Alternatives Considered but Eliminated from Detailed Study section of the FEIS for more details.

Concern: 5 (same as above)

To maintain and increase access or to protect wilderness areas from disturbance, the alternatives should be modified to allow or eliminate motorized and mechanized uses in wilderness areas.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
29	1	445	1	17283	1
31	1	570	7	17331	1
98	9	594	2	17359	2, 8
108	8	629	4, 5	17399	1
125	2	663	8	17509	2, 3, 6
146	1	684	2	17594	2
307	3, 63, 101, 105	690	1	17673	1, 6
313	1, 2	873	36, 50	17875	1
326	2	974	23, 24	17881	1
367	1	1096	1		
426	1	14789	1		

Response to comment

The action alternatives do provide for differing levels of motorized use through the recreation opportunity spectrum and suitability plan components, currently no threshold for minimum or maximum densities of routes is prescribed. The suggested approach was considered and discussed at length. Designated routes and areas for motorized use are addressed in travel planning. While the Land Management Plan sets the stage for travel planning, the plan is not travel planning and becoming too specific may limit the range of possible solutions during travel planning. The action alternatives use suitability to describe motorized access.

In all alternatives, except Alternative Z, recreational motorized and mechanized trail use would not be suitable in Idaho Roadless Areas recommended for wilderness. Maintenance activities outside of designated wilderness are expected to continue the use of motorized and mechanized equipment.

Concern 6:

The Draft EIS should describe the trade-offs between alternatives, such as the time expected to achieve desired conditions and effects on sustainability.

Letter #	Comment #
629	3
663	6, 7
877	51

Response to comment

The final EIS analyzes the alternatives within the temporal scale of the life of the plan (20 to 30 years). Because of the many types of projects and activities that can occur over the life of the Land Management Plan, it is not likely that a project or activity can maintain or contribute to the attainment of all desired conditions, nor are all desired conditions relevant to every activity. To be consistent with desired conditions of the Land Management Plan, a project or activity must be designed to maintain or make

progress toward attaining one or more of the Plan’s desired conditions or objectives. The Affected Environment and Environmental Consequences section of the final EIS discloses the environmental consequences on a large scale at the planning level that includes sustainability of natural resources.

Aquatic Ecosystems

Concern 1:

Plan components FW-DC-WTR-05 should include State of Idaho data on stream conditions and FW-STD-ARE&M-01 should specify that reclamation bonds with the Forest are separate from that of the state. Existing plan components should be maintained, improved, and enforced and desired conditions should be defined to remove ambiguity.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
43	2	721	17, 6, 8, 2, 4	7176	1, 9,
61	8,2	805	18	17453	4
99	3	1052	75, 70	17462	2
307	50,99	1060	158, 105, 40, 95, 99, 25, 22, 21	17844	2
465	13, 19	4767	5	Empty cell	Empty cell

Response to comment

Forest Service Handbook 1909.12 provides the implementing directives for the 2012 Planning Rule. The directives provide direction and guidance to address aquatic and riparian ecosystems in land management plans and identify other relevant directives related to aquatic habitat.

Forest Service Handbook 1909.12, Chapter 20, section 22.11 defines desired conditions as: a description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined, but do not include completion dates. (36 CFR 219.7(e)(1)(i)).

While some desired conditions are quantitative and others are more qualitative, the 2012 Planning Rule does not require that the process to measure every desired condition be explained in the revised plan. The 2012 Planning Rule requires that projects do not foreclose opportunity over the long term to meet any desired conditions. The 2012 Planning Rule does not require the full suite of plan components for every topic or land allocation. As a whole, the combined plan components must meet the requirements of the Planning Rule. Emphasis for Forest Service management may shift over time; regardless, future projects must be consistent with the plan direction. Several of the aquatic and riparian desired conditions are expressed as comparable to reference conditions, which include ranges.

The Forest Plan ensures the Nez Perce-Clearwater would meet all applicable laws and regulations. The revised plan recognizes states’ authority per the Clean Water Act. For instance, FW-DC-WTR-5 acknowledges state water quality standards. Some management activities have the potential to adversely affect water quality, so plan standards and guidelines such as those that address sediment delivery are included in the plan to provide appropriate constraints on those actions. In addition, some activities are designed to improve water quality. For example, a new culvert on a Forest Service administered road (with appropriate permits secured) could improve water quality or support beneficial uses by installing a structure that will have less erosion. Including these plan components doesn’t usurp state authority, rather

it ensures the national forest complies with state requirements under the Clean Water Act. Further, Appendix K of the FEIS includes information regarding the Idaho Department of Environmental Quality 305(b)/303(d) lists. Table 6 shows miles of stream and related pollutant or pollutions by subbasin occurring on the Nez Perce Clearwater. Table 7 shows the status of subbasins in the total maximum daily load process on the Nez Perce-Clearwater.

The Revised Forest Plan speaks to reclamation plans and reclamation bonds that are required and filed with the Forest when working under a Plan of Operations. This is separate from the bond with the State of Idaho, which requires that all mines in the State of Idaho have an approved reclamation bond.

Regarding comments about the enforceability of plan components, in the final 2012 planning rule, § 219.7(e)(1)(iv) and § 219.15(d)(3) clarify that compliance with both standards and guidelines is mandatory, with standards requiring strict adherence to their terms, while guidelines allow for flexibility so long as the purpose for the guideline is achieved. § 219.9(b)(1) to clarifies that the responsible official must determine whether the plan components provide the necessary ecological conditions, or whether additional, species-specific plan components must be included in the plan.

As required by the planning regulations (36 CFR 219.15), both standards and guidelines have mandatory project and activity consistency requirements. Consistency with a standard is determined by strict adherence to the specific terms of the standard, while consistency with a guideline allows for either strict adherence to the terms of the guideline, or deviation from the specific terms of the guideline if the purpose for which the guideline was included in the plan is met at the project level (FSH 1909.15, chapter 22) [emphasis added here]. This approach to guidelines allows for flexibility as circumstances warrant; for example, when there is more than one way to achieve the intended purpose, or new information provides a better way to meet the purpose, without lessening protections. Thus, both standards and guidelines provide certainty in terms constraining management activities to address a resource risk or stressor.

While the land management plan must fulfill all the requirements of the planning regulations, a one-to-one correlation of one plan component to each requirement listed in sections 219.8 through 219.11 of the planning rule is not necessary. Rather, the integrated plan content provided by all combined components must provide the necessary protections and framework for guiding future activities (FSH 1909.12 section 22).

The Nez Perce-Clearwater National Forest's plan currently has 68 standards and 121 guidelines, including 36 standards benefiting fish, water, wildlife and soils resources (and another 58 guidelines for these same resource areas).

The management constraints specified in the standards and guidelines vary depending on data and scientific information regarding what is needed for resource protection. Where there is scientific information that indicates a management activity provides a similar risk forestwide, the plan provides specificity (e.g., fill material shall not be side-cast in streams). Where varying management strategies may be needed or appropriate to address variable site-specific conditions, standards or guidelines may be more descriptive in nature in order to minimize the risk while allowing for project design to be tailored to site-specific conditions.

The Nez Perce-Clearwater has received this comment on multiple occasions that generally requests standards over guidelines, but commenters have not made specific requests tied to the Forest Service process for determining which plan component is appropriate, i.e. the data and scientific information regarding what is needed for resource protection, the degree to which that scientific information may

change over the life of the plan and whether varying management strategies may be needed to address variable site-specific conditions.

Some commenters have been understandably confused because a standard under the 1982 planning rule was a measurable threshold used to curtail activities, while in the 2012 rule, standards function in a fundamentally different way.

Under the 2012 planning rule, standards and guidelines are constraints on project and activity decision making. In the case of standards, they are established to help achieve or maintain the desired conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. In the case of guidelines, they allow for departure from its terms, so long as the purpose of the guideline is met (36 CFR section 219.15(d)(3)). Guidelines are established to help achieve or maintain a desired conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. It is the role of other plan components, such as goals, desired conditions, or monitoring plan components, to do things like set restoration goals, describe a desired end state for a resource area, or evaluate progress towards a desired condition on the ground. A critical change in the 2012 planning rule is the focus away from measurable thresholds for curtailing activity, and instead a focus on describing and attainment of desired conditions. There is a requirement that a project or activity contributes to the maintenance or attainment of one or more goals, desired conditions, or objectives, or does not foreclose the opportunity to maintain or achieve any goals, desired conditions, or objectives, over the long term.

The rule does not have tiered levels of noncompliance, thus, an activity that precludes attainment of a desired condition is in violation of the plan, just as a project not meeting a standard or guideline would be. Desired conditions have been carefully written as the overarching mechanism to move towards the conditions the Nez Perce-Clearwater wants to achieve on the ground, and many contain high bars for not precluding attainment, such as continued recovery of ESA listed species, etc.

Some commenters requested standards or guidelines to require monitoring, analysis, or surveys prior to conducting management activities. However, standards or guidelines should not direct or compel processes such as analysis, assessment, consultation, planning, inventory, or monitoring. Those processes can be part of other plan content such as management approaches.

Concern 2:

The forest plan component MON-WTR-06, for monitoring watershed improvement projects, is deficient and needs to include pre- and post-project monitoring and ground evaluations. To standardize monitoring strategies the Forest Service should team with other federal agencies and use the PACFISH/INFISH biological opinion monitoring protocol.

Letter #	Comment #
307	57,137,51, 138,140,52
721	1,2,3,6,7

Response to comment

A land management plan must contain a plan monitoring program (36 CFR 219.12). The purpose of land management plan monitoring is to evaluate the effectiveness of plan direction and determine whether changes to plan components are needed (FSH 1909.12, section 30.2). The planning directives at 1909.12 chapter 30 section 32 describe the required elements of the plan monitoring program. The responsible official has discretion to set the scope, scale, and priorities for plan monitoring within the financial and

technical capabilities of the administrative unit (FSH 1909.12, section 32.12). Monitoring questions are not required for every plan component.

The information requested by commenters is not required monitoring for the eight items set out in the Planning Rule at 36 CFR 219.12(a)(5). The monitoring program is not intended to depict all monitoring activities undertaken by the Forest, nor is the Forest limited to conducting only this monitoring. The biennial evaluation of the monitoring information will help determine whether a change to the plan or change to the monitoring program is warranted based on new information, whether a new assessment may be needed, or whether there is no need for change at that time (36 CFR 219.5). The indicators selected for monitoring will be evaluated as part of the biennial monitoring report, and changes can be made if any indicator is not providing sufficient information to address the monitoring question.

The monitoring questions are tied to specific Forest Plan components, which include desired future conditions, plan objectives, and standards and guidelines. They must focus on providing the information necessary to evaluate whether Forest Plan components are effective and appropriate, and whether management is being effective in maintaining or achieving progress toward the desired conditions and objectives for the Forest. MON-WTR-06 is designed to measure progress towards achieving objectives, and thus focuses on the number and type of restoration actions. Other monitoring questions do address progress towards desired conditions (MON-WTR-02 and -04), and these list PIBO as a data source. The 2012 Planning Rules does not require Land Management Plans to include F project level monitoring.

The goal of the PacFish/InFish Biological Opinion Monitoring Program (PIBO) is to monitor stream and riparian habitats, in order to determine if the PacFish (Pacific Anadromous Fish) and InFish (Inland Fish) aquatic conservation strategies can effectively maintain or restore the structure and function of riparian and aquatic systems.

The Revised Forest Plan will continue to rely on the monitoring program that utilizes supported data sources including PACFISH/INFISH biological opinion (PIBO) data. PIBO data are the most accurate, reliable, and relevant on-the-ground data for monitoring aquatic ecosystem conditions using a probabilistic sampling design. The program was initiated to evaluate the effect of land management activities on aquatic and riparian communities at multiple scales and to determine whether management practices are effective in maintaining or improving the structure and function of riparian and aquatic conditions.

The forest has worked extensively with the ARCS working group, which included federal, state, and tribal representatives, to develop plan components and monitoring strategies.

Concern 3: (Letter number 805, comment 15)

The Forest Service should reference the EIS's section on wildlife in the aquatic and riparian conservation strategy because many wildlife species rely on aquatic habitats.

Response to comment

FSH 1909.12 Chapter 20, Section 23.23b: "Interdisciplinary Team should examine if other plan components can further improve the conditions of fish, wildlife, and plants that are commonly used or enjoyed by the public."

The Land Management Plan, Aquatic Ecosystems section has been revised to address public comments. This section was re-written to include concerns regarding the aquatic and riparian conservation strategy.

The following language was added to the introduction to address the concern in reference to wildlife’s importance to the riparian management zones:

“Riparian management zones also provide wildlife habitat, forage, increased biodiversity, and wildlife corridors, enabling connectivity within river systems.”

Within the FEIS, in the Aquatic Ecosystems and Fisheries section, several references to the importance of wildlife within riparian areas are discussed including the acknowledgements:

“Riparian ecosystems are equally important habitat to wildlife for feeding, drinking, cover, breeding season habitats, and habitat connectivity. Many wildlife species are associated with riparian ecological systems, including neotropical migrant birds, native upland birds such as mountain quail and ruffed grouse, beaver, Canada lynx, and fisher,”

“Management practices that maintain suitable stream temperature, amounts of large wood, and levels of sediment and nutrients are also beneficial to aquatic and terrestrial wildlife species associated with riparian management zones,”

“Wildlife use riparian zones and wetlands disproportionately more than other areas and the density and diversity of wildlife are greater in riparian zones and wetlands than in other habitats (Oakley et al. 1985). Riparian zones strongly influence wildlife populations. Wildlife, including amphibians, reptiles, small mammals, and large mammals, use riparian habitats either year around or seasonally. Many amphibians and reptiles are restricted to aquatic and riparian habitats, while large mammals use riparian habitats seasonally. Some mammals, such as beaver and moose, rely on riparian and riverine habitats. The density, diversity, and structure of vegetation, combined with the landforms found in riparian zones and wetlands, provides wildlife with woody plant communities, surface water and soil moisture, structural diversity, and linear structure that creates migration corridors for many species (Lohman, 2004).”

Within the FEIS, the Wildlife and the Abundance and Diversity of Wildlife sections both contain several references and analysis of riparian habitats in relation to several wildlife species.

Concern 1: Conservation Watershed Network

Within the conservation watershed network, the Forest Service should conserve and protect salmonid habitat, estimate riparian thinning, and evaluate stream conditions for critical habitat.

Letter #	Comment #
721	3
939	14, 15, 4
1060	105
17598	1

Response to comment

The planning regulations define the required plan components, desired conditions, objectives, standards, guidelines, and suitability of lands at 36 CFR 219.7(e)(1). It requires projects be consistent with each applicable plan component and describes how consistency is determined at 36 CFR 219.15(d). Optional plan content in the plan can include potential management approaches or strategies and partnership opportunities or coordination activities (36 CFR 219.7(f)(2).

36 CFR 219.2(b)(2) indicates plans do not authorize projects or activities or commit the Forest Service to take action. A plan may constrain the Agency from authorizing or carrying out projects and activities, or the manner in which they may occur. In addition, a plan does not regulate uses by the public. Plans should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System.

Some commenters requested standards or guidelines require analysis or surveys prior to conducting management activities. However, standards or guidelines should not direct or compel processes such as analysis, assessment, consultation, planning, inventory, or monitoring. Those processes can be part of other plan content such as management approaches. The forest describes management approaches in appendix 4 of the plan.

Stream Condition Indicator Assessment and multiscale analysis are included as management approaches in Appendix 4 of the Forest Plan. Between the draft and final environmental impact statement, both the Stream Condition Indicator Assessment and multiscale analysis have been further developed. During that development process, the Idaho Department of Fish and Game, the Nez Perce Tribe, National Marine Fisheries Service, and the US Fish and Wildlife Service were involved in providing input and review of those steps. While management approaches are not required by the plan, the Stream Condition Indicator Assessment and multiscale analysis may be used to determine consistency with standard to supports conclusions that actions do not retard attainment of aquatic and riparian desired conditions.

The intent of the use of the Stream Conditions Indicator Assessment during project development and assessment of project effects provides an evaluation of whether stream and riparian indicators are meeting desired conditions. Where indicators do not meet desired conditions, multiscale analysis will aid in determining conservation measures or aquatic restoration actions that will move toward attaining a resilient watershed and toward desired conditions.

The Forest received several comments regarding what commenters felt should be the purposes of the conservation watershed network. The creation of the Conservation Watershed Network is a strategy to provide protection of at-risk species strongholds and consider multi-scale conservation considerations for at-risk species.

As such, the preamble to planning regulations acknowledges the identification of conservation watershed networks are a key strategy for some places in the west where network conservation for fishes is still an option (36 CFR 219, Volume 77, No. 68, April 9, 212 Rule Preamble). Recent revisions in the Northern Region have identified conservation watershed networks to build on key watershed guidance found in PACFISH and priority watershed guidance found in INFISH (U.S. Department of Agriculture and U.S. Department of the Interior 1995). Under both 1990-era strategies, key and priority watersheds are selected to protect aquatic species population strongholds. Selected watersheds provide a pattern of protection where the habitat of migratory salmonids receives special attention and treatment. Areas in good condition with strong local populations are considered anchors of good habitat and are expected to provide colonists for adjacent restored habitat (U.S. Department of Agriculture and U.S. Department of the Interior 1995);(U.S. Department of the Interior 1998). The identification of conservation watershed networks in the 2020 Land Management Plan uses similar principles.

A conservation watershed network is a designated collection of watersheds where management emphasizes habitat conservation and restoration to support native fish and other aquatic species (2020 Land Management Plan, appendix E). The goal of the network is to sustain the integrity of key aquatic habitats to maintain long-term persistence of native aquatic species. Identification of conservation watershed networks, which should include watersheds that are already in good condition or could be

restored to good condition, is expected to protect native fish and help maintain healthy watersheds and river systems.

West of the Continental Divide, multi-scale analysis was used to develop the conservation watershed network, emphasizing watersheds with cold water habitats where bull trout are most likely to persist in a warming climate (2020 Land Management Plan, appendix E). The analysis started at the scale of the Columbia River Basin and ended with HUC12 sub-watersheds within the plan area. Multi-scale analysis is consistent with guidance contained in the April 2014 Interior Columbia Basin Ecosystem Management Project Memorandum of Understanding approved by senior managers in several of the western federal land management and regulatory agencies (Environmental Protection Agency, National Marine Fisheries Service, US Fish and Wildlife Service, Bureau of Land Management, and the US Forest Service). The 2014 memorandum updated science findings from the original Interior Columbia Basin Ecosystem Management Project and guides inclusion of best available scientific information into land management plan revisions, including this one (final EIS appendix C). Importantly, the use of climate science related to bull trout vulnerability and identification long-term refugia in the face of climate change (Isaak et al. 2015) was a key part of the conservation watershed network identification (bull trout biological assessment).

Part of the intent of the CWN is to protect cold-water habitat for at-risk salmonids. Plan components are designed to provide guidance and constraints on activities, such as riparian thinning, but specific estimates of how much thinning would occur or where it would occur it outside of the legal scope of the revised plan and would depend on site-specific resource needs. A commenter suggested that the forest should evaluate critical habitat, presumably for ESA listed species. This is outside the scope of the forest service’s authority, as critical habitat designations are part of the ESA listing process and are conducted by regulatory agencies such as USFWS and NMFS. Forest Service effects on critical habitat are determined through consultation with USFWS and NMFS for all projects that contain critical habitat.

A more complete list and explanation of CWN criteria was added to the FEIS.

Concern 2: Conservation Watershed Network

The Forest Service should address adverse effects on the conservation watershed network water quality, including the effects from fire, roads, timber harvest, and instream projects.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	129	877	246	1052	56, 71, 70, 74,
717	190, 187, 186, 190	938	38, 43, 39	1060	105, 97, 101, 102
307	141	939	14, 15, 3, 4, 211, 20	1065	54, 58, 63, 59, 56, 58
805	14				

Response to comment

As there is a distinct difference between the identification of “priority watersheds” as required by the planning regulations from the “key/priority watersheds” that were identified for PACFISH/INFISH that have been subsequently reframed as conservation watershed networks in the Land Management Plan, explanation is needed to clearly respond to this issue.

The planning regulations require identification of watersheds that are “a priority for maintenance or restoration” using the national Watershed Condition Framework protocol. The Watershed Condition Framework is a national protocol designed to foster integrated ecosystem-based watershed assessments;

target programs of work in watersheds that have been identified for restoration; enhance communication and coordination with external agencies and partners; and improve national-scale reporting and monitoring of program accomplishments. While the process used to identify priority watersheds strives to integrate upland and aquatic conditions and generally helps target restoration activities at forest, regional, and national scales, protection of at-risk species strongholds is not the primary focus and it does not consider multi-scale conservation considerations for species.

As such, the preamble to planning regulations acknowledges that identification of conservation watershed networks are a key strategy for some places in the west where network conservation for fishes is still an option (36 CFR 219, Volume 77, No. 68, April 9, 212 Rule Preamble). Recent revisions in the Northern Region have identified conservation watershed networks to build on key watershed guidance found in PACFISH and priority watershed guidance found in INFISH (U.S. Department of Agriculture and U.S. Department of the Interior 1995). Under both 1990-era strategies, key and priority watersheds were selected to protect aquatic species population strongholds. Selected watersheds provided a pattern of protection where the habitat of migratory salmonids receives special attention and treatment. Areas in good condition with strong local populations were considered anchors of good habitat and were expected to provide colonists for adjacent restored habitat (U.S. Department of Agriculture and U.S. Department of the Interior 1995); (U.S. Department of the Interior 1998). The identification of conservation watershed networks in the Land Management Plan uses similar principles.

Appendix K describes a conservation watershed network as a designated collection of watersheds where management emphasizes habitat conservation and restoration to support federally listed fish and Species of Conservation Concern. The goal of the network is to sustain the integrity of key aquatic habitats to maintain long-term persistence of native aquatic species. Designation of conservation watershed networks, which includes watersheds that are already in good condition or could be restored to good condition, are expected to protect listed fish and help maintain healthy watersheds and river systems.

Also contained within Appendix K is the revised criteria and results of analysis that was completed between the draft and final Environmental Impact Statement for the Conservation Watershed Network. Table 15 shows which HUC12 sub-watersheds met each of the 5 criteria and which ones did not.

Multi-scale analysis was used to develop the conservation watershed network. The analysis started at the scale of the Columbia River Basin and ended with HUC12 sub-watersheds within the plan area. Multi-scale analysis is consistent with guidance contained in the April 2014 Interior Columbia Basin Ecosystem Management Project Memorandum of Understanding approved by senior managers in several of the western federal land management and regulatory agencies (Environmental Protection Agency, National Marine Fisheries Service, US Fish and Wildlife Service, Bureau of Land Management, and the US Forest Service). The 2014 memorandum updated science findings from the original Interior Columbia Basin Ecosystem Management Project and guided inclusion of best available scientific information into land management plan revisions. Importantly, the use of climate science related to bull trout via Climate Shield was a part of the conservation watershed network identification.

FW-DC-CWN-03 is tied to sediment delivery risk that will be assessed at the project level using one of or a combination of models such as GRAIPLite, NetMap, WEPP:ROAD. Modelling results indicate where restoration actions should occur to minimize risk to aquatic resources from sediment. This could be achieved by actions resulting from FW-STD-CWN-02.

The Final Environmental Impact Statement, Appendix B contains criteria such as a limitations on vegetation management in the Conservation Watershed Network. The Conservation Watershed Network (CWN) offers a constraint on proposed silviculture prescriptions and the rate of desired condition

attainment. Watershed management requirements are defined by Resource Condition Zone (the level 3 identifier). Conservation Watershed Networks identified at the HUC 12 scale will have no more than 30 percent of each identified and mapped CWN in openings per decade. Openings are defined as any vegetation treatment method or stand replacing fire which results in an average size class of less than 5.0 inches diameter at breast height.

The Forest Service uses a database application called Infra to manage information on national resources, such as buildings, trails, roads, wilderness areas, and water systems. Infra, along with the Natural Resource Information System (NRIS) and the Automated Lands Program (ALP), are major components of the Forest Service's corporate information management system.

One commenter suggested that the Forest Service include in the final plan components the Conservation Watershed Network include both a list and a map that make distinctions of which watersheds are meeting desired conditions and which are not. The final Environmental Statement does not include a map or list of HUC12 watersheds that meet desired conditions as this will be an analysis that is completed at the project level as new projects are developed for implementation on the forest.

Some commenters asked how much riparian thinning will occur in CWN. It is worthy to note that inner and outer riparian management zones are not suitable for timber production, but thinning for other multiple use values such as fisheries is allowed as appropriate in the inner riparian zone, and harvest is allowed in the outer riparian zone only for other resource benefit under the riparian management zones plan components. Modeling results indicate that approximately 1,200- acres of riparian areas within the CWN could be treated annually under the preferred alternative if needed to move riparian habitats towards desired conditions. This treatment estimate is inclusive of inner and outer riparian areas respective to their individual restrictions and project objectives. This range of riparian habitat that could potentially be treated represents less than 1 percent of CWN riparian habitat. CWN riparian habitat is a subset of all riparian habitat on the forest.

The final EIS includes a crosswalk of plan component by plan component comparison of the changes from PACFISH/INFISH to the Land Management Plan. In addition, the final EIS and biological assessment provide sufficient detail to inform the decisionmaker of the broad environmental consequences of the plan components. They discuss the effects of management activities, past and present, and describe the plan components that both constrain actions that pose risks to aquatic and riparian resource and will guide pro-active restoration where needed.

One commenter asked what INFRA is. The Forest Service has a database application that used to be called INFRA to manage information on national resources, such as buildings, trails, roads, wilderness areas, and water systems. Infra, along with the Natural Resource Information System (NRIS) and the Automated Lands Program (ALP), are major components of the Forest Service's corporate information management system. INFRA is an older term for the database of record where infrastructure info is stored. Nowadays, the proper term is NRM (Business Area INFRA). That is to say that NRM is now the database of record for all resource areas.

Concern 3: Conservation Watershed Network

The Forest Service should address adverse effects on the conservation watershed network water quality, including the effects from fire, roads, timber harvest, and instream projects.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	56	938	43	1065	63, 59
717	192, 191	1051	3	Empty cell	Empty cell
877	252, 248, 246, 247,	1054	28	Empty cell	Empty cell

Response to comment

The concept of "programmatic" NEPA reviews is embedded in the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) that address analyses of "broad actions" and the tiering process. In 2014, the Council on Environmental Quality issued guidance for the effective use of programmatic NEPA reviews (CEQ, 2014) . The final EIS for the land management plan fits under “III.- When to Use a Programmatic and Tiered NEPA Review” as a “decision to adopt formal plans, such as documents that guide or constrain alternative uses of Federal resources, upon which future agency actions will be based”.

As described in the planning regulations at 36 CFR 219.2, Forest Service planning occurs at three levels—national strategic planning, National Forest System unit planning, and project or activity planning. The development of this plan occurs at the unit level of planning. It results in a land management plan that provides a framework for integrated resource management and for guiding project and activity decision-making on the Forest. The plan does not authorize projects or activities or commit the Forest Service to take action. However, the plan may constrain the Agency from authorizing or carrying out projects and activities, or the manner in which they may occur. Implementation of the plan occurs at the third level of Agency planning, project and activity planning, consistent with the land management plan and supported with site-specific NEPA effects analysis.

Commenters suggested that estimated sediment yields in watersheds with lands identified as suitable for timber production would be useful. Sediment modeling is more appropriate at the project development scale. Appendix 4, Management Approaches, suggests that sediment modeling, be included in the stream condition indicator Assessment and/or multiscale analysis. Sediment modeling (e.g. GRAIP Lite, WEPP, or other model as determined by the line officer to be adequate to inform the decision) for roads helps identify high delivery segments for the interdisciplinary team (IDT) at beginning of project initiation.

Commenters asked how will net decrease be measured under FW-STD-CWN-02. Within Appendix 4, Management Approaches, an explanation of the purpose of this plan component along with possible management strategies have been added. Management strategies for carrying out this standard include considering implementing road improvements to hydrologically disconnect the road system from the channel network, such as installing cross drain culverts or adding rolling dips to road to direct water from ditches, reducing the number of road/stream crossings, or relocating or decommissioning stream adjacent roads; and a variety of indicators could be used to measure the net decrease in hydrologic connectivity. For example, number of actions implemented; miles of road improved by adding drainage structures or miles of road relocated or decommissioned; or amount of reduced sediment delivery to streams as estimated by models, such as WEPP, GRAIP, or GRAIP Lite.

Commenters suggested that timber harvest is not treated differently in the Conservation Watershed Network and that GIS software could be used to identify lands that are suitable for timber production that are not accessible by the current road network. Within Appendix B of the FEIS, limitations to harvest within the Conservation Watershed Network are documented. These limitations include a constraint on proposed silviculture prescriptions and the rate of desired condition attainment. Watershed management requirements are defined by Resource Condition Zone (the level 3 identifier). Conservation Watershed

Networks identified at the HUC 12 scale will have no more than 30 percent of each identified and mapped CWN in openings per decade. Openings are defined as any vegetation treatment method or stand replacing fire which results in an average size class of less than 5.0 inches diameter at breast height.

In addition to constraints on acreage of vegetation treatment, standards and guidelines throughout the Aquatic Ecosystems section will constrain activities to limit effects on aquatic resources.

One commenter suggested that there was no discussion about the current road system in the environmental impact statement. The current road system discussion is contained within Section 3.4.4 Infrastructure, as well as in the grizzly bear effects section, and the fish and aquatic ecosystems sections. A discussion of the current road system as well as what will be needed for future harvest under the alternatives is contained within the environmental consequences piece of this section.

Additional discussion of the effects of other resource areas was added to the FEIS.

The final EIS and biological assessment provide sufficient detail to inform the decisionmaker of the broad environmental consequences of the plan components. Included in the biological assessment is a map of management areas and road relationships.

Concern 1: Aquatic Ecosystems - Fish

In order to return fisheries to their former range and populations, the Forest Service should include standards for restoring fisheries, their historical range, and ESA (Endangered Species Act)-listed fish.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
113	2	938	35, 61	1115	6
307	20, 22	939	1-4, 19, 21, 28	17732	4
805	16, 48	1052	70, 72, 74, 75	17893	6
877	64, 234, 242, 266-268, 293, 294	1060	38		

Response to comment

Per the planning regulations at 36 CFR 219.9(b), land management plans must “provide the ecological conditions necessary to contribute to the recovery of federally listed threatened and endangered species”.

Per the Endangered Species Act, Federal agencies are required to ensure that any action authorized, funded, or carried out is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of designated critical habitat (ESA, section 7(a)(2)).

The regulations are clear that the forest service’s role in ESA recovery is primarily one of managing habitat. With respect to fish, it does this primarily through ESA section 7 consultation with the US Fish and Wildlife Service and NMFS to ensure that it meets the requirements of Section 7(a)(2), -“any action authorized, funded, or carried out is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of designated critical habitat”. The Land Management Plan underwent consultation with the agencies and any future ground disturbing activities authorized that are consistent with the Land Management Plan could not occur without further site-specific analysis, section 7 consultation, and project decision documents. Restoration

of fish populations to levels that permit fisheries to occur is within the purview of other agencies (state and federal) that manage fish populations.

The Nez Perce-Clearwater has complied with the requirement of 36 CFR 219.9 by including plan components that provide the necessary habitat conditions for threatened and endangered salmon, steelhead, and bull trout recovery. Analyses in the final EIS and biological assessment demonstrate how plan components are designed to support these species and their critical habitat. The biological assessment released with the draft record of decision and biological opinion provided by the National Marine Fisheries Service and the Fish and Wildlife service satisfy the procedural requirements under section 7 of the Endangered Species Act.

Commenters were concerned that the impacts to fisheries were summarized for all alternatives with one discussion. The FEIS has discussed the effects to fish and their habitats between alternatives where there is a difference in effects. Due to constraints set by standards and guidelines, effects under certain circumstances would be the same under all alternatives.

Several commenters asked about Endangered Species Act species, Recovery Plans, and restoration. The Plan recognizes the responsibility to provide adequate habitat protections and levels of restoration to support species recovery. Additional analysis was added to the Aquatic Ecosystems and Fisheries Section for ESA listed fish status and potential effects of the revised plan. Graphs of ESA listed fish trends summarized by the Idaho Department of Fish and Game or other agencies, were included to provide context of species trends within the Nez Perce-Clearwater. Although the Forest Service does not manage fish species or populations, this information provides a baseline of current trends at this time. The Forest Service manages critical habitat for threatened and endangered species as well as habitat used by all aquatic organisms. Endangered Species Act Recovery plans are specifically referenced in the Forest Plan in Section 1.1 and 2.2 Aquatic Ecosystems, and relevant information from recovery plans and BASI were included in discussions of ESA listed fishes.

PIBO data is the most current data of habitat conditions. The most recent report from 2019 summarizes Nez Perce-Clearwater data from managed and reference streams as well as data from the Reference Eco Region. This summarized information can be found in the Aquatic Ecosystems and Fisheries Section.

Some commenters suggested that the Nez Perce-Clearwater put management of native and anadromous fish habitat as its top priority. Management of fish habitat is one of many resources that is managed by the Forest Service. The Multiple Use Sustained Yield Act of 1960 directs the forest service to manage for multiple uses throughout the forest. The forest service fulfills this requirement by managing for a variety of resources including vegetation management, recreation, cultural resources, aquatic ecosystems, wildlife, minerals, range, infrastructure, and other relevant resources. In addition, 36 CFR 219.10(a) indicates plans must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses in the plan area. The Nez Perce-Clearwater is managed for vegetation management, recreation, cultural resources, aquatic ecosystems, wildlife, minerals, range, infrastructure, and other relevant resources. Aquatic restoration is one of many resources that are included in the restoration of integrated ecosystems.

Therefore, it would be outside of the authority of the forest service to manage for only one resource.

Some commenters suggested additional information be added regarding lamprey. Current information from the Pacific Lamprey Conservation Initiative was included to help establish baseline information and analyze potential effects to lamprey. The information was compiled from various agencies, including US Fish and Wildlife Service, the Nez Perce Tribe, Latah County Soil and Water Conservation District, and

Idaho Department of Fish and Game regarding lamprey. Various lamprey management plans were referenced in the EIS. The Lochsa River, along with Crooked Fork Creek, and the Potlatch River have been added to the list of streams where lamprey are known to exist. Additional information was added to explain management of lamprey by the Idaho Department of Fish and Game, the Nez Perce Tribe, and the United States Fish and Wildlife Service. In addition, there is a specific plan component designed to help conserve lamprey during dewatering events.

The Conservation Watershed Network contains the habitats that also contain some of the coldest water across the forest. Criteria 4 considers Climate Shield modeled reaches for bull trout. Plan components including goals, desired conditions, objectives, and standards are included for HUC12 sub-watersheds that are identified as Conservation Watershed Network. Specifically, objectives are focused on restoration actions for native fish and aquatic species specific to impacts from roads.

Standards and guidelines throughout multiple resource areas were identified where it was determined some level of management constraint (also known as design criteria) was needed to ensure achievement of desired conditions. Not all desired conditions require a standard or guideline to address a risk from management actions, and there is not a one-to-one relationship between these varying plan components.

Concern 2: Aquatic Ecosystems - Fish

To evaluate fish habitat for long-term management and monitoring, standards must be quantifiable. To support stream health and fish habitat, riparian buffers should be maintained at 300 feet. As the Forest Service coordinates with federal agencies, it should also coordinate with State agencies.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
272	2	939	20, 27, 29	16859	1
276	2	941	6	16962	6
397	8	946	3	17297	5
465	19	1056	12	17507	6
663	21	1065	61	17733	3
747	6	1089	1	17898	8
805	13	1099	8	17901	12
877	235, 237, 239-241, 265	2300	2	17908	6
938	60	13498	4		

Response to comment

The planning regulations require plans to establish widths for riparian management zones around waterbodies, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes (36 CFR 219.8(a)(ii)). PACFISH/INFISH include riparian habitat widths varying from 100 to 300 feet depending on stream type, consistent with this requirement. Long-term monitoring has demonstrated this is a successful strategy for maintaining and restoring aquatic integrity. This Land Management Plan will continue this strategy in a consistent manner forest wide, with updates consistent with the current planning regulations and based on best available scientific information, to apply the requirements in 36 CFR 219.8 for water quality and riparian resources.

Commenters suggested reviewing Guenther et al. (2012) where authors found increases in stream temperature in relation to selective logging. We reviewed the suggested literature along with literature that

is cited in the Aquatic Ecosystems and Fisheries Section. The suggested literature was from a study in coastal British Columbia where streamside clearcutting occurred. This literature is not relevant for comparison to this Land Management Plan as streamside clearcutting would not be allowed and standards would constrain this from happening. Literature that is referenced in the Final EIS, found no differences in temperature before and after a project using a no-cut buffer as small as 25 feet (Groom et al. 2011). Similarly, a comprehensive study in Oregon and Washington that evaluated various buffer widths found no increases in stream temperature using a 50-foot buffer (Anderson and Poage 2014). Riparian management zones in the Land Management Plan would be at 100-300 feet, more than the buffer shown to be effective in protecting stream temperature.

Commenters requested that the State of Idaho be added to FW-GL-CWN-01. State agencies have been added to this plan component.

Crosswalk tables comparing the 1987 Forest Plans to the plan components in the new Forest Plan have been included in the analysis in the Aquatic Ecosystem and Fisheries Section. The plan components included in the Land Management Plan are consistent with the 2012 planning rule.

Climate change data (Climate Shield) via NorWest are incorporated into the CWN criteria. In addition, under management approaches, the stream condition indicator assessment uses Climate Shield data as an indicator for stream temperature for spawning and rearing fish. Refer to response to comment under Aquatic Ecosystems- Fish, Concern #1.

The forest uses PIBO data for long term monitoring. This data has been shown to be effective at the forest scale at detecting habitat changes and trends over time with respect to reference conditions.

Although not all desired conditions provide quantified measures within the plan component itself, all provide sufficient detail to determine progress toward their achievement. This includes the qualitative description of reference ranges defined by agency monitoring.

Regarding comments that standards should be quantifiable, the word “standard” has an entirely different meaning under the 2012 planning rule compared to the 1982 planning rule, and as such, the terms measurable and quantifiable, do not apply. With regard to concern about standards, the preamble to the 2012 planning rule discusses the agency’s reasons for decisions regarding standards:

The 2012 planning rule includes specific requirements for plan components in §§ 219.8 through 219.11. The final rule has been modified to clarify that “standards or guidelines” must be part of the set of plan components required by each of those sections. However, the Department does not agree there should be specific national standards for each of the resources or uses mentioned in the comment, because significant differences in circumstances across the National Forest System could make specific national standards unworkable or not reflective of the best available scientific information for a given plan area. The final rule balances the need for national consistency with the need for local flexibility to reflect conditions and information on each unit. Additional direction will be included in the Forest Service Directives System, and a new requirement was added to § 219.2 that require the Chief to establish a national oversight process for accountability and consistency of planning under this part.

As required by the planning regulations (36 CFR 219.15), both standards and guidelines have mandatory project and activity consistency requirements. Consistency with a standard is determined by strict adherence to the specific terms of the standard, while consistency with a guideline allows for either strict adherence to the terms of the guideline, or deviation from the specific terms of the guideline if the purpose for which the guideline was included in the plan is met at the project level (FSH 1909.15, chapter

22). This approach to guidelines allows for flexibility as circumstances warrant; for example, when there is more than one way to achieve the intended purpose, or new information provides a better way to meet the purpose, without lessening protections. Thus, both standards and guidelines provide certainty in terms of constraining management activities to address a resource risk or stressor.

While the land management plan must fulfill all the requirements of the planning regulations, a one-to-one correlation of one plan component to each requirement listed in sections 219.8 through 219.11 of the planning rule is not necessary. Rather, the integrated plan content provided by all combined components must provide the necessary protections and framework for guiding future activities (FSH 1909.12 section 22).

The Nez Perce-Clearwater National Forest's plan currently has 68 standards and 121 guidelines, including 36 standards benefiting fish, wildlife, and soils resources (and another 58 guidelines for these same resource areas).

The management constraints specified in the standards and guidelines vary depending on data and scientific information regarding what is needed for resource protection. Where there is scientific information that indicates a management activity provides a similar risk forest wide, the plan provides specificity (e.g., fill material shall not be side-cast in streams). Where varying management strategies may be needed or appropriate to address variable site-specific conditions, standards or guidelines may be more descriptive in nature in order to minimize the risk while allowing for project design to be tailored to site-specific conditions.

Several comments have come on multiple occasions that generally requests standards over guidelines, but do not make specific requests tied to our process for determining which plan component is appropriate, i.e. the data and scientific information regarding what is needed for resource protection, the degree to which that scientific information may change over the life of the plan and whether varying management strategies may be needed to address variable site-specific conditions.

Of important note is that standards and guidelines are constraints on proposed activities, and they do not compel action, nor do they move the Forest towards a desired landscape. Achieving restoration goals, making progress towards a desired condition on the ground and describing a desired end state for a resource area are not appropriate for standards or guidelines. A critical change in the 2012 planning rule is the mandatory compliance with desired conditions, or more correctly a prohibition on any activity that precludes attainment of desired conditions. The rule does not have tiered levels of noncompliance, thus, an activity that precludes attainment of a desired condition is in violation of the plan just as a project not meeting a standard or guideline would be. Desired conditions have been carefully written as the overarching mechanism to move towards the conditions we want to achieve on the ground, and many contain high bars for not precluding attainment, such as continued recovery of ESA listed species, etc.

Some commenters requested standards or guidelines to require monitoring, analysis, or surveys prior to conducting management activities. However, standards or guidelines should not direct or compel processes such as analysis, assessment, consultation, planning, inventory, or monitoring. Those processes can be part of other plan content such as management approaches.

Without specific plan components being proposed to change from a guideline to a standard, the Forests will continue to default to the Forest Service's consistent implementation direction, stated above.

Concern 3: Aquatic Ecosystems - Fish

There are multiple effects on fish from logging, grazing, instream activities, roads, and climate change. These effects need to be analyzed, disclosed, and reflected in the management decisions.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	55	877	236, 238, 243, 244, 284, 286, 287, 290	17543	1
549	6	939	25, 26, 47, 50	17901	11
805	21	1054	28		

Response to comment

The planning regulations at 36 CFR 219.10(a)(3) indicates the development of plan components shall consider appropriate placement and sustainable management of infrastructure, such as recreational facilities and transportation and utility corridors for the integrated resource management of multiple uses in the plan area.

The plan includes objectives, standards, and guidelines to guide the management of forest system roads and trails to achieve the desired condition. It includes measurable and time-specific objectives for road decommissioning, placing roads in intermittent stored service, road reconstruction, and road maintenance to address road-related resource effects. Standards and guidelines constrain transportation management actions, including location (placement) of road construction and relocation, to minimize risks of adverse environmental effects. While the final EIS recognizes that roads can have environmental impacts, the land management plan’s road-related direction is expected to guide management that maintains or restores ecological integrity.

Road decommissioning is included in several plan component objectives including FW-OBJ-WTR-02, FW-OBJ-WTR-05, FW-GDL-AREM -02, and FW-OBJ-INF-01. Standards and guidelines that constrain actions associated with roads are contained within in the aquatic and riparian plan components including: FW-GDL-RMZ-02, FW-GDL-RMZ-07, FW-STD-ARINF-07, FW-GDL-ARINF-01, FW-GDL-ARINF-02, FW-GDL-ARINF-03, FW-GDL-ARINF-04, FW-GDL-ARINF-05, FW-GDL-ARINF-06, FW-GDL-ARINF-07, FW-GDL-ARINF-08, FW-GDL-ARINF-09, FW-GDL-ARINF-10, and FW-GDL-AREM -02.

Analysis of the infrastructure needed for future timber harvest was completed and is included in Section 3.4.4 Infrastructure. Analysis of roads needed for future harvest from existing roads versus additional roads needed is summarized in the Environmental Consequences section.

Commenters suggested deleting plan component FW-GDL-ARGR-04. After careful consideration, this plan component was deleted as the intent is covered by STD-ARGRZ-03.

Plan component FW-STD-RMZ-01 has been modified due to public comments. Refinement of language of this plan component has narrowed the focus of its intent. Vegetation management may only occur in within 150 feet to restore or enhance aquatic and riparian associated resources. Vegetation management may occur in the outer Riparian Management Zones to meet desired conditions for fuel loading and silvicultural desired conditions, so long as project activities retain functions of the outer Riparian Management Zone, including sediment filtering, large wood recruitment to streams, and protection of the inner Riparian Management Zone from windthrow. Vegetation management in Riparian Management Zones shall not retard attainment of aquatic and riparian desired conditions.

Regarding comments that effects on fish from logging, grazing, instream activities, roads, and climate change need to be analyzed, disclosed, and reflected in management decisions, there are appropriate disclosures and effects analysis that take place at both the programmatic and project level that address this concern. The plan does not authorize any activities or compel the FS to specific actions. It is a programmatic framework that is designed to direct and constrain project activities in the future, and therefore follows a programmatic analysis framework. Appropriate disclosures of effects on ESA listed fish species have been completed in a Forest Plan BA in consultation with USFWS and NMFS. In addition, the FEIS discusses effects of the revised plan for each of the proposed alternatives. Effects of Climate Change on fish have been discussed in both the Biological Assessment and the FEIS. Specific effects of on- the- ground activities are more appropriately disclosed in project level ESA consultation documents as needed in cases where ESA listed fishes or critical habitat is present. In addition, project level NEPA documents would typically discuss effects of on-the -ground activities between alternatives. Records of Decision are the documents that serve as the appropriate repository for reflecting how these effects were considered in management decisions.

Concern 1: Aquatic Ecosystems – Multiscale Analysis

The data used for multiscale analysis should be described in terms of type, how often it is evaluated, and the length of analysis.

Letter #	Comment #
938	45
1060	169

Response to comment

The planning regulations define the required plan components, desired conditions, objectives, standards, guidelines, and suitability of lands at 36 CFR 219.7(e)(1). It requires projects be consistent with each applicable plan component and describes how consistency is determined at 36 CFR 219.15(d). Optional plan content in the plan can include potential management approaches or strategies and partnership opportunities or coordination activities (36 CFR 219.7(f)(2).

36 CFR 219.2(b)(2) indicates plans do not authorize projects or activities or commit the Forest Service to take action. A plan may constrain the Agency from authorizing or carrying out projects and activities, or the manner in which they may occur. In addition, a plan does not regulate uses by the public. Plans should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System.

Some commenters requested standards or guidelines require analysis or surveys prior to conducting management activities. However, standards or guidelines should not direct or compel processes such as analysis, assessment, consultation, planning, inventory, or monitoring. Those processes can be part of other plan content such as management approaches. The forest describes possible management approaches in Appendix 4 of the Land Management Plan. Refer to the more thoroughly developed description for multiscale analysis – uncertainty of “no specific requirement for length of analysis on specific kinds of data to be used” is now clarified.

Concern 2: Aquatic Ecosystems – Multiscale Analysis (letter number 938)

For the multiscale analysis, the Forest Service should evaluate all-natural disturbances and include sediment delivery risk.

Response to comment

The planning regulations define the required plan components, desired conditions, objectives, standards, guidelines, and suitability of lands at 36 CFR 219.7(e)(1). It requires projects be consistent with each applicable plan component and describes how consistency is determined at 36 CFR 219.15(d). Optional plan content in the plan can include potential management approaches or strategies and partnership opportunities or coordination activities (36 CFR 219.7(f)(2)).

Multiscale analysis is included within Appendix 4 – Management Approaches, which is optional plan content. Multiscale analysis may be used to determine consistency with standards and supports conclusions that actions do not retard attainment of aquatic and riparian desired conditions.

The multiscale analysis has been significantly developed since the draft environmental impact statement. Commenters suggested that it include natural disturbances on maps – fire, insect and disease, landslides, flood history, timber. These layers are included in the table of indicators for both stream condition indicator assessment and multiscale analysis.

Some commenters encouraged the Forests to continue consulting with experts and seeking the best method for evaluating sediment delivery risk from projects, which may include some level of ground-truthing. Sediment modeling is included as indicators for multiscale analysis. After further development of the multiscale analysis process, ground truthing of modeling results is a step in the multiscale analysis process.

Concern 3: Aquatic Ecosystems – Multiscale Analysis (letter number 721)

Multiscale analysis evaluations should be conducted in cooperation with other federal agencies and should be issue driven.

Response to comment

Optional plan content in the plan can include potential management approaches or strategies and partnership opportunities or coordination activities (36 CFR 219.7(f)(2)).

Commenter suggested that the management approach for the Stream Conditions Indicator Assessment identify departures from desired conditions and define the scope of analysis. In order to design an integrated project that meets multiple objectives, an additional element is needed to resolve potential conflicts with competing activities such as timber harvest, fuels management, grazing, or road construction.

The Forest Service has worked with National Marine Fisheries Service, the Nez Perce Tribe, and the Idaho Department of Fish and Game to refine the procedure for multiscale analysis. Identification of indicators, data sources, and a list of questions to identify issues were areas where the Forest Service worked with its partners to resolve concerns received in public comments.

Concern 1: Aquatic Ecosystems – Priority Watersheds

To provide clarity, the Forest Service should differentiate between priority watersheds and watershed conservation networks and should provide data behind the classification of priority watersheds. The number of watersheds with priority work occurring in them should be quantified. Priority watersheds should be those not meeting desired conditions.

Letter #	Comment #	Letter #	Comment #
717	184, 185, 186, 187, 188	1060	65, 66, 166, 175
877	273, 295	1115	7
939	7, 32		

Response to comment

One commenter asked about the number of streams on the Nez Perce-Clearwater that have not been assessed by Idaho Department of Environmental Quality for the 303(d)/305(b) Integrated Report and asked what the plan was for assessing these streams. As noted in the FEIS, Appendix K, approximately 1,505 miles of stream have yet to be assessed for water quality. This equates to about 20 percent of the streams on the Nez Perce-Clearwater. As described in the 2022 IDEQ 303(d)/305(b) Integrated Report. Assessment units or streams would remain in Category 3 until DEQ can obtain sufficient data and information to determine whether beneficial uses are supported. However, an AU may remain in Category 3 indefinitely under any of the following circumstances: the stream had no flow when visited by DEQ (i.e., intermittent stream); access to the monitoring site was denied; or the monitoring site was inaccessible. When any of these circumstances are encountered, DEQ would make every attempt to revisit the assessment unit to collect sufficient data and information to support a beneficial use attainment determination.

Some of the comments attached to this concern were related to the identification of priority watersheds, the number of Priority Watersheds allowed at any given time, and the timelines of restoration actions within priority watersheds. Those comments are addressed under Concern 2 - The Forest Plan should list specific projects in priority watersheds and list restoration priorities. To be a priority, restoration should not depend on timber harvest. The Forest Service should coordinate with tribes before changing or selecting priority watersheds.

Other comments expressed confusion the relationship of priority watersheds to Conservation Watershed Network, the IDEQ integrated report, and how priority watersheds relate to priority watersheds under the 1987 Forest Plans. Appendix K of the FEIS was updated to include more clarity regarding the legislative authority, definition of, selection of priority watersheds, as well as future expectations for the process on the forest in the Watershed Condition Framework and Priority Watersheds section. Under the 2012 planning rule, “priority watersheds” are associated with the Forest Service Watershed Condition Framework program. Information regarding Watershed Condition Framework can be found at https://www.fs.usda.gov/naturalresources/watershed/condition_framework.shtml. In addition, the section “Conservation Watershed Network” in FEIS, Appendix K better describes the objectives and selection process for CWNs. A conservation watershed network is a designated collection of watersheds where management emphasizes habitat conservation and restoration to support federally listed fish and Species of Conservation Concern.

In regards to the question on if the selection of priority watersheds for the planning area was informed by the Idaho Department of Environmental Quality 303(d)/305(b) Integrated Report, the answer is yes. One attribute of the used in the rating of watershed condition in the Watershed Condition Framework process is water quality, specifically impaired waters, 303(d) listed waterbodies, or waters with other water quality problems. This is described in FEIS, Appendix K under Watershed Condition Framework and Priority watersheds and in the table titled Number of Subwatersheds by Watershed Condition Class by Indicator. The discussions for Watershed Condition Framework was expanded in the FEIS Water

Resources section and FEIS, Appendix K. In addition, Appendix K of the FEIS was also updated to include a description of the latest information from the 2022 IDEQ 303(d)/305(b) Integrated Report.

There was also confusion expressed about the terms “key” and “priority” watershed under PACFISH/INFISH from the 1987 forest plans, and how those relate to “priority” watersheds in the revised Land Management Plan. Although both use the term “priority watersheds”, the actual constructs are distinctly different in terms of identification processes and objectives. The priority watersheds identified under the 1987 forest plans were selected through the INFISH amendment of the 1987 Forest Plans in order to conserve inland dish habitat. Because PACFISH/INFISH was an amendment to the 1987 plans, those designations would be superseded by the direction under the revised Land Management Plan. This information was clarified in the FEIS Aquatic Ecosystems and Water Resources sections. The 2012 planning rule requires that plans identify watersheds that are a priority for maintenance or restoration (36 CFR 219.7(f)(1)) and that they are identified through the Forest Service Watershed Condition Framework. Priority watersheds would change as watersheds are restored or priority changes. Priority watersheds are not designated areas or special management areas.

Concern 2: Aquatic Ecosystems – Priority Watersheds

The Forest Plan should list specific projects in priority watersheds and list restoration priorities. To be a priority, restoration should not depend on timber harvest. The Forest Service should coordinate with tribes before changing or selecting priority watersheds. It should assess the watersheds' suitability for creating beaver dams.

Letter #	Comment #	Letter #	Comment #
717	189	939	30
877	271, 272, 274,	1060	176, 177
938	36	1065	57

Response to comment

Commenters requested more specific identification of projects that would be completed over the life of the plan. As described in the 2012 Planning Rule, plans do not authorize projects or activities or commit the Forest Service to take action (36 CFR 219.2(b)(2)). A plan may constrain the Agency from authorizing or carrying out projects and activities, or the manner in which they may occur. In addition, a plan does not regulate uses by the public. The 2012 Planning Rule also indicates that plan components contained in a land management plan guide future project and activity decision making (36 CFR 219.7(e)). Future projects developed and implemented under the Land Management Plan would be required to be consistent with each applicable plan component and demonstrate consistency with the Land Management Plan (36 CFR 219.15(d)). Optional plan content in the land management plan could include potential management approaches or strategies, partnership opportunities, or coordination activities (36 CFR 219.7(f)(2)).

Some commenters requested that the amount of aquatic ecosystem restoration objectives be decoupled from timber harvest objectives and that restoration activities should be prioritized and not dependent on timber harvest projects. Objectives are a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives should be based on reasonably foreseeable budgets, within the fiscal capability of the unit. The Forest Service is a multiple use agency, and as such, seeks to balance resource objectives from a variety of resource areas. Objective levels for each of the alternatives were developed across resource areas to achieve a similar rate of movement towards respective desired conditions. Aquatic ecosystem restoration requires funding, and often that funding comes from timber sale retained receipts or restoration is included in vegetation management

stewardship projects. Other sources of funding for restoration work is available and not all restoration would be tied to timber harvest activities. Watershed and aquatic ecosystem restoration projects are intended to occur as integrated treatments strategically located and implemented at the watershed scale, primarily in priority and conservation watershed network watersheds. Restoring watersheds at the landscape scale requires restoration of upland vegetation as well as riparian and in-stream work. Vegetation management and wildland fire are the primary treatments the agency uses to restore upland vegetation and can be used to achieve both upland vegetation as well as riparian restoration objectives. Completing restoration in either or concurrently in both areas as needed moves the entire landscape toward desired conditions. Overall, the Land Management Plan is intended to provide an integrated approach to promoting the restoration of natural landscapes and natural processes. Instead of focusing on local scale concerns, the focus would be to move the entire landscape toward a more natural functioning system within the natural range of variation. The plan components for most natural resource areas are intended to maintain or increase ecological integrity and resiliency.

Some commenters expressed desire for Alternative X aquatic ecosystem restoration levels in the preferred alternative, and spawning habitat to be the primary driver of restoration projects. The Preferred Alternative was developed from individual parts of Alternatives W, X, Y, and Z. Although some commenters may prefer an alternative or portion of an alternative that aligns with their objectives, those objectives may not align with other commenters objectives, or Forest Service objectives. It is impossible for the Preferred Alternative to meet all of the various objectives or requests expressed or preferred by various segments of the public. The responsible official is required to give the public an opportunity for input and develop and consider a number of alternatives, selecting a preferred alternative based on the best interests of the public as determined by principles such as multiple use, sustained yield, economic sustainability, environmental sustainability, and safety. The preamble to the 2012 planning rule states under the “requirements for public participation” section that: “Nothing in this section should be read to indicate that the responsible official will seek to direct or control management of lands outside of the plan area, nor will the responsible official conform management to meet non-Forest Service objectives or policies. (FR 21262).”

Some commenters expressed the desire for more plan components containing specific language concerning beavers and beaver dam analogs. The Land Management Plan includes four plan components that specifically mention beavers and/or beaver dam analogs. These include FW-GL-WTR-03, FW-DC-WTR-09, FW-OBJ-WTR-02, and FW-OBJ-RMZ-01. Additional information on beavers and restoring beaver habitat was added to the FEIS Water Resources, Aquatic Ecosystems and Fisheries, and Wildlife sections.

One commenter expressed concern that impacts of increased logging were not discussed in the DEIS. Additional analysis was completed and included in the FEIS Water Resources and Aquatic Ecosystems and Fisheries sections to better describe the impacts to water and fisheries resources from the potential increased risk from vegetation management actions and associated activities, such as commercial transport of timber. As part of the legal requirements associated with plan revision, the Forest entered into official consultation with the US Fish and Wildlife Service and National Marine Fisheries Service, and produced and submitted a Biological Assessment for the revised forest plan. That document discloses effects of the proposed action on ESA listed fishes.

Commenters requested a complete list of all the priority watersheds that would be identified over the life of the plan, or projects associated with them. Other commenters expressed concern over the process for identifying priority watersheds, specifically that the process could occur at any time and was not open to objections. The Agricultural Improvement Act of 2018 (a.k.a. the 2018 Farm Bill), Section 8405

permanently authorizes the Forest Service to develop and maintain the Watershed Condition Framework, using the agency's existing processes and criteria. It provides specific legislative authorization and requirements for the process, one of those being to identify for protection and restoration up to 5 priority watersheds in each National Forest. The 2012 planning rule requires that plans identify watersheds that are a priority for maintenance or restoration (36 CFR 219.7(f)(1)). Priority watersheds are identified through the Forest Service Watershed Condition Framework

The 2012 Planning Rule is clear that the revised plan cannot authorize projects or commit the Forest Service to take action, so including a complete list of projects would not be consistent with the planning rule and would be speculative. The appropriate location for specific project level activities associated with priority watersheds is the Watershed Restoration Action Plans that would be developed for each of the Priority Watersheds, not the revised plan. In addition, providing a complete list of priority watersheds over the life of the plan would not be consistent with the processes outlined in the 2018 Farm Bill, which allows up to 5 priority watersheds on a forest at one time. By design, Watershed Condition Framework priority watersheds are not intended to be permanent designations - when all needed work is completed, a new Watershed Condition Framework priority watershed is to be identified. Priority areas for potential restoration activities could change quickly because of disturbance events, such as wildfire or severe flooding. Therefore, the 2012 planning rule includes priority watersheds as other plan content, so that an administrative change could be used to quickly respond to changes in priority.

Commenters requested information about consulting other agencies or Tribes when identifying Priority Watersheds. The Land Management Plan was updated to include language that describes the intended role of partners in selecting future Priority Watersheds: “The participation of partners in the priority selection process is expected and highly encouraged. The 2012 Planning Rule and the planning directives require the responsible official to reach out to local, state, tribal, and other federal agencies and interest groups when identifying priority watersheds (FSH 1909.12, section 22.31).” To facilitate moving watersheds toward desired conditions, the Land Management Plan includes objective FW-OBJ-WTR-01, which would facilitate the completion of actions identified in watershed restoration action plans for 15 priority watersheds (Preferred Alternative), as identified under the Watershed Condition Framework process every 15 years. Actions included in watershed restoration action plans are generally expected to take 5 years to accomplish.

Commenters requested more information about how the Priority Watersheds included in the Land Management Plan were identified. The FEIS Water Resources section and FEIS, Appendix K was also updated and additional information regarding priority watersheds was included. Utilizing the Watershed Condition Framework process, in 2011 the Nez Perce-Clearwater designated four subwatersheds as priority watersheds – Upper Little Slate Creek, Upper Elk Creek, Upper Clear Creek, and Waw’ aalamnime Creek (Fishing Creek). For each of these four subwatersheds, a watershed restoration action plan was developed to designate the essential projects necessary to restore the watershed to a better condition. Issues in these watersheds include exclusion of wildfire, departed vegetation conditions, road location and densities, undersized culverts, past mining impacts, riparian structure and function, invasive species, loss of soil productivity, and water quality.

In 2014, the Upper Newsome Creek and Meadow Creek subwatersheds were added to the list of designated priority watersheds. To date, all restoration work in the watershed restoration action plans has been completed in the Waw’ aalamnime Creek, Upper Newsome Creek, and Meadow Creek subwatersheds. The majority of the restoration work was accomplished through partnership with the Nez Perce Tribe. Work in the Upper Elk Creek, Upper Clear Creek, and Upper Little Slate subwatersheds is ongoing. In 2023, Nez Perce Tribe staff and Nez Perce-Clearwater staff were informally consulted, and

the Musselshell Creek and Lower Crooked River subwatersheds were identified as priority watersheds so as to be included in a larger effort to better leverage funding secured under the Wildfire Crisis Landscape Investments for the Nez Perce-Clearwater Lower Salmon Priority Landscape. By aligning priority areas additional focus and funding would be available to provide for multiple resource benefits, including fish habitat improvements, and to align with partnership restoration priorities.

One commenter requested the names of all specific projects implemented in Priority Watersheds. Those projects are developed by forest staff and leadership at the local level, and a catalogue of projects at that level is beyond the scope of plan revision. Individual restoration projects are developed and occur as need is determined by local responsible officials and staff. Watershed Restoration Action Plans for completed and ongoing priority watersheds are publicly available at https://www.fs.usda.gov/naturalresources/watershed/condition_framework.shtml.

In summary, several of the initial priority watershed selections did involve the participation of partners, including the Nez Perce Tribe. The watersheds which were already identified by the Nez Perce-Clearwater as priority watersheds in which restoration was ongoing were simply carried forward in the Land Management Plan. The Nez Perc-Clearwater would work with partners to identify future priority watersheds over the life of the plan.

Concern 1: Aquatic Ecosystems - Pacfish and Infish

The Forest Service should retain the PACFISH/INFISH measures developed during consultation and should include monitoring protocols to avoid impacts on aquatic resources.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	57, 137	1065	41, 48	1121	2
721		1115	5	6106	3
939	22, 23				

Response to comment

The final EIS states there is a need to update PACFISH/INFISH, which was intended to be an interim amendment to land management plans, yet remain consistent with strategies in place across public lands in the western United States that have proven successful in improving aquatic conditions. Therefore, the original PACFISH/INFISH plan components were built upon and adjusted to comport with the 2012 planning regulations’ current regulatory definitions and implementing directive guidance at FSH 1909.12, chapter 20.

To fully understand the degree of change from the current plan to the revised plan, it’s important to review the stated intent of the amendment in the PACFISH/INFISH decision notice and environmental assessment, and the actual requirements in attachment A of the decision.

As part of this strategy, the PACFISH/INFISH identified a network of “key and priority watersheds”. “These watersheds were designated where watersheds have excellent habitat or strong assemblages of fish, or watersheds that provide for population distribution goals, or where the watersheds have a high restoration potential. Within the watersheds, ongoing projects were to be screened to determine their potential habitat effects and whether they will need to be modified to reduce risk to fish habitat. Watershed analysis would also be required for some management activities within the riparian habitat conservation areas” (page 1 1998 INFISH Decision Notice). The revised Land Management Plan’s conservation watershed network used multi-scale analysis and current climate science to build upon and

update the concept of key and priority watersheds. The conservation watershed network includes watersheds important for listed species and species of conservation concern. See Conservation Watershed Network concern statements for additional discussion.

The PACFISH/INFISH also delineated riparian habitat conservation area (RHCA) widths around various waterbodies, similar in function to riparian management zones required under the current planning regulations. The revised Forest Plan riparian management zone widths are similar to those in the PACFISH/INFISH.

PACFISH/INFISH “standards and guidelines” are combined under a single heading with no discrimination or definition of which are standards, and which are guidelines. Although intent can be interpreted through verb use in some of the statements (e.g., verbs such as prohibit imply a standard), many of the statements compel action, processes, analyses, monitoring, or tactical planning which standards and guidelines developed under the current planning regulations should not do. Under the current planning regulations, outcomes for action are described in objectives. And standards and guidelines “place design or operational constraints on projects and activities; or prohibit the Forest Service from authorizing certain types of projects or activities to help achieve or maintain desired conditions, to avoid undesirable effects, or to meet applicable legal requirements” (FSH 1909.12, section 20).

Thus, where the PACFISH/INFISH “standards and guidelines” could be rewritten as design or operational constraints on management actions in such a way that they did not compel action, analysis, or planning, they were rewritten as either explicitly a standard or a guideline. Where the Forest determined an PACFISH/INFISH “standard and guideline” that described an action was an important outcome to support achieving a desired condition, it was included as a plan objective.

It is important to note that the INFISH was developed under the 1982 Planning Rule. Unlike the 1982 Planning Rule, the 2012 Planning Rule (current planning regulations) explicitly defines plan consistency (36 CFR 219.15(d)) for each defined plan component (desired conditions, objectives, standards, guidelines, suitability of lands, and goals) (36 CFR 219.7(e)). There were no project consistency requirements for riparian goals and objectives, although some of the “standards and guidelines” included guidance to design activities so they did not “retard attainment” of riparian management objectives.

However, project and activity decision making under the Revised Land Management Plan must be consistent with all applicable plan components. Projects or activities are consistent with desired conditions when they contribute to the maintenance or attainment of one or more desired conditions, or they do not foreclose the opportunity to maintain or achieve any desired conditions, over the long term (36 CFR 219.15(d)(1)).

Some commenters questioned whether the requirement to complete a watershed analysis before projects in RHCAs within key and priority watersheds” should remain in the plan.

Requiring analysis cannot be a plan standard since it is neither a design nor an operational constraint. However, as recommended by the Interior Columbia Basin Ecosystem Management Project (2014) strategy a multi-scale analysis management approach has been described in Management Approaches in appendix 4 of the revised Forest Plan. While not required in a standard, it is an important tool that could be used to for project-specific decisions when useful.

Rather than requiring a watershed analysis, the revised Forest Plan addresses the management risks associated a number of standards and guidelines that apply forestwide (not just limited to

PACFISH/INFISH watersheds) in the fish and aquatic habitat, riparian management zone, conservation watershed network, roads and trails, and recreation sections

Thus overall, the revised Forest Plan broadens aquatic and riparian resource protections rather than weakening them. The final EIS includes a crosswalk of plan component by plan component comparison of the changes from PACFISH/INFISH to the revised Forest Plan. In addition, the final EIS and biological assessment provide sufficient detail to inform the decisionmaker of the broad environmental consequences of the plan components. They discuss the effects of management activities, past and present, and describe the plan components that both constrain actions that pose risks to aquatic and riparian resource and will guide pro-active restoration where needed.

Commenters stated that more focused monitoring is needed for Forest Plan drainages and project planning. A land management plan must contain a plan monitoring program (36 CFR 219.12). The purpose of land management plan monitoring is to evaluate the effectiveness of plan direction and determine whether changes to plan components are needed (FSH 1909.12, section 30.2). The planning directives at 1909.12 chapter 30 section 32 describe the required elements of the plan monitoring program. The responsible official has discretion to set the scope, scale, and priorities for plan monitoring within the financial and technical capabilities of the administrative unit (FSH 1909.12, section 32.12). Monitoring questions are not required for every plan component.

The information requested by commenters is not required monitoring for the eight items set out in the Planning Rule at 36 CFR 219.12(a)(5). The monitoring program is not intended to depict all monitoring activities undertaken by the Forest, nor is the Forest limited to conducting only this monitoring. The biennial evaluation of the monitoring information will help determine whether a change to the plan or change to the monitoring program is warranted based on new information, whether a new assessment may be needed, or whether there is no need for change at that time (36 CFR 219.5). The indicators selected for monitoring will be evaluated as part of the biennial monitoring report, and changes can be made if any indicator is not providing sufficient information to address the monitoring question.

The monitoring questions are tied to specific Forest Plan components, which include desired future conditions, plan objectives, and standards and guidelines. They must focus on providing the information necessary to evaluate whether Forest Plan components are effective and appropriate, and whether management is being effective in maintaining or achieving progress toward the desired conditions and objectives for the Forest. MON-WTR-06 is designed to measure progress towards achieving objectives, and thus focuses on the number and type of restoration actions. Other monitoring questions do address progress towards desired conditions (MON-WTR-02 and -04), and these list PIBO as a data source. The 2012 Planning Rules does not require Land Management Plans to include F project level monitoring.

The goal of the PacFish/InFish Biological Opinion Monitoring Program (PIBO) is to monitor stream and riparian habitats, in order to determine if the PacFish (Pacific Anadromous Fish) and InFish (Inland Fish) aquatic conservation strategies can effectively maintain or restore the structure and function of riparian and aquatic systems.

The Revised Forest Plan will continue to rely on the monitoring program that utilizes supported data sources including PACFISH/INFISH biological opinion (PIBO) data. PIBO data are the most accurate, reliable, and relevant on-the-ground data for monitoring aquatic ecosystem conditions using a probabilistic sampling design. The program was initiated to evaluate the effect of land management activities on aquatic and riparian communities at multiple scales and to determine whether management practices are effective in maintaining or improving the structure and function of riparian and aquatic conditions.

Concern 2: Aquatic Ecosystems - Pacfish and Infish

Plan components should be rigorous enough to support the recovery of ESA-listed species. The Forest Service should conduct a science review and a crosswalk, detailing changes from the existing Forest Plan to the revised Forest Plan and EIS.

Letter #	Comment #	Letter #	Comment #
48	2	877	278
307	51	1060	39
721	2	1065	39, 45, 50, 56

Response to comment

FSH 1909.12 Chapter 20 Section 23.13a – Threatened and Endangered Species

The Endangered Species Act and implementing regulations at 16 USC 1536(b)(4) and 50 CFR 402.14(i) requires Federal agencies, in consultation with the US Fish and Wildlife Service, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of designated critical habitat of such species. In addition, section 7 (a)(1) of the ESA directs Federal agencies to use their authorities to further the purposes of the Act by carrying out conservation programs for the benefit of threatened and endangered species.

The final EIS includes a crosswalk of plan component by plan component comparison of the changes from PACFISH/INFISH to the revised Forest Plan. In addition, the final EIS and biological assessment provide sufficient detail to inform the decisionmaker of the broad environmental consequences of the plan components. They discuss the effects of management activities, past and present, and describe the plan components that both constrain actions that pose risks to aquatic and riparian resource and will guide proactive restoration where needed.

Commenters concern regarding desired conditions is addressed under Concern Statement #1 under the Aquatic Ecosystems response.

PACFISH/INFISH included riparian goals, riparian management objectives, and “standards and guidelines” that applied within the riparian habitat conservation areas. The riparian goals were to “maintain or restore” the same factors the current planning regulations require a land management plan take into account to “maintain or restore” ecological integrity at 36 CFR 219.8(a)(3), such as water temperature, sediment, connectivity, floodplain values, etc. The revised Forest Plan builds upon PACFISH/INFISH direction to include a suite of integrated plan content that applies to riparian management zones, with goals, desired conditions, objectives, and standards and guidelines.

The INFISH riparian management objectives are an appropriate starting point to describe the desired condition for fish habitat. They are similar to desired conditions under the current planning regulations. The PACFISH/INFISH strategy acknowledged that the components of good habitat can vary across specific geographic areas. Thus, the interim riparian management objectives were considered to represent the best watershed scale information available in 1995, but national forest managers were encouraged to establish site-specific riparian management objectives through watershed analysis or site-specific analysis.

Some commenters stated that plan components should be rigorous enough to support recovery of ESA listed species. As part of the process of plan revision, and to fulfil requirements of the ESA, the forest

wrote a biological assessment that contains analysis and determinations in this regard, and submitted it to NMFS and USFWS. As part of that process, the forest expects to receive a biological opinion that will provide and analysis and determination regarding whether the plan components are rigorous enough to support recovery of ESA listed species. So while this evaluation is expected to occur, it would be inappropriate for the forest to make this the determination independently from the review process that will be completed as part of the formal ESA consultation with the regulatory agencies.

Concern 3: Aquatic Ecosystems - Pacfish and Infish

The Forest Service should include measurable and enforceable standards for bull trout and should maintain the current 300-foot stream buffer.

Letter #	Comment #
663	
17901	

Response to comment

36 CFR 219.8(a)(3) requires plan components to maintain or restore ecological integrity in riparian areas. At (ii) the regulations require the plan to establish widths for riparian management zones around all lakes, perennial and intermittent streams, and open water wetlands, within which the plan components required by paragraph (a)(3)(i) of this section will apply, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes.

FSH 1909.12 Chapter 20 23.11e – Riparian Areas (ii) states that “Plans must establish width(s) for riparian management zones around all lakes, perennial and intermittent streams, and open water wetlands ... giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes.”

The Nez Perce-Clearwater has adopted riparian management zone protections similar to PACFISH/INFISH. The Nez Perce-Clearwater riparian management zone widths are wider than what is supported in the literature as discussed in the FEIS section Aquatic Ecosystems and Fisheries. Riparian management zones of 300-feet remain for Category 1 – Fish-bearing streams.

The planning regulations require plans to establish widths for riparian management zones around waterbodies, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes (36 CFR 219.8(a)(ii)). PACFISH/INFISH include riparian habitat widths varying from 100 to 300 feet depending on stream type, consistent with this requirement. Long-term monitoring has demonstrated this is a successful strategy for maintaining and restoring aquatic integrity. This revised Forest Plan will continue this strategy in a consistent manner forestwide, with updates consistent with the current planning regulations and based on best available scientific information, to apply the requirements in 36 CFR 219.8 for water quality and riparian resources.

Some respondents stated the final rule must include measurable standards for specific resources such as climate change, species viability, sustainable recreation, valid existing rights, or watershed management, in order to implement the intent of the rule and to ensure consistency. Others were opposed to the use of standards and guidelines.

The rule includes specific requirements for plan components in §§ 219.8 through 219.11. The final rule clarifies that “standards or guidelines” must be part of the set of plan components required by each of those sections. However, the Department does not agree there should be specific national standards for

each of the resources or uses mentioned in the comment, because significant differences in circumstances across the National Forest System could make specific national standards unworkable or not reflective of the best available scientific information for a given plan area. The final rule balances the need for national consistency with the need for local flexibility to reflect conditions and information on each unit.

As required by the planning regulations (36 CFR 219.15), both standards and guidelines have mandatory project and activity consistency requirements. Consistency with a standard is determined by strict adherence to the specific terms of the standard, while consistency with a guideline allows for either strict adherence to the terms of the guideline, or deviation from the specific terms of the guideline if the purpose for which the guideline was included in the plan is met at the project level (FSH 1909.15, chapter 22) [emphasis added here]. This approach to guidelines allows for flexibility as circumstances warrant; for example, when there is more than one way to achieve the intended purpose, or new information provides a better way to meet the purpose, without lessening protections. Thus, both standards and guidelines provide certainty in terms constraining management activities to address a resource risk or stressor.

While the land management plan must fulfill all the requirements of the planning regulations, a one-to-one correlation of one plan component to each requirement listed in sections 219.8 through 219.11 of the planning rule is not necessary. Rather, the integrated plan content provided by all combined components must provide the necessary protections and framework for guiding future activities (FSH 1909.12 section 22).

The Nez Perce-Clearwater National Forest's plan currently has 68 standards and 121 guidelines, including 36 standards benefiting fish, wildlife and soils resources (and another 58 guidelines for these same resource areas).

The management constraints specified in the standards and guidelines vary depending on data and scientific information regarding what is needed for resource protection. Where there is scientific information that indicates a management activity provides a similar risk forestwide, the plan provides specificity (e.g., fill material shall not be side-cast in streams). Where varying management strategies may be needed or appropriate to address variable site-specific conditions, standards or guidelines may be more descriptive in nature in order to minimize the risk while allowing for project design to be tailored to site-specific conditions.

Of important note is that standards and guidelines are constraints on proposed activities, and they do not compel action nor do they move the Forest towards a desired landscape. Achieving restoration goals, making progress towards a desired condition on the ground and describing a desired end state for a resource area are not appropriate for standards or guidelines. A critical change in the 2012 planning rule is the mandatory compliance with desired conditions, or more correctly a prohibition on any activity that precludes attainment of desired conditions. The rule does not have tiered levels of noncompliance, thus, an activity that precludes attainment of a desired condition is in violation of the plan just as a project not meeting a standard or guideline would be. Desired conditions have been carefully written as the overarching mechanism to move towards the conditions we want to achieve on the ground and many contain high bars for not precluding attainment, such as continued recovery of ESA listed species, etc.

Concern 1: Aquatic Ecosystems – Reference Watersheds

The Forest Service should include the natural range of variation in desired conditions and specify desired conditions for species recovery. Also, it should describe how aquatic restoration could occur without timber harvest and at the accelerated pace required to meet objectives.

Letter #	Comment #
1052	53
1065	42, 44, 46, 52, 53, 55
17348	1, 3

Response to comment

36 CFR 219.10(a) indicates plans must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses in the plan area. The Nez Perce-Clearwater is managed for vegetation management, recreation, cultural resources, aquatic ecosystems, wildlife, minerals, range, infrastructure, and other relevant resources. Aquatic restoration is one of many resources that are included in the restoration of integrated ecosystems.

Some commenters were concerned about how priority watersheds would be selected. Priority watersheds are determined as directed by the 2018 Farm Bill. Appendix K of the FEIS has been updated to describe the rationale, authority, and process for selecting priority watersheds.

Commenters requested standards or guidelines require analysis or surveys prior to conducting management activities. However, standards or guidelines should not direct or compel processes such as analysis, assessment, consultation, planning, inventory, or monitoring. Those processes can be part of other plan content such as management approaches. The forest describes management approaches in appendix 4 of the plan. The FEIS focuses on standards and guidelines in its analysis and only refers to multiscale analysis, as described in management approaches, as one example that may be used to determine consistency with the standards.

Commenters were concerned that the plan does not provide the rationale for why each watershed was selected using the criteria for Conservation Watershed Network. The criteria for determining which HUC12 met the criteria is included in Appendix K of the FEIS. Table 18 shows which criteria was met by each HUC 12. HUC12 subwatersheds that meet three of the five criteria are considered Conservation Watershed Network. There are 245 HUC12 subwatersheds, within the Nez Perce Clearwater National Forests. Of the 245 HUC12 subwatersheds, 81 subwatersheds met three or more of the criteria used to determine the Conservation Watershed Network.

Some commenters were concerned about the relationship between NRV and desired conditions. Reference conditions from PIBO sites across the Interior Columbia River Basin provide a representation of the natural range of variability in aquatic ecosystems in the Interior Columbia River (Kershner et al. 2004), including the Nez Perce-Clearwater.

In the latest PIBO report for the Nez Perce Clearwater National Forest, under the section entitled “Interpreting the Data- Important Considerations” the following text explains how PIBO data is used to estimate the expected distribution of stream conditions within NRV:

“Often, the land management planning process includes the range of natural variation of ecosystem characteristics under historic disturbance regimes as an important context for evaluating current and future desired conditions. The PIBO ‘reference’ reaches sampled in wilderness and other areas not heavily influenced by human disturbances can be used to estimate the expected distribution of stream conditions in the absence of management-induced disturbance. Incorporating a distribution of reference reach conditions recognizes that even relatively pristine streams may have poor habitat conditions due to natural disturbance regimes. Subsequently, distribution of habitat conditions in reference areas can be compared to the distribution of stream

conditions in managed sites as a measure of status. If the distribution of your managed site conditions mimics the reference condition distribution, it can be assumed that managed sites fall within the range of natural variation. Conversely, if the distributions of reference and managed sites are different, then management may have had an effect on stream condition”

The most recent PIBO data (2020) is summarized for the Nez Perce Clearwater in the Effected Environment section of the Aquatic Ecosystems and Fisheries section of the FEIS.

The Forest Service Handbook (FSH1909. ch12, sec 23.11a) describes the role of the Natural Range of Variation in plan revision.

An understanding of the natural range of variation related to key ecosystem characteristics provides context and insights to the design of plan components. Agency intent is to promote ecosystem integrity in the plan area.

The goal of understanding natural range of variation is to help design plan components to maintain or restore the integrity of the diversity of terrestrial, riparian, and aquatic ecosystems and habitat types throughout the plan area provide an ecosystem (coarse-filter) approach to maintaining the persistence of native species.

When developing plan components, the Interdisciplinary Team considers the role of the natural range of variation by designing plan components to maintain or restore NRV, except in situations where the Responsible Official determines that it is not appropriate, practical, possible or desirable to manage around NRV. The Interdisciplinary Team designs plan components based on a general scientific and ecological understanding of the conditions that would sustain key ecosystem characteristics and sustain at-risk species using factors such as: representativeness, redundancy, habitat associations of particular species, disturbance dynamics, or observed conditions in reference areas. (FSH 1909.12, ch. 10, sec. 12.14b); and requires the Responsible Official to provide the rationale for not basing plan components on NRV.

In some cases, the desired conditions for a particular resource may overlap with but extend beyond the natural range of variation for one or more of the reasons listed in the handbook section cited above. An example would be trying to anticipate the effects of climate change and manage for a landscape that is resilient to those effects. For example, Appendix B of the FEIS contains more discussion on this topic. The desired conditions in the plan are informed by NRV, but do not necessarily always duplicate NRV.

Commenters referred to FW-DC-WTR-10 and suggested that for "primary constituent elements and primary biological features" necessary for species recovery, the plan must identify what these are in order for the conditions to be achieved. There are physical or biological features essential to the conservation of the species and that may require special management considerations or protection. These features are previously referred to as primary constituent elements and are laid out in the appropriate quantity and spatial arrangement for conservation of the species. These include, but are not limited to: (1) Space for individual and population growth and for normal behavior; (2) Food, water, air, light, minerals, or other nutritional or physiological requirements; (3) Cover or shelter; (4) Sites for breeding, reproduction, or rearing (or development) of offspring; and (5) Habitats that are protected from disturbance or are representative of the historical, geographical, and ecological distributions of a species (DOI, 2010).

Combining funding and efforts with partners is expected to increase the pace and scale of restoration efforts. Any organization that wishes to fund or engage in aquatic restoration on the forest is encouraged to create and participate in partnerships with the forest and other restoration partners.

The Conservation Watershed Network has been identified to prioritize aquatic restoration efforts toward watersheds that have the highest potential for conservation benefit for at risk species. Selected Conservation Watershed Network watersheds are expected to provide a pattern of protection across the landscape where the habitat of listed salmonids and Species of Conservation Concern receives special attention and treatment. HUC12 watersheds with strong local populations, are expected to function as refugia and a source of colonizing fish for adjacent HUC12 watersheds with habitat not meeting desired conditions. Adjacent HUC12 watersheds with habitat not meeting desired conditions, with high potential for restoration and fish production, are expected to benefit from habitat suitable for population expansion after desired conditions are met.

In addition, the comprehensive suite of plan components is expected to be beneficial forestwide to aquatic resources by establishment of desired conditions and plan components that are designed to move conditions toward those desired conditions.

Concern 2: Aquatic Ecosystems – Reference Watersheds

Because reference watersheds are described at the subbasin level, the Forest Service needs to explain how this would be applied at the watershed level. Reference watersheds should also include the actual range of desired conditions.

Letter #	Comment #
1065	43, 47
17348	2

Response to comment

As part of PACFISH and INFISH consultations with National Marine Fisheries Service and US Fish and Wildlife Service in 1996 and 1998 respectively, the PIBO required monitoring to determine if components in PACFISH and INFISH were effective at preventing further habitat degradation at the scale of the entire Columbia River Basin, and in recent years, to areas as small as sub-basin watersheds (i.e., an 8-digit Hydrologic Unit or HUC8). This monitoring program collects reach-level stream habitat, temperature, macroinvertebrate, and riparian data to evaluate whether key biological and physical components of aquatic and riparian communities are being degraded, maintained, or restored. With two decades of consistently collected data and improvements in data analysis, comparisons between managed and reference watersheds can now be scaled down to conditions on an individual national forest. Currently, PIBO monitoring provides rigorously collected local data that can be statistically compared to reference conditions in the same geophysical province. However, although this data and monitoring is useful for trend monitoring over time, it’s not as useful for outlining static numerically measured thresholds in land management plan desired conditions.

A review by Kershner and Roper (2010) discussed results of monitoring eight riparian management objectives and their related rankings and noted that many locations in unmanaged, reference watersheds do not meet the measures of “proper functioning condition”. Several years into the PIBO monitoring effort, Kershner and Roper (2010) disclosed that the eight riparian management objectives monitored in 726 reference and managed subwatersheds had never all been properly functioning in one watershed at the same time.

Thus, directing management to achieve a set of fixed numerical thresholds as the authors of the PACFISH/INFISH did with the numerical riparian management objectives would not be based on best available scientific information as it would inaccurately assume “that the problem is well-bounded,

clearly defined, relatively simple, and generally linear with respect to cause and effect” (Holling and Meffe 1996). While the data is useful for comparing trends of managed watersheds to reference watersheds and is a key factor and measuring progress toward achieving desired conditions forestwide, the wide variability does not provide a definitive value or range of values for aquatic and riparian characteristics that apply in all stream reaches at all points in time.

Several commenters were concerned about timber harvest being the source of funding for aquatic restoration. Although many projects are funded by timber harvest receipts, there is nothing in the revised plan that precludes seeking or securing aquatic restoration funding from other sources.

See response in previous question regarding aquatic restoration. The forest will need to rely on funding provided by accelerated upland restoration, as well as partnerships, in order to implement a faster pace of restoration.

Concern 1: Aquatic Ecosystems – Riparian Management Zones

Within riparian management zones the Forest Service should address habitat improvements, including restoration and connectivity. The Forest Service should use the provided best available scientific information to determine monitoring strategies, reference conditions, and desired conditions.

Letter #	Comment #	Letter #	Comment #
307	143	877	279
663	22	938	40
717	183	939	6
721	4, 5	1065	49
805	17	1115	8, 9
873	25	17348	10

Response to comment

The Land Management Plan provides a suite of integrated plan components to contribute to conservation and recovery of listed species. The approach builds from the 1995 PACFISH/INFISH strategies with modifications and improvements as called for by the planning regulations at 36 CFR 219.8 and 9(a), and with support from standard and guideline refinements and integration for watershed, fish and riparian resource areas. Plan component refinements are consistent with current planning regulation requirements and address an updated synthesis of the science related to riparian management zones that builds from beneficial outcomes realized since the enactment of PACIFSH/INFISH.

The Land Management Plan provides a greater level of clarity and focus for riparian management than the 1987 plans as amended by PACFISH/INFISH in 1995.

Key aspects of the plan’s contribution to habitat restoration and conservation are the time-specific, measurable objectives, as described in the Aquatic Ecosystem section of the Land Management Plan. The previous plan and PACFISH/INFISH did not include these focused and numeric objectives.

Plan components beyond objectives that focus efforts on restoration of watersheds and not retarding attainment of desired conditions. FW-STD-WTR-04 is intended to ensure that all projects include measures to maintain aquatic and riparian desired conditions where they are currently met, or where not met, to restore or not prevent attainment of aquatic desired conditions to the extent that project activities would contribute to those conditions. Short term adverse effects may be allowable when they support

long-term recovery of federally listed species and aquatic and riparian desired conditions. The purpose of this standard is, at a minimum, to prevent long-term degradation of aquatic and riparian desired conditions and ideally, restore conditions where currently degraded. Under FW-STD-WTR-06, In order to restore watersheds, management activities in watersheds with approved total maximum daily loads shall be designed to comply with the total maximum daily load allocations.

FW-STD-CWN-01: In Conservation Network Watersheds not meeting aquatic and riparian desired conditions, activities shall be designed and implemented in a manner that supports, and/or contributes towards the recovery of federally listed species and the achievement of these desired conditions and does not retard them when evaluated at the HUC12 subwatershed scale. Short-term adverse effects from project activities may occur when they support the long-term recovery of aquatic and riparian desired conditions and federally listed species. FW-STD-ARINF-07: In the Conservation Watershed Network and HUC12 subwatersheds with Endangered Species Act critical habitat or listed aquatic species, when constructing or reconstructing roads, projects shall result in a net decrease in the hydrologic connectivity of the road system and stream channel network unless no further decreases are needed to meet desired conditions for Water and Aquatic Resources or Conservation Watershed Network. Treatment priority shall be given to roads or road segments that pose the greatest relative ecological risk to riparian and aquatic ecosystems. The net decrease is measured by project area.

FW-DC-RMZ-01: Riparian Management Zones reflect a natural composition of native flora and fauna and a distribution of physical, chemical, and biological conditions as compared to reference conditions. The species composition and structural diversity of native plant communities in riparian management zones provide adequate summer and winter thermal regulation, nutrient filtering, appropriate rates of surface erosion, bank erosion, and channel migration. Nutrients, large woody debris, and fine particulate organic matter are supplied in amounts and distributions sufficient to sustain physical complexity and stability. FW-DC-RMZ-02: Riparian Management Zones feature key riparian processes and conditions that function consistent with local disturbance regimes, including slope stability and associated vegetative root strength, wood delivery to streams and within the riparian management zones, input of leaf and organic matter to aquatic and terrestrial systems, solar shading, microclimate, and water quality.

Commenters suggested that the Forest Service to review the literature cited below and incorporate its findings into your environmental analysis that will shape the level of management permitted to occur in riparian reserves. Stream temperature Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. The literature was reviewed and incorporated into the Aquatic Ecosystems section analysis.

This analysis used the best available scientific information to inform the plan and analysis of effects. The directives for the 2012 planning rule provide guidance on identifying the best available scientific information. According to the directives, the best available scientific information is those that are reliable, accurate and relevant. While the BASI informs the planning process, plan components, and other plan content, it does not dictate what the decisions must be.

However, not all information used in the planning process should be considered the best scientific information. Of the scientific information there is a subset that is the BASI. The Responsible Official shall determine the BASI based on the following three criteria:

1. Accurate. To be accurate, the scientific information must estimate, identify, or describe the true condition of its subject matter. This description of the true conditions may be a measurement of specific conditions, a description of operating behaviors (physical, biological, social, or economic), or an estimation of trends. Statistically accurate information is near to the true value of its subject, quantitatively unbiased, and free of error in its methods.

The extent to which scientific information is accurate depends on the relationship of the scientific findings to supportable evidence that identifies the relative accuracy or uncertainty of those findings. The accuracy of scientific information can be more easily evaluated if reliable statistical or other scientific methods have been used to establish the accuracy or uncertainty of any findings relevant to the planning process.

2. **Reliable.** Reliability reflects how appropriately the scientific methods have been applied and how consistent the resulting information is with established scientific principles. The scientific information is more reliable if it was resulted from an appropriate study design and well-developed scientific methods that are clearly described. The assumptions, analytical techniques, and conclusions are well referenced with citations to relevant, credible literature, and other pertinent existing information. The conclusions presented are based on reasonable assumptions supported by other studies and consistent with the general theory underlying those assumptions or are logically and reasonably derived from the data presented. Any gaps in information and inconsistencies with other pertinent scientific information are adequately explained.

Scientific information that describes statistical or other scientific methods used to determine both its accuracy and uncertainty can be considered to be more reliable. The use of quantitative analysis that has known (and quantifiable) rates of errors and results improves this reliability. An accuracy assessment of the data supports the reliability of the quantitative analysis.

The application of quality control to the scientific information also improves the reliability of the information. One form of quality control is peer review when scientific information has been critically reviewed by qualified scientific experts in that discipline and the criticism provided by the experts has been addressed by the proponents of the information. Publication in a refereed scientific journal usually indicates that the information has been appropriately peer reviewed.

3. **Relevant.** The information must pertain to the issues under consideration at spatial and temporal scales appropriate to the plan area and to a land management plan. Relevance in the assessment phase is scientific information that is relevant to providing information, including conditions and trends, about the 15 topics in 36 CFR 219(b) or to the sustainability of social, economic, or ecological systems (36 CFR 36 219.5(a)(1)). Relevance in the planning phase is scientific information pertinent to the plan area or issues being considered for the development of plan components or other plan content.

Individual resource section analyses in the FEIS reference the literature that has been determined to be the Best Available Scientific Information. A larger comprehensive look at what has been suggested as BASI versus what is being proposed to be BASI, as determined by the responsible official at the time of signature, is being prepared. Where conflicting science exists, individual resource sections describe that conflict and why one source of scientific information is used over another. A final determination on what is the BASI will be described in the project record at the time of signature on the ROD.

Concern 2: Aquatic Ecosystems – Riparian Management Zones

The modification of the 300-foot buffer zone would have a variety of impacts that the Forest Service needs to address.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
95	1	873	26, 27, 29, 30	17175	3
380	3	877	280, 281, 283	17304	6
388	1	939	5, 24, 33, 34	17382	2
390	1	1052	73	17901	2
452	3, 12	1060	106, 110		

Response to comment

The planning regulations require plans to establish widths for riparian management zones around waterbodies, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes (36 CFR 219.8(a)(ii)). The Inland Native Fish Strategy amendment to the west of the Continental Divide include riparian habitat conservation strategy widths varying from 100 to 300 feet depending on stream type, consistent with this requirement. Long-term monitoring has demonstrated this is a successful strategy for maintaining and restoring aquatic integrity.

36 CFR 219.8(a)(3) requires plan components to maintain or restore ecological integrity in riparian areas. At (ii) the regulations require the plan to establish widths for riparian management zones around all lakes, perennial and intermittent streams, and open water wetlands, within which the plan components required by paragraph (a)(3)(i) of this section will apply, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes.

36 CFR 219.8(a)(3)(ii)(B) requires plan components “ensure that no management practices causing detrimental changes in water temperature or chemical composition, blockages of water courses, or deposits of sediment that seriously and adversely affect water conditions or fish habitat shall be permitted within the riparian management zones or the site-specific delineated riparian areas”.

It’s important to note that while riparian management zones aren’t suitable for timber production, timber harvest is allowed to achieve desired conditions.

The creation of a two-zone riparian management zone (FW-RMZ-STD-01) maintains the application of standards and guidelines as constraints on management actions that pose a risk to aquatic resources. Plan components allow vegetation management activities to achieve the desired conditions. Both zones require protection of aquatic resources, but greater management limitation and protections are afforded to the zone within 150 feet of the active stream channel.

Commenters were concerned that FW-GDL-RMZ-10 (Now FW-GDL-WTR-07) is the only acknowledgement of an attempt to protect lamprey and mussels. With lamprey listed as a species of conservation concern, they are acknowledged in the Aquatic Ecosystems and Conservation Watershed Network introductions as well as plan components that refer to species of conservation concern: FW-DC-CWN-01, FW-STD-ARGRZ-03, and FW-DC-ARREC-01. Pearlshell mussel has been identified as a focal species under the monitoring plan (Appendix 3 to the revised plan). In addition, language describing the forests continuing involvement in lamprey and mussel conservation has been added to the FEIS.

Intermittent streams and ephemeral channels are included in the revised plan's definition of riparian management zones to protect native species and water quality.

In order to allow for the flexibility needed to manage around local NRV, the 2012 planning rule includes specific requirements for plan components in §§ 219.8 through 219.11. The final rule was modified in the

final version to clarify that “standards or guidelines” must be part of the set of plan components required by each of those sections. However, the Department did not agree there should be specific national standards for each of the resources or uses mentioned in the comment, because significant differences in circumstances across the National Forest System could make specific national standards unworkable or not reflective of the best available scientific information for a given plan area. The final rule balances the need for national consistency with the need for local flexibility to reflect conditions and information on each unit.

Concern 3: Aquatic Ecosystems – Riparian Management Zones

Multiple activities, including timber harvest, thinning, logging, and road maintenance and construction, within the riparian management zone should be considered for impacts.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	26, 58	938	41, 65	1065	51
452	1, 2, 4	939	16, 17	17348	9
877	275, 282, 296	1054	24		

Response to comment

Forest Service Handbook 1909.12, Chapter 20, Section 23.11e – Riparian Areas # 2. When establishing widths for riparian management zones as require by the Rule, and in areas where available information on the distribution of riparian dependent resources within the plan area is too limited to determine appropriate riparian management zone dimensions, the Interdisciplinary Team should consider the following when establishing widths:

- a. Establishing a default distance from the edge of all lakes, perennial streams, intermittent streams, and open water wetlands, such as the ordinary high-water mark or bankfull flow, for the riparian management zone.
- b. Giving special attention to the first 100 feet from the edges of all perennial streams, lakes, and other bodies of permanent surface water containing aquatic flora and fauna or supporting substantial riparian vegetation. In other words, plan components for riparian management zones should be developed to maintain, improve, or restore the condition of the land around and next to waterbodies in the context of the environment in which they are located, recognizing their unique values and importance to watersheds while providing for multiple uses on National Forest System lands.

Plan component FW-STD-RMZ-01 has been modified to clarify its intent. Refinement of language of this plan component has narrowed the focus of its intent. Vegetation management may only occur in the area within 150 feet of the stream (inner riparian zone) to restore or enhance aquatic and riparian associated resources. Vegetation management may occur in the outer Riparian Management Zones to meet desired conditions for fuel loading and silvicultural desired conditions, so long as project activities retain functions of the outer Riparian Management Zone, including sediment filtering, large wood recruitment to streams, and protection of the inner Riparian Management Zone from windthrow. Vegetation management in Riparian Management Zones shall not retard attainment of aquatic and riparian desired conditions.

Title 36 Code of Federal Regulations Part 219, often referred to as the 2012 Planning Rule, Section 219.10 describes multiple use within plan content. While meeting the requirements of §§219.8 and 219.9, a plan developed or revised under this part must provide for ecosystem services and multiple uses,

including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capability of the plan area as integrated resource management for multiple use. The plan must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses in the plan area.

36 CFR 219.10(a) indicates plans must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses in the plan area. The Nez Perce-Clearwater is managed for vegetation management, recreation, cultural resources, aquatic ecosystems, wildlife, minerals, range, infrastructure, and other relevant resources. Aquatic restoration is one of many resources that are included in the restoration of integrated ecosystems.

Some commenters suggested that specific, on the ground activities should be analyzed for effects. In a programmatic document such as a land management plan, the actions that are analyzed for effects are the land management decisions and the plan components. Individual activities such as timber harvest, road construction, etc, are more appropriate for analysis at an individual project scale.

Concern 1: Aquatic Ecosystems – Stream Condition Indicator Assessment (letter number 1060, comment numbers 107 and 170)

The Forest Service should use the stream condition indicator assessment during project development to assess project effects, such as road density and sediment delivery.

Response to comment

The 2012 planning rule is clear that the revised forest plan cannot compel or commit the forest service to action, therefore it would be inappropriate to create a plan component that required the use of a particular analytical framework. One of the reasons for this is to ensure that the forest is not constrained into the use of a particular model or framework if and when new and better assessment techniques become available. This flexibility is intended to allow for the continual incorporation of best available scientific information in developing assessment strategies. In order to address this where practical, the planning rule does suggest that examples of techniques can be developed under optional plan content. Optional plan content in the plan can include potential management approaches or strategies and partnership opportunities or coordination activities (36 CFR 219.7(f)(2)).

Commenters suggested that road density be added to the Stream Condition Indicator Assessment. Although road density was considered, it was determined that other indicators be used for this purpose while achieving the same goal. Several indicators are included in the indicator table, as shown in Appendix 4. Streamside roads, unstable slopes, as well as miles of roads with high modeled sediment delivery risk. Multiple levels of sediment modeling are included as indicators including, GRAIPLite and WEPP.

The Stream Condition Indicator Assessment is a possible strategy that may be used to determine consistency with this standard and supports conclusions that actions do not retard attainment of aquatic and riparian desired conditions.

Concern 2: Aquatic Ecosystems – Stream Condition Indicator

The Forest Service should incorporate connectivity and more explicit temperature measurements in the stream condition indicator assessment. It also should use additional data from tribal and State resources.

Letter #	Comment #
938	42, 47

Response to comment

Optional plan content in the plan can include potential management approaches or strategies and partnership opportunities or coordination activities (36 CFR 219.7(f)(2)).

The Stream Condition Indicator Assessment and multiscale analysis are included in Appendix 4 – Management Approaches. The Forest Service has worked with National Marine Fisheries Service, the Nez Perce Tribe, and the Idaho Department of Fish and Game to refine the indicators for the Stream Condition Indicator Assessment and multiscale analysis. Identification of indicators, data sources, and a list of questions to identify issues were areas where the Forest Service worked with its partners to resolve concerns received in public comments.

Commenter suggested that the Forest Service should incorporate connectivity and temperature measurements in the Stream Condition Indicator Assessment.

Temperature and connectivity, including habitat connectivity and floodplain connectivity, are indicators that are included and considered under the Stream Condition Indicator Assessment.

The Stream Condition Indicator Assessment is focused on habitat indicators, not population data, but when looking at multiple scales of relevant data, population and critical habitat data are considered.

Concern 3: Aquatic Ecosystems – Stream Condition Indicator

The Forest Service should update the stream condition indicator assessment because it does not match the NOAA matrix of pathways and indicators that it was based on. The thresholds should also be updated to identify areas of concern and not make determinations of acceptable or unacceptable risk.

Letter #	Comment #
1051	2
1060	171

Response to comment

The planning regulations define the required plan components, desired conditions, objectives, standards, guidelines, and suitability of lands at 36 CFR 219.7(e)(1). It requires projects be consistent with each applicable plan component and describes how consistency is determined at 36 CFR 219.15(d). Optional plan content in the plan can include potential management approaches or strategies and partnership opportunities or coordination activities (36 CFR 219.7(f)(2)).

36 CFR 219.2(b)(2) indicates plans do not authorize projects or activities or commit the Forest Service to take action. A plan may constrain the Agency from authorizing or carrying out projects and activities, or the manner in which they may occur. In addition, a plan does not regulate uses by the public. Plans should not repeat laws, regulations, or program management policies, practices, and procedures that are in the Forest Service Directive System.

Some commenters requested standards or guidelines require analysis or surveys prior to conducting management activities. However, according to the 2012 planning rule, standards or guidelines should not direct or compel processes such as analysis, assessment, consultation, planning, inventory, or monitoring.

Those processes can be part of other plan content such as management approaches. The forest describes management approaches in appendix 4 of the plan.

A significant revision of the Stream Condition Indicator Assessment and multiscale analysis was completed between the draft and final environmental impact statement.

Concern 1: Aquatic Ecosystems – Water Quality

To determine effectiveness on water quality, BMPs should be evaluated and actions that do not meet standards should not be allowed. Restoration projects should occur regardless of the alternative selected and restoration categories should indicate improvement or decline.

Letter #	Comment #	Letter #	Comment #
307	139	1060	178
877	258		
1052	54, 55, 58, 69		

Response to comment

Commenters expressed concern for lack of quantifiable standards for water quality a perceived lack of connection between desired conditions, objectives, and standards. Part of this concern may relate to the fundamental difference between the way “standard” is used between the 1982 rule and the 2012 rule. In the 1982 rule, a standard is often a measurable threshold that is used in monitoring to determine limits of activity. In the 2012 rule, a standard is a constraint on management that is used in order to progress toward desired conditions. These uses are very different, and this often causes confusion. The term measurable standard has no corollary in the 2012 rule, although a monitoring plan has been developed based on the final rule and directives, but it does not use the concept of standard in the same way as the 1982 rule. A lack of “measurable or quantifiable” standards that commenters point out is often more of a reflection of the change in terminology under the 2012 planning rule.

The 2012 Planning Rule requires land management plans to include plan components, including standards or guidelines, to maintain or restore water quality (36 CFR 219.8(a)(2)(iii)) and include plan components ensure implementation of national best management practices for water quality (36 CFR 219.8(a)(4)). The Land Management Plan includes several plan components to maintain and restore water quality. The desired condition for waterbodies on the Nez Perce-Clearwater is that water quality, including groundwater, meets or exceeds applicable state water quality standards, fully supports designated beneficial uses, and is of sufficient quality to support surrounding communities, municipal water supplies, and natural resources. The Forest has no documented lands or areas that are delivering water, sediment, nutrients, and/or chemical pollutants that would result in conditions that violate the State of Idaho’s water quality standards (FW-DC-WTR-05). Although not all desired conditions provide quantified measures within the plan component itself, all provide sufficient detail to determine progress toward their achievement.

Standards and guidelines throughout multiple resource areas were identified where it was determined some level of management constraint (also known as design criteria) was needed to ensure achievement of desired conditions. Not all desired conditions require a standard or guideline to address a risk from management actions, and there is not a one-to-one relationship between these varying plan components. Standards and guidelines to help achieve or maintain the desired conditions for water quality, to avoid or mitigate undesirable effects, or to meet applicable legal requirements are included in the Land Management Plan. They would limit water contamination from fuel spills (FW-STD-WTR-03, FW-STD-

RMZ-02); use of herbicides, pesticides, and other chemicals in riparian management zones (FW-STD-RMZ-03, FW-GDL-RMZ-08); aerial spray of chemical retardant, foam, or other fire chemicals (FW-GDL-RMZ-04); application of dust abatement chemicals (FW-STD-ARINF-02); mining activities (FW-STD-AREM-02, FW-GDL-AREM-03); solid and sanitary waste facilities (FW-GDL-ARREC-01); new facilities or infrastructure in floodplains (FW-GDL-ARREC-02); and groundwater use developments (FW-GDL-WTR-05). Appendix 4 of the Land Management Plan offers a possible management approach for improving water quality, which includes building and maintaining partnerships to fund and implement projects that result in improved water quality (FW-GL-WTR-02).

Some commenters requested that the amount of aquatic ecosystem restoration objectives be decoupled from timber harvest objectives and that restoration activities should be prioritized and not dependent on timber harvest projects. Objectives are a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives should be based on reasonably foreseeable budgets, within the fiscal capability of the unit. The Forest Service is a multiple use agency, and as such, seeks to balance resource objectives from a variety of resource areas. Objective levels for each of the alternatives were developed across resource areas to achieve a similar rate of movement towards respective desired conditions. Aquatic ecosystem restoration requires funding, and often that funding comes from timber sale retained receipts or restoration is included in vegetation management stewardship projects. Other sources of funding for restoration work is available and not all restoration would be tied to timber harvest activities. Watershed and aquatic ecosystem restoration projects are intended to occur as integrated treatments strategically located and implemented at the watershed scale, primarily in priority and conservation watershed network watersheds. Restoring watersheds at the landscape scale requires restoration of upland vegetation as well as riparian and in-stream work. Vegetation management and wildland fire are the primary treatments the agency uses to restore upland vegetation and can be used to achieve both upland vegetation as well as riparian restoration objectives. Completing restoration in either or concurrently in both areas as needed moves the entire landscape toward desired conditions. Overall, the Land Management Plan is intended to provide an integrated approach to promoting the restoration of natural landscapes and natural processes. Instead of focusing on local scale concerns, the focus would be to move the entire landscape toward a more natural functioning system within the natural range of variation. The plan components for most natural resource areas are intended to maintain or increase ecological integrity and resiliency.

Commenters requested the Forest Service incorporate federal best management practices into the forest plan and include them as forest plan standards. The National Best Management Practices Program is guided by the land management planning regulation 36 CFR 219.8 (a)(4), which requires the Chief of the Forest Service to establish requirements for National best management practices for water quality in the Forest Service Directive System. These requirements, and associated program direction, are outlined in Forest Service Handbook 2509.19, Chapter 10 National Core Best Management Practices and Forest Service Manual 2500, Chapter 30, Section 2532 Water Quality Management. Best management practices, often referred to as “BMPs” are methods, measures, or practices used to address the Clean Water Act (CWA) objective of maintaining and restoring the chemical, physical, and biological integrity of the Nation’s waters. The use of best management practices is the primary mechanism for mitigating impacts to resources from Forest management actions. The Land Management Plan ensures implementation of national best management practices for water quality (36 CFR 219.8 (a)(4)) through standard FW-STD-WTR-02, which requires project-specific best management practices, including both federal and state BMPs, to be incorporated into project planning as a principal mechanism for controlling non-point pollution sources, to meet soil and watershed desired conditions, and to protect beneficial uses.

As described in FEIS, Appendix K, best management practices utilized on the Nez Perce-Clearwater Forest come from federal and state direction, such as national best management practices outlined in Volume 1: National Core BMP Technical Guide (U.S. Department of Agriculture 2012a); Forest Service Handbook 2509.22, R1/R4 Soil and Water Conservation Practices (U.S. Department of Agriculture 1988) Idaho Forest Practices Act (IDAPA 20.02.01); and the Idaho Forestry Best Management Practices Field Guide (University of Idaho Extension Office 2015); Stream Channel Alteration Rules (IDAPA 37.03.07); Dredge and Placer Mining Operations in Idaho (IDAPA 20.03.01); and The Manual of Best Management Practices for the Mining Industry in Idaho (Idaho Department of Lands 1992). The best management practices included in these references are numerous and should not be included as standards in the Land Management Plan as a one size fits all methodology. Best management practices should be selected for based on the specific activity, site conditions, and risk of impact. Examples of best management practices that could be used include adding cross drains and gravel on system roads, utilizing erosion control barriers, limiting the types of herbicides to treat invasive plant species in riparian areas, revegetating mining sites to minimize soil erosion, moving livestock when prescribed utilization levels are reached, maintaining drainage structures on system trails, or obliterating temporary roads. In some instances, project specific design features could be developed and used to address site specific resource concerns. Appendix 4 of the Land Management Plan includes a potential management approach for use of best management practices during implementation of land management actions that have the potential to affect water quality. The implementation of best management practices is a measurement included in the monitoring plan (MON-WTR-08).

Some commenters suggested that monitoring of BMPs needed to be done with the objective of evaluating BMP effectiveness. The FEIS, Appendix K includes an updated section titled National Core Best Management Practices Reviews on the Nez Perce-Clearwater. The Forest Service's National Core Best Management Practice (BMP) program was initiated in 2012. The intent of the program is to improve water quality management through consistent and effective application of BMPs associated with management activities conducted on NFS lands. Prior to development of the national program, BMP planning and implementation was directed by overlapping state-specific guidance and individual forest and regional policies and protocols. The National Core BMP program provides a standardized set of core BMPs for avoiding or mitigating effects to soil and water resources associated the range of management activities. In addition to the core BMPs, it provides a series of systematic monitoring protocols for virtually all management activities conducted on NFS lands (U.S. Department of Agriculture 2012a). The Nez Perce-Clearwater, along with all other NFS units in the United States, has been implementing the National Core BMP Program and fulfilling annual monitoring requirements since 2014. To date, the forest has conducted 17 BMP reviews in a variety of categories. BMP reviews consisted of either implementation monitoring, effectiveness monitoring, or both. With so few BMP reviews having been conducted on the Nez Perce-Clearwater, broader context on BMP implementation and effectiveness from the remainder of Forest Service Region 1 is helpful. Approximately 200 BMP audits have been conducted in Region 1 since 2014. The majority of reviews conducted in R1 have received Excellent composite ratings. As part of monitoring element MON-WTR-08 included in the Monitoring Plan (Land Management Plan, Appendix 3), the Biennial Monitoring Evaluation Report would include a summary of National Cored BMP monitoring audits completed on the Nez Perce-Clearwater.

Some Commenters were concerned about a perceived lack of effectiveness of BMPs. One particular comment was an unattributed quote from a recent non-peer-reviewed publication (WildEarth Guardians. 2020. The Environmental Consequences of Forest Roads and Achieving a Sustainable Road System, page 26) that was used to suggest the inadequacy of BMPs. It stated "A recent technical report by the FS (Edwards et al. 2016) summarizes research and monitoring on the effectiveness of different BMP treatments. Researchers found that while several studies have found some road BMPs are effective at

reducing delivery of sediment to streams, the degree of each treatment has not been rigorously evaluated. Few road BMPs have been evaluated under a variety of conditions, and much more research is needed to determine the site-specific suitability of different BMPs (Id.; also see Anderson et al., 2011).” This paper is not considered BASI for several reasons, including the lack of peer review. Claims this paper attributes to Edwards et al. 2016 are not consistent with the objectives and findings of that paper, and could be easily misinterpreted without more context. It is important to understand the purposes and scope of the Edwards et al., 2016 literature review referred to in this quote in order to understand various statements made in the paper. In a document that was intended to help practitioners select the most appropriate BMPs for their objectives, Edwards et al., 2016 undertook a novel approach of evaluating individual BMPs at a national scale. They did this in part to attempt to separate out the BMP “effectiveness” as they defined as any reduction in nonpoint source pollution. This definition was purposely qualitative. In paragraph 3 of the introduction, they stated, “Due to the subjective nature of and many ways for defining and interpreting effectiveness, we intentionally have made no further attempt to define effectiveness throughout the chapters. Just as the reader is left to evaluate the rigor of the research and quality of the data and studies presented, the reader also is responsible for further interpretation of the pollutant reduction values cited from these works. It is up to the reader to determine if the BMP is sufficiently effective to warrant implementation in the field or citation in written documents (e.g., environmental analyses).”

A main objective of (Edwards et al. 2016) publication was to encourage and facilitate the use of BMPs, and to identify BMPs that were effective at a national scale. The structure and analysis they undertook was admittedly at odds with the way that BMPs are usually implemented. Often numerous BMPs are applied to a project at once, and it is the suite of practices acting together that confer the most protective effect. The authors acknowledged this fact on page 4 in the last paragraph of the introduction. In addition, in order to separate out individual effects, they admittedly omitted (again in the introduction) some important watershed level studies evaluating suites of BMPs applied collectively. The lack of consideration of cumulative effects of multiple BMPs applied at a watershed or project scale constrains the range of inferences that can be made from this publication. The publication was written to try to parse out individual BMP effects to assist practitioners with selection of the most successful practices, and to identify further research direction in BMP application. They were trying to identify universal BMPs that were effective across a large geographical scale. This is a very difficult task, as so much of effectiveness is expected to be dependent on local site-specific conditions, or regional factors like soil type, geology, and weather patterns. In summary, there were very specific objectives of Edwards et al., 2016 publication, and the analysis was designed to meet those objectives. For these reasons, it would be inappropriate to interpret Edwards’ results or statements as an overall indictment of BMPs or their effectiveness. On the contrary, the publication concludes in the final section that: “At the opening of this chapter, we indicated that the effectiveness of most BMPs has not been well quantified from the perspective of statistical rigor and replicated studies across many different types of conditions. But the sheer number of papers included in this document shows there are many studies of road BMP effectiveness as well as studies with results that may be applicable to roads. Based on the results of most of these studies, the case can be made that most BMPs result in some level of effectiveness in terms of reduced sediment generation or transport. Until more extensive and rigorous comparisons of effectiveness become available for specific types or categories of BMPs, the information and tabulated data herein provide the reader a starting place for selecting BMPs for local use.”

There is a robust literature documenting effectiveness of forest practice BMPs at reducing nonpoint source pollution at watershed scales across different regions (Cristan et al. 2016, Ice and Schilling 2012). Researchers have continued to evaluate BMP effectiveness in the seven years since Edwards et al., 2016 was published.

A second reference that was cited by a commenter to imply that BMP effectiveness is questionable, is the Andersen and Lockaby 2011 reference that evaluated BMP effectiveness (specifically quantification of sediment reduction) in the Southeastern United States. The authors of that report observed that BMPs are generally effective at reducing sediment but observed that specific quantifiable levels of sediment reduction associated with a BMP were often unknown. The Anderson and Lockaby 2011 reference does not support claims that BMPs are not effective, but rather highlighted that specific sediment reduction yields had not been widely quantified for BMPs used in southwestern United States. However, several studies since then have examined quantifiable sediment reduction in the southeast and elsewhere (Brown et al. 2013) (Cristan et al. 2018 , Cristan et al 2019). The ability to quantify sediment reductions with individual BMPs is useful, however it is imprudent to expect that measurable erosion responses to BMPs would be equivalent between regional areas that differ with regard to geology, weather, elevation, topography, and soils because all of those and other factors influence what types of actions are effective. BMP effectiveness and a scarcity of quantifiable sediment reduction evaluations in the Southeast pre 2011 does not imply that BMP effectiveness in the Pacific Northwest is inadequate.

Concern 2: Aquatic Ecosystems – Water Quality

Stream buffers, sediment yields, and other water quality indicators should be measured and compared, to define existing aquatic conditions. The effect of reducing stream buffers, old growth, and the effect of Total Maximum Daily Load plans should be analyzed.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	52, 54	939	17, 18	1060	16, 40, 159, 160, 161
549	7	985	5	17500	2
877	276	1052	57		

Response to comment

Commenters expressed concern for potential increased sediment yields from timber harvest and the associated road construction needed in lands suitable for timber harvest. The 2012 Planning Rule requires land management plans to include plan components, including standards or guidelines, to maintain or restore water quality (36 CFR 219.8(a)(2)(iii)) and include plan components ensure implementation of national best management practices for water quality (36 CFR 219.8(a)(4)). The Land Management Plan includes several plan components to maintain and restore water quality. The desired condition for waterbodies on the Nez Perce-Clearwater is that water quality, including groundwater, meets or exceeds applicable state water quality standards, fully supports designated beneficial uses, and is of sufficient quality to support surrounding communities, municipal water supplies, and natural resources. The Forest has no documented lands or areas that are delivering water, sediment, nutrients, and/or chemical pollutants that would result in conditions that violate the State of Idaho’s water quality standards (FW-DC-WTR-05). Sediment was a primary cause for streams on the Nez Perce-Clearwater to not meet beneficial uses and be listed as impaired by the Idaho Department of Environmental Quality. The desired condition for sediment regimes on the Nez Perce-Clearwater is that sediment delivery to streams is of the types, quantities, and rates that support the natural instream sediment transport and storage rates and instream sediment substrate composition (FW-DC-WTR-06). To help watersheds trend toward desired conditions FW-DC-WTR-05 and FW-DC-WTR-06, standard FW-STD-WTR-06 requires management activities in watersheds with approved total maximum daily loads to be designed to comply with the total maximum daily load allocations following project implementation. Standard FW-STD-WTR-04 requires projects to restore or not retard attainment of desired condition if aquatic and riparian desired conditions are not being achieved. Land Management Plan, Appendix 4 includes a potential management approach

for assessing and reducing sediment delivery. Possible approaches include the use of the Stream Condition Indicator Assessment included in the Multiscale Analysis tool and the use of existing models such as GRAIP, GRAIP-Lite, WEPP, and R1/R4 Sediment Yield guidance, and/or newer models developed during the life of the plan that improve on existing models. The Monitoring Plan (Land Management Plan, Appendix 3) includes monitoring elements for water quality (MON-WTR-06) and total maximum daily loads (MON-WTR-06).

While it is possible the transportation network may increase as a result of projects aimed at improving forest vegetation conditions and moving the forest toward NRV, it is not possible to predict how much of an increase in system roads may be needed. While there is a predicted increase in harvest activity proposed in the Action Alternatives when compared to the No Action Alternative, the harvest level is still much lower than the harvest level that occurred at the time the current transportation system was built and designed for. Predicting a proportional increase in the transportation network would be highly speculative. The infrastructure report indicates that 81 percent of lands suitable for timber production or harvest are currently accessible for timber harvest from existing roads in the transportation network. Should projects be proposed in the other 19 percent of land not currently accessible, a vast majority of the access would come from temporary roads, not from roads that would contribute to the overall transportation system. The Land Management Plan includes numerous plan components to limit the amount of sediment delivery from roads. See response to comments under other Concerns in FEIS, Appendix M for other topics related to water quality, such as total maximum daily loads and Infrastructure - Streamside Roads and Trails.

Commenters suggested the number of stream miles fully supporting designated beneficial uses should be added and that active water quality monitoring should be employed for parameters on the 303(d) list that are impairing designated beneficial uses. Tier 1 data collection techniques should be employed to conduct designated beneficial use support status monitoring on impaired streams. FEIS, Appendix K, outlines the miles of stream on the Nez Perce-Clearwater by beneficial use status as indicated in the Idaho Department of Environmental Quality 303(d)/305(b) Integrated Report (State of Idaho Department of Environmental Quality 2022). This information is reassessed by the Idaho Department of Environmental Quality every two years. Approximately 30 percent of streams on the Nez Perce-Clearwater are not supporting beneficial uses, primarily due to sediment and temperature. The Land Management Plan includes the desired condition for waterbodies on the Nez Perce-Clearwater to have water quality, including groundwater, that meets or exceeds applicable state water quality standards, fully supports designated beneficial uses, and is of sufficient quality to support surrounding communities, municipal water supplies, and natural resources. The Forest has no documented lands or areas that are delivering water, sediment, nutrients, and/or chemical pollutants that would result in conditions that violate the State of Idaho's water quality standards (FW-DC-WTR-05). To help watersheds trend toward desired conditions FW-DC-WTR-05, standard FW-STD-WTR-06 requires management activities in watersheds with approved total maximum daily loads to be designed to comply with the total maximum daily load allocations following project implementation. Appendix 4 of the Land Management Plan offers a possible management approach for improving water quality, which includes building and maintaining partnerships to monitor water quality and fund and implement projects that result in improved water quality as recommended by goal FW-GL-WTR-02. The monitoring plan (Land Management Plan, Appendix 3) contains monitoring elements for the status and trend of water quality (MON-WTR-05) and if management activities complied with total maximum daily load allocations (MON-WTR-06). Monitoring measures include the number of TMDL implementation plans developed in coordination with Idaho Department of Environmental Quality and the number of sites monitored on Category 4 or 5 impaired streams to evaluate if TMDL targets or loads are achieved.

Commenters requested the Forest to complete all required TMDL implementation plans for Forest lands. The Forest Service is not the responsible agency for developing TMDL implementation plans. In instances where a total maximum daily load assessment includes National Forest System lands, the Forest Service serves as a designated management agency through governmental memoranda of understanding. The State of Idaho is the lead agency for total maximum daily load development but must get United States Environmental Protection Agency approval before the total maximum daily load is formalized. For each of the subbasins with a developed total maximum daily load, the Idaho Department of Environmental Quality works with agencies and local landowners to develop a total maximum daily load implementation plan. The Water Resources section in the FEIS and the water quality section in FEIS, Appendix K provide more information regarding total maximum daily loads. The Land Management Plan, Appendix 4 includes a management approach for Water Quality, including guidance on total maximum daily loads. The monitoring plan (Land Management Plan, Appendix 3) contains a monitoring element (MON-WTR-06), which includes documenting the number of TMDL implementation plans developed in coordination with Idaho Department of Environmental Quality.

Some commenters recommended protecting old growth forests to sequester carbon. Mature forests and old growth in particular is recognized for its role in sequestering carbon, as described in the FEIS, Forestlands section. The Land Management Plan includes plan components MA2 and MA3-DC-FOR-10, MA3-STD-FOR-01, MA2 and MA3-GDL-FOR-02, MA2 and MA3-GDL-FOR-03, MA2 and MA3-GDL-FOR-04 that outline the desired condition and requirements for management of old growth stands and limits fragmentation of old growth stands. These mature forests would fluctuate in location and abundance over time based on natural disturbances and successional processes. The plan components promote the creation of resilient old growth by emphasizing the establishment of the types of old growth that were historically most important, longest-lived, and most prevalent.

Some commenters felt that the standards and guidelines in certain alternatives were inadequate to protect aquatic species and that habitat conditions are too degraded in some streams. The desired conditions, standards, and guidelines for water resources, riparian management zones, conservation watershed networks, infrastructure, livestock grazing, vegetation management, and fire and fuels management are the same for every action alternative. The objectives are also consistent between alternatives, with only the amount of activity varying by alternative. To better improve habitat conditions in streams, the Land Management Plan includes numerous plan components to maintain or improve water quality and promote the maintenance or restoration of water resources in the plan area, including lakes, streams, and wetlands; ground water; public water supplies; source water protection areas; and other sources of drinking water. The FEIS Water Resources section and Aquatic Ecosystem and Fisheries section discuss existing stream conditions and provide analysis of plan components included in the Land Management Plan.

A commenter felt that the DEIS utilized ambiguous terms such as "functioning properly", "functioning at risk," and "impaired." As these terms are qualitative and subjective, quantitative measures are needed to inform land management practices. The terms "functioning properly", "functioning at risk", and "impaired" are not ambiguous terms, but are part of the Watershed Condition Framework. Nationally, in 2011 the Forest Service introduced the Watershed Condition Framework (U.S. Department of Agriculture 2011b), a nationally consistent, comparable, and credible process for improving the health of watersheds on national forests and grasslands. The framework provides a method for classifying watershed condition at the HUC12 subwatershed scale, which incorporates quantitative measures to determine watershed condition class. The FEIS, Appendix K provides more information on Watershed Condition Framework and outlines the attributes used in the rating of watershed condition class and the current existing condition of watersheds on the Nez Perce-Clearwater.

One commenter felt that the forest needed to identify areas of cold water refugia that are important to bull trout. The forest utilized the Dan Isaak et al. paper on the future of cold water refugia (Isaak et al. 2015) in the development of plan components, and most directly, in the establishment of the Conservation Watershed Network. The Forest used the climate shield modeled reaches for bull trout across the Forest to look more closely at where cold water is predicted to persist into the future in the face of climate change.

Some commenters requested that water quality indicators and sediment yields should be measured and compared to define existing aquatic conditions. With over a decade of consistently collected data and improvements in data analysis, PIBO data can now be used to compare managed and reference watersheds on the scale of individual national forests. PIBO monitoring provides rigorously collected local data and offers a statistically valid method of assessing departures from reference conditions in the same geophysical province. PIBO data from the forest was used to define existing conditions. Additional data was used where appropriate such as forest monitoring reports that included sediment measurements originating under the 1987 plans. Other sources of information used to characterize existing conditions included the IDEQ 303(d)/305(b) integrated report and the watershed condition class rating for HUC12 subwatersheds, which incorporates several water quality indicators. The FEIS, Appendix K describes these information sources and displays the existing condition for Nez Perce-Clearwater watersheds and streams.

Some commenters suggested that sediment yield and cobble embeddedness measurements should be required and monitored at the project scale. The plan cannot compel specific analysis or dictate a specific model or measurement methodology to be used. The reason for this is to maintain flexibility to do adaptive resource management. Under the revised plan, the forest would not be tied to a specific model or measurement technique. This allows for the needed flexibility to adapt to new knowledge over the life of the plan. For areas with a history of cobble embeddedness, monitoring at the project scale does little to inform management, especially in the Idaho batholith, because although the amount of sediment currently produced by activities today is much less, highly erosive sediment from decades of management over mixed granite and metamorphic rock has likely overwhelmed the hydraulic capacity of some streams, and although conditions are slowly improving, largescale recovery in some locations has not happened in the years since PACFISH was implemented. For this reason, cobble embeddedness was determined to not the best measure of progress, as in some of these places, natural remediation may take hundreds of years. The limited scale of project activities, and the relatively short life of the plan against long term time scales, are expected to limit substantial effects in some of these places, even if they are trending toward desired conditions. While there are no specific plan components placing a quantifiable limit on sediment increases during project activities, the management approaches in Land Management Plan, Appendix 4 outline methods to quantify sediment at the project scale.

Some commenters suggested that stream buffer protections from PACFISH/INFISH should be carried forward unchanged from the 1987 plan. Riparian Management Zone (RMZ) widths have been clarified, retained, and enhanced from PACFISH/INFISH under the Land Management Plan - widths stay the same, and in some cases increase. The Land Management Plan outlines the various categories for RMZs and the width of each category. Standard FW-STD-RMZ-07 requires that the Riparian Management Zone definitions be used for all actions and projects. The Monitoring Plan (Land Management Plan, Appendix 3) includes monitoring elements for RMZs (MON-RMZ-01). As described in the FEIS, Aquatic Ecosystems and Fisheries section, because the Land Management Plan does not reduce RMZ width from riparian habitat conservation area widths outlined PACFISH/INFISH, and because the RMZ widths under the Land Management Plan are equal or larger than those have been shown to be protective of water quality, there is no analysis of the effect of reducing RMZ widths.

Concern 1: Aquatic Ecosystems – Water Resources

To protect aquatic resources, the Forest Service should increase or maintain stream buffers. To restore degraded watersheds, it should evaluate plan components, use quantitative standards, and analyze smaller geographic areas.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
423	9	877	230, 253, 254, 255, 256, 257, 259, 260, 262, 263, 269, 285, 289,	1060	37, 43, 95, 96, 108, 164
607	4	939	51	1065	60
805	47, 49	1052	59, 60, 61, 62	17348	8, 12

Response to comment

Forest Service Handbook 1909.12 Chapter 20, section 23.11e – Riparian Areas - describes the rule requirements for riparian areas from 36 CRF 219.8(a)(3)(ii) and giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes. In addition, 36 CRF 219.8(a)(3)(ii)(A) Riparian management zone width(s) may vary based on ecological or geomorphic factors or type of water body; and will apply unless replaced by a site-specific delineation of the riparian area.

CRF 219.8(a)(3)(ii)(B) states that: plan components must ensure that no management practices causing detrimental changes in water temperature or chemical composition, blockages of water courses, or deposits of sediment that seriously and adversely affect water conditions or fish habitat shall be permitted within the riparian management zones or the site-specific delineated riparian areas.

The Nez Perce-Clearwater has adopted riparian management zone protections similar to PACFISH/INFISH. The Nez Perce-Clearwater riparian management zone widths are wider than what is supported in the literature as discussed in the FEIS Aquatic Ecosystems and Fisheries section. Riparian management zones of 300-foot remain for Category 1 – Fish-bearing streams. PACFISH/INFISH Biological Opinion (PIBO) data show that improvements to watersheds have occurred through implementation of riparian zones termed riparian habitat conservation areas. The riparian habitat conservation areas are now being replaced by riparian management zones. The “whichever greatest” language in riparian management zone descriptions would contribute to minimal impacts. The riparian management zone minimum width for all intermittent streams would be 100 feet, instead of varying from 50 to 100 feet, as they do for some subwatersheds under current direction.

Vegetation management in the riparian management zone would occur only for the purposes of restoring or enhancing riparian, fish, and aquatic resources (FW-STD-RMZ-01). The components described in the Riparian Management Zones section of the Aquatic Ecosystems plan components, represents a refinement and enhancement of PACFISH and INFISH direction with greater clarity and emphasis on the do not retard concept and use of standards and guidelines. FW-STD-RMZ-01 is intended to replace Standard TM-1 in PACFISH and provide clarification of this part: “Apply silvicultural practices for Riparian Habitat Conservation Areas to acquire desired vegetation characteristics where needed to attain Riparian Management Objectives. Apply silvicultural practices in a manner that does not retard attainment of Riparian Management Objectives and that avoids adverse effects on listed anadromous fish.” Additionally, any treatments in riparian management zones would be designed to reflect the composition,

structure, and pattern of vegetation consistent with the natural range of variation, as described in the desired conditions.

Nez Perce-Clearwater Aquatic Ecosystems plan components build and strengthen on that in PACFISH and INFISH and carries forward the principle of upward trend from the 1987 plans. It is the goal of the objectives, combined with all standards and guidelines, that improving trends that are evident in some subbasins will be maintained and enhanced, and for those where there is presently no improvement indicated, movement towards meeting desired conditions will be initiated. When FW-STD-WTR-04 and FW-STD-CWN-01 are assessed using tools such as the Stream Condition Indicator Assessment and multiscale analysis included in management approaches of the Revised Forest Plan, stream and riparian restoration actions result based upon the conditions of the aquatic indicators in relation to desired conditions. Restoration actions would maintain or improve conditions toward desired conditions. The level of restoration needed would be dependent upon the extent of impact to the resource and the condition of the indicator during project development. In any case, degradation of existing conditions is not expected, and any improving trends are expected to be supported and not retarded by actions.

Commenters question how effects between alternatives could be indistinguishable from each other. Since the Aquatic Ecosystem plan components include a more comprehensive set of desired conditions, standards and guidelines, and objectives than included in PACFISH and INFISH, the Revised Forest Plan is expected to be as effective at restoring ecologically healthy watersheds, riparian, and aquatic habitats as the 1987 Forest Plans. The Aquatic Ecosystems plan components are the same across all Action Alternatives - only the amount of potential restoration proposed in objectives varies by alternative. Because of this, the impacts from proposed management under each of the alternatives is the same or very close to the same. The Land Management Plan also contain standards and guidelines that are intended to prevent degradation from any harvest activity that might occur in riparian management zones. These components provide more specific direction and clarification beyond what is included in PACFISH and INFISH.

Several commenters suggested the need for quantifiable standards to be included in the Land Management Plan. In order to address this concern, it is important to discuss the difference between standards under the 1982 planning rule and the 2012 planning rule. The word “standard” is used in a fundamentally different way between the two rules, and this difference often leads to confusion. In the 1982 rule, a standard is used as a numerical threshold that is used to evaluate whether or not activities are in compliance with the forest plan. Under the 2012 rule, a standard is defined as a mandatory constraint on project and activity decision-making established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements (36 CFR 219.7(e)(1)(iii)). Under the 2012 planning rule, standards are not quantitative thresholds used for monitoring compliance, but function as constraints on Forest Service activities (like zoning ordinances). When commenters ask that standards be quantifiable, it is clear that they are trying to view the new planning rule terms through the lens of the old one. Because standards are defined and used differently under the new planning rule, and in the revised forest plan, terminology such as quantifiable or measurable cannot be applied in the way that it was under the 1982 rule.

Some commenters expressed concern the objectives plan components confuses issues by comparing the potential work done between alternatives. An objective is a concise, measurable, and time- specific statement of a desired rate of progress toward a desired condition or conditions. Objectives are the only plan components in the Aquatic Ecosystems section of the Land Management Plan that vary by alternative. Objectives vary according to the projected pace and scale, or rate of progress towards achieving or trending towards desired conditions. The objectives for all resource areas are similar in pace

and scale with the aim of meeting desired conditions in thirty to thirty-five years. Objectives are based on reasonably foreseeable budgets, within the fiscal capability of the unit.

Commenters requested the Forest to complete all required TMDL implementation plans for Forest lands and recommended the Forest continue to coordinate with the IDEQ and work collaboratively with other public and private landowners to manage aquatic resources and improve water quality. The Forest Service is not the responsible agency for developing TMDL implementation plans. In instances where a total maximum daily load assessment includes National Forest System lands, the Forest Service serves as a designated management agency through governmental memoranda of understanding. The State of Idaho is the lead agency for total maximum daily load development but must get United States Environmental Protection Agency approval before the total maximum daily load is formalized. For each of the subbasins with a developed total maximum daily load, the Idaho Department of Environmental Quality works with agencies and local landowners to develop a total maximum daily load implementation plan. The Water Resources section in the FEIS and the water quality section in FEIS, Appendix K provide more information regarding total maximum daily loads. The Land Management Plan, Appendix 4 includes a management approach for Water Quality, including guidance on total maximum daily loads. This Management Approach also outlines guidance that could be used to coordinate with IDEQ and engage with local watershed councils and advisory groups as encouraged by goal FW-GL-WTR-02. The monitoring plan (Land Management Plan, Appendix 3) contains a monitoring element (MON-WTR-06), which includes documenting the number of TMDL implementation plans developed in coordination with Idaho Department of Environmental Quality.

Commenters expressed concern that roads and trails and compacted soils considered at the watershed level could have an impact on peak water flows and was not considered in the DEIS watershed analysis or the draft forest plan. The Land Management Plan includes a desired condition for instream flows to be sufficient to create and sustain riparian, aquatic, and wetland habitats and to retain patterns of sediment, nutrient, and wood routing. The timing, magnitude, duration, and spatial distribution of peak, high, and low flows are retained. Stream flow regimes maintain riparian ecosystems and natural channel and floodplain dimensions. (FW-DC-WTR-07). Roads, depending on density and location, can affect near-surface lateral flow pathways and watershed drainage density, which can alter timing and magnitude of streamflow (Wemple and Jones 2003). To help achieve or maintain the desired conditions for hydrologic flow regimes and to avoid or mitigate undesirable effects standard FW-STD-ARINF-07 requires that when constructing or reconstructing roads in the Conservation Watershed Network and HUC12 subwatersheds with Endangered Species Act critical habitat or listed aquatic species, projects shall result in a net decrease in the hydrologic connectivity of the road system and stream channel network unless no further decreases are needed to meet desired conditions for Water and Aquatic Resources or Conservation Watershed Network. Appendix 4 of the Land Management Plan offers a possible management approach that includes methods for decreasing the hydrologic connectivity of the road system. Standard FW-STD-ARINF-04 specifies that new, replacement, and reconstructed stream crossing sites, such as culverts, bridges, and other permanent stream crossings, accommodate at least the 100-year flow, including associated bedload and debris. Guideline FW-GDL-ARINF-10 requires transportation infrastructure to be designed to maintain natural hydrologic flow paths, including surface and subsurface flow, to the extent practical. For example, streams and seeps upslope from roads should have cross-drains or relief culverts with sufficient capacity to ensure water is not routed down ditches. The Land Management Plan also includes plan components to limit the extent of compacted soils (MA2 and MA3-GDL-SOIL-02) and requires the restoration of soils compacted from past management actions (MA2 and MA3-GDL-SOIL-02, FW-OBJ-SOIL-01, FW-OBJ-WTR-05) and restoration of newly created detrimental soil disturbance (FW-STD-SOIL-02, MA2 and MA3-GDL-SOIL-05). See the response to comments for Terrestrial Ecosystems-Soil Resources for more information.

Water quantity was one of the indicators used to compare alternatives for environmental consequences to water resources. The FEIS, Water Resources section includes existing condition information related to water quantity; factors that could affect flow regimes, including road densities; and an analysis for water quantity for the no action and action alternatives. Land Management Plan, Appendix 4 includes a possible management approach for flow regimes. As part of the management approach, the Forest developed the Nez Perce-Clearwater Approach to Assess Water Yield and Peak Flow analytical tool to help evaluate existing or potential changes in flow regimes. Water yield and peak flow are also indicators included in the Multiscale Analysis management approach that utilizes a Stream Condition Function and Indicator Assessment. Assessing the extent of factors affecting water yield and peak flow help to determine level of risk for potential alteration in the timing, magnitude, duration, and spatial distribution of peak, high, and low flows.

Commenters expressed concern about text from Edwards et al., 2008 concerning BMP effectiveness. That particular paper and its use regarding BMP effectiveness has been discussed in relation to other comments in Appendix M. See Aquatic Ecosystems - Water Resources Concern 2 for more information and the response to the particular comments.

Some commenters expressed concern about the effectiveness of Best Management Practices (BMPs). Commenters cited publications from the 1990s to show that BMP use was ineffective at reducing sediment, or that BMPs were actually harmful. In this case, these citations are outdated and do not reflect the current best available science. When these papers were published, BMPs were in their infancy, and there is now decades of monitoring data supporting the beneficial use and value of road and forestry BMPs.

In addition, some studies cited by the commenter are taken out of context. An example is provided below of one such statement. Commenters cited EPA commissioned research that studied nationwide effects of forestry operations on sediment in streams, that was prepared for the EPA by an environmental consulting firm (Endicott 2008), to suggest the ineffectiveness of BMPs. Commenters wrote “However, comprehensive monitoring of the effectiveness of logging road BMPs in achieving water quality standards does not demonstrate the BMPs are protecting water quality, nor does it undermine the abundant evidence that stormwater infrastructure along logging roads continues to deposit large quantities of sediment into rivers and streams (Endicott, 2008).” This is not consistent with the review conducted by Endicott or the way the EPA interpreted Endicott’s results. To clarify, Endicott’s review strongly supported the efficacy of BMPs. Endicott stated: “BMP effectiveness studies, taken together, demonstrate that modern BMPs substantially mitigate nonpoint pollution from forestry activities at the site scale, although the BMPs are not 100 percent effective (Jackson et al., 2004).” In addition, the EPA interpreted Endicott’s work as being indicative of BMP effectiveness. As cited by the EPA in its decision memo “Decision Not to Regulate Forest Road Discharges under Section 402(p)(6) of the Clean Water Act: The scientific literature increasingly demonstrates the effectiveness of BMPs in preventing, minimizing, and mitigating discharges affecting water quality and aquatic habitats (Anderson and Lockaby 2011, Ice et al. 2004); NCASI, 2012; (Cristan et al. 2016); (Endicott 2008).

In a more recent peer reviewed publication in the journal *Forest Science*, reinforces the notion that BMPs are very effective in reducing sediment from forest roads (Sugden 2018). Additional contemporary BMP reviews have found a high level of effectiveness (Ice and Schilling 2012, Cristan et al. 2016). Situations where BMPs failed to protect water quality are usually a result of a lack of BMP implementation, not BMP ineffectiveness.

Some commenters were concerned about the potential for climate change to lead to more extreme weather events that might exceed the capacity of design features and BMPs that have been used in the past. This is

a valid concern, and is part of the impetus behind the revised forest plan. While it is hard to predict how weather will change over the life of the plan, plan components have been designed to mitigate for this uncertainty. An example is FW-DC-ARINF-02, which states: The transportation network is resilient to the effects of climate change, including the ability to accommodate increased runoff and peak flows that may exceed historic streamflow events.

Commenters requested clarification for the difference between the conservation watershed network and priority watersheds. Watershed Condition Framework priority watersheds can best be thought of as tactical and near-term designations guiding the implementation of agency work priorities in the near-term (i.e. 5-year program of work), whereas Conservation Watersheds are more strategic and long-term designations helping to provide conditions that maintain or restore habitat for aquatic species in highly dynamic environments over the duration of a land management plan. Appendix K of the FEIS was updated to include more clarity regarding the legislative authority, definition of, selection of priority watersheds, as well as future expectations for the process on the forest in the Watershed Condition Framework and Priority Watersheds section. Under the 2012 planning rule, “priority watersheds” are associated with the Forest Service Watershed Condition Framework program. Watershed Condition Framework priority watersheds are not intended to be permanent designations - when all needed work is completed, a new Watershed Condition Framework priority watershed is to be identified. Information regarding Watershed Condition Framework can be found at https://www.fs.usda.gov/naturalresources/watershed/condition_framework.shtml. In addition, the section “Conservation Watershed Network” in FEIS, Appendix K better describes the objectives and selection process for CWNs. The conservation watershed network is a designated collection of watersheds where management emphasizes habitat conservation and restoration to support federally listed fish and Species of Conservation Concern. The Conservation Watershed Network was evaluated at the HUC12 scale. The 81 designated Conservation Watersheds are listed in the land management plan under the Conservation Watershed Network section. Priority watersheds could occur in watersheds included in the Conservation Watershed Network that require process-based restoration strategies to support ESA listed fish species and Species of Conservation Concern.

Some commenters expressed concern about road density and minimum road networks. The FEIS Aquatic Ecosystems and Water Resources sections were updated to include additional discussion regarding road densities and minimum road networks. Additional discussion was also added to explain how plan components would function to mitigate effects of roads. Although there is potential for negative effects from infrastructure plan components, there is also potential for mitigation of negative effects, as well as positive outcomes. For example, the desired condition FW-DC-INF-02 is designed to direct that roads not needed are absent from the landscape, which implies that the road network will not be maintained above the minimum needed for administrative and public use. Maintaining a minimum road network should benefit aquatic species by limiting road effects on their habitats. In addition, FW-OBJ-INF-01 is designed to provide direction that priorities will include reducing effects on desired aquatic and riparian conditions from chronic sediment delivery of potential future road prism failures, which will provide protection from these potential threats. In addition, there is an entire suite of aquatic and riparian plan components for infrastructure (ARINF) that includes 7 standards and 11 guidelines specifically designed to create progress toward desired condition FW-DC-ARINF-01. Desired condition FW-DC-ARINF-01 describes a transportation system that has minimal impacts on aquatic and riparian conditions through reduced hydrologic connectivity, lower sediment delivery, reduced floodplain impacts, and improved aquatic organism passage in areas where infrastructure affects these features.

Some commenters were concerned with the lack of plan components to limit detrimentally disturbed soils and requested further analysis of them. See Response to Comments in Appendix M for Terrestrial Ecosystems-Soils Resource.

Commenters expressed concern about soil compaction in the American, Crooked, and Red River drainages. They requested inventory data and disclosure of soil impacts in those watersheds, as well as a complete listing of restoration needs in those watersheds. Soil quality standards and evaluation of soil productivity and function are not calculated at the watershed scale. Soil monitoring occurs at within activity units at the project level scale. Restoration needs for soils are generally the same across the Nez Perce-Clearwater. Soil disturbance and compaction occurs primarily in areas in the more managed portion of the Forest and include areas such as dispersed and developed recreation sites; timber harvest units and associated skid trails, jammer roads, and landings; historic mining sites; and areas that have had concentrated livestock grazing. The Land Management Plan includes 14 specific plan components designed to maintain and restore soil resources. See the FEIS, Soils Resource section, management approaches in Land Management Plan, Appendix 4, and response to comments for Terrestrial Ecosystems-Soils Resource in Appendix M.

Concern 2: Aquatic Ecosystems – Water Resources

Because they support many aquatic and terrestrial species, connectivity between aquatic resources needs to be assessed. Prescribed fire, roads, timber harvest, and climate change can degrade water quality and impacts need to be analyzed. In order to improve watershed health, they need to be monitored.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	136	877	249, 250, 251, 261, 277, 288, 300	1060	103, 162, 163, 173, 174
563	4, 5	939	49	1065	62
577	19	1052	45, 46, 52		

Response to comment

The Planning Rule require plans to provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capability of the plan area as integrated resource management for multiple use (36 CFR 219.10). The plan must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses in the plan area.

Commenters expressed concern that no analysis was provided in the DEIS on the effects of timber harvest to water quality or comparison of action alternatives. Additional analysis has been added to FEIS Water Resources, Effects to Resource from Other Resources, Timber Harvest and Vegetation Management section to better describe potential effects from timber harvest and vegetation management, as well as how standards and guidelines could constrain these activities. Additional analysis was also added to the environmental consequences section for effects that vary by action alternative.

Commenters asked about comparison of alternatives regarding timber harvest effects on aquatic habitat and species. Additional analysis has been added to the FEIS Section Aquatic Ecosystems and Fisheries, Effects to Resource from Other Resources, Timber Harvest and Vegetation Management section to better describe potential effects from timber harvest and vegetation management, as well as how standards and guidelines could constrain these activities.

Commenters expressed concern that vegetation management and prescribed burning would be allowed in riparian management zones and questioned the wording for FW-STD-RMZ-01 and FW-STD-RMZ-06. Much consideration and coordination with agencies such as the Nez Perce Tribe, the National Marine Fisheries Service, and the US Fish and Wildlife Service was given to reviewing and revising these plan components between the draft forest plan and the revised Land Management Plan. The plan components have been edited to clarify constraints of timber harvest and fire ignition in riparian management zones. Further clarification of these plan components are included in management approaches for Vegetation Management in Riparian Management Zones (Land Management Plan, Appendix 4). Monitoring questions and indicators for these plan components were also included in the monitoring plan Land Management Plan, Appendix 3. Additional analysis was also added to the to the environmental consequences narrative in the FEIS, Water Resources section and FEIS, Aquatic Ecosystems and Fisheries section.

Commenters recommended that ensuring hydrologic and riparian system connectivity is explicitly mentioned as a crucial component when enhancing or restoring stream habitat as outlined in FW-OBJ-WTR-02. The 2012 Planning Rule requires land management plans to include plan components to maintain or restore the ecological integrity of riparian areas in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity (36 CFR 219.8(a)(3)(i)). The word “connectivity” was added to plan component FW-OBJ-WTR-02. It now reads “Enhance or restore 50 to 100 miles of stream habitat within naturally unconfined channels every 5 years to maintain or restore connectivity, structure, composition, and function of habitat for fisheries and other aquatic species in streams with legacy effects that caused channels to become straightened or incised, impaired beaver habitat, or diminished floodplain capacity. Activities include, but are not limited to, berm removal, large woody debris placement, streamside road decommissioning, riparian planting, beaver dam analogs, and process-based restoration/floodplain restoration.”

Commenters requested that the analysis for potential change in water yield identified in the management approaches be a requirement and that literature cited for water yield analysis be corrected. Land Management Plan, Appendix 4 includes a possible management approach for flow regimes. As part of the management approach, the Forest developed the Nez Perce-Clearwater Approach to Assess Water Yield and Peak Flow analytical tool to help evaluate existing or potential changes in flow regimes. The literature cited for the water yield analysis tool was corrected. As this tool is a management approach, it is not considered a requirement. Potential management approaches and strategies presented in Land Management Plan, Appendix 4 may include suggestions for on-the-ground implementation, analysis, assessment, inventory, or monitoring, as well as partnership and coordination opportunities the Nez Perce-Clearwater is suggesting might be helpful in achieving its desired conditions. The potential approaches and strategies are not intended to be all-inclusive, nor are they commitments to perform specific actions. The types of actions that are exemplified in Appendix 4 do not commit the Nez Perce-Clearwater to perform or permit these actions but are provided as actions that would likely be consistent with plan components and that might be undertaken to maintain or move towards the desired conditions and objectives. Management approaches can change as new best available science becomes available.

Commenters requested that FW-DC-WTR-07 needs language added to install streamflow gaging stations and conduct routine flow monitoring to ensure that minimum instream flows for aquatic life are being met and to evaluate long-term trends in streamflow. A land management plan must contain a plan monitoring program (36 CFR 219.12). The purpose of land management plan monitoring is to evaluate the effectiveness of plan direction and determine whether changes to plan components are needed (FSH 1909.12, section 30.2). The planning directives at 1909.12 chapter, 30 section 32 describe the required elements of the plan monitoring program. The responsible official has discretion to set the scope, scale,

and priorities for plan monitoring within the financial and technical capabilities of the administrative unit (FSH 1909.12, section 32.12). Monitoring questions are not required for every plan component. The installation of gaging stations and routine stream flow monitoring was not included in the monitoring plan (Land Management Plan, Appendix 4). This monitoring could occur outside of the forest plan revision process. Goal FW-GL-WTR-02 encourages the Nez Perce-Clearwater to build and maintain partnerships to fund and implement projects that result in improved water quality and watershed and stream conditions.

Within the monitoring plan, a commenter asked what “WIT” stands for. WIT is an acronym for “Watershed Improvement Tracking.” It is a forest service database that is used to manage watershed improvement accomplishments, funding, observations, and planning details about sites that have been improved or restored or are proposed for restoration for the benefit of watershed, wildlife, and aquatic ecosystems health and function.

Commenters requested that FW-DC-WTR-11 be added to the list of plan components that are monitored. Plan component FW-DC-WTR-11 was added to the monitoring plan (Land Management Plan, Appendix 3) and would be addressed under the monitoring question MON-WTR-04.

Another commenter recommended that in order to improve watershed health, it needs to be monitored. Land Management Plan, Appendix 3 includes 12 monitoring elements for water and aquatic resources, two monitoring elements for watershed condition networks, and four elements for riparian management zones.

Commenters asked how a change in the hydrologic connectivity of the road system and stream channel network will be measured in relation to FW-STD-CWN-02. Because the plan component pertained to roads both in and outside of the conservation watershed network, FW-STD-CWN-02, was moved to the infrastructure section. The standard is now labeled FW-STD-ARINF-07. A management approach for Road and Stream Hydrologic Connectivity was added to Land Management Plan, Appendix 4 to better describe the intent of the plan component and to provide possible methods and tools to measure hydrologic connectivity of the road system and stream channel network. For example, number of actions implemented; miles of road improved by adding drainage structures or miles of road relocated or decommissioned; or amount of reduced sediment delivery to streams as estimated by models, such as WEPP, GRAIP, or GRAIP Lite.

A Commenter suggested adding Species of Conservation Concern to the wording of plan component FW-STD-CWN-02 (re-labeled FW-STD-ARINF-07). Although the Forest did not add Species of Conservation Concern to the wording of the plan component, Species of Conservation Concern were used in the criteria to determine the Conservation Watershed Network. The FEIS, Appendix K describes the criteria for determining watersheds that were included in the Conservation Watershed Network.

Commenters were concerned that FW-DC-ARINF-01 only addresses how to lessen impacts of roads being built, not actually reducing the amount of roads constructed. This desired condition doesn't address reducing road mileage, and road mileage is what impacts wildlife and fisheries. For the purposes of the land management planning regulation at 36 CFR part 219, a desired condition is a description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. The Land Management Plan desired condition for roads is that the transportation system has minimal impacts on aquatic and riparian conditions through reduced hydrologic connectivity of roads to streams, lower sediment delivery to streams, reduced road impact to floodplains, and improved aquatic organism passage, where transportation infrastructure affects these features (FW-DC-ARINF-01). To move towards this desired

condition, the Land Management Plan includes objective FW-OBJ-INF-01 to complete 600 miles of road work, such as reconstruction; re-routing; road improvements; decommissioning; or placing roads in intermittent stored service, every 5 years. Priorities shall include reducing effects on desired aquatic and riparian conditions from chronic sediment delivery or potential future road prism failures, including previously decommissioned roads where drainage features have failed. Additionally, objective FW-OBJ-INF-02 aims to annually maintain 1,400 miles of operational maintenance level two through five roads under the Preferred Alternative and objective FW-OBJ-CWN-02 proposes stormproofing 10 to 20 percent of roads in Conservation Watershed Network areas prioritized for restoration every 5 years, as funding allows, to benefit threatened and endangered aquatic species.

Commenters requested that the Forest use data to address known problems in the revised forest plan, particularly for the upper North Fork Clearwater River. The FEIS Section Aquatic Ecosystems and Fisheries Streams has been updated with PIBO data from 2019, including information from the Upper North Fork Clearwater River.

Several commenters expressed concern about BMP effectiveness. Additional narrative regarding BMPs was added to the FEIS, Aquatic Ecosystems and Fisheries section and FEIS, Appendix K. Several commenters cited Edwards et al. 2016. to back up claims that BMPs are not effective or are not expected to be effective in the future. See the response to comments for Aquatic systems-Water quality for discussion related to BMP effectiveness.

Some commenters were concerned about climate change and the effects of climate on BMP effectiveness. While it is hard to predict exactly how climate effects will occur over the life of the plan, since their inception, BMPs have been evolving toward a higher level of effectiveness. BMPs are constantly being reviewed and refined, and at this point, the Forest Service has over 30 years of monitoring data that informed the current language in BMPs. If conditions change in the future, and the measures are deemed to be inadequate, then adjustments to techniques or plan amendments will be made as deemed appropriate using the best available science at that time. At this present time, the best available science has been considered on both climate change effects and BMP use, and incorporated into the plan.

Concern 3: Aquatic Ecosystems – Water Resources

Because they benefit water quality, Wild and Scenic Rivers should be evaluated, wetlands should be protected, and beaver habitat suitability should be assessed. The plan components that support water quality should be clearly defined standards and not guidelines.

Letter #	Comment #	Letter #	Comment #
717	182	1052	47, 48, 49
805	46	1060	98, 99, 100, 107, 109, 165, 172
877	270	17348	11

Response to comment

Some commenters felt that certain guidelines should be changed to standards, because of a perceived higher level of certainty that they associated with standards. The planning regulations define the required plan components, desired conditions, objectives, standards, guidelines, and suitability of lands at 36 CFR 219.7(e)(1). As required by the planning regulations at 36 CFR 219.15 and as incorporated by the plan, both standards and guidelines have mandatory project and activity consistency requirements. Consistency with a standard is determined by strict adherence to the specific terms of the standard, while consistency

with a guideline allows for either strict adherence to the terms of the guideline, or deviation from the specific terms of the guideline if the purpose for which the guideline was included in the plan is met at the project level (FSH 1909.15, chapter 22). This approach to guidelines allows for flexibility as circumstances warrant; for example, when there is more than one way to achieve the intended purpose, or new information provides a better way to meet the purpose, without lessening protections. Thus, both standards and guidelines provide certainty in terms constraining management activities to address a resource risk or stressor. In some cases where guidelines have exceptions, the agency preserves flexibility where it feels it is warranted, and maintains a high level of certainty in terms of constraint of detrimental activities. In other cases, Forest Service authorities are limited by law or regulation (e.g., General Mining Act of 1872). Changing guidelines to standards could also add unnecessarily restrictions on potential beneficial activities, such as riparian and instream restoration.

Guideline FW-GDL-WTR-01 in the Draft forest plan was moved to a standard and is now standard FW-STD-WTR-06. It specifies that management activities in watersheds with approved total maximum daily loads shall be designed to comply with the total maximum daily load allocations following project implementation.

A commenter recommended that FW-STD-WTR-04 should be edited to make clear that the sentence beginning with “Short term adverse effects...” represents a specific exception to the standard itself. This sentence should not be construed as a basis for circumventing other Plan language or federal law regarding adverse effects to wildlife or plant species or their habitats. The “shall be minimized” language has been removed from the plan component to address this comment. Two management approaches are including in the Land Management Plan, Appendix 4 to clarify the intent of the plan component and offer potential strategies to assess conditions, develop appropriate restoration activities, and determine consistency with the plan component.

Commenters requested the definition of the following terms and asked that the data used to place watersheds into these categories "functioning properly", "functioning at risk," and "impaired" be discussed. How are these terms used to inform land management practices? And why are they qualitative and not quantitative? Please add quantitative limits to each category. The Watershed Condition Framework (U.S. Department of Agriculture 2011b) is a consistent nationwide approach to watershed restoration, which is conducted holistically at the subwatershed (HUC12) scale, typically 10,000 to 40,000 acres. The watershed condition classification process (Potyondy and Geier 2011) is one of the steps included in the Watershed Condition Framework and is a methodology that characterizes watershed condition based on qualitative and quantitative indicators and attributes related to watershed processes. Subwatersheds are ranked in one of three discrete classes that reflect the level of watershed health or integrity (Potyondy and Geier 2011). Watersheds with high integrity are in an unimpaired condition in which ecosystems show little or no influence from human actions (Lackey 2001). Within this context, the three watershed condition classes are directly related to the degree or level of watershed functionality or integrity: functioning properly (Class 1), functioning at risk (Class 2), and impaired function (Class 3). The Watershed Condition Framework (U.S. Department of Agriculture 2011b) characterizes a watershed in good condition as one that is functioning in a manner similar to natural wildland conditions (Karr and Chu 1999, Lackey 2001). This characterization should not be interpreted to mean that managed watersheds cannot be in good condition. A watershed is considered to be functioning properly if the physical attributes are adequate to maintain or improve biological integrity. This consideration implies that a Class 1 watershed that is functioning properly has minimal undesirable human impact on its natural, physical, or biological processes, and it is resilient and able to recover to the desired condition when disturbed by large natural disturbances or land management activities (Yount and Niemi 1990). By contrast, a Class 3 watershed has impaired function because some physical, hydrological, or biological

threshold has been exceeded. Substantial changes to the factors that caused the degraded state are commonly needed to set them on a trend or trajectory of improving conditions that sustain physical, hydrological, and biological integrity. The classification of watersheds helps land managers identify WCF priority watersheds and develop essential projects in watershed restoration action plans. The FEIS, Appendix K provides more information on Watershed Condition Framework and outlines the attributes used in the rating of watershed condition class and the current existing condition of watersheds on the Nez Perce-Clearwater.

Commenters suggested that beaver habitat suitability should be assessed, efforts to increase beaver populations in underutilized areas should be prioritized, and Beaver Dam Analogues should be employed as a technique to achieve some of the benefits of natural beaver activity. The Land Management Plan acknowledges that beavers have ecological benefits and encourages beaver presence on the Nez Perce-Clearwater. A goal has been added to the Land Management Plan to work with partners to improve habitat, increase resiliency, and enhance ecological integrity by improving habitat for beaver where appropriate (FW-GL-WTR-03). Language was added to plan component FW-OBJ-RMZ-01 to include “beaver dam analogs” as an example of treatment to improve riparian habitat. Language was added to plan component FW-OBJ-WTR-02 to include “beaver dam analogs” as an example of an activity to enhance or restore stream habitat. The desired condition FW-DC-WTR-09 for beavers remains the same as the draft forest plan. It encourages beavers to be present in watersheds where their activities benefit ground water, surface water, and aquatic habitat complexity, and where their activities support conservation and recovery of imperiled aquatic species.

The FEIS, Water Resources section identified reintroducing or supplementing beaver into suitable habitats within their former range Restoration needs on the Nez Perce-Clearwater. Increasingly, restoration practitioners are using beavers to accomplish stream, wetland, and floodplain restoration (Castro et al. 2018). Beaver populations have declined across much of the Nez Perce-Clearwater, primarily due to heavy trapping in the 1800s. More recently, decline is due to a combination of factors including reductions in herbaceous and woody vegetation, direct removal of animals, trapping, livestock grazing impacts, roads located in riparian areas, and other human activities. Under the prolonged absence of fire, some riparian areas have converted more towards coniferous tree species and away from the aspen, cottonwood, poplar, and willow species preferred by beavers.

The Land Management Plan includes desired conditions and objectives to improve riparian vegetation. Plan components FW-DC-TE-05 and FW-DC-GS-04 describe desired conditions for riparian and wetland vegetation and plan components FW-DC-RMZ-01 and FW-DC-RMZ-02 outline desired conditions riparian management zones. Objectives specific to riparian area vegetation include improving 300 to 700 acres of riparian habitat every 5 years (FW-OBJ-RMZ-01); restoring hardwood species or allow disturbance processes, such as fire or other disturbance, on 3,000 to 4,200 acres of riparian areas every 5 years (FW-OBJ-TE-01); and maintaining existing meadows and grasslands by reducing conifer encroachment into meadows and grasslands on 500 acres every 5 years (FW-OBJ-GS-01). The Management Approach for Riparian Management Zones (Land Management Plan, Appendix 4) recommends using a variety of tools, including the Beaver Restoration Analysis Tool (BRAT), when developing projects to restore vegetation conditions in riparian management zones. Additional information on beavers and restoring beaver habitat was added to the FEIS Water Resources, Aquatic Ecosystems and Fisheries, and Wildlife sections.

Commenters requested that a monitoring question or indicator for beaver presence be included in the monitoring program, perhaps by designating beaver as a focal species for monitoring. Although considered as a focal species, American beaver was not added to the focal species list. Focal Species are a

small subset of species whose status permits inference to the integrity of the larger ecological system to which it belongs and provides meaningful information regarding the effectiveness of the plan in maintaining or restoring the ecological conditions to maintain the diversity of plant and animal communities in the plan area. Beaver were considered as a focal species to provide inference for hardwood communities in riparian areas and wetlands. Due to the fact it is still legal to trap beavers and because beaver sometimes establish themselves in areas where they cause damage to infrastructure or are a safety concern, beaver were not included as a focal species. To acknowledge that beavers have ecological benefits and to encourage beaver presence on the Nez Perce-Clearwater a goal was added to the Land Management Plan to work with partners to improve habitat, increase resiliency, and enhance ecological integrity by improving habitat for beaver where appropriate (FW-GL-WTR-03). Monitoring beaver presence or absence and manipulation of beaver populations (and wildlife populations in general) is a function of state fish and wildlife agencies. Although the Forest Service does not monitor beaver presence, beaver habitat is included in the monitoring plan. MON-RMZ-01 includes indicators for measuring restoration including beaver dam analogs.

Commenters suggest that management approaches use the word “should” rather than “could”. Optional plan content in a revised plan can include potential management approaches or strategies and partnership opportunities or coordination activities (36 CFR 219.7(f)(2)). Potential management approaches and strategies presented in Land Management Plan, Appendix 4 may include suggestions for on-the-ground implementation, analysis, assessment, inventory, or monitoring, as well as partnership and coordination opportunities the Nez Perce-Clearwater is suggesting might be helpful in achieving its desired conditions. The potential approaches and strategies are not intended to be all-inclusive, nor are they commitments to perform specific actions. The types of actions that are exemplified in Appendix 4 do not commit the Nez Perce-Clearwater to perform or permit these actions but are provided as actions that would likely be consistent with plan components and that might be undertaken to maintain or move towards the desired conditions and objectives. Management approaches, as found in Appendix 4, can change as new best available science becomes available.

Commenters suggested that more analysis be completed on Federal Wild and Scenic and State Wild and Scenic Minimum Stream Flow water rights. Additional analysis has been included in the FEIS, Water Resources section to better describe water rights for designated wild and scenic rivers. In summary, regulation ensures that water quality is maintained and, where possible, enhanced, and minimum flows are reserved to maintain a designated river’s social and ecological values. Water rights are regulated in wild and scenic river drainages. All surface water rights, and ground water rights diverted from sources hydraulically connected to the wild and scenic river reaches upstream from the ending points are recorded, tracked, and administered as anticipated under the provisions of the Wild and Scenic Agreement. The area hydraulically connected to the wild and scenic river reaches covers 2,112,767 acres, or 52 percent of Nez Perce-Clearwater lands.

Additional information was also added to FEIS, Appendix K that better explains water rights for designated wild and scenic rivers. Section 13(c) of the Wild and Scenic Rivers Act expressly reserves the quantity of water necessary to protect river values, including water quality and flow-dependent outstandingly remarkable values, to achieve the purposes of the Act. This reservation of water is called a federal reserved water right and is generally adjudicated in a state court (e.g., basin-wide adjudication). The designation does not supersede existing, valid water rights and establishes a priority date coincident with the river's date of designation into the National Wild and Scenic Rivers System. The priority date is the date when the water right was established, and it determines who gets water when there is a shortage. If there is not enough water available to satisfy all of the water rights, then the oldest (or senior) water

rights are satisfied first and so on (in order) until there is no water left. When there is not enough water to satisfy all the water rights, new (or junior) water rights holders do not get water.

Also, a table was added to FEIS, Appendix K that identifies active decreed water rights for minimum instream flow for wild and scenic rivers on the Nez Perce-Clearwater. For each of the designated wild and scenic rivers the federal reserved water rights and stream flow amount are identified, as well as the associated stream name (tributary to wild and scenic river) and State of Idaho reserved water rights. In summary, information concerning water rights was updated in the FEIS and appendices to ensure that those documents contain the most up-to-date and accurate information.

Commenters expressed concern that the DEIS water resources section did not provide an analysis on the effects of Wild and Scenic suitable or eligible rivers on water resources, or a comparison of alternatives. Narrative, including a comparison of alternatives, was added to the Effects to Water Resources from the Management of Other Resources in the FEIS Water Resources section. In summary, for all action alternatives, identifying segments of rivers and streams that are eligible or suitable for wild and scenic river designation provide beneficial effects to water resources. Rivers found to be eligible or suitable for wild and scenic river inclusion would be managed to protect the river-related outstandingly remarkable values identified for the river and protect the free-flowing nature and quality of the water. These protection measures would be maintained until a decision is made on the future use of the river and adjacent lands through an Act of Congress or a determination that the river is not suitable for inclusion. Wild and scenic rivers are bounded by a corridor that extends one-quarter mile on each side of the river segment, measured from the high-water mark. Wild and scenic river designation in the future could offer additional water resource benefits, such as the establishment of non-consumptive minimum stream flow water rights.

A commenter requested that RMZ widths be adjusted so that Category 3 protections be given to all wetlands greater than 0.5 acres, rather than greater than 1.0 acres. The Riparian Management Zone (RMZ) widths for wetlands were determined based on the proportional size of the wetland. A wetland of one acre is approximately 200 feet by 200 feet. The riparian management zone would extend 100 feet from the edge of the wetland. An RMZ that extends the protection an additional 100 feet should be sufficient for wetlands less than one acre in size. The riparian habitat conservation area widths for wetlands under the 1987 forest plans, as amended by PACFISH/INFISH are the same as those for the RMZ widths in the revised Land Management Plan. Project analysis could determine that RMZ widths for a particular wetland should be increased, based on site-specific conditions at the project level.

A commenter recommend that the Final EIS include information to clarify that where discharges of biological and chemical pesticides would leave residues in waters of the United States, then a National Pollutant Discharge Elimination System permit will be obtained for the activities in compliance with Section 301(a) of the Clean Water Act. As discussed in FEIS, Water Resources section, effects from herbicide application depend on the type, extent, and amount of herbicide that is used, the proximity to a stream or wetland, the ratio of surface area to volume of a stream, and whether transport from the site is runoff or infiltration controlled. Adverse impacts to water resources are controlled through limits on herbicide type and application rates outlined in various NEPA documents. Where discharges of biological and chemical herbicides would leave residues in waters of the United States, a National Pollutant Discharge Elimination System permit would need to be obtained for those activities in order to comply with Section 301(a) of the Clean Water Act. Although most of the risk to water quality from chemical application may be reduced by applying best management practices, they cannot be eliminated. The proposed Land Management Plan includes specific directions for invasive weed treatment in and around riparian management zones to protect water quality (FW-STD-RMZ-03). The Land Management Plan,

Appendix 4 includes a management approach for invasive species and one for water quality and both include guidance for obtaining a National Pollutant Discharge Elimination System permit for those activities where discharges of biological and chemical herbicides would leave residues in waters of the United States, in order to comply with Section 301(a) of the Clean Water Act. The Land Management Plan also includes a guideline that specifies for new or reconstructed groundwater use developments such as recreation and administrative sites, drinking water wells, or wastewater facilities should not Discharge pollutants directly to surface water or groundwater unless covered by a National Pollutant Discharge Elimination System permit (FW-GDL-WTR-05).

Concern 1: Aquatic Ecosystems – Municipal Watersheds and Source Water Protection Areas

The Forest Service should protect drinking water sources, increase stream buffers, protect all water sources, and create management allocations for surrounding communities.

Letter #	Comment #
307	27
1060	58, 59, 60, 51
17348	6

Response to comment

Commenters expressed concern for groundwater dependent ecosystems and that certain management activities be reduced or not permitted near water. The 2012 Planning Rule requires plan components to establish widths for riparian management zones around all lakes, perennial and intermittent streams, and open water wetlands, giving special attention to land and vegetation for approximately 100 feet from the edges of all perennial streams and lakes 36 CFR 219.8(a)(3)(ii). The Rule also requires plan components “ensure that no management practices causing detrimental changes in water temperature or chemical composition, blockages of water courses, or deposits of sediment that seriously and adversely affect water conditions or fish habitat shall be permitted within the riparian management zones or the site-specific delineated riparian areas” (36 CFR 219.8(a)(3)(ii)). The Land Management Plan includes desired conditions, objectives, standards, and standards for riparian management zones. Riparian management zones are not intended as exclusion areas or reserves. Instead, management activities designed to benefit aquatic and riparian-dependent resources and move the landscape towards desired conditions are allowed and encouraged within them. Plan component FW-STD-RMZ-07 establishes default riparian management zone widths that can contain both upland and riparian vegetation. Although the default riparian management areas widths are uniform, the management of them is not intended to be.

Some commenters questioned how public water could come out as only "moderate" (Forests to Faucets project) importance. The Forests to Faucets 2.0 assessment identified HUC12 watersheds in the United States that are most important to surface drinking water sources. Watersheds on the Nez Perce-Clearwater have a moderate importance for the delivery of surface drinking water supplies from waters originating on the Forests (Mack et al. 2021). Because this was a nationwide assessment, watersheds that ranked higher were for those providing water to larger population centers.

A commenter requested that additional information on the status of source water protection areas be included in the FEIS. This requested information was added to FEIS, Appendix K. Approximately 73,490 acres of the Nez Perce-Clearwater are delineated as source water protection areas for surface water intakes and 6,440 acres are delineated as source water protection areas for groundwater intakes. Appendix K, Source Water Protection Areas section outlines the source water protection areas occurring on the Nez

Perce-Clearwater that have source water protection assessments and the population amount served by the public water system. There are 13 public water systems that have surface water intakes located on Nez Perce-Clearwater lands or have surface water source water protection areas that extend onto Forest lands as delineated in the source water assessments. These public water systems serve approximately 22,650 people. There are 28 public water systems withdrawing groundwater from wells and springs within Nez Perce-Clearwater lands or have groundwater source water protection areas that extend onto Forest lands as delineated in the source water assessments. These public water systems serve approximately 6,240 people. The FEIS, Appendix K also identifies the communities with formalized source water protection plans established with the Idaho Department of Environmental Quality.

A commenter requested additional information regarding municipal watersheds be added to the Water Resources Analysis and that separate management allocation was warranted to help protect streams as public drinking water for particular communities. Direction for management of National Forest System watersheds that supply municipal water is provided in 36 CFR 251.9 and Forest Service Manual 2542. The Forest Service is directed to manage watershed lands for multiple uses while recognizing domestic supply needs. Municipalities may apply to the Forest Service for municipal watershed agreements if they desire protective actions or restrictive measures to protect municipal water supplies not specified in the Forest Plan. Formal written agreements to ensure protection of water supplies may be appropriate when multiple use management fails to meet the needs of a water user.

Additional discussion regarding municipal watersheds was added to the FEIS Water Resources, No Action Alternative section. The Nez Perce Forest Plan included designated management areas for Wall Creek Municipal Watershed and Elk Creek Municipal Watershed. The Wall Creek Municipal Watershed provided water for domestic use to the town of Clearwater, Idaho. The instream water reservoir and intake is no longer active and the city obtains its water from groundwater wells (PWS # ID2250011). The Elk Creek Municipal Watershed provided water for domestic use to the town of Elk City, Idaho. There is no official Municipal Watershed Management Plan on record between Elk City and the Nez Perce National Forest. The existing Clearwater Forest Plan did not have a designated management area for municipal watersheds, but the Clearwater acknowledged that the town of Elk River depended on Elk Creek for public water supply.

The Planning Rule (36 CFR 219.8(a)(2)(iv)) requires that a plan include plan components to maintain or restore water resources in the plan area, including ground water; public water supplies; source water protection areas; and other sources of drinking water, including guidance to prevent or mitigate detrimental changes in water quantity, quality, and availability. It also requires that a plan include plan components for integrated resource management to provide for ecosystem services and multiple use [including watershed] (36 CFR 219.10(a)), considering riparian areas and surface and subsurface water quality (§219.10(a)(1)) and public water supplies and associated water quality (§219.10(a)(9)). Water draining off the Nez Perce-Clearwater is often used for drinking water supplies. Municipal watersheds and source water protection areas are two separate constructs for drinking water protection that are applicable to National Forest System land management. Municipalities may apply to the Forest Service for municipal watershed agreements if they desire protective actions or restrictive measures not specified in the Land Management Plan. Formal written agreements to ensure protection of water supplies may be appropriate when multiple use management fails to meet the needs of a water user. Although there are currently no municipal watershed agreements established for watersheds on the Nez Perce-Clearwater, agreements could be developed in the future. Source water protection areas, as delineated by the Idaho Department of Environmental Quality, protect public water systems from contamination in accordance with the 1996 amendments to the Safe Drinking Water Act. Approximately 73,490 acres of the Nez Perce-

Clearwater are delineated as source water protection areas for surface water intakes and 6,440 acres are delineated as source water protection areas for groundwater intakes.

The Land Management Plan does not allocate designated area for municipal watersheds, but does include plan components that protect public water supplies. The desired condition for municipal water supplies and source water protection areas is that lands that contribute to municipal watersheds and source water protection areas are in a condition that contributes to consistent delivery of clean water and meets or exceeds State of Idaho water quality standards (FW-DC-MWTR-01). To help trend towards this desired condition, standard FW-STD-MWTR-01 requires management activities conducted in source water protection areas to be consistent with source water protections and goals. Short-term effects from activities in source water protection areas may be acceptable when those activities support long-term benefits to water quality. Best management practices would be implemented with all management activities having the potential to affect water quality (FW-STD-WTR-02). A potential management approach is included in Land Management Plan, Appendix 4 for Municipal Watersheds and Source Water Protection Areas. The Land Management Plan, Appendix 3 includes a monitoring element for municipal watersheds and source water protection areas (MON-MWTR-01).

A section was added to FEIS, Appendix K that speaks directly to municipal watersheds. Although there are currently no formal municipal watershed agreements established for watersheds on the Nez Perce-Clearwater, agreements could be developed in the future. Forest Service Manual 2542.03 states that Forests should “identify watersheds providing the principal source of community water during land management planning.” A section was added to FEIS, Appendix K that speaks directly to municipal watersheds. The Nez Perce-Clearwater provides the principal source (greater than 40 percent) of community water for the cities of Elk River, Elk City, and Pierce. The water supply for those communities would be managed as source water protection areas until such a time that a formal municipal watershed agreement with the Forest Service is made. The City of Elk River (Idaho Rural Water Association 2008) and Elk City Water and Sewer Association (Idaho Department of Environmental Quality 2017) have formalized source water protection plans established with the Idaho Department of Environmental Quality.

Commenters requested how Best Management Practices get incorporated into land management planning and project implementation and asked where the BMPs show up as being implemented for each watershed. Best management practices for water quality, often referred to as “BMPs”, are methods, measures, or practices used to meet nonpoint source control needs as directed by the Clean Water Act. Best management practices can be applied before, during, and after pollution-producing activities to reduce or eliminate the introduction of pollutants into receiving waters (36 CFR 219.19). The National Best Management Practices Program is guided by the land management planning regulation 36 CFR 219.8 (a)(4), which requires the Chief of the Forest Service to establish requirements for National best management practices for water quality in the Forest Service Directive System. These requirements, and associated program direction, are outlined in Forest Service Handbook 2509.19, Chapter 10 National Core Best Management Practices and Forest Service Manual 2500, Chapter 30, Section 2532 Water Quality Management.

The National Core Best Management Practices (BMP) Technical Guide (U.S. Department of Agriculture 2012a) provides a standard set of core best management practices and a consistent means to track and document the use and effectiveness of best management practices on National Forest System lands. As described in FEIS, Appendix K and Land Management Plan, Appendix 4, best management practices utilized on the Nez Perce-Clearwater come from federal and state direction and the use of best management practices is the primary mechanism for mitigating impacts to resources from land

management actions. Best management practices specific to a particular activity or potential impact would be identified during project planning and included as project design criteria or included as provisions in contracts for implementing the project.

The Land Management Plan ensures implementation of national best management practices for water quality (36 CFR 219.8 (a)(4)) through standard FW-STD-WTR-02, which requires project-specific best management practices, including both federal and state BMPs, to be incorporated into project planning as a principal mechanism for controlling non-point pollution sources, to meet soil and watershed desired conditions, and to protect beneficial uses. Land Management Plan, Appendix 3 includes a monitoring element for standard FW-STD-WTR-02 to determine if appropriate BMPs are incorporated in project decision documents (MON-WTR-08).

Concern 2: Aquatic Ecosystems – Municipal Watersheds and Source Water Protection Areas

The Forest Service should increase monitoring to include chemical and physical characteristics of drinking water sources. It should also disclose municipal watersheds that it manages and how they would meet the needs of users.

Letter #	Comment #
307	160
17348	4, 7

Response to comment

A commenter requested that additional water quality measures be added to the monitoring plan. The following measures were added to monitoring element MON-MWTR -01 in the Monitoring Plan (Land Management Plan, Appendix 3): number and locations of stream reaches by subbasin listed as impaired in the IDEQ 303(d)/305(b) integrated report within source water protection areas; miles of 303(d) listed waters within source water protection areas; and miles of waters under an approved total maximum daily load (TMDL) plan within source water protection areas.

Commenters recommended that the Water Resources analysis describe the protections that are expected in municipal watersheds and source water protection areas under the Land Management Plan. The Planning Rule (36 CFR 219.8(a)(2)(iv)) requires that a plan include plan components to maintain or restore water resources in the plan area, including ground water; public water supplies; source water protection areas; and other sources of drinking water, including guidance to prevent or mitigate detrimental changes in water quantity, quality, and availability. It also requires that a plan include plan components for integrated resource management to provide for ecosystem services and multiple use [including watershed] (36 CFR 219.10(a)), considering riparian areas and surface and subsurface water quality (§219.10(a)(1)) and public water supplies and associated water quality (§219.10(a)(9)). The Land Management Plan includes numerous plan components that provide for the maintenance or restoration of water resources. These plan components can be found primarily in the Aquatic Ecosystems section of the Plan. Plan components directly related to public water supplies can be found in the Municipal Watersheds and Source Water Protection Areas section of the Plan. The FEIS Water Resources section explains each of these plan components and describes how they would maintain or restore water resources. A section was added to FEIS, Appendix K that speaks directly to municipal watersheds and source water protection areas. A potential management approach is included in Land Management Plan, Appendix 4 for Municipal Watersheds and Source Water Protection Areas and offers strategies for assessing impacts to source water

protection areas from land management activities and offers methods to protect source water protection areas.

Commenters recommend that the Water Resources analysis describe how much of a source water protection area is under the NFS control. Additional information was added to FEIS, Appendix K. Source water protection areas occur within 57 subwatersheds. A table was added that lists each of the 57 subwatersheds and shows the percent of source water protection area that occurs within the Nez Perce-Clearwater portion of a particular HUC12.

A commenter expressed concern with wording in desired condition FW-DC-MWTR-01. The phrase "meets the supply need of users" was removed from the Land Management Plan as the forest is not in a position to control the amount of water available from natural sources such as springs or precipitation. The revised plan component now reads, "Lands that contribute to municipal watersheds and source water protection areas are in a condition that contributes to consistent delivery of clean water and meets or exceeds State of Idaho water quality standards" (FW-DC-MWTR-01).

At-Risk Plant Species

Concern 1 – Terrestrial Ecosystems-At-Risk Plant Species

In Management Area 3, the Forest Service should support management flexibility and not select vegetation species that would be protected under the Endangered Species Act. Plan components should support at risk species by conserving and maintaining habitat.

Letter #	Comment #
307	127
805	12
1060	75, 118

Response to comment

There are 30 plants on the list of species of conservation concern. These species were identified to be species of conservation concern because they met one of the categories outlined in the final planning directives at FSH 1909.12, chapter 10, section 12.52 and plan components were developed to maintain viable population of these plant species. In order for a species to be considered for conservation concern, it cannot be federally listed under the Endangered Species Act. The land allocation is not a consideration for identifying species of conservation concern.

Concern 2 – Terrestrial Ecosystems-At-Risk Plant Species

The Forest Service should seek to maintain viable populations of at-risk plant species in the face of climate change and non-native pollinators. Surveys for at risk species should be conducted before disturbance activities are authorized.

Letter #	Comment #
877	359-362
1060	72

Response to comment

Direction related to supporting a full suite of native plant species in terrestrial ecosystems is designed to provide for ecological integrity and sustainability. Plan components to support viable populations of plants include desired conditions, objectives, guidelines, and a standard. There are 30 plants on the list of species of conservation concern. These species were identified to be species of conservation concern because they met one of the categories outlined in the final planning directives at FSH 1909.12, chapter 10, section 12.52 and plan components were developed to maintain viable population of these plant species. Once the revised land management plan is implemented, species of conservation concern would be identified in project planning areas and effects from proposed actions would be disclosed in site-specific NEPA documentation.

Best Available Scientific Data

Concern 1:

The Forest Service should review other literature and incorporate the best available science for the resources analyzed in the Draft EIS.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
5	2	563	2	1067	2, 3, 7
68	1	567	23	17462	6
92	1	877	55, 56, 161	17876	1
307	44, 76	953	1	17916	1, 41, 42, 53, 56, 58, 59, 60, 64, 65, 67, 70, 73, 74, 75, 76, 77, 80, 83, 107

Response to comment

To ensure that the revised plan helps contribute to sustainable stewardship of the nation’s forests, the Nez Perce-Clearwater has used the best available scientific information to inform the 2014 Assessment and the development of the proposed plan components.

Specialists used multiple resources that included peer-reviewed and technical literature; databases and data management systems; modeling tools and approaches; information obtained via participation and attendance at scientific conferences; local information, workshops, and collaborations; and information received during public participation periods for related planning activities. Resource specialists considered what is most accurate, reliable, and relevant in their use of the best available scientific information. The citations in Chapter 3 (and corresponding References/Literature Cited), as well as additional data stored in the project record, serve as the Nez Perce-Clearwater’s initial list of best available scientific information. Scientific literature submitted by commenters has been assessed and these considerations are located in the project record. A final determination of best available scientific information will be made with the Record of Decision.

Concern 2:

Some of the models and analysis methods used in the Draft EIS are outdated or inconsistent with other studies; the Forest Service should review them for best available science and acknowledge any uncertainties.

Letter #	Comment #
49	3
307	34, 53, 74, 75, 100
877	45, 57
17916	61, 66, 68, 72, 81, 84

Response to comment

Resource specialists considered what is most accurate, reliable, and relevant in their use of the best available scientific information for use of modeling tools. Some resource analyses did update models and this change is disclosed within the applicable resource section of Chapter 3 in the final EIS.

Concern 3:

The Forest Service should conduct a science consistency review to ensure that the best available science is used in the Final EIS and revised Forest Plan.

Letter #	Comment #
877	47, 48, 49, 50, 52, 53, 59
1060	31

Response to comment

A final determination of best available scientific information will be made with the Record of Decision. Resource specialists considered what is most accurate, reliable, and relevant in their use of the best available scientific information. Scientific literature submitted by commenters has been assessed and these considerations are located in the project record.

Concern 4:

The Forest Service should acknowledge the importance of best available science information in the Final EIS and revised Forest Plan and explain why the information is the most useful or valid, or both.

Letter #	Comment #
877	2, 67
1060	30

Response to comment

Chapter 1 of final EIS discloses that there is a need to incorporate new information and science into plan guidance. Scientific literature submitted by commenters has been assessed and these considerations are located in the project record.

Canada Lynx

Concern 1:

The Forest Service should recognize the sensitivity of lynx winter habitat by reducing clearcutting and other disturbances in those areas. Structural components of denning habitat should be accounted for by requiring down logs to be of sufficient diameter. Other standards and guidelines that support lynx habitat should be strengthened.

Letter #	Comment #
529	19
587	21
805	61
877	446, 447, 457, 460, 461
17673	37, 39, 40

Response to comment

A majority of lynx habitat is protected from roads and vegetation management. Only 17 percent is affected by potential vegetation management. Lynx are a rare occurrence on the forest with very limited documented sightings.

The forest plan is compliant with and requires the strict adherence to the Northern Rockies Lynx Management Direction (U.S. Department of Agriculture 2007b) and Record of Decision (U.S. Department of Agriculture 2007a) which has guidance for protecting winter and denning habitat.

Satellite imagery is poor at detecting the dense horizontal cover that provides snowshoe hare habitat in a multistory forest structure, which is an important feature of lynx foraging habitat, and downed woody material for denning habitat. Therefore, no forest wide estimates were made for these components of lynx habitat. During site-specific planning, habitat types used for the modeling and mapping of lynx habitat are verified and refined and lynx habitat is further characterized to estimate the amount and distribution of foraging and denning habitat components.

Concern 2:

To comply with the Endangered Species Act, the Forest Service should recognize habitat that lynx inhabit and not just where there has been evidence of reproduction. In consideration of the Northern Rockies Lynx Management Direction, the Forest Service should provide for lynx linkage areas or areas for connectivity and should monitor those areas. It should analyze impacts on lynx under each alternative.

Letter #	Comment #
307	60, 145
805	59, 62, 64, 69
877	441-444, 448, 449, 456, 463
17688	1

Response to comment

The forest plan is compliant with the Endangered Species Habitat and the Northern Rockies Lynx Management Direction. Habitat connectivity for species such as lynx and grizzly bear is included in the forest plan components. Impacts to lynx are analyzed in the BA and FEIS for each alternative. Connectivity is also strengthened in the following plan components:

FW-DC-WL-09. Wide-ranging species are free to move across and between habitats, allowing for dispersal, migration, genetic interaction, and species recruitment.

MA2-GDL-WL-05. To maintain large areas of unfragmented habitat for wide-ranging species, such as elk and grizzly bear, new motorized trails open to the public should not be authorized in Idaho Roadless

Areas unless there are adjacent areas of 5,000 acres without open motorized system routes. This guideline does not apply to:

- Community Protection Zones (CPZs) as defined by the Idaho Roadless Rule.
- Areas with existing motorized access that are currently less than 5,000 acres.
- Existing trails that are relocated or reconstructed to mitigate negative impacts to ecological resources.

FW-GL-TE-01. The Nez Perce-Clearwater works with federal, state, tribal, and private land managers towards an all-lands approach through management and cooperation, including efforts to mitigate threats or stressors, provide for wildlife and fish habitat connectivity, and to provide social, economic, and ecological conditions that contribute to mutual objectives.

FW-DC-WTR-02. Spatial connectivity exists within or between watersheds. Lateral, longitudinal, and drainage network connections include floodplains, wetlands, upslope areas, headwater tributaries, and intact habitat refugia. These network connections provide chemically and physically unobstructed routes to areas critical for fulfilling life history requirements of aquatic, riparian-associated, and many upland species of plants and animals.

FW-DC-WL-03. The arrangement and distribution of vegetation patches is consistent with the natural range of variation and varies widely in size, shape, and structure to provide connectivity for native wildlife.

MA2-DC-RWILD-03. Recommended wilderness areas facilitate the connectivity and movement of wildlife species across the Nez Perce-Clearwater by remaining large areas with little human activity.

MA2-DC-IRA-03. Roadless areas contribute habitats for wide ranging species and connectivity for movement of wildlife. These areas also provide foraging, security, denning, and nesting habitat for wildlife.

Concern 3:

The Forest Service should expand the analysis of motorized vehicle use and roads on lynx habitat to include more information on the effects of motorized vehicle use, roads, snow compaction, and habitat fragmentation.

Letter #	Comment #
423	6
529	18
587	7, 13
717	152, 153
805	67, 68, 70,
877	418, 458, 459, 462
968	14, 15
17916	43-50, 52

Response to comment

The FEIS expanded on the analysis of roads and winter recreation. The FEIS includes information on potential impacts from snowmobile trails. The Northern Rockies Lynx Management Direction contains a guideline to not expand over-the-snow routes or play areas unless it would consolidate use and improve lynx habitat. Due to the Idaho Roadless Rule approximately 83% of lynx habitat on the forest is protected from disturbance due to new roads and vegetation management. The remaining 17% of habitat is managed for multiple uses. Table 227 contains a breakdown by alternative of motorized and non-motorized recreation effects on lynx habitat.

Concern 4:

The Forest Service should use the most current lynx conservation assessment and strategy. This is to ensure that the most relevant lynx information is included in the Final EIS.

Letter #	Comment #
805	78
1060	54, 149
17879	3

Response to comment

Comment noted. The best available science was used, including the most recent conservation assessment and strategy.

Concern 1: Draft Plan – Northern Rockies Lynx Management Direction (letter number 877, comments 450, 451, 452, 454, 455)

For Appendix 8, the Forest Service should review scientific literature to ensure that management of lynx habitat, in the context of timber management, is consistent with the most current studies and that management does not conflict with other scientific studies.

Response to comment

The most recent and best available science was included in the lynx analysis in the FEIS and the Biological Assessment. The FEIS reviewed and discussed the Best Available Scientific Information including Kosterman 2014, Kosterman 2018, Holbrook 2017, and Holbrook 2018.

Plan components in the NRLMD provide for the conservation of Canada lynx and their habitat. They are aligned with the conservation measures for vegetation management in core habitat listed in the 2013 Lynx Conservation and Assessment Strategy (Interagency Lynx Biology Team 2013) at the forestwide scale, considering exceptions allowed by the incidental take statement.

Concern 2: Draft Plan – Northern Rockies Lynx Management Direction (letter number 877, comments 450, 451, 452, 453, 454, 455)

Compared with the existing plan, there is less lynx suitable habitat than the Northern Rockies Lynx Management Direction previously assumed. The Forest Service should compare original estimates of range-wide Canada lynx suitable habitat with updated acreages, based on project-level changes and monitoring.

Response to comment

In 2014, as part of the Land Management Plan process, the mapped lynx habitat was revised to develop consistent mapping criteria across both the Nez Perce and Clearwater National Forests and to include the best available scientific information concerning lynx population dynamics, distribution, habitat use, competitor interactions, prey species, and human interactions that have become available since 2007. This mapping was also completed in coordination with the U.S. Fish and Wildlife Service and was based upon broad PVTs. This process resulted in the revised mapping of 78 lynx analysis units across the Nez Perce-Clearwater (U.S. Department of Agriculture 2014a). The revised lynx analysis units will be used to display the amount, relative quality, and distribution of lynx habitat across the Nez Perce-Clearwater. See the 2014 Nez Perce-Clearwater Forest Plan Assessment (U.S. Department of Agriculture 2014a) for more details on this and other aspects of the methodology and analysis process. This analysis and change in lynx analysis units is in line with guidance within the Northern Rockies Lynx Management Direction (NRLMD) with review and approval by regional staff.

After this mapping effort, the Nez Perce-Clearwater experienced large wildfires between 2015 and 2018. The amount of habitat currently unsuitable for lynx required updating to have an accurate accounting of effects and modeling with PRISM and SIMPPLLE. Therefore in 2018, the Nez Perce-Clearwater updated the habitat spatial data to update the amount of habitat currently unsuitable within lynx analysis units (Lutes 2019). The update consisted of using the Forest Service Activity Tracking System (FACTS) database to update areas currently unsuitable due harvest activities and updating the amount of habitat that changed from unsuitable to suitable as a result of forest aging and used burn severity data from sources, such as Rapid Assessment of Vegetative Condition after Wildfire (RAVG), Burned Acres Reflectance Classification (BARC), or Monitoring Trends in Burn Severity (MTBS), to identify areas of potential lynx habitat which burned at moderate to severe levels which were considered currently unsuitable for lynx. For more detailed information about the lynx habitat mapping process see the Nez Perce-Clearwater National Forest' Forest Plan Assessment (U.S. Department of Agriculture 2014a) and the U.S. Department of Agriculture's 2019 Lynx Habitat Mapping Update 2018 Process Steps (Lutes 2019).

In (2021) Olson and others developed a refined model of lynx habitat across the northwestern United States using environmental predictors and GPS data from lynx populations in Washington, Montana, and Wyoming. This model indicates high relative probability of lynx habitat on the Idaho and Montana sides of the Lolo Pass area, south of Powell in the Wind Lakes, Kooskookia Meadows, and Elk Summit Area. This habitat model is currently under review for use as a habitat analysis and management tool within the Northern Region. If adopted, lynx analysis unit boundaries may be re-delineated to better line up with the new model.

PRISM modeling was used to estimate forest growth, trends, and yield. The PRISM results were then run through SIMPPLLE to project out 50 years on how the Nez Perce-Clearwater will interact with wildfire, insects and disease, and vegetation management under the alternatives. The SIMPPLLE model is a spatially explicit model that uses logic pathways to predict how forests respond over time to succession, wildfires, and insect and disease risks based on cover types, size classes, crown closure, aspect, and slope (Chew et al. 2012). This model was used for assessments of the natural range of variation and the potential future consequences of alternatives. For the Final Environmental Impact Statement, SIMPPLLE model pathways and assumptions were updated to better reflect the northern Idaho climate, tree growth, dominance type behavior, and fire behavior. The updated models and assumptions provided improved estimates of the natural range of variability and vegetation and responses to management. The changes are described in the Forestlands section and appendices.

Climate Change and Forest Carbon

Concern 1: Climate Change Adaption Strategies (letter number 310, comment 7)

The Forest Service should recognize that the Idaho Roadless Rule reduces the effectiveness of the climate strategy because it restricts management in designated and recommended Wilderness areas.

Response to comment

Commenters had concerns that the Forest Service did not analyze or recognize that achieving the climate strategy is hindered in designated wilderness or recommended wilderness areas. They expressed that the Idaho Roadless Rule also restricts the ability to implement the climate strategy.

The U.S. Wilderness Act (U.S. Public Law 88–577, §2c) defines wilderness, in part, as ‘an area where the earth and its community of life are untrammelled’ and as an area ‘which is protected and managed so as to preserve its natural conditions’. Untrammelled is generally recognized as to minimize control, interference, or manipulation of the plants, animals, soils, water bodies, and natural processes. This does not necessarily mean absolute prohibition of management actions but requires serious consideration of precaution and a conservative approach to the impacts, methods, timing, duration, and spatial extent of proposed actions. Any future projects that propose ecological restoration in wilderness areas would be evaluated on a site-specific basis to ensure that all the proposed benefits and likely impacts are fully and fairly considered. Recognizing the impacts from climate change and other landscape stressors, land management agencies may look at implementing ecological restoration projects in wilderness areas. The article “Protected area stewardship in the Anthropocene: integrating science, law, and ethics to evaluate proposals for ecological restoration in wilderness” (Landres et al. 2020) outlines a framework to evaluate proposals for ecological restoration in wilderness areas. The framework helps identify the trade-offs and uncertainties regarding the benefits and risks of restoration in wilderness areas.

As required by the 2012 Planning Rule (36 CFR 219.8 (a)(1)(iv)), the Nez Perce-Clearwater did consider stressors, such as climate change, when developing integrated plan components and analyzing the potential effects of implementing the revised Land Management Plan. The Forest Service acknowledges that the amount and variety of tools available to manage landscapes in the face of climate change could be limited in designated wilderness, recommended wilderness, and Idaho Roadless Rule areas, but also recognizes that there are benefits those areas offer in aiding the ability of species and ecosystems to adapt to changing climates and conditions. For example, wolverine and their habitats are particularly vulnerable to climate change. Sensitive to the timing and duration of snow cover, research indicates that wolverine populations will likely become smaller and more fragmented in the future due to contiguous areas of spring snow cover becoming smaller and more isolated. Most of the wolverine habitat on the Nez Perce-Clearwater currently falls within either designated wilderness or Idaho Roadless Rule areas. Wolverine female denning habitat occurs in the Hoodoo and the Mallard Larkins recommended wilderness areas (Preferred Alternative). These areas provide habitat where the risk of human disturbance to wolverines is very low during the time period when females have dependent young.

Although the specific details of climate change effects on wilderness landscapes remain uncertain and highly variable from place to place, climate change could make wilderness and protected area stewardship more difficult. For example, the difficulty in managing ever increasing invasive plant species infestations and outbreaks of insects and disease. Under the Land Management Plan, the desired condition for recommended wilderness areas are characterized by a natural environment where ecological processes such as natural succession, wildfire, and insects and disease function with a limited amount of human influence. However, recommended wilderness is suitable for restoration activities where the outcomes

will protect the wilderness character of the area if the ecological and social characteristics that provide the basis for each area’s suitability for wilderness recommendation are preserved.

Since the release of the Draft Forest Plan and Draft EIS, the U.S. Department of Agriculture (USDA) and the Forest Service have developed climate adaptation plans. The USDA Action Plan for Climate Adaptation and Resilience was developed to respond to Executive Order 14008 outlines how the USDA will provide relevant information, tools, and resources to its stakeholders and target programs and activities to increase resilience to climate impacts (U.S. Department of Agriculture 2021). The Forest Service Climate Adaptation Plan FS-1196 presents a comprehensive approach to integrating climate change adaptation into the Forest Service’s operations and mission. The plan outlines key climate risks to the agency’s operations and critical adaptation actions to reduce these risks and help ensure the Forest Service continues to meet the needs of present and future generations (U.S. Department of Agriculture 2022a). The Nez Perce-Clearwater Land Management Plan includes management direction that directly aligns with the adaptation actions outlined in these adaptation plans.

Commenters expressed that the inability to actively manage portions of the Nez Perce-Clearwater would preclude the Forest from implementing the “climate strategy”. When assessing whether species and ecosystems require intervention to facilitate adaptation to climate change, potentially the best option is to leave the area alone. Although climate change threatens many of the values for which wilderness areas were designated, wilderness can often serve as a central component of a comprehensive response to climate change (Cole 2008).The large scale and long-term protection of wilderness provides one of the best and most economical opportunities to sustain biodiversity in the face of climate change. Designated and recommended wilderness areas can protect entire ecosystems and the wide range of environmental gradients necessary for species migration, dispersal, and viable populations as the climate changes.

Concern 1: Terrestrial Ecosystems – Climate Change

By stating that we are in a natural warming period, the Forest Service downplays and does not recognize the human origin and overwhelming evidence of climate change and its impacts on the National Forests' vegetation, wildlife, including special status species, and streamflow. The Forest Service should address beneficial and negative cumulative impacts of climate change.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
60	4	672	1	1099	5
153	1	747	2	3110	64
276	5	877	30, 106, 107, 108, 109	17304	1
455	2	946	5		
663	23	962	1		

Response to comment

Commenters expressed concern that the DEIS did not recognize the anthropogenic causes of climate change and that Forest Service should address climate change in the forest plan and analyze the cumulative impacts of climate change.

Interim Council on Environmental Quality guidance (2023) on NEPA and climate change recommends that federal agencies illustrate how climate change may impact proposed actions and alternatives, as well as consider adaptation actions that would make projects and affected communities more resilient to a changing climate. The FEIS identifies climate change as an issue underpinning the need for change. As

noted in the Purpose and Need for Change section in the FEIS, the current 1987 forest plans limit the pace and scale of restoration and are slow to respond to the challenges of changing conditions, such as climate change.

The FEIS Climate Change section acknowledges that human influence on the climate system is clear, and recent anthropogenic emissions of greenhouse gases are the highest in history (Intergovernmental Panel on Climate Change 2007). It also recognizes that the future climate has the potential to influence all resources. Natural variation in climate will continue, coupled with the effects of anthropogenic influences. The FEIS Climate Change section outlines projected climate changes, provides examples of resource specific climate change projections, describe potential management strategies to address climate change, and summarizes the 2022 Forest Service Climate Adaptation Plan. In addition, the FEIS provides a thorough analysis of potential climate change impacts across a variety of different resources, including forestlands vegetation, non-forest vegetation, fire management, wildlife, aquatic ecosystems and fish, water resources, soil resources, invasive species, livestock grazing, and sustainable recreation. The analysis for climate change used a qualitative, programmatic approach. Land Management Plans are strategic documents and do not authorize or mandate a specific agency action, therefore, the analysis could not quantitatively estimate climate impacts resulting from the Land Management Plan.

The 2012 Planning Rule (U.S. Department of Agriculture 2012b) specifies that land management plans must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, taking into account stressors, such as climate change (219.8 (a)(1)(iv)). The FEIS Climate Change section discusses the plan components included in the Land Management Plan that address climate change and promote resilience and adaption to the effects of climate change. The Land Management Plan includes the desired condition that carbon storage and sequestration potential are sustained through maintenance or enhancement of ecosystem biodiversity and function, and forests are resilient to natural disturbance processes and changing climates (FW-DC-CARB-01). Although not specifically mentioned, most of the physical and biological ecosystem desired conditions in the Land Management Plan were developed to facilitate natural ecological processes and create healthy ecosystems, which are more resilient and better adapted to changing climate. The best available scientific information was used to develop these plan components.

The Northern Rockies Adaptation Partnership publication Halofsky et al. (2018a, b) is the main source of information for identifying resource vulnerabilities and providing strategies and approaches to address vulnerabilities specific to the Northern Rockies. Appendix G provides further information on climate change adaptation strategies and identifies plan components from the Land Management Plan that support them.

See response to comments under other Concerns in the Climate Change section and Forest Carbon section of FEIS, Appendix M for other topics related to climate change, such as carbon storage, maintenance and retention of old growth, and estimated emissions from harvest.

Concern 2: Terrestrial Ecosystems – Climate Change

Climate change will affect vegetation, fish, and wildlife, specifically mountain goats, wolverines, and cold-water fish. The Forest Service should protect these species through standards, guidelines, and allocations for preserving available habitats, including climate refuges, such as cold water refugia for fish species.

Letter #	Comment #	Letter #	Comment #
877	121	16861	3
938	4	17673	26
1052	56		

Response to comment

Commenters asserted that climate change will affect vegetation, fish, and wildlife, specifically mountain goats, wolverines, and cold-water fish. Commenters recommended that the Forest Service should protect these species through standards, guidelines, and allocations for preserving available habitats, including climate refuges, such as cold water refugia for fish species.

The planning regulations at 36 CFR 219.8(a)(1)(iv) indicate that plans should provide for ecological sustainability, including components for maintaining and restoring ecological integrity that address climate change as a system driver and stressor. The Land Management Plan includes plan components that take into account a changing climate, including adaptive responses to the impacts of climate change. The revised plan addresses climate change impacts at the forest level by coordination of plan components to achieve desired conditions and at the resource level through resource specific plan components. Although not specifically mentioned, most of the physical and biological ecosystem desired conditions in the Land Management Plan were developed to facilitate natural ecological processes and create healthy ecosystems, which are more resilient and better adapted to changing climate. There are numerous plan components in the wildlife and aquatic ecosystems sections of the Land Management Plan that promote the maintenance or restoration of ecological integrity of habitats for fish and wildlife species. For example, the Land Management Plan establishes the Conservation Watershed Network (CWN), which, among other things, identifies areas of cold water refugia that are likely to persist into the future. This enables restoration actions to be focused on areas likely to be increasingly important to cold water fishes in the future. The CWN also focuses on maintaining and improving connectivity of watersheds, allowing for natural selection of advantageous adaptations among listed fishes, thus maximizing potential for genetic variability. In addition to resource specific examples, the revised plan in its entirety is designed to promote restoration of natural landscapes and natural processes, and plan components that address these issues will cultivate population resilience. For example, plan components from multiple resource areas will affect riparian areas, but all are designed to be beneficial by facilitating natural processes that slow evaporation, and provide shade and instream cover, and promote proper functioning of riparian areas. These processes contribute to stream health. Because healthy streams are most resilient to disturbance (Pelletier et al. 2020) and better able to adapt to changing climates (Bisson et al. 2009), they provide the best opportunity for continued persistence of ESA listed fishes on the forest.

Climate change is recognized as a stressor and integrated into the discussion of affected environment and environmental consequences in the FEIS for the individual resource areas. The forestlands vegetation, non-forest vegetation, fire management, wildlife, aquatic ecosystems and fish, water resources, soil resources, invasive species, livestock grazing, and sustainable recreation resource sections were updated in the FEIS and include analysis of potential climate change impacts.

Identifying climate change vulnerabilities and risks and incorporating adaptation strategies into management actions can improve the resiliency of forests and grasslands and associated aquatic and terrestrial ecosystems. The Northern Rockies Adaptation Partnership publication (Halofsky et al. 2018b, a) is the main source of information for identifying resource vulnerabilities and providing strategies and approaches to address vulnerabilities specific to the Northern Rockies. Appendix G provides further

information on climate change adaptation strategies and identifies plan components from the Land Management Plan that support them.

See response to comments under other Concerns in the Climate Change section and Forest Carbon section of FEIS, Appendix M for other topics related to climate change, such as carbon storage, maintenance and retention of old growth, and estimated carbon emissions from harvest.

Concern 3: Terrestrial Ecosystems – Climate Change

The alternatives analysis in the Final EIS should include a discussion of how logging contributes to climate change. Additionally, the Forest Service should analyze impacts associated with logging infrastructure, such as road developments.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
3	1	877	103, 110, 112, 120, 124	17297	3
157	4	962	2	17507	2
362	2	1056	6	17673	27, 28
574	1	2300	1	17732	2
666	2	3686	3	17884	1
672	3	7176	5	17898	4
764	18	13498	5	17908	2

Response to comment

Commenters expressed concern that the draft plan failed to consider logging and all associated logging activities; including the removal of biomass, the use of fossil fuels in road construction and in the cutting and processing trees; are significant cumulative contributors to the Earth's changing climate. Commenters recommended that increased carbon sequestration be prioritized as a Desired Condition.

Carbon uptake and storage are just some of the benefits that national forests provide. The 2012 Planning Rule states "Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528-531), the Forest Service manages NFS lands to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land." This law means the Forest Service does not prioritize one resource over another by default but considers how management actions provide for a balance of resource and human needs. Furthermore, the agency mission to provide for the sustainability of resources for future generations prioritizes actions that set up land and resources to provide long-term benefits, considering desired conditions of resiliency and ecosystem integrity. Actions may include reductions to stored carbon to achieve those desired conditions. The Land Management Plan did include a desired condition for climate change and carbon. Desired condition FW-DC-CARB-01 emphasizes that carbon storage and sequestration potential be sustained through maintenance or enhancement of ecosystem biodiversity and function, and forests are resilient to natural disturbance processes and changing climates.

In response to public comments, additional analysis was included in the Forest Carbon section of the FEIS. The updated analysis includes a qualitative and general description of the effects of logging, thinning, and hazardous fuels reduction treatments on carbon stocks and emissions based on the best available science. The updated section also includes a quantitative analysis of the potential loss of carbon as a result of timber harvest and mechanical fuels treatments by alternative. Carbon loss due to harvest and mechanical fuels treatments under the Preferred Alternative were estimated to be 0.26 teragrams of

carbon per year from above ground carbon pools, compared to the approximately 279.43 teragrams of carbon stored in all lands of the Nez Perce-Clearwater. A more detailed carbon analysis of activities associated with timber harvest, such as emissions from road construction and cutting and processing of trees would be highly speculative and would almost certainly fail to detect statistically significant differences among the alternatives, as uncertainty is very high at such small scales.

Additionally, the Nez Perce-Clearwater utilized information from the Forest Service Office of Sustainability and Climate and the Forest Service Research & Development to complete the Forest Carbon Assessment for the Nez Perce-Clearwater National Forests in the Northern Region. This new analysis includes an updated assessment of forest carbon in the plan area, including its role in the global carbon cycle. The assessment describes qualitatively how past and current management practices and environmental factors might influence carbon stocks and fluxes, including emissions. The carbon assessment is incorporated in the FEIS as Appendix D.

The magnitude and timeframe on which these carbon dynamics play out vary greatly depending on the forest attributes, disposition of harvested wood products, and environmental factors. A key assumption, however, is that the forestland will not be converted to a non-forest condition after harvesting and will remain productive. When a forest is harvested or thinned, but maintained as a forested condition, the forest regrows and eventually recovers the carbon removed during harvesting. As forests grow, they recover the carbon transferred out of the ecosystem during harvesting. Management activities to increase forest resilience may reduce carbon stocks in the short term but can have long-term benefits for carbon sequestration by maintaining resilient forests.

See response to comments under other Concerns in the Climate Change section and Forest Carbon section of FEIS, Appendix M for other topics related to climate change, such as carbon storage, maintenance and retention of old growth, and estimated emissions from harvest.

Concern 4: Terrestrial Ecosystems – Climate Change

The Forest Service should consider reducing deforestation and the burning of fossil fuels. This is because the current rotations between tree harvests are not long enough to significantly store carbon and offset climate change.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
102	1	1056	5	17453	5
645	3	4767	3	17868	4
646	2	7009	2		
877	122	16316	1		

Response to comment

Commenters recommended addressing climate change by reducing carbon emissions and promoting climate stability by emphasizing carbon storage in trees. They also recommended an analysis of an alternative that preserves forests and reduces logging and deforestation.

The 2012 Planning Rule (U.S. Department of Agriculture 2012b) specifies that land management plans must include plan components to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, taking into account stressors, such as climate change (219.8 (a)(1)(iv)). There are no applicable legal or regulatory requirements or established thresholds concerning management of forest carbon or greenhouse gas emissions. The 2012 Planning Rule and associated

directives require an assessment of baseline carbon stocks and a consideration of this information in management of the forests.

Vegetation management on national forest lands is not considered deforestation but rather an altering of stands to a more open state, or the conversion of forests back to the early successional stage of development and the initiation of new forests through regeneration. Forests are dynamic systems that naturally undergo ebbs and flows in carbon storage and emissions as trees establish and grow, die with age or disturbances, and re-establish and regrow. When a forest is harvested or thinned, but maintained as a forested condition, the forest regrows and eventually recovers the carbon removed during harvesting. As forests grow, they recover the carbon transferred out of the ecosystem during harvesting. Management activities to increase forest resilience may reduce carbon stocks in the short term, but can have long-term benefits for carbon sequestration by maintaining resilient forests.

As determined in the Land Management Plan, 1,042,519 acres, or approximately 26 percent of the Forest, are considered suitable for timber production on the Nez Perce-Clearwater. The average annual amount of proposed timber harvest and mechanical fuels treatment would be 8,825 to 10,000 acres under the Preferred Alternative, compared to the overall 4,074,832 acres of the Nez Perce-Clearwater. The FEIS, Climate Change and Carbon Stock section includes the analysis of the potential loss of carbon as a result of timber harvest and mechanical fuels treatments by alternative, including the No Action Alternative, which represents the existing condition.

An alternative called “Ecological Processes” was considered but not analyzed in detail. The alternative emphasized ecological processes over anthropogenic vegetation management. Many of the concepts from the alternative were included in the Land Management Plan. For example, desired conditions were developed with an emphasis on the natural processes that influence the vegetation on the Nez Perce-Clearwater, as well as appropriate consideration of the impacts of climate change. The plan components also recognize and support the important natural roles of wildfire, insects, and diseases on the landscape, and strives to conserve key ecosystem components such as old growth, snags, and downed woody material, as well as connectivity for wildlife species. Other concepts presented in this alternative did not meet the purpose and need for the Land Management Plan.

Commenters recommended that the forest plan should emphasize carbon storage down wood and soils in the forest. All the Action Alternatives include plan components MA2 and MA3-GDL-FOR-01 and FW-GDL-SOIL-02 that set requirements for maintenance of down wood and ground cover during timber harvest and fuels treatment activities. These carbon pools accounted for approximately 25 percent of the carbon stock in the Nez Perce-Clearwater in 2013.

Some commenters recommended protecting old growth forests to sequester carbon. Mature forests and old growth in particular is recognized for its role in sequestering carbon, as described in the FEIS, Forestlands section. The Land Management Plan includes plan components MA2 and MA3-DC-FOR-10, MA3-STD-FOR-01, MA2 and MA3-GDL-FOR-02, MA2 and MA3-GDL-FOR-03, MA2 and MA3-GDL-FOR-04 that outline the desired condition and requirements for management of old growth stands and limits fragmentation of old growth stands. These mature forests would fluctuate in location and abundance over time based on natural disturbances and successional processes. The plan components promote the creation of resilient old growth by emphasizing the establishment of the types of old growth that were historically most important, longest-lived, and most prevalent. By creating resilient old growth that is persistent over the long-term, there could be an increase the amount of carbon sequestered.

Commenters recommended that impacts of climate change should be considered when predicting regeneration after wildfire or logging because forest types could shift over time in a warming world, and

that regeneration after wildfire or logging could lead to a completely different ecosystem. The FEIS, Forestlands section was updated and a new piece titled “NRV as a Basis for Desired Conditions” was added. It addresses uncertainties associated with future conditions, including how they relate to the natural range of variation, and the potential for changes to occur on the landscape due to climate change and large disturbances. Regeneration potential was taken into account when identifying the lands suitable for timber production (Appendix B) and incorporated in the vegetation modeling.

Concern 5: Terrestrial Ecosystems – Climate Change (letter number 877, comments 104, 105)

The Draft EIS states that "Resilience to climate and weather disturbance were not used as measures as they are largely related to dominance type and size class diversity". The static dominance types and size classes, which desired conditions are based on, cannot reflect a different climate.

Response to comment

Commenters expressed concern that climate change was not considered in the development of vegetation desired conditions. Commenters determined that the use of static dominance types and size classes, which desired conditions are based on, cannot reflect a different climate. The FEIS, Forestlands section was updated and a new piece titled “NRV as a Basis for Desired Conditions” was added. It addresses uncertainties associated with future conditions, including how they relate to the natural range of variation, and the potential for changes to occur on the landscape due to climate change and large disturbances.

Forest Service Handbook (FSH) 1909.12 Land Management Planning Handbook recognize there may be other factors (social, economic, or ecological) that lead the responsible official to determine that the NRV may not be an appropriate desired condition for certain characteristics. These considerations include maintaining conditions that contribute to long-term resilience given uncertainties in future climate and disturbances; sustaining stand structures or species compositions that provide habitat for at-risk wildlife or plant species; conserving rare structures or components; existing or anticipated human use patterns; the effects changing climate may have; and ecosystem services expected from forest lands (such as reduction of fire hazard). The following factors are considered in the development of vegetation desired conditions: manage vegetation to generally be within the NRV; maintain conditions that would contribute to long-term ecosystem resilience and adaptation to uncertainties of future climate and disturbances; sustain important wildlife habitat conditions; and consider social and economic factors.

Research indicates there is potential for ecological transformations to occur in temperate ecosystems, based on the potential for interrelated drivers such as chronic and acute drought, wildfire, and insect outbreaks to push ecosystems beyond their thresholds for resilience (Millar and Stephenson 2015, Golladay et al. 2016). In some cases management intervention might be able to ease the transition to new forest states and minimize losses of ecosystem services (Millar and Stephenson 2015). We do not have the capability to predict such possible shifts at the local scale. By basing the desired conditions around the NRV, with a focus on maintaining the full suite of ecosystem diversity and components that enhance resilience to disturbance, the Land Management Plan would guide management toward maintaining functioning ecosystems in the face of uncertainty.

Several recent studies and analysis have been conducted regarding the appropriateness of using the NRV to frame desired conditions (Hansen et al. 2018, Timberlake et al. 2018). In both cases, the authors found that using the NRV provided a solid and defensible base to inform future desired conditions.

Haugo and Welch, (2013) developed an assessment of ecosystems, vulnerabilities and restoration needs for Forests in the Clearwater Basin in Idaho and was done in cooperation with the Nature Conservancy

and the Clearwater Basin Collaborative. The authors allow that NRV may help inform the desired future condition, but also promote that current departure from NRV is reflective of departure from historic fire regimes. The report addresses ecosystem integrity in the face of climate change by evaluating dominant ecosystem characteristics and functions.

The FEIS, Forestlands section notes that there is literature that indicate a high likelihood of future scenarios wherein the suite of ecosystems present today and in the NRV are no longer resilient to change and transform into novel ecosystems. In other words, conditions may shift outside of the NRV, and ecosystem integrity may no longer be measured by that yardstick; and desired conditions built around NRV may not be achievable. The risks for species shift and loss of forest cover due to drought and disturbance are acknowledged; however, these scenarios are generally predicted to occur in the longer term (beyond the 15-year planning cycle), and are difficult if not impossible to quantify at the scale of a national forest. The specific configuration of potentially new ecosystem conditions is not quantifiable due to the level of uncertainty associated with future climates, and any attempt to craft desired conditions to capture the suite of conditions that may be sustainable in 50 plus years would be based on substantial guesswork and downscaling of larger modeling efforts. However, a monitoring element is included in the Land Management Plan, Appendix 3 that would be integral to informing the Forest on the status and trend of vegetation on the Nez Perce-Clearwater (MON-FOR-02). As climate-related changes occur and more localized information becomes available, adjusted desired conditions could be incorporated via forest plan amendments, if necessary.

Appendix B describes how climate was incorporated into the NRV modeling. The potential effects of climate change, and associated levels of uncertainty, were integral in the development of desired conditions and was used in the FEIS analysis. Desired conditions represent conditions that align both with the NRV and BASI that informs potential future sustainable conditions. The desired conditions for vegetation composition, structure, and density are built upon the concept of maintaining and improving the resilience and resistance of vegetation, in part to address climate change. The vulnerabilities of tree species to climate change were considered in the development of desired conditions. Appendix B includes additional explanation concerning NRV as a basis for desired future conditions; and documents the adjustments made to desired conditions using BASI to account for potential future changes in climate.

Concern 6: Terrestrial Ecosystems – Climate Change (letter number 567, comment 11)

In the revised Forest Plan and EIS, the Forest Service should not use climate change as a reason to eliminate motorized access. Carbon dioxide emissions from motorized recreation is not a significant factor, compared with prescribed burns and forest fires.

Response to comment

A commenter requested that the Forest Service should not use climate change as a reason to eliminate motorized access and that carbon dioxide emissions from motorized recreation is not a significant factor, compared with prescribed burns and forest fires.

The Land Management Plan includes a desired condition for carbon storage and sequestration potential to be sustained through maintenance or enhancement of ecosystem biodiversity and function, and forests are resilient to natural disturbance processes and changing climates (FW-DC-CARB-01).

Climate change was considered during development of plan components. The FEIS includes an assessment of baseline carbon stocks (FEIS, Appendix D) and an analysis of effects to carbon stores as a result of forest management under the Land Management Plan. The FEIS, Climate Change and Forest Carbon section focused on the major factors influencing the carbon budget of the Forest, which are

primarily natural disturbances. As noted in the FEIS, Appendix D, fire and disease were the primary disturbances influencing carbon stocks on the Nez Perce-Clearwater from 1990 to 2011. Motorized recreation was not an activity that was analyzed. The Land Management Plan does not eliminate motorized access on the basis of climate change or carbon dioxide emissions.

Concern 1: Terrestrial Ecosystems – Forest Carbon

In the Final EIS, the Forest Service should recognize logging as a disturbance that causes the loss of carbon sequestration in soil, and it should discuss how each alternative increases the loss of carbon.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
286	1	877	111, 113, 114, 115, 116, 117, 118	16962	3
307	48	941	3	17304	2
397	3	985	4	17646	1
465	16	1056	7	17673	29, 30
562	1	1121	3	17893	4
672	4	4657	1	17908	3
873	31, 32	12883	11		

Response to comment

Commenters expressed concern that every alternative in the revised plan increases logging levels and eliminates the forest's potential to sequester carbon. The 2012 Planning Rule states "Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528-531), the Forest Service manages the NFS to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land." This law means the Forest Service does not prioritize one resource over another by default but considers how management actions provide for a balance of resource and human needs. Furthermore, the agency mission to provide for the sustainability of resources for future generations prioritizes actions that set up land and resources to provide long-term benefits, considering desired conditions of resiliency and ecosystem integrity. Actions may include reductions to stored carbon to achieve those desired conditions.

Forests are highly dynamic systems that are continuously repeating the natural progression of establishment, growth, death, and recovery, while cycling carbon throughout the ecosystem and the atmosphere (Halofsky et al. 2018b). Rates of sequestration may be enhanced through management strategies that retain and protect forest land from conversion to non-forest uses, restore and maintain resilient forests that are better adapted to a changing climate and other stressors, and reforest lands disturbed by catastrophic wildfires and other natural events (Halofsky et al. 2018b).

Implementation of plan components for timber management (TBR) would create short-term, localized reduction of carbon sequestration through the removal of living vegetation and disturbance of soil and ground cover. As determined in the Land Management Plan, 1,042,519 acres, or approximately 26 percent of the Forest, are considered suitable for timber production on the Nez Perce-Clearwater. The average annual amount of proposed timber harvest and mechanical fuels treatment would be 8,825 to 10,000 acres under the Preferred Alternative, compared to the overall 4,074,832 acres of the Nez Perce-Clearwater. The FEIS, Climate Change and Carbon Stock section presents the amount of carbon loss from timber harvest and mechanical fuels treatments from 1990 to 2011 for the Nez Perce-Clearwater and utilizing that information, analyzed the potential loss of carbon as a result of timber harvest and mechanical fuels

treatments by alternative. Carbon loss due to harvest and mechanical fuels treatments under the Preferred Alternative were estimated to be 0.26 teragrams of carbon per year from above ground carbon pools, compared to the approximately 279.43 teragrams of carbon stored in all lands of the Nez Perce-Clearwater. The wood and fiber removed from the forest would be transferred to the wood products sector for a variety of uses, each of which has different effects on carbon (Skog et al. 2014). Carbon can be stored in wood products for a variable length of time, depending on the commodity produced.

Vegetation management or natural disturbances on national forest lands are not considered deforestation but rather an altering of stands to a more open state, or the conversion of forests back to the early successional stage of development and the initiation of new forests through regeneration. The forests on the Nez Perce-Clearwater have been cycling through this natural succession process for millennia. Forests are dynamic systems that naturally undergo ebbs and flows in carbon storage and emissions as trees establish and grow, die with age or disturbances, and re-establish and regrow. When a forest is harvested or thinned, but maintained as a forested condition, the forest regrows and eventually recovers the carbon removed during harvesting. As forests grow, they recover the carbon transferred out of the ecosystem during harvesting. Management activities to increase forest resilience may reduce carbon stocks in the short term but can have long-term benefits for carbon sequestration by maintaining resilient forests.

Many management activities initially remove carbon from the forest ecosystem, but they can also result in long-term maintenance or increases in forest carbon uptake and storage by improving forest health and resilience to various types of stressors (McKinley et al. 2011). Collectively, Land Management Plan direction would result in short-term losses of carbon in some cases, such as allowing for vegetation treatments, and storage of carbon on the landscape in some cases, such as retaining old growth and soil ground cover, but generally would result in maintaining the capacity of the landscape to sequester carbon by managing for native vegetation and natural disturbance processes. All the Action Alternatives include plan components MA2 and MA3-GDL-FOR-01 and FW-GDL-SOIL-02 that set requirements for maintenance of down wood and ground cover during timber harvest and fuels treatment activities. These carbon pools accounted for approximately 25 percent of the carbon stock in the Nez Perce-Clearwater in 2013.

Products derived from the harvest of timber from the national forests extend the storage of carbon or substitute for fossil fuel use, both of which are part of the overall carbon cycle (Halofsky et al. 2018b). Harvested wood products (HWP), such as lumber, panels, and paper, can account for a significant amount of offsite carbon storage and estimates of this addition are important for both national-level accounting and regional reporting (Skog 2008).

Under all alternatives, management activities involving timber harvest can result in both long-term carbon storage off site and substitution effects through the use of harvested wood products. Carbon can be stored in wood products for days to centuries, depending on the commodity produced and end use. As more commodities are produced and remain in use, the amount of carbon stored in products increases, creating a cumulative benefit when considered with forest regrowth. Even as more wood products are discarded, the carbon stored in solid waste disposal sites also increases. Harvested wood products can also substitute for more fossil fuel-intensive materials like steel, concrete, and plastic, resulting in a net decline in emissions (Dugan et al. 2018, McKinley et al. 2011, Gustavsson et al. 2006, Lippke et al. 2011). Likewise, harvested wood and discarded wood products can be burned to produce heat or electrical energy, also producing a benefit by substituting for more carbon-producing energy sources. The Intergovernmental Panel on Climate Change recognizes wood and fiber as a renewable resource that can provide lasting climate-related mitigation benefits that can increase over time with active, sustainable management (Intergovernmental Panel on Climate Change 2000).

Some commenters recommended protecting old growth forests to sequester carbon. Mature forests and old growth in particular is recognized for its role in sequestering carbon, as described in the FEIS, Forestlands section. The Land Management Plan includes plan components MA2 and MA3-DC-FOR-10, MA3-STD-FOR-01, MA2 and MA3-GDL-FOR-02, MA2 and MA3-GDL-FOR-03, MA2 and MA3-GDL-FOR-04 that outline the desired condition and requirements for management of old growth stands and limits fragmentation of old growth stands. These mature forests would fluctuate in location and abundance over time based on natural disturbances and successional processes. The plan components promote the creation of resilient old growth by emphasizing the establishment of the types of old growth that were historically most important, longest-lived, and most prevalent. By creating resilient old growth that is persistent over the long-term, there could be an increase the amount of carbon sequestered.

Commenters expressed concern that the draft forest plan and draft EIS did not acknowledge the important role forests play in sequestering carbon. The 2012 Planning Rule (U.S. Department of Agriculture 2012b) and associated directives require an assessment of baseline carbon stocks and a consideration of this information in management of the forests. The Forest Service Office of Sustainability and Climate facilitated work by Forest Service Research & Development to develop a nationally consistent carbon assessment framework and to deliver forest information for every NFS unit. Estimates of total ecosystem carbon and stock change (flux) have been produced at the forest level across the Nation, relying on consistent methodology and plot-level data from the USFS Forest Inventory and Analysis program. The Nez Perce-Clearwater utilized this information to complete the Forest Carbon Assessment for the Nez Perce-Clearwater National Forests in the Northern Region, which includes the carbon stock trends for the Forests between 1990 and 2011. This new analysis includes an updated assessment of forest carbon in the plan areas, including its role in the global carbon cycle and is included in the FEIS as Appendix D. The Carbon Assessment is based on peer-reviewed and published datasets and tools and provides a detailed quantitative analysis of baseline carbon stocks and flux on the forest (including soils), carbon storage in harvested wood products, and the relative effects of disturbance and environmental factors on carbon storage over time. The information from the Carbon Assessment was utilized to update the carbon stock analysis in the FEIS, Climate Change and Carbon Stock section to estimate the potential effects of the Action Alternatives on carbon storage.

The Land Management Plan recognizes the importance of the role of the Nez Perce-Clearwater related to carbon storage and sequestration, establishing a desired condition that directly addresses carbon sequestration. This desired condition focuses on sustaining this key ecosystem service through maintenance or enhancement of ecosystem biodiversity and function and managing for resilient forests adapted to natural disturbance processes and changing climates.

Some commenters recommended that the forest plan revision should have an over-riding theme of carbon sequestration instead of logging. It is not Forest Service policy to maximize carbon or elevate the consideration of carbon above the many other services that NFS lands provide. The Forest Service defines carbon stewardship as actions that are informed by carbon science that provide for increased carbon uptake and storage or increased stabilization through land-use and vegetation management strategies. Thoughtful carbon stewardship seeks to optimize carbon within the context of ecosystem integrity and climate adaptation, not to maximize carbon at the expense of forest health or habitat. Carbon storage in any particular forest location may go up or down over time, but analysis of storage should occur at very large spatial scales. Carbon benefits are not limited to immediate increases in carbon stocks but may be realized over a variety of time scales. Carbon responses may include near-term increases in carbon stocks or carbon benefits that take many decades to occur.

The Forest Service carbon stewardship principles align with the holistic approach to land management, which supports the multi-use mission to steward national forests and grasslands for the benefit of current and future generations. These principles guide the Forest Service to emphasize ecosystem function and resilience, recognize carbon sequestration as one of many ecosystem services, support diversity of approach, consider system dynamics and scale in decision making, and use the best information and analysis methods.

While national forests and grasslands can play an important role in climate change mitigation through land management, balancing the numerous environmental benefits provided by healthy ecosystems is paramount to achieving the mission of the Forest Service. Carbon stewardship aims to optimize carbon benefits on the landscape in a way that also recognizes the importance of achieving other management objectives. Maximizing for ecosystem carbon stocks can create undesirable tradeoffs with other environmental benefits, and in some landscapes may result in lower carbon benefits where carbon stability is compromised. Maximizing carbon is therefore not necessary, and is often counter to, achieving effective carbon stewardship.

Actively managing forest ecosystems can help achieve desired conditions such as restoring fire-adapted and fire-resilient landscapes and improve stand densities that are ecologically resilient and sustainable, while also providing socioeconomic benefits. Per the Multiple Use and Sustained Yield Act, national forests are managed for multiple uses and ecosystem services such as outdoor recreation, range, timber, watershed, and wildlife purposes. Carbon uptake and storage are just some of the benefits that national forests provide.

Concern 2: Terrestrial Ecosystems – Forest Carbon

The Forest Service should establish strict reforestation guidelines so that tree seedlings will be replanted to ensure sustainability of the forests and maintain carbon dioxide storage.

Letter #	Comment #
61	8
272	7

Response to comment

The National Forest Management Act (1976) states: “It is the policy of the Congress that all forested lands in the National Forest System shall be maintained in appropriate forest cover with species of trees, degree of stocking, rate of growth, and conditions of stand designed to secure the maximum benefits of multiple use sustained yields.

The Land Management Plan includes standard FW-STD-TBR-04 that requires timber harvest activities to only be used when there is reasonable assurance of restocking within five years after final regeneration harvest or to meet other desired conditions. Restocking level is prescribed in a site-specific silvicultural prescription for a project treatment unit and is determined to be adequate depending on the objectives and desired conditions for the plan area.

Reforestation, whether by planning for natural regeneration or tree planting, allows for the accelerated development of forested ecosystems following planned timber harvest or natural disturbance events. Reforestation presents unique opportunities to address emerging issues associated with climate change by conserving and managing tree genetic diversity and sequestering carbon to counter greenhouse gas emissions (U.S. Department of Agriculture 2022b). Successful reforestation after harvest or mortality-

inducing disturbances can help ensure continued carbon uptake and storage (Intergovernmental Panel on Climate Change 2014) (U.S. Department of Agriculture 2022a).

Concern 3: Terrestrial Ecosystems – Forest Carbon (letter number 672, comment 5)

The Forest Service should analyze impacts on forest carbon from prescribed burning.

Response to comment

The FEIS, Climate Change and Carbon Stock section and FEIS, Appendix D discuss the impacts of wildland fire on forest carbon stocks. Of all the potential disturbances on the landscape, wildland fire – both natural and planned ignitions – would have the greatest potential to cause short-term reductions in carbon stocks by removing vegetation, as well as causing carbon emissions. However, fire is also a primary mechanism for restoring and maintaining native vegetation with conditions consistent with the natural range of variation, thereby contributing to carbon sequestration potential over the long term. Prescribed burning and hazardous fuels reduction may indirectly reduce the risk of more severe wildfires and greater carbon losses in the future (Agee and Skinner 2005, Wiedinmyer and Hurteau 2010). Hazardous fuels treatments can help build resilience to disturbances that rapidly oxidize carbon and emit it to the atmosphere (Halofsky et al. 2018b). The FEIS, Climate Change and Carbon Stock section presents the amount of carbon loss from wildland fire from 1990 to 2011 for the Nez Perce-Clearwater and utilizing that information, analyzed the potential loss of carbon as a result of wildland fire by alternative.

The Land Management Plan includes desired conditions and objectives for treating vegetation through prescribed fire and mechanical fuels treatments to improve vegetative structure and composition. This includes reducing surface fuels, ladder fuels, and canopy density in order to reduce fire intensity. Fuels treatments are not designed to stop wildfires, but, are conducted to reduce the intensity of future fires so that they can be safely suppressed or, in the case of high-frequency, low- severity regimes, to eventually allow unplanned natural wildfires to burn within the normal range of variation.

Plan components for fire and fuels management would help ensure the long-term sustainability of vegetation communities while also allowing for flexibility in allowing fire to play its natural role on the landscape. The Action Alternatives propose to continue to use wildland fire to create young stand conditions, reduce hazardous fuels, promote fire-adapted species, and encourage natural fire-return intervals. By reducing the threat of uncharacteristic wildfire, management activities may create conditions more advantageous for supporting forest health in a changing climate and reducing greenhouse gas emissions over the long term. Furthermore, the reduction of stand densities is consistent with adaptation practices to increase resilience of forests to climate-related environmental changes (Halofsky et al. 2018a).

As noted in the FEIS, Climate Change and Carbon Stock section prescribed fire and managing wildland fire can actually be adaptation options that address climate change effects on forested vegetation. These vegetation management actions can be used to treat departed vegetation conditions, creating more resilient and diverse forests. Reducing stand density may also reduce the risk of more severe disturbances, such as insect and disease outbreak and severe wildfires, which could result in lower forest carbon stocks and greater greenhouse gas emissions.

Consistency with State and Local Plans

Concern 1:

The Forest Service should use county natural resource plans and analyze how the alternatives might affect state and county agencies and entities.

Letter #	Comment #
3110	14, 37, 47

Response to Comment

The Forest Service coordinated land management planning with a federally recognized Indian Tribe, other Federal agencies, and State and local governments as required by 2012 Planning Rule 36 CFR §219.4(b). The details on this information can be found in Chapter 1 and 4 of the FEIS.

Cooperating Agencies

Concern 1:

The Forest Service should include an interdisciplinary team member from each cooperating agency or should collaborate more fully with cooperating agencies to better address local interests.

Letter #	Comment #
587	35
3110	21, 22, 34

Response to Comment

Three cooperating agencies (Idaho County, Clearwater County, and State of Idaho by and through the Idaho Governor’s Office of Species Conservation) and the Nez Perce Tribe participated in the development of the Land Management Plan and Final Environmental Impact Statement as cooperating agencies. Details on the involvement of these agencies is located in the project record.

Cultural Resources

Concern 1:

The chapter on cultural resources is lengthy and vague. It fails to commit the Forest Service to the clear and necessary goal of protecting and preserving these resources. In addition, the Forest Service should not have to state that cultural resource plan components are based on current federal cultural resource laws.

Letter #	Comment #
805	78
1060	54, 149
17879	3

Response to comment

There are many statutory requirements related to cultural resource management that the Forest Service must comply with outside of what may be described in land management plan components. While not

required, the reference to that legal framework in the plan is intended to help inform future implementers of that important context.

1) The proposed Forest Plan lists approximately 20 different laws, regulations and policies that exist to protect cultural resources in a multitude of ways, however, the proposed Forest Plan also specifically indicates the Forest is largely moving away from cultural resource plan components that reiterate/repackage extent protection procedures already contained in these laws, regulations and policies as these measures are all incorporated by reference into the new Forest Plan (e.g. the Southern Nez Perce Trail will be protected as these various laws require, or adverse effects to the trail will be mitigated per the law). 2) The Forest manages approximately 3,000 different cultural resource sites. No attempt to rank these 3,000 properties in order of importance was made, nor does the 2012 Planning Rule require the agency to rank/craft plan components for each of the 3,000 sites. 3) Specific decisions concerning motorized/nonmotorized use of the Southern Nez Perce Trail are outside the scope of the Forest Plan. These type of decisions are made during the travel management planning process which has currently been paused on the Nez Perce portion of the combined Forest. 4) The Forest agrees the Southern Nez Perce Trail is eligible for listing in the National Register. Preliminary work has been started but remains pending Tribal input. 5) The Forest has added a Forest Plan Goal to make the Southern Nez Perce Trail a National Historic Trail (FW-GL-REC-01).

The Forest shares the Tribe's goal of stopping resource damage at developed and dispersed recreation sites where possible and mitigate damage to sites after impacts are curtailed (FW-GDL-CR-02).

Under all alternatives, undertakings with the potential to affect cultural resources must be consulted on individually and the effects of each undertaking to specific historic properties must be avoided, minimized, or mitigated pursuant to the National Historic Preservation Act and implementing regulations 36 CFR 800.

Concern 2:

The Forest Service should ensure that all new projects be appropriately reviewed for cultural resources, not just 200-acres annually in FW-OBJ-CR-03. It should consider including an objective to preserve access, including motorized access, to educational and interpretive cultural areas.

Letter #	Comment #
307	93
587	10
17628	3

Response to comment

The 200 acres of proposed survey are not associated with survey acres meant to support the variety of land management actions that will occur during the life of the new Forest Plan (e.g. project support survey). Indeed, the Forest routinely surveys thousands of acres a year in an effort to support these projects. Rather, the 200 annual acres reflect what the Heritage Program proposes to survey on its own in an attempt to address specific intra-program research needs meant to better understand the manner in which cultural resource sites are situated across the Forest landscape.

Motorized access to historic properties has mixed results concerning the successful management of cultural resources. Motorized access enables visitors to more easily access historic sites, but at the same

time can lead to higher occurrences of artifact collecting, vandalism, and dispersed recreational impacts to historic properties.

A Pilot Knob action plan would be a stand-alone endeavor unrelated to the Forest Planning process.

Concern 3: (letter number 53, comment 1)

The Forest Service should reconsider conducting 15 cultural evaluations per year, as stipulated in FW- OBJ-CR-01. This is because that many evaluations would be too expensive for the Forest Service's budget and would be an unnecessary use of staff resources.

Response to comment

The Forest has routinely evaluated approximately 15-20 sites each year for the last 5 years. Continuing this practice is not expected to place a capacity/financial burden on existing staff.

Concern 1 (letter number 307)

Because the Lolo Trail is a nationally recognized historic corridor, it should be designated as a separate management area and not lumped into Management Area 1, with Wilderness and Wild and Scenic Rivers.

Response to comment

In response to public comment, the Lolo Trail National Historic Landmark has now been included as a separate, stand-alone Geographical Area. See section 5.7.4 Lolo Trail National Historic Landmark in the forest plan.

Designated Wilderness

Concern 1, 2, 3, 4, 5, 6:

These comments are related to the identification and management of designated wilderness. These were general statements such as: “the DFP and DEIS need to be changed to be consistent with the Wilderness Act’s mandate to preserve untrammeled Wilderness;” “should revisit the amount of land designated as wilderness and distinguish between the amount of wilderness under each alternative;” “should revisit wilderness plans that could be interpreted in ways that contradict the Wilderness Act and be consistent with the Wilderness Act’s mandate to preserve untrampled wilderness;” “Idaho has contributed its fair share – more wilderness in Idaho is completely unnecessary and unreasonable;” “Please do not allow any Drones in proposed or existing wilderness areas.” Some letters stated their support to make specific areas, such as the Great Burn, designated wilderness. Some comments were not applicable to, or out of the scope of, the Plan revision and do not require a response other than to dismiss them.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
63	3	587	1	3110	36
451	1	830	1	877	556,557,558,559,560,561,562,563,565,566,567,568,569,570,571,572,573,574,575,576,577,578,579,580,582
465	6	7602	2		

Response to comment

The Planning rule (36 CFR 219.7) states that the responsible official shall identify existing designated areas and include components for the management of these areas. Forest Service Manual 2320 provides

direction for the management of wilderness. Designation of and changes to designated wilderness are held by Congress and outside the scope of this Land Management Planning effort. However, the Nez Perce-Clearwater manages all or parts of three designated wildernesses. As such, the Land Management Plan provides plan components addressing management of these areas to ensure compliance with the Wilderness Act and other wilderness related laws, regulations, agency policy and Wilderness specific management plans. As example, “MA1-STD-WILD-01. Management activities within designated wilderness areas shall preserve wilderness character as required by the Wilderness Act, as well as each wilderness area’s enabling legislation and its specific management plan.” Additionally, Management Approaches for designated areas are in Appendix 4. The amount of designated Wilderness does not vary between alternatives. Discussion of designated areas can be found in the FEIS 3.6.1.

The authority to designate of an area as Wilderness lies solely with congress. Therefore, any letters of support for such an action are not addressed through this Plan revision. However, a decision to recommend an area for wilderness designation is made through this Plan revision and is documented in the Record of Decision.

Alternatives regarding the amount and location of recommended wilderness are analyzed in the FEIS 3.6.2 utilizing information in the FEIS Appendix E, through public engagement, and information provided throughout the FEIS and Land Management Plan. Areas that were determined to provide outstanding examples of wilderness character, would contribute to a balance of solitude and primitive and unconfined recreation, motorized recreation, and non-motorized recreation opportunities. Areas were also considered in how they contribute to a balance of ecological, social and economic sustainability as well as overall management goals and desired conditions as outlined in the Land Management Plan.

Developed and Dispersed Recreation

Concern 1, 2 , 3 (letter 307, comments 10, 12, 18):

This concern statement focuses on the special value of developed and dispersed recreation sites and areas. The commenter feels these areas deserve a unique management designation that is not included in the timber base. The commenter cited several areas deserving of such designation.

Response to comment

Forest Service Handbook 1909.12, Chapter 20, provides direction regarding management areas. As stated, management areas are based on purpose and represent emphasis on a landscape basis. Management areas can include integrated, compatible resource direction. The Land Management Plan, Section 1.3, identifies three management areas. Management Area 1 – Designated Wilderness, Wild and Scenic Rivers and National Historic Landmark Areas are discussed in Section 5.5. These designated areas offer substantial unroaded dispersed recreation opportunities along with some roaded opportunities in Wild and Scenic Rivers and National Historic Landmark Areas as appropriate. Management Area 2 – Backcountry includes recommended wilderness areas and suitable wild and scenic rivers, as well as Idaho Roadless Rule areas and are discussed in section 5.6. These areas offer primarily unroaded recreation opportunities and some limited roaded opportunities. Combined, these areas offer significant opportunity across the forest for unroaded dispersed recreation opportunities. Management Area 3 – Front Country offers numerous opportunities for road-supported dispersed recreation.

Dispersed recreation is a general term referring to recreation use outside developed recreation sites; this includes activities such as scenic driving, hiking, backpacking, climbing, hunting, fishing, snowmobiling, horseback riding, cross-country skiing, and recreation in primitive environments (Land Management Plan,

Appendix 2-Glossary). The FEIS, Chapter 3.4.2 – Sustainable Recreation discusses developed and dispersed recreation and indicates most recreation use on the Nez Perce-Clearwater occurs in primitive dispersed sites rather than developed facilities. In 2009, the United States Forest Service Northern Region began developing a standardized protocol for inventorying and monitoring resource conditions of dispersed recreation sites. The majority of dispersed recreation sites across the Nez Perce-Clearwater have been inventoried and entered into the infrastructure database, also known as INFRA. The opportunities, activities and values associated with dispersed sites is well documented in this INFRA database and management actions and priorities are implemented accordingly. This provides compatible resource direction consistent with management area direction as per FSH 1909.12, Chapter 20.

Additional integrated and compatible resource direction is provided through the Recreation Opportunity Spectrum classes that allocates areas suitable for motorized and non-motorized recreation across the Forest. The FEIS, Chapter 3.4.2 indicates that 45 percent of the Nez Perce-Clearwater is in a Recreation Opportunity Spectrum class that is suitable for summer non-motorized recreation and 40 percent is suitable for winter non-motorized recreation. Maps displaying these allocations are found in Land Management Plan Appendix 1. Regardless of management area, dispersed recreation is an example of compatible uses that can be integrated in management area direction. Additional direction for management of dispersed recreation is also found in Appendix 4 to the Revised Land Management Plan – Management Approaches.

Therefore, the recreation resource direction provided through Plan Components, Management Area direction, the Recreation Opportunity Spectrum, Management Approaches and direction that comes from travel management planning provides a holistic and integrated approach to recreation and ecological sustainability that best addresses dispersed recreation, the majority of the recreation opportunity on the Nez Perce-Clearwater, and eliminates the need or utility of a special management designation for this use.

Draft EIS-Tables and Figures

Concern 1:

The Forest Service should edit tables that conflict with other tables and should edit the language in the Draft Forest Plan.

Letter #	Comment #
53	6
877	564, 581
17673	24
17688	37

Response to Comment

Thank you for your comment. The Forest Service has checked the text and tables of the FEIS and the Land Management Plan to ensure there are no discrepancies.

Concern 2:

Nonmotorized recreation use should be added to the suitability of lands and suitability of uses tables in the Final EIS.

Letter #	Comment #
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53	4, 5
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Response to Comment

Tables in the effects section of Sustainable Recreation in Chapter 3 of the FEIS compares suitable summer and winter motorized and non-motorized use, by alternative.

Concern 3:

Tables and figures should balance current and historical data to demonstrate changes between the existing Forest Plan and the revised Forest Plan.

Letter #	Comment #
452	15
17688	20, 21

Response to Comment

The analysis in Chapter 3 of the EIS incorporates changes between the management under the 1987 Forest Plans. The No Action data presented in the analysis of Chapter 3 is commonly found in tables that display all alternatives for comparison. The No Action alternative represents management direction found under the Forest Plan.

Economic Sustainability

Concern 1: Economics and Social Environment

The Forest Service should ensure that the Forest Plan not result in detrimental economic, social, or cultural impacts on businesses in Elk City and surrounding communities. Rather than simply mitigating these impacts, the Forest Service has an obligation to enhance and develop actions that result in positive contributions to local economies.

Letter #	Comment #
764	14, 15
776	1

Response to comment

Chapter 62 and plan component guideline FW-GDL-ES-01 refers directly to the support of rural communities and economies. Additionally, plan components in Chapter 50 and 51 address the demand and need for sustained multiple-use related species of wildlife; plan component FW-DC-REC-06, and the rest of Chapter 57 of the plan, address the intent to provide a full spectrum of recreation opportunities, including motorized recreation, to contribute to local economies. Lastly, the entirety of Chapter 5 of the plan focuses on the balance of production of natural resources, as it pertains to the support and enhancement of forest conditions, as well as the sustainable contribution of economic opportunities for local communities and industries. For example, FW-DC-TBR-02 specifically describes the desired condition to have restoration and timber harvesting opportunities contribute to business and employment, and more generally economic and social sustainability.

In the FEIS, the economic contributions from Forest operations, multiple uses and ecosystem goods and services were considered in the analysis of the planning alternatives and presented in section 3.8.1. In

addition to the economic consequences subsection, social, cultural impacts are discussed qualitatively throughout the social and economic sustainability sections (3.8.1-2) of the FEIS. Further discussion of the significance of resources in contributing to economic and social sustainability are discussed in sustainable recreation, wildlife, and timber sections, 3.4.2, 3.2.3, and 3.5.1, respectively.

Concern 2: Economics and Social Environment

The Forest Service should include important economies such as Sanders County in the analysis. Also, the value of fish- and wildlife-related recreation to local economies should be included in the analysis. It should include more economic data and should more accurately discern economic impacts between alternatives.

Letter #	Comment #
805	91
17872	1

Response to comment

Sanders County did not meet the criteria for county inclusion in the economic area of influence. These requirements are further documented in the spatial scale section of the economic sustainability subchapter of the EIS (METI, 2010).

Economic values associated with wildlife and fish specific recreation are included and accounted for in the economic contribution analysis results provided in the FEIS section 3.8.1 . In this analysis, visitor expenditure profiles are used to estimate contribution from wildlife focused recreation. These expenditure profiles provide evidence to the unique benefits to people provided by wildlife recreation opportunities. Broader human values associated with wildlife are also qualitatively discussed in section 3.8.1, 3.8.2 and in the wildlife subchapter 3.2.3.

An explanation for the lack of discernment for wildlife related recreation is provided in the economic consequence section of 3.8.1 , which identifies a lack of available evidence correlating levels of forest visitation, or changes to visitation, with a planning decision. Though the contribution from wildlife recreation related visitation is significant, it is not anticipated to change as a result of a planning decision. Additionally, economic contributions are measured as broad, forest-level economic activities. Across alternatives, resource and management changes can and will be substituted from one location to another. The resulting broad contribution is analyzed to have a smaller over-all change across alternatives, as a result. A shift from one recreation focus to another, or from one location, to another, would be net neutral when considering economic contributions at the Forest-level.

For greater discernment of recreation impacts between alternatives, the sustainable recreation analysis 3.4.2 should be referenced foremost.

Concern 3: Economics and Social Environment

Findings from IMPLAN and Aphelia-based analyses are vague, relative to the economic condition, and they do not accurately portray the economic impacts between alternatives. Also, higher timber harvest levels under Alternatives W, X, and Y would require higher staffing levels and corresponding employment and labor income, instead of being held constant.

Letter #	Comment #
764	12, 13
1051	10

Response to comment

The economic affected environment can be described with greater detail because it can be empirically observed under standardized public data. Alternative variations in economic contributions from a Forest plan level decision cannot be spatially or temporally identified to a similar level of detail to quantify potential effects. The broad management effects of a Forest Plan level decision require broad evaluation and therefore contributions are analyzed accordingly.

The IMPLAN and Aphelia-based analyses provide the best available methodology given a limit of known parameters including the spatial extent of input and outputs that are associated with broad planning decisions. The methodology identifies a limited range of variance of contributions across alternatives, due to lack of direct changes to resource inputs as a result of the planning decision. This limitation is discussed further in section 3.8.1.

Staffing levels do not fluctuate in the economic analysis because the model assumes a constant budget constraint across alternatives. As a result, estimated economic contributions from timber management and other resource programs, as indicated in section 3.8.1, are observed as resource operational limitations, not programmatic averages. Changes to budgets, and programmatic capacity are not decided or determined within the Forest plan or planning decision, and therefore limits exist with respect to the ability to estimate future operating levels and resource outputs.

Concern 4: Economics and Social Environment (letter number 877, comment 817)

The revised Forest Plan and EIS should include an analysis of the impacts on the US Treasury or taxpayers from various programs, such as range, timber, or recreation.

Response to comment

The economic analysis provides a contribution analysis of these program areas, but impacts to the treasury and taxpayer, i.e., financial efficiency analysis, are conducted and reviewed at the project level.

Concern 5: Economics and Social Environment

The limited socioeconomic review in the Draft EIS entirely fails to adequately consider the value of a rancher's local economy and the trickledown effect that a lost animal unit month causes to an entire rural community. For instance, the Draft EIS fails to identify and analyze the potential for livestock grazing permittees to vacate allotments and potentially go out of business, which would have social and economic impacts.

Letter #	Comment #
805	37
17595	5

Response to comment

As indicated in section 3.5.3 of the FEIS, AUMs designated under each alternative remain at the same levels. While conditions to the range environment fluctuate across alternatives, the business capacity to conduct range activities is not expected to decline as measured by the AUM indicator. Information

relating to the business and operations of private ranches are not available to the Forest to interpret with respect to the Forest planning decision.

The economic contribution analysis inputs AUM data analyzed across alternatives in the EIS. Net changes to AUMs across the Forest are reflected in the contribution analysis output. This output indicates the operation limits designated across the alternatives and it is expected that a decision will not decrease the availability of leasable AUM capacity.

Concern 1: Economic and Social Environment-Economics of Timber Harvest

The plan should highlight the importance of the forestry sector in the discussion of local economies. The existing narrative can be enhanced by including direct employment data and plans for operations and future plant expansions for surrounding logging contractors, timber purchasers, and sawmills.

Letter #	Comment #	Letter #	Comment #
356	1	17353	1
528	3	17872	2
979	2	17899	2
873	5, 6, 51		

Response to comment

The Forest Service is not privileged to access or disclose information on specific private enterprises in the EIS. County-level observations of employment in resource subsectors are provided in the EIS. Additional information on timber markets is highlighted in the timber section 3.5.1 of the FEIS.

Concern 2: Economic and Social Environment-Economics of Timber Harvest

The analysis should note that the Stewardship Contracting Program, adopted as a pilot program in 1999 and expanded in 2003 and in 2014, has had an adverse impact on forest region communities. Also, it severely limits a small purchaser's ability to compete due to the inability to obtain required bonding necessary to secure long-term contracts facilitated under stewardship contracting.

Letter #	Comment #
356	2
873	8
17353	2

Response to comment

The authority and implementation of the stewardship program is outside the scope of land management plan revision.

Concern 3: Economic and Social Environment-Economics of Timber Harvest

The Forest Plan should allow access to areas currently deemed unavailable to harvest under the Idaho Roadless Rule. This is because many of these areas also have serious forest health concerns, requiring management and access to some of this acreage. Also, it would shift more land toward timber production and would reflect a more realistic portion of land available to management, based on its importance to local communities.

Letter #	Comment #	Letter #	Comment #
450	4	16860	1
873	3	17890	2

Response to comment

Designation of management areas and access is thoroughly analyzed across the range of alternatives

Concern 4: Economic and Social Environment-Economics of Timber Harvest (letter number 3110, comment 32)

Since standards are intended to be a constraint on a project to ensure that a specific desired condition is maintained or achieved, the Forest Service should revise FW-STD-TBR-04 to reflect that when two alternatives meet a desired condition, the selection should be based on the greatest dollar return.

Response to comment

Income is an important indicator for the economic analysis in the economic sustainability subchapter. The potential contribution of income is analyzed across alternatives.. The intent of this programmatic EIS is to broadly analyze economic contributions and ecosystem services that may be impacted by a planning decision.

Under NFMA and the Forest Service Manual, financial efficiency is analyzed at the project level. FSH 2409.18, Chapter 20, in the Timber Sale Preparation Handbook, addresses economic feasibility and financial efficiency analysis and their application to individual site-specific project activities including timber harvests.

Concern 5: Economic and Social Environment-Economics of Timber Harvest (letter number 1056, comments 1, 8)

The Forest Service should fully analyze an alternative the does not increase the volume or that reduces the timber volume and increases timber rotations. It should acknowledge that timber targets on all alternatives, which are increased over current targets, are based on age class data and that studies have found that the accuracy for size class is only 62 percent, when compared with ground survey data points.

Response to comment

The long-term sustained yield capacity calculated for the 1987 Forest Plans was 210 million board feet for the proclaimed Nez Perce National Forest and 429 million board feet for the proclaimed Clearwater National Forest. The allowable sale quantity, as defined for the 1987 Forest Plans, is 108 million board feet on the Nez Perce National Forest and 267 million board feet on the Clearwater National Forest, for a total of 375 million board feet. The actual annual timber volume of timber products offered averaged 46 million board feet for the period 1997 through 2018.

Harvest levels which fall far below the sustained yield limit have greatly impacted forest health and continue to promote uncharacteristic fire behavior which threatens critical wildlife habitat. It would not be possible to obtain the desired conditions for forested vegetation specified in the Forest Plan at such low harvest levels. A minimum level of harvest is required; as indicated by the preferred alternative, to promote ecosystem integrity and reduce the potential of catastrophic loss of wildlife habitat.

The harvest scheduling analysis performed to develop the projected timber and wood sale quantities is detailed in Appendix B of the FEIS. The preferred alternative established a harvest level (190-210

MMBF/yr) which promotes attainment of desired conditions and operates under the Forest Plan constraints. The harvest schedule strives to meet ecological integrity (FW-DC-TE-05) as well as social and economic sustainability (FW-GDL-ES-01).

Concern 6: Economic and Social Environment-Economics of Timber Harvest (letter number 717, comments 197, 198)

The projected timber sale quantities under Alternatives W and X are potentially at odds with the 2012 Planning Rule's guidance that these quantities are supposed to be "based on the planning unit's fiscal capability and organizational capacity." The Forest Service should consider the capacity of current milling infrastructure. This is because flooding local mills with a glut of logs would drive down prices and call into question whether or not the industry could sustain additional infrastructure in the long run.

Response to comment

Wood sale quantities were modeled using a realistic budget constraint. Additionally, timber market conditions and current milling capacity were taken into account and discussed in the timber section (3.5.3) of the FEIS in the Trends in Lumber Production subsection. The five-county timber capacity figure illustrates the gap between available processing capacity and timber harvest in the area, indicating that existing mills could readily scale up production if timber supply increases.

Concern 7: Economic and Social Environment-Economics of Timber Harvest (letter number 877, comment 818)

The Forest Service should include a discussion of how permanent or long-lasting jobs in forestry are and how mechanization has affected the logging industry over the decades since mechanization. This is the reason for some job loss.

Response to comment

Advancement of processing technologies are prevalent in the timber industry; however, a discussion of this topic would be mostly outside of the scope of the intended analysis.

Concern 1: Economic and Social Environment-Economics of Recreation

The Forest Service should acknowledge economic contributions of recreationists, including off-road motor vehicle users, and that communities that rely on motorized recreation would be affected by the expansion of Wilderness areas. The Draft EIS should also provide a strategy for site-specific travel decisions that protect motorized recreation.

Letter #	Comment #	Letter #	Comment #
188	1	660	1
289	2	676	1
356	5	805	30
359	1	960	2
361	1	1076	1
383	2	3110	8, 9
435	1	16858	2
445	5	17349	19
531	1	17353	3, 4
567	4	17362	2
573	1	17872	3
587	3, 4	17916	86, 87, 88, 89, 90
605	2		

Response to comment

Site specific travel management decisions are formulated in travel planning decisions.

Economic contributions generated from recreation activities are measured using expenditure profiles from all user groups of the Forest. These profiles are aggregated and analyzed in the economic contribution analysis.

An explanation for the lack of discernment for recreation contributions is provided in the economic consequence section of 3.8.1 , which identifies a lack of available evidence correlating levels of forest visitation, or changes to visitation, with a planning decision. Though the contributions from motorized recreation related visitation are significant, they are not anticipated to change as a result of a planning decision. Additionally, economic contributions are measured as broad, forest-level economic activities. Across alternatives, resource and management changes can and will be substituted from one location to another. The resulting broad contribution is analyzed to have a neutral over-all change across alternatives, as a result. A shift from one recreation focus to another, or from one location, to another, would be otherwise neutral when factoring economic contributions at the Forest level.

Lastly, the National Forest System measures recreation contributions, that are unique to Forest activities and visits for the purpose of isolating this economic activity from the much larger contribution within the overall outdoor industry. For example, the purchase of durable goods, such as recreation vehicles, which are often included in state-level outdoor recreation economic contributions, such as those described by the 2017 Outdoor Industry Association report, are not included in Forest-level economic contributions. To discern marginal contributions associated with direct Forest visitation, economic activities were limited to non-durable goods and service purchases made within a 50-mile radius of the Forest. As a result, visitation expenditure profiles across user groups are more narrowly focused in Forest-level recreation economic analyses compared to Outdoor Industry Association reports.

The Forest plan Chapter 57, including FW-DC-REC-01, FW-DC-REC-09, FW-DC-REC-12, addresses plan components specific to the spectrum of recreation opportunities and motorized recreation and trails, and the EIS Chapter 3.4.2 analyzes the spectrum of recreation opportunities offered, with respect to possible changes to motorized recreation in the Forest Plan.

Concern 2: Economic and Social Environment-Economics of Recreation (letter number 53, comment 2)

The plan should increase the percentage reduction in deferred maintenance over a five-year time frame to 10-15% every five years since the Forest Service trail system faces a \$314 million backlog in trail maintenance, only one-quarter of the agency’s 158,000 miles of trails meets agency standards for maintenance, and nearly two-thirds receive no maintenance at all.

Response to comment

The Nez Perce-Clearwater revised forest plan includes the following components: FW-OBJ-REC-01 - Annually maintain to standard a minimum of 30 percent of National Forest System trail miles and FW-OBJ-REC-02 - Reduce deferred maintenance of trails by five percent, every five years. This work is highly dependent on available funding and personnel, contractor and volunteer resources. As budgets and capacity permit, additional miles of deferred maintenance would be scheduled on a priority basis as determined by resource conditions, user safety, and use rates. It is outside the scope of forest plan revision to address Agency wide trail maintenance backlog issues.

Concern 3: Economic and Social Environment-Economics of Recreation

The Draft EIS should be modified to accurately assess the economic benefits of nonmotorized and nonmechanical recreation to local economies and to acknowledge that allowing motorized use of such areas as the Great Burn can affect the availability of wild areas that attract visitors who value solitude and contribute to the ecotourism economy.

Letter #	Comment #
261	2
1054	18

Response to comment

The Sustainable Recreation section of the FEIS (3.4.2) analyzes the spectrum of recreation opportunities offered and altered across alternatives.

In the Economic Sustainability section (3.8.1) analyzes the economic contribution from recreation related visits to the Forest. Expenditure profiles for each recreation user group are included in the model and help determine the economic contribution from recreation activities in and around the Forest. Visitation is not dependent on a planning decision, meaning, the selection of a programmatic alternative is not expected to broadly change visitation levels across the Forest. This limitation is further discussed in the economic consequences subsection. This implies that economic activity is broadly measured across the Forest, and not at a specific location, or point of access. The primary reason for this is data-related, however, it also serves to capture substitutions and shifts that occur from one location to another, which would otherwise deem individual site estimates less useful, at the Forest scale.

Issues relating to site specific visitor patterns would need to be addressed in a travel planning, or project level decision.

An explanation for the lack of discernment for recreation contributions is provided in the economic consequence section of 3.8.1, which identifies a lack of available evidence correlating levels of forest visitation, or changes to visitation, with a planning decision. Though the contribution from motorized recreation related visitation are significant, they are not anticipated to change as a result of a planning

decision. Additionally, economic contributions are measured as broad, forest-level economic activities. Across alternatives, resource and management changes can and will be substituted from one location to another. The resulting broad contribution is analyzed to have a neutral over-all change across alternatives, as a result. A shift from one recreation focus to another, or from one location, to another, would be otherwise neutral when factoring economic contributions at the Forest-level.

Lastly, the National Forest System measures recreation contributions, that are unique to Forest activities and visits for the purpose of isolating this economic activity from the much larger contribution within the overall outdoor industry. For example, the purchase of durable goods, such as recreation vehicles, which are often included in state-level outdoor recreation economic contributions, such as those described by the 2017 OIA report, are not included in a Forest-level economic contributions. To discern marginal activities associated with direct Forest visitation, economic activities were limited to non-durable good and service purchases made within a 50-mile radius of the Forest. As a result, visitation expenditure profiles across user groups are narrowed in range.

The Forest plan Chapter 57, including FW-DC-REC-01, FW-DC-REC-09, FW-DC-REC-12, addresses plan components specific to the spectrum of recreation opportunities and motorized recreation and trails, and the EIS section 3.4.2 analyzes the spectrum of recreation opportunities offered, with respect to possible changes to motorized recreation in the Forest Plan.

Concern 1: Economic and Social Environment-Economics of Hunting and Fishing

The importance of healthy populations of the fish species to local economies should be considered. The drastic increase in timber harvest in the Draft EIS alternatives would sacrifice the health of the fishery and the jobs associated with it for short-term job creation from timber harvest.

Letter #	Comment #	Letter #	Comment #
68	1	1052	6, 68
549	8	1121	5

Response to comment

The social and economic importance of hunting, fishing, and wildlife viewing is considered in the Wildlife Multiple Uses section of the FEIS and Forest Plan, and the health and relative impacts to conditions of fisheries are analyzed in the EIS (3.2.8) Wildlife and fish related recreation is also considered and analyzed as part of the economic contribution analysis. However, visitation to the Forest, and hence the economic activities associated with visitation are not estimated to fluctuate across alternatives, due to the lack of broad evidence connecting programmatic planning and visitation patterns. This issue is further discussed in the economic sustainability section (3.8.1).

Concern 2: Economic and Social Environment-Economics of Hunting and Fishing

The Forest Service should consider the economic importance to local economies of elk and deer populations for big game hunting, as well as the economic loss from fewer hunter days under the alternatives. Local economies that profit from elk hunting have lost over \$10.5 million dollars every year during the past 22 years. The current economic sustainability analysis in the Draft EIS is incomplete and inaccurate because it fails to analyze the effects of each alternative on sporting opportunity and the resulting economic impact.

Letter #	Comment #	Letter #	Comment #
78	1	805	76
412	6	17688	2

Response to comment

The plan strives to provide these economic opportunities as indicated in Chapter 62 and plan component guideline FW-GDL-ES-01 which refers directly to the support of rural communities and economies. Additionally, plan components in Chapter 50 and 51 address the demand and need for sustained multiple use focused species of wildlife and their habitat; plan component FW-DC-REC-06, and the rest of Chapter 57 of the plan, address the intent to provide a full spectrum of recreation opportunities, including wildlife-related recreation, to contribute to local economies.

Qualitative impacts to elk and deer habitat are detailed in the Wildlife subchapters 3.2.3, as well as in the Social Sustainability report 3.8.2.

Wildlife recreation is analyzed broadly in the economic contribution analysis and in the recreation spectrum analysis in the Sustainable Recreation section (3.4.2). Visitor data from wildlife related recreation trips are accounted for and analyzed. Forest Plans do not regulate days available for hunting.

Concern 3: Economic and Social Environment-Economics of Hunting and Fishing (letter number 17349, comment 27)

Trapping is a consistent forest use and an economic driver in the planning area; as such, it needs continued recognition as a sustainable and socially important part of the National Forests.

Response to comment

The plan strives to provide these economic opportunities as indicated in Chapter 62 and plan component guideline FW-GDL-ES-01 which refers directly to the support of rural communities and economies. Additionally, plan components in Chapter 50 and 51 address the demand and need for sustained multiple use focused species of wildlife and their habitat; plan component FW-DC-REC-06, and the rest of Chapter 57 of the plan, address the intent to provide a full spectrum of recreation opportunities, including wildlife-related recreation, to contribute to local economies.

Qualitative impacts to trapped species and their habitat are detailed in the Wildlife subchapters 3.2.9, as well as generally in the Social Sustainability report 3.8.2 .

Wildlife recreation is analyzed broadly in the economic contribution analysis and in the recreation spectrum analysis in the Sustainable Recreation section (3.4.2). Visitor data from wildlife related recreation trips are accounted for and analyzed. Forest Plans do not regulate days available for hunting.

Trapping and other forms of wildlife related visitor activities are measured by the visitor use monitoring system and considered in the economic contribution analysis.

Concern 4: Economic and Social Environment-Economics of Hunting and Fishing (letter number 17892, comment 1)

The wildlife section of the plan should mention the economic value of wildlife.

Response to comment

Need to confirm that concern has been recoded to wildlife.

Energy and Minerals

Concern 1:

The Forest Service should change Chapter 3.5.2 of the EIS to clarify state laws, should include a discussion of other leasable mineral materials, and should expand discussion on the potential changes to mining.

Letter #	Comment #
805	82
17892	2

Response to comment

Forest Service States in chapter 3.5.2 of the FEIS that mineral resources are divided into three groups: locatable minerals, salable minerals, and leasable mineral materials. The authority of the Forest Service to influence and regulate the exploration, development, production, and reclamation phases of mining operations vary with each group. The Relevant Law, Regulations, and Policy section details the regulatory framework for each of the three groups of mineral resources. Changes to mining methods are ongoing as technology advances.

Concern 2:

The Forest Service should clarify or expand several guidelines regarding energy and minerals. Several guidelines should be recategorized or rewritten as standards

Letter #	Comment #
307	115
805	35
938	56
962	3
1060	112

Response to comment

Management of National Forest System lands is guided and constrained by laws and regulations, policies, practices, and procedures that are in the Forest Service directive system. This plan provides the vision, strategy, and constraints that guide integrated resource management, provide for ecological sustainability, and contribute to social and economic sustainability on the forest and within the broader landscape. Plan components that help achieve desired conditions have been designed to be consistent with existing law, policy, and regulation.

Concern 3:

The Forest Service would violate the National Forests Management Act because it is allowing mineral exploitation and exploration, including pit mining and dredging. This would result in severe surface disturbance and adverse impacts on fish and wildlife.

Letter #	Comment #
52	3
17354	6

Response to comment

The Nez Perce Clearwater National Forest is managed under the Multiple Use and Sustained Yield Act. As such, we are required to manage for many uses including mining. Other laws, regulations, and policy that authorize mining on National Forest System lands can be found in the revised plan, section 5.2 Energy and Minerals. The forest plan is programmatic and guides site-specific projects. All site-specific projects that implement the forest plan will either comply with applicable plan direction or require a project or forest wide plan amendment, as may be required by other laws the agency must also comply with.

Concern 4: (letter number 877, comment 814)

The Forest Service should reevaluate the potential for opening and closing mineral leasing in its range of alternatives for the Forest Plan. This is because, in the current energy and minerals section, it does not propose any withdrawals or segregation from mineral entry.

Response to comment

The Nez Perce Clearwater National Forest mineral leasing program is guided by the Mineral Leasing Act of 1920. Solid Leasable and Non-Solid Leasable proposals are not subject to Locatable Mineral withdrawals or segregation from mineral entry.

Concern 5:

The Forest Service should include additional information in the EIS related to the affected environment for mining; the impacts of mining, including new and expansion of existing mineral withdrawals, on the human environment; the potential conflicts with other resource management and uses; and mitigation measures for the impacts and monitoring plans.

Letter #	Comment #
164	2
278	1
17348	13

Response to comment

The Nez Perce Clearwater National Forest reviews mining proposals on a site-specific basis depending on the type on mineral extraction proposal. Mitigation measures and conflicts would be evaluated on a site-specific proposal through a separate analysis. Mineral withdrawals can be recommended through the Forest Plan. If a, mineral withdrawals is proposed through a Forest Plan Revision it would be a recommendation and not finalized through the Forest Plan process.

Concern 1: Energy and Minerals-Suction Dredging (letter number 877, comment 815)

The Forest Service should clarify whether it intends to address the Concern of suction dredge mining in the EIS and whether it intends to approve more suction dredge mining in additional areas.

Response to comment

The Nez Perce Clearwater National Forest contains lands open to mineral entry and subject to 36CFR228 Locatable Mining Regulations. A Suction dredge mining proposal would be evaluated on a site-specific basis.

Concern 1: Energy and Minerals-Rare Earth Minerals (letter number 17353, comment 6)

The Forest Service should continue to allow for mineral and metal development in the Hoodoo area to provide direct and indirect economic gains. It should not recommend the Hoodoo Roadless Area or recommend any river segments for Wild and Scenic designation. That is because these recommendations would affect mineral and metal deposits and interfere with the National Defense Authorization Act, which recognizes critical and strategic minerals and metals as an essential part of our national defense

Response to comment

Proposed Roadless areas or Wild and Scenic designations would be subject to valid and existing rights. The National Defense Authorization Act identifies certain critical and strategic minerals. Locatable Minerals are open to mineral entry on certain lands within the Nez Perce Clearwater National Forest. Lands open for mineral entry can be recommended for withdrawal from mineral entry in the Forest Planning Process.

Concern 2: Energy and Minerals-Rare Earth Minerals (letter number 356, comment 8)

The Forest Service should select Alternative X management of the Clearwater River Basins, because it is consistent with the State of Idaho Rivers Program direction and would allow for the continuation of mineral extraction in river systems.

Response to comment

Mineral extraction within river systems is analyzed on a site-specific basis, subject to 36CFR228 regulations.

Fire Management

Concern 1:

The presence of fire indicates high degrees of ecosystem function, so forest manipulation should replicate natural processes, such as fire.

Letter #	Comment #
528	1
877	123, 129, 130, 131, 132, 133, 136, 137, 139, 140, 141, 142, 143, 146, 148, 149, 154, 155, 159, 798
1051	1
13498	3
16861	4
17473	1
17688	14

Response to comment

Fire has been and will continue to be the major change agent of vegetation within the landscapes of the Nez Perce Clearwater National Forest. Given the importance of fire as a key ecosystem process, maintaining vegetation and forest diversity, sustaining fire adapted species and structures, and creating vegetation conditions at multiple scales that support and sustain native wildlife species in the short and long term are critical components of the revised forest plan.

Desired conditions are focused on trending landscape and forest level stand structure, vegetation pattern and patch size and old growth persistence commensurate with historic fire regimes.

Forest-wide plan components are designed to specifically address within-stand canopy structure and species composition of legacy trees for warm dry, warm moist and cool moist broad PVT groups. Management area plan components are designed to promote canopy structure and species composition of legacy trees, landscape pattern and patch size, and old growth for all broad PVT groups. Historic fire regimes should inform the spatial distribution of patches relative to slope, aspect, and elevation gradients.

The fire management approaches found in Appendix 4 of the Revised Forest plan also expand on the principle of implementing projects commensurate with fire regimes. FW-MSA-FIRE-01. One possible approach to achieving desired conditions and objectives would be for Interdisciplinary teams to consider what fire regimes the project areas encompass. Consider treatments designed to emulate the fire regimes within the project area and strive to meet vegetation desired conditions for the entire project area. Emphasize returning fire into Fire Regimes I, II, and III. Consider planning and analyzing for wildland fire to be utilized within the entire project area rather than just where mechanical treatment units are located. Consider mechanical treatments such as harvest or non-commercial thinning to remove ladder fuels especially shade tolerant species, as a precursor to application of wildland fire.

Concern 2:

In the revised Forest Plan and EIS, rather than trying to manage wildfires on private lands, the Forest Service should discuss how homeowners should take necessary steps to protect their homes from wildfire.

Response to comment

The Forest Service has no authority in private land management but strives to educate the public and partners about wildfire risk (FW-GL-FIRE-03). Plan components under the Fire Management section provide direction on communicating with the public about wildfire risk to landowners.

Concern 3:

The Forest Service should increase access to forest system roads to enable firefighters to effectively fight fires.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
52	5	717	209	17363	1
89	2	873	10, 45	17882	3
91	1	877	147	17886	1
346	3	1077	2	17899	1
447	1	1115	15		
452	14, 17	3110	4		

Response to comment

FW-DC-INF-01 and FW-DC-INF-02 provide direction for administrative and public access across the forest. The Forest Service is allowed access to system roads for administrative use to conduct official business and fire management is consistent with this use. The Nez Perce-Clearwater fire management program consists of hand crews, helicopters, smokejumpers, and fire engines. These resources are effective assets to suppress over 90 percent of the fires where fire control is the objective. Large fires on the forests that escape initial attack are mostly attributed to extreme weather and fuels conditions that contribute to extreme fire behavior and unsafe conditions for responders, rather than access to a given fire start.

Concern 4:

Large unconsumed fuels continue to contribute significantly to on-site fuel loading. Many of the National Forests' harshest fires can be attributed to large unconsumed fuels and reburns. Timber harvest, thinning, grazing, mechanical treatments, salvage, and downed/burned timber and debris removal should all be used to mitigate the risk of wildfires.

Letter #	Comment #
307	103
877	151, 157, 158

Response to comment

All alternatives in the final environmental impact statement contain desired conditions and objectives for treating vegetation through wildland fire and mechanical treatments to improve vegetative structure and composition. This includes reducing surface fuels, ladder fuels, and canopy density to reduce fire intensity. Fuels treatments are not designed to stop wildfires but are conducted to reduce the intensity of fires so that they can be safely suppressed or, in the case of high-frequency, low- severity regimes, to eventually allow unplanned natural wildfires to burn within the normal range of variation.

Concern 5:

The Forest Service should define wildland urban interfaces in such a way that prevents Counties from treating National Forest System land; or, if they do treat public land, the County plans must be reviewed under NEPA.

Letter #	Comment #
307	135
877	126, 127, 128, 135, 138, 152, 160

Response to comment

The wildland urban interface in the land management plan is based on the definition in the Healthy Forest Restoration Act (Sec. 101 16 USC 6511). This act clearly defines WUI as an area within or adjacent to an at-risk community that is identified in recommendations to the Secretary in a community wildfire protection plan. Wildland Urban Interface (WUI) is defined by the Idaho, Clearwater, Latah, Lewis, and Benewah County Wildfire Protection Plans, as per HFRA 2003 direction. The CWPP’s were promulgated by each of the counties and are not considered federal actions that requires NEPA analysis or ESA consultation. The county CWPP’s were developed and approved by each of the counties in coordination with multiple state, local and federal agencies, and other entities. The CWPPs are authorized under

Healthy Forest Restoration Act of 2003, which specifically states that Federal agency involvement in developing a community wildfire protection plan, or a recommendation made in a community wildfire protection plan, shall not be considered a Federal agency action under the National Environmental Policy Act of 1969 (Sec. 103 16USC 6513 (c)(1)).

The individual county wildfire protection plans do not authorize any actions on lands administered by the Nez Perce-Clearwater National Forests.

Concern 6:

The Forest Service should clarify whether fire has an important natural role and should be allowed to burn or that wildfires are not allowed to just burn. Both practices are stated in the Draft EIS, which causes confusion. The Forest Service should use clear and specific standards and monitoring components and should construct a more robust scientific history of fire in the National Forests to provide direction in fire management.

Letter #	Comment #
672	6
877	144, 145

Response to comment

Fire has been and will continue to be the major change agent of vegetation within the landscapes of the Nez Perce Clearwater National Forest. Fire is a necessary and critical ecological function across the Nez Perce-Clearwater that plays a central role in providing quality habitat for both plant and wildlife species. The statement in the DEIS that “... wildfires are not allowed to just burn” has been removed from the final environmental impact statement to reduce confusion. The intent of the original statement was to portray that there is a significant amount of planning and analysis that fire managers and agency administrators conduct to allow fires to play their natural role on the landscape. These decisions consider weather and fuels conditions when and where a given fire is burning or expected to burn in addition to firefighter safety; public safety; risk to property; fire resource availability; national, regional, and forest priorities; costs; and potential resource benefits. These decisions are documented in the Wildland Fire Decision Support System application and are conducted for every fire.

Because location and timing of wildfires are difficult to predict, the Forest Service relies on post-fire data, through the Fuels Treatment Effectiveness Monitoring system, to measure treatment effectiveness (see MON-FIRE-02). Fire behavior modeling, using pre- and post-treatment fuels, can be assessed at the project level, but since it is not known where these treatments will be at this point, treatment effectiveness cannot be accurately disclosed until project-specific planning is conducted.

Concern 7: (letter numbers 877, comment number 156)

The Forest Service fails to consider the likelihood that prescribed burning and other treatment options would eliminate what might have served as fire refugia. It should analyze the importance of fire refugia as shelter for animal and plant species and their role in post-fire succession. Similarly, the Forest Service should investigate biochar to manage slash piles and sequester carbon.

Response to comment

Fire refugia was addressed in the final environmental impact statement in the fire management section based on comments received from the draft environmental impact statement. It is important to note that

fires within low and mixed severity fire regimes, whether management ignited, or naturally occurring rarely burn all vegetation. Fire suppression may also be appropriate where rare or unique ecological values could be lost, such as imperiled species habitat where uncharacteristic fuel accumulations have created the potential for a fire that is outside the historical range of variability or where infrequent high severity fires are characteristic but where such fires are not viewed as ecologically desirable, such as old growth (Noss et al. 2006). These areas, as well as unburned areas or low severity burn areas within large mixed and high severity fires, could offer areas that are considered fire refugia. These areas are landscape elements that remain unburned or minimally affected by fire, thereby supporting postfire ecosystem function, biodiversity, and resilience to future disturbances. Fire refugia provide habitat for individuals or populations in which they can survive fire, in which they can persist in the postfire environment, and from which they can disperse into the higher-severity landscape (Meddens et al. 2018).

There are no proposed specific activities in the forest plan. The use of Biochar for managing slash piles would be a project specific prescription to be analyzed for future projects implemented under the new forest plan.

Concern 8: (letter numbers 877, comment number 134)

The Forest Service should define what it means by "fuel."

Response to comment

The National Wildfire Coordinating Group definition of fuel has been added to the Revised Forest plan glossary and is stated as: Fuel: Any combustible material, especially petroleum-based products, and wildland fuels.

Concern 9: (letter numbers 877)

The Forest Service should consider comparing a discussion on fire in the Nez Perce National Forest with fire in the Clearwater National Forest. Its Baseline Assessment for Carbon Stocks in Chapter 4 of the 2014 Assessment suggests that fire plays out differently in these two forests.

Response to comment

The 2014 assessment presented the amount of tree mortality due to wildfire across the two forests prior to combination. At the time of the assessment period 1990-2013; tree mortality due to fire was 3 percent on the Clearwater and 20 percent on the Nez Perce. These percentages of mortality are directly related to acres burned. The final environmental impact statement was updated to include analysis of fire in the context of historical fire regimes as opposed to analyzing Potential Vegetation Types in the Draft EIS. Fire was analyzed utilizing historic fire regimes as described in Barrett et al. (2010), as well as mean fire return intervals for land type associations across the whole Nez Perce Clearwater National Forests. Fire does not "play out differently" on the forests, but historical large fires that generated the forests that exist today have happened at different times and under variable weather and climatic conditions. Fire history data available and included in the analysis shows these fire polygons and where and when they occurred on the forests. What fire regimes these historical fires occurred, subsequent fires and when they occurred influenced where the forests are in terms of vegetative succession to date. These variables have more impact than whether they occurred on the Nez Perce or the Clearwater.

Concern 10: (letter numbers 52, 89, 91, 447, 17363, 17882)

The Forest Service should apply proactive fire mitigation practices, such as logging, thinning, and vegetation management, to minimize long-term smoke and air quality concerns.

Response to comment

All alternatives in the final environmental impact statement contain desired conditions and objectives for treating vegetation through wildland fire and mechanical treatments to improve vegetative structure and composition. Using mechanical methods for fuels treatments and restoration is a necessary tool for the Forest Service to achieve desired conditions. This includes reducing surface fuels, ladder fuels, and canopy density. These fuels reduction treatments would promote reduced fire intensity and reduced smoke production during future fires.

Forest Products

Concern 1 - Timber, Forest Products, and Firewood-Timber Suitability

Allocating a semiprimitive setting over land suitable for timber production would be misleading, because a semiprimitive setting is incompatible on lands where timber harvest is the focus of vegetation management. In the revised Forest Plan, the Forest Service should explicitly state that wilderness additions should be withdrawn from the timber base. All existing roadless areas should be modified to nonmotorized dispersed recreation in an unroaded setting, recommended Wilderness, key big game summer range, or key fishery habitat.

Letter #	Comment #	Letter #	Comment #
23	3	7009	3
307	67, 112	13498	6
1060	36	16981	3
3110	5	17446	1
4767	4	17453	2
6106	4		

Response to comment

Semi-primitive non-motorized areas are not suitable for timber production, although limited amounts of harvest can occur to maintain natural vegetation. These areas are often, but not always, associated with inventoried roadless areas and limitations on harvest from the 2008 Idaho Roadless Rule may also apply. These areas typically have poor access and either natural processes or prescribed fire would be drivers of vegetation change more often than timber harvest. Less than one percent of lands classified as suitable within management area 3 are classified as having a semiprimitive setting.

All recommended wilderness additions are allocated from lands currently designated under the 2008 Idaho Roadless Rule. These lands are not considered as part of the suitable timber base and are not used to calculate sustained yield harvest levels.

Existing roadless areas are analyzed to determine the opportunities each land area possess to provide a broad range of recreational opportunities to the public. The majority of acres classified as primitive, semi primitive non-motorized and semi primitive motorized are associated with lands designated under the 2008 Idaho Roadless Rule and are classified as lands unsuitable for timber production. All lands within the roadless areas provide habitat for a range and diversity of plants and animals.

Concern 2 - Timber, Forest Products, and Firewood-Timber Suitability

Persistent, significant, adverse environmental impacts are likely to result from salvage logging. The Forest Service should include or revise Forest Plan components to clarify that there is no loss of timber volume due to wildfire on lands suitable for timber production and to prohibit salvage in areas unsuitable for timber.

Letter #	Comment #
877	614, 616, 617, 618, 619, 620, 621, 622
3110	29

Response to comment

Salvage harvest would primarily occur within management area 3 on lands suitable for timber production. Salvage harvest would generally not occur in management area 2 on lands unsuitable for timber production, but may occur if removing dead trees will protect or enhance other resource values.

Sustainability of timber harvest on lands suitable for timber production, as well as lands suitable for timber harvest, is integrated into the desired conditions for terrestrial vegetation. Best available scientific information is incorporated into the plan components, which inform each alternative. Standards and guidelines for the management and protection of the soils and coarse woody debris resource are applied to each alternative. Sustainability of timber harvest is required under the National Forest Management Act (1976) and applies to salvage harvest operations. Compliance with plan components during project development will promote the continued maintenance and improvement of site quality and productivity following harvest activities. As site productivity is maintained and enhanced through project design informed by site-specific analysis, sustainability of timber harvest is also maintained over time.

Plan component FW-DC-TBR-06 states “Loss of timber volume due to wildfire is minimal on lands suitable for timber production”. Given the unpredictable nature of wildfire and wildfire suppression success it is not possible to predict no loss of timber resources resulting from wildfire. It is the intent of the Nez Perce-Clearwater to minimize as much as possible any potential loss of timber from wildfire. We must also acknowledge that fire must be allowed to play a role in maintaining ecosystems over time. The use of prescribed fire within management area 3 is intended to both protect the timber resource from uncharacteristic fire behavior and to allow ecosystems to function within the current fire regimes.

Concern 3 - Timber, Forest Products, and Firewood-Timber Suitability (letter number 3110, comment 27)

The Forest Service should revise FW-DC-TBR-03 to state that, on lands suitable for timber harvest, the “dead and dying trees in excess of trees needed for snags and snag recruitment are salvaged.”

Response to comment

Following a natural disturbance event such as wildfire or insect outbreaks dead and dying timber may be available for salvage. Plan component FW-DC-TBE-03 states “In areas suitable for timber harvest, dead or dying trees in excess of trees needed for snags and snag recruitment are available for salvage (see MA3-GDL-FOR-05 for requirements)”. It is important to distinguish “lands suitable for timber harvest” from “lands suitable for timber production”. All lands suitable for timber production are within management area 3 (front country) where timber harvest is the primary tool to move vegetation conditions toward desired conditions. Salvage harvest would typically occur here to reduce fuel loading and to

promote the establishment of new stands of trees. Lands suitable for timber harvest can occur on lands not suitable for timber production, but where timber harvest may occur to accomplish other resource objectives. These lands are within management area 2 where timber harvest including salvage harvest is limited.

Concern 4 - Timber, Forest Products, and Firewood-Timber Suitability (letter number 307, comment 108)

The Forest Service should reconsider FW-GDL-TBR-04, because healthy young cedar-, grand fir-, or Douglas-fir-dominated stands could be harvested merely because the species occur in a wildland-urban interface area.

Response to comment

The primary objective of vegetation treatment within the wildland-urban interface is to manage fuel loadings and the arrangement of fuels to reduce or minimize undesirable fire effects, to protect life and property and to promote firefighter safety. Objectives for vegetation management within the wildland-urban interface are not designed to promote the long term development of forested ecosystems but to develop a modified forest structure where the structure and density of vegetation allows for effective firefighting strategies.

Plan component FW-GDL-TBR-04 states “On lands suited for timber production, even-aged stands should generally have reached or surpassed the culmination of mean annual increment prior to regeneration harvest. The mean annual increment equals 95 percent of the culmination of mean annual increment as measured by cubic volume. Stands need not have met culmination of mean annual increment prior to regeneration harvest if one of the following conditions have been identified during project development:

- When such harvesting would assist in reducing fire risk within the wildland urban interface or the community protection zone.
- When harvesting stands, landscapes will trend toward vegetation desired conditions.
- When harvest is thinning, stand improvement or uneven-aged systems do not regenerate even-aged or two-aged stands.
- When harvest is for sanitation or salvage of timber stands that have been substantially damaged by fire, windthrow, or other catastrophe or which are in imminent danger from insect or disease attack.
- When harvest is on lands not suited for timber production and the type and frequency of harvest is due to the need to protect or restore multiple use values other than timber production or to move the area towards desired conditions”.

This guideline gives a broad range of conditions under which thinning of trees which have not reached the culmination of mean annual increment may occur on lands suitable for timber production. Wildland-urban interface boundaries are established by county governments to promote public safety. The Nez Perce-Clearwater is obligated to be responsive to the counties concerns.

Concern 5 - Timber, Forest Products, and Firewood-Timber Suitability (letter number 3110, comment 30)

The Forest Service should reconsider standard FW-STD-TMR-01. This is because, in situations with multiple alternatives that move toward the desired condition, the Forest Service would not select the viable alternative because most likely it would produce the most timber.

Response to comment

The 2012 Planning Rule and the Forest Service Handbook FSH 1909.12-Land Management Planning Handbook – Chapter 60 Forest Vegetation Resource Management provides guidance on the development of plan components. Plan component FW-STD-TMR-01 states “Harvest activities on lands not suitable for timber production shall be designed to move toward desired conditions of those lands and are not designed for the purpose of timber production”. The language of this plan component complies with Section 64.15 Selection of Harvesting System of FSH 1909.12 which states:

NFMA directs that plans:

(E) insure that timber will be harvested from National Forest System lands only where . . .

(iv) the harvesting system to be used is not selected primarily because it will give the greatest dollar return or the greatest unit output of timber . . . (16 U.S.C. 1604(g)(3)).

The Planning Rule requires plan components, including standards or guidelines, to meet this limitation at §219.11(d)(5).

As described in section 64 of this Handbook, plans should include a standard indicating that the harvesting system for a project must not be selected primarily for the greatest dollar return or output of timber.

The process of developing a timber sale involves producing a feasibility analysis to ensure that there is a balance of ecosystem, social and economic benefits. Timber sales are packaged to offer economic viability for purchasers.

Concern 6 - Timber, Forest Products, and Firewood-Timber Suitability

The Forest Plan would allow salvage harvest of trees over and above the long-term sustained- yield calculations that are substantially damaged by fire, windthrow, or other catastrophe or in imminent danger from insect or disease attack. The Forest Service should use minor thinning prescriptions but with a larger management paradigm designed to provide timber products in a sustainable manner through regeneration harvest.

Letter #	Comment #
873	12
877	615
968	6

Response to comment

The 2012 Planning Rule and the Forest Service Handbook FSH 1909.12-Land Management Planning Handbook – Chapter 60 Forest Vegetation Resource Management provides guidance on the development

of plan language and components. The frequency and severity of disturbance events which create standing dead and dying trees are difficult to predict. For this reason, it is not practicable to predict the amount of salvage harvest which may be available in any given decade. Salvage harvest volumes are considered differently from green timber volume. The language of the revised forest plan complies with Section 64.3 Limiting the Quantity of Timber that Can be Removed of FSH 1909.12 which states:

(b) Salvage harvesting.

Nothing in subsection (a) of this section shall prohibit the Secretary from salvage or sanitation harvesting of timber stands which are substantially damaged by fire, windthrow, or other catastrophe, or which are in imminent danger from insect or disease attack. The Secretary may either substitute such timber for timber that would otherwise be sold under the plan or, if not feasible, sell such timber over and above the plan volume.

This guidance allows the Agency to sell salvage volume above the level of the established sustained yield limit. Salvage volume is not included in the calculation of Projected Wood Sale Quantity, Projected Timber Sale Quantity or quantity of timber sold.

The Forest Service planning regulations at 36 CFR 219.11 (d) requires implementation of the statute as follows:

Neither the sustained yield limit nor the departure limit applies to the sale of volume from salvage or sanitation harvesting of timber stands substantially damaged by fire, windthrow, or other catastrophe, or that are in imminent danger from insect or disease attack (U.S.C 1611(b)).

Additional guidance and authorization to harvest salvage volume is provided in FSH 1909.12 Section 64.32 – Projected Wood Sale Quantity, Projected Timber Sale Quantity, and Quantity of Timber Sold:

The projected wood sale quantity (PWSQ), is an estimate of the volume of all timber and other wood products that is expected to be sold during the plan period from expected harvests for any purpose (except salvage harvest or sanitation harvest) on all lands in the plan area. The projected wood sale quantity includes all woody material likely to be sold from these harvests whether or not the woody material meets the utilization standards (sec. 64.34 of this Handbook).

A variety of silviculture treatment prescriptions may be used to both achieve desired conditions for forested vegetation and to meet the objectives of the Projected Wood Sale Quantity. Both even-aged regeneration harvest such as clearcutting and intermittent treatments such as commercial thinning are scheduled to move forested vegetation towards desired conditions. Refer to Table 366 of the Timber Section (3.5.1 FEIS) for a list of potential harvest treatments.

Concern 7 - Timber, Forest Products, and Firewood-Timber Suitability

While the amount of unsuitable lands where some timber harvest may occur is large, only a small percentage of these lands may be managed per year; therefore, the Forest Service should retain the maximum possible number of acres for timber management. There is immediate action needed to address thick stands of wildfire-prone grand fir, cedar, Engelmann spruce, and lodgepole, which now dominate the landscape, instead of more fire-resistant species, such as white pine, western larch, and ponderosa pine.

Letter #	Comment #
873	40
979	1
17872	4

Response to comment

Approximately 46 percent of management area 2 is classified as unsuitable lands where timber harvest may occur. The 2008 Idaho Roadless Rule dictates that only 1 percent of these lands may be harvested per decade and that any such harvest results from forest restoration treatments intended to protect or enhance resource values other than timber. Refer to the Timber section 3.5.1 for a full breakdown of unsuitable lands by management area. A small portion of management area 3 is classified as unsuitable lands where harvest may occur. These management area 3 lands are primarily associated with the outer portion of riparian zones. These outer riparian zone acres are subject to the same restrictions as those acres within management area 2; management objectives are not focused on timber management. On portions of the forest classified as unsuitable lands where timber harvest may occur the intent is to allow natural processes such as wildfire to play a dominant role in achieving desired conditions. These lands are expected to respond under a more natural fire regime and recover to a species composition dominated by seral species. To facilitate this transition the forest plan expresses objectives to plant seral species such as ponderosa pine, western larch and western white pine following wildland fires.

Concern 8 - Timber, Forest Products, and Firewood-Timber Suitability (letter number 1060, comment 151)

The Forest Service should revise FW-STD-TBR-05 with respect to direct, indirect, and cumulative effects in project-level NEPA analyses.

Response to comment

Plan component FW-STD-TBR-05 refers to the maximum opening size resulting from even-aged regeneration harvests. Project level NEPA analysis will determine if there is a need to implement this standard and what direct effects are anticipated. Indirect and cumulative effects are disclosed in the Forestlands and Appendix B section of the EIS.

Forest Service Handbook FSH 1909.12-Land Management Planning Handbook – Chapter 60 Forest Vegetation Resource Management provides guidance on the development of plan language and components. FSH 1909.12 Section 64.21 – Limits on Maximum Size of Created Openings provides guidance on developing this standard as well as rules for implementing this standard.

Concern 1 - Timber, Forest Products, and Firewood-Harvest Levels

Areas in each management unit should be excluded from the determination of mean annual increment, including wilderness areas, roadless areas, old growth areas, the 300-foot buffer along salmon, steelhead, cutthroat trout, bull trout streams, and areas of steep slopes or fragile soils. The Forest Service should use zoning areas to avoid conservation areas and riparian zones.

Letter #	Comment #
621	6
3110	23
17733	6

Response to comment

Harvest scheduling for even-aged regeneration harvest units is based on the principle of culmination of mean annual increment through policy direction. Forest Service Handbook 1909.12 Section 64.26 – Culmination of Mean Annual Increment of Growth provides direction in the development of plan component language regarding under what circumstances the principle of culmination of mean annual increment is to be applied. Plan components that describe the stand conditions under which culmination of mean annual increment are to be applied are described in the Timber section (FW-STD-TBR-9 through 11) of the Land Management Plan. The sustained yield limit, described in Section 3.5.1 of the FEIS sets the upper limit of timber harvest that could occur. Plan component FW-OBJ-TBR-01 is the expected level of timber harvest under the preferred alternative which is based on the pace and scale of restoration needed to achieve desired conditions for forest vegetation.

Application of the principle of culmination of mean annual increment is only applied on lands suitable for timber production. Lands suitable for timber production are all located within management area 3. Please refer to appendix A of the FEIS for a list of maps which illustrate the location of lands suitable for timber production. Sensitive areas such as riparian areas are classified as unsuitable lands where harvest may occur to achieve other resource objectives and are subject to management constraints designed to protect sensitive resources. Refer to the Forest Plan, Chapter 2. Lands classified as wilderness are all located within management area 1 and are not subject to timber harvest.

Concern 2 - Timber, Forest Products, and Firewood-Harvest Levels

The Forest Service should revise specific standards and guidelines for greater specificity and direction.

Letter #	Comment #
307	106, 107
3110	28, 33

Response to comment

Development of Forest Plan language regarding identification of treatment units and harvest levels is guided by the 2012 Planning Rule and Forest Service Handbook 1909.12. The Forest Plan is developed as a programmatic document which does not specifically authorize vegetation treatment projects or direct specific actions to be undertaken. The plan provides direction for the development of proposals which are analyzed and expressed within NEPA documents and are subject to public review and comment.

Plan components are informed and developed through analyzing the natural range of variation at multiple scales as directed by the 2012 Planning Rule. Proposed harvest levels vary by alternative and are based on limits defined by the sustained yield limit and suitability analysis. Policy directing the determination of the sustained yield limit and timber suitability can be found in Forest Service Handbook 1909.12 – Land Management Planning Handbook, Chapter 60. Sustained yield limit and timber suitability are described in the revised forest plan, Chapter 5, Production of Natural Resources – Subsection 5.1 – Timber. The level of harvest is based on both the pace and scale of treatments needed to achieve desired conditions over the life of the revised forest plan.

The 2012 Planning Rule and Forest Service Handbook 1909.12 require that plan components address ecosystem integrity through analysis of composition, structure, function and connectivity. Patch size and pattern are important indicators of both forest structure and habitat connectivity. The analysis of average opening patch size and pattern has been updated in Section 3.2.1 and Appendix B of the FEIS.

For a detailed analysis of the estimates for average opening size (patches) please see the document “Using Natural Range of Variation Modeling to Estimate Historic Opening Size on the Nez Perce-Clearwater National Forests” found in the project record. The forestwide average patch size is 350 acres. This forestwide estimate describes the size of forested patches resulting from stand replacing disturbances. Patch sizes specific to each broad potential vegetation type can be found in Appendix B, Table 11. Maximum opening size for regeneration harvest units is 207 acres as described in plan component FW-STD-TBR-06. Refer to Appendix 4 – Management Approaches of the Forest Plan for a description of how average patch size by broad potential vegetation types is applied to vegetation treatments.

Concern 3 - Timber, Forest Products, and Firewood-Harvest Levels

The revised Forest Plan and EIS should include a regime of regeneration harvests over 40 acres in size. This would be done to convert those stands to more fire-resistant white pine, western larch, and ponderosa pine species and to provide forage for big game species. Additionally, the Forest Service should consider the cumulative impact of land management actions on adjacent lands not included in the National Forest System, when determining the appropriate harvest unit size for wildlife habitat security and connectivity.

Letter #	Comment #	Letter #	Comment #
307	109	1115	14
528	4	17349	1
979	3	17899	3

Response to comment

Forest Plan component FW-STD-TBR-06 establishes the maximum opening size exemption for even-aged regeneration harvest units. The maximum opening size exemption is established to 207 acres. This opening size is based on a natural range of variation analysis for average forest vegetation patch size resulting from natural disturbance patterns. The current 40-acre limit on patch size has proven insufficient to establish and promote early seral species at landscape scales. Increasing the average patch size to reflect natural disturbance patterns is a strategy to promote early seral species establishment and move forested vegetation towards forested dominance types which are more resilient to wildland fire. In addition to the maximum opening size; recommendations for establishing openings specific to each broad potential vegetation type are provided in Appendix 4 – Management Approaches of the Forest Plan.

The Forest Service does not directly consider the cumulative impacts of land management actions on lands not administered by the Agency. Rather, the EIS addresses the cumulative effects of other land management policy, guidance, or practices (EIS citation). Effects of land management actions (such as current or proposed openings on adjacent lands) would be addressed in project specific proposals associated with the NEPA process.

Concern 4 - Timber, Forest Products, and Firewood-Harvest Levels

The proposed harvest volumes are too high. The Nez Perce-Clearwater must justify how increasing logging levels to 60-80 million board feet annually under Alternative Z would qualify as "natural processes dominating over anthropogenic influences". Additionally, the forest plan should require that extraction efforts be planned and executed to balance habitat security, route densities and the overall nutritional quality of the forest following logging activities.

Letter #	Comment #
465	18
946	4
17374	1

Response to comment

Plan components are informed and developed through analyzing the natural range of variation at multiple scales as directed by the 2012 Planning Rule. Proposed harvest levels vary by alternative and are based on limits defined by the sustained yield limit and suitability analysis. Policy directing the determination of the sustained yield limit and timber suitability can be found in Forest Service Handbook 1909.12 – Land Management Planning Handbook, Chapter 60. Sustained yield limit and timber suitability are described in the revised forest plan, Chapter 5, Production of Natural Resources – Subsection 5.1 – Timber. The level of harvest is based on both the pace and scale of treatments needed to achieve desired conditions over the life of the revised forest plan.

The projected timber sale quantity for the action alternatives is presented in Chapter 3.5.1 of the FEIS. The preferred alternative includes a projected timber sale quantity of 190 to 210 million board feet per year. This harvest level is estimated to be obtainable for 40 years. After 40 years the harvest level is expected to be maintained at a minimum of 145 million board feet per year. Harvest levels beyond 40 years are needed to maintain the forest at or near the desired conditions specified in the Forest Plan.

The long-term sustained yield capacity calculated for the 1987 Forest Plans was 210 million board feet for the proclaimed Nez Perce National Forest and 429 million board feet for the proclaimed Clearwater National Forest. The allowable sale quantity, as defined for the 1987 Forest Plans, is 108 million board feet on the Nez Perce National Forest and 267 million board feet on the Clearwater National Forest, for a total of 375 million board feet. The actual annual timber volume of timber products offered averaged 46 million board feet for the period 1997 through 2018.

Harvest levels which fall far below the sustained yield limit have greatly impacted forest health and continue to promote uncharacteristic fire behavior which threatens critical wildlife habitat. It would not be possible to obtain the desired conditions for forested vegetation specified in the Forest Plan at such low harvest levels. A minimum level of harvest is required; as indicated by the preferred alternative, to promote ecosystem integrity and reduce the potential of catastrophic loss of wildlife habitat.

The abundance and diversity of wildlife found on the Nez Perce-Clearwater have existed under the fire regimes which define the ecosystems of the forest. The level of timber harvest represents a small fraction of the total disturbance levels common for this forest. The natural range of variation analysis described in appendix B of the FEIS describes the effects of limited disturbance on ecosystem sustainability.

Concern 5 - Timber, Forest Products, and Firewood-Harvest Levels (letter number 307, comment 102

Commenters stated that it should not be a desired condition to harvest dead and dying trees (per FW-DC-TBR-03) just because numbers exceed the very low levels identified in MA3-GDL-FOR-05. This is because dead trees provide very important ecosystem functions including wildlife habitat, fisheries habitat, prevention of soil displacement, and soil development. It was suggested that this statement be removed from plan alternatives.

Response to comment

Response is moved to “Snags-01” Response to Comment

Concern 6- Timber, Forest Products, and Firewood-Harvest Levels

The Forest Service should accelerate timber harvesting to promote economic activity and healthy forests. An accelerated harvest should be implemented to achieve desired future conditions in MA 3. This would be done to prevent a rapid drop-off in harvest, which could cause economic disruption to the industry and local communities.

Letter #	Comment #	Letter #	Comment #
42	1	16853	1
434	1	17350	1
632	2	17886	2
1060	34		

Response to comment

The harvest scheduling analysis performed to develop the projected timber and wood sale quantities is detailed in Appendix B of the FEIS. The preferred alternative established a harvest level which promotes attainment of desired conditions and operates under the Forest Plan constraints. The harvest schedule strives to meet ecological integrity (FW-DC-TE-05) as well as social and economic sustainability (FW-GDL-ES-01). Development of the harvest schedule was performed using the PRISM model to maximize potential harvest levels while maintaining ecological integrity and ensuring a long-term sustained yield of timber resources.

Plan components are informed and developed through analyzing the natural range of variation at multiple scales as directed by the 2012 Planning Rule. Proposed harvest levels vary by alternative and are based on limits defined by the sustained yield limit and suitability analysis. Policy directing the determination of the sustained yield limit and timber suitability can be found in Forest Service Handbook 1909.12 – Land Management Planning Handbook, Chapter 60. Sustained yield limit and timber suitability are described in the revised forest plan, Chapter 5, Production of Natural Resources – Subsection 5.1 – Timber. The level of harvest is based on both the pace and scale of treatments needed to achieve desired conditions over the life of the revised forest plan.

The projected timber sale quantity for the action alternatives is presented in Chapter 3.5.1 of the FEIS. The preferred alternative describes a projected timber sale quantity of 190 to 210 million board feet per year. This harvest level is estimated to be obtainable for 40 years. After 40 years the harvest level is expected to be maintained at a minimum of 145 million board feet per year. Harvest levels beyond 40 years are needed to maintain the forest at or near the desired conditions specified in the Forest Plan.

Concern 7- Timber, Forest Products, and Firewood-Harvest Levels

There is a discrepancy regarding the timber outputs identified in Table 4 under Alternatives Y and Z, compared with the document text. This should be reviewed and updated.

Letter #	Comment #
452	7
663	9
968	8

Response to comment

References to timber outputs, sustained yield limits and projected timber and wood sale quantities have been reconciled between the Forest Plan and FEIS as well as supporting documents. In addition, FEIS Section 3.5.1, has been updated to reflect updated PRISM modelling between the Draft and Final FEIS. A more detailed description of all modelling updates for both PRISM and SIMPPLLE model analysis can be found in Appendix B of the EIS.

Concern 8 - Timber, Forest Products, and Firewood-Harvest Levels (letter number 17473, comment 2)

The Forest Service should maintain allowable timber harvest volumes at or below the 1987 Forest Plan volume of 50 to 60 million board feet.

Response to comment

The long-term sustained yield capacity calculated for the 1987 Forest Plans was 210 million board feet for the proclaimed Nez Perce National Forest and 429 million board feet for the proclaimed Clearwater National Forest. The allowable sale quantity, as defined for the 1987 Forest Plans, is 108 million board feet on the Nez Perce National Forest and 267 million board feet on the Clearwater National Forest, for a total of 375 million board feet. The actual annual timber volume of timber products offered averaged 46 million board feet for the period 1997 through 2018.

Harvest levels which fall far below the sustained yield limit have greatly impacted forest health and continue to promote uncharacteristic fire behavior which threatens critical wildlife habitat. It would not be possible to obtain the desired conditions for forested vegetation specified in the Forest Plan at such low harvest levels. A minimum level of harvest is required; as indicated by the preferred alternative, to promote ecosystem integrity and reduce the potential of catastrophic loss of wildlife habitat.

Concern 9 - Timber, Forest Products, and Firewood-Harvest Levels (letter number 1115, comment 11)

The Forest Service should prioritize timber harvest in areas where big game habitat improvement is the primary objective.

Response to comment

Forest Plan components FW-DC-WL-03, FW-DC-WL-09, FW-DC-WLMU-06, and FW-DC-WLMU-07 and management area specific plan components (MA2-GDL-WL-01, MA2&MA3-DC-WLMU-01, MA2-DC-WLMU-02, MA2&MA3-OBJ-WLMU-01, and MA2&MA3-GDL-WLMU-01) for big game will provide direction for the development of project specific goals and objectives. The scale of proposed vegetation treatments under the revised Forest Plan will both improve overall forage availability and increase nutritional resources for big game. Improvement of big game habitat will result from both mechanical vegetation treatments such as timber harvest and from prescribed fire.

Concern 1 - Timber, Forest Products, and Firewood

Aggressive and accelerated management of grand fir and Douglas-fir stands should be recommended on lands determined to be suitable for timber harvesting. This would address recent outbreaks of the mountain pine beetle, hemlock looper, and scolytus, all of which are indicators that much of the forest is overmatured. To support this, the Forest Service should allow the use of temporary roads and regular timber sales to promote the sustainable harvest of a least 200 million board feet per year.

Letter #	Comment #	Letter #	Comment #
133	1	17890	1
17882	1	17906	2
17887	1		

Response to comment

The 2012 Planning Rule and Forest Service Handbook 1909.12 directs the development of Forest Plan components and language. Refer to Section 2.1.3 Forestlands in the Revised Forest Plan for the desired conditions for terrestrial vegetation. These desired conditions are intended to move the current vegetation landscape dominated by later successional species such as grand fir and mountain hemlock toward a landscape dominated by early seral species such as ponderosa pine, western white pine and western larch. The pace of this restoration effort is illustrated in the objectives tables associated with each broad potential vegetation type.

Insect and disease outbreaks are typically associated with the presence and density of host species. For example, host species such as lodgepole pine may give rise to mountain pine outbreaks. By reducing the density of lodgepole pine stands severe mountain pine beetle outbreaks may be reduced.

The use of temporary roads will continue to provide the primary access to timber harvest units. Old roads, many of which are closed and/or overgrown will be prioritized for use when such use is compatible with other resource values and concerns.

The projected timber sale quantity for the action alternatives is presented in Chapter 3.5.1 of the FEIS. The preferred alternative describes a projected timber sale quantity of 190 to 210 million board feet per year. This harvest level is estimated to be obtainable for 40 years. After 40 years the harvest level is expected to be maintained at a minimum of 145 million board feet per year. Harvest levels beyond 40 years are needed to maintain the forest at or near the desired conditions specified in the Forest Plan.

Concern 2 - Timber, Forest Products, and Firewood (letter number 452, comment 5)

The Forest Service should allow non-culminated trees to be harvested, so as to create wildlife forage or for other resource objectives.

Response to comment

Limitations on the removal of trees having not reached the culmination of mean annual increment is governed by the NFMA (16 USC 1604 (m)) and policy found at 36 CFR 219.11(d)(7). This policy only applies to treatment units with an even-aged regeneration harvest prescription. Refer to section 3.5.1 in the FEIS for a list of annual acres treated by treatment type. Wildlife forage is anticipated to be created through a combination of vegetation treatment types including prescribed fire. For treatment units having reached the culmination of mean annual increment, a clearcut regeneration treatment will generate short term forage production. For other treatment types such as commercial thinning, the removal or harvest of

trees having not reached the culmination of mean annual increment is warranted. These units will also produce a short-term increase in forage production resulting from a reduction in total stand density.

Concern 3 - Timber, Forest Products, and Firewood

The proposed plan would allow for heavy logging. This would make catastrophic wildfires more common in Idaho, as it has become in Washington and Oregon, where the clear-cutting has dried out the soils and made firefighting ever more difficult. The Forest Plan should exclude clearcutting, except where absolutely necessary. Clearcutting at the levels proposed rarely mimics natural disturbance and could seriously damage wildlife security habitat.

Letter #	Comment #
1054	13
17543	2

Response to comment

Plan components are informed and developed through analyzing the natural range of variation at multiple scales as directed by the 2012 Planning Rule. Proposed harvest levels vary by alternative and are based on limits defined by the sustained yield limit and suitability analysis. The directives guiding the determination of the sustained yield limit and timber suitability can be found in Forest Service Handbook 1909.12 – Land Management Planning Handbook, Chapter 60. Sustained yield limit and timber suitability are described in the revised forest plan, Chapter 5, Production of Natural Resources – Subsection 5.1 – Timber. The level of harvest is based on both the pace and scale of treatments needed to achieve desired conditions over the life of the revised forest plan.

Best available science does not correlate logging activity with an increase in catastrophic wildland fire. Timber harvest results in a reduction of both density of forest vegetation and a reduction in fuel loading. Post logging treatment activities such as broadcast and pile burning result in further reductions of fuel loading which results in reducing post treatment fire severity.

Maintaining adequate soil moisture to promote reforestation efforts is an important consideration in the development of silviculture prescriptions. Silviculture prescriptions are developed at the stand level to ensure long term site productivity and to achieve desired conditions for forested vegetation detailed in the revised forest plan. Silviculture treatments such as clearcutting are used when appropriate to achieve desired conditions. Clearcutting is an appropriate tool used to promote the establishment of early seral species such as western white pine, western larch and ponderosa pine. These intolerant species require abundant sunlight in order to thrive. Section 3.2.1 of the FEIS describes the need to convert late seral climax species compositions towards early seral species to promote ecosystem integrity.

The abundance and diversity of wildlife found on the Nez Perce-Clearwater have existed under the fire regimes which define the ecosystems of the forest. The level of timber harvest represents a small fraction of the total disturbance levels common for this forest. The natural range of variation analysis described in appendix B of the FEIS describes the effects of limited disturbance on ecosystem sustainability.

Concern 4 - Timber, Forest Products, and Firewood (letter number 12883, comment 10)

The Forest Service should not allow exceptions for commercial thinning, thinning, or other logging, all of which reduce current 300-foot buffers to 150 feet along rivers and streams in the Nez Perce-Clearwater National Forests.

Response to comment

Plan components are developed through guidance presented in the 2012 Planning Rule. Plan components detailed in the revised forest plan describe the conditions under which any vegetation management activities may occur. Riparian management zone widths and management constraints are defined for each stream category as described in the Aquatic Ecosystems sections of the revised forest plan. Limited vegetation management is allowed under the plan to achieve desired conditions within riparian management zones as determined by project specific analysis.

Concern 5 - (Timber, Forest Products, and Firewood letter number 717, comments 199 and 200)

In the revised Forest Plan and EIS, the Forest Service should disclose estimates of the additional new road construction that would be required under the action alternatives. This is to avoid impacts on water quality and fish and wildlife habitat. The Forest Service should not allow a departure from the sustainable yield limit, because treating salvage logging as an additional bonus would only further escalate timber harvest and cause even more degradation.

Response to comment

The revised forest plan and supporting EIS does not authorize or schedule any specific management projects. Any new road construction will be proposed and analyzed under project specific NEPA and subject to public review and comment. Refer to Section 3.4.4 – Infrastructure of the FEIS for a discussion of the infrastructure analysis and estimates of the minimum road system required to implement the preferred alternative.

Departure from the sustained yield limit is authorized under policy found in Forest Service Handbook 1909.12. The analysis of Alternative X utilized the authority to exceed the sustained yield limit to study both the effects of this approach and to compare rates of attainment of desired conditions. The preferred alternative does not utilize the authority to exceed the sustained yield limit.

Salvage volume is not included in the calculation of projected timber or wood sale quantities as detailed in Forest Service Handbook 1909.12, Chapter 60. This is largely due to the inability to accurately predict the quantities of salvage volume that may be available at any point in time. The quantity of timber salvaged over the past 30 years is approximately 2 percent of acres effected by wildfire as described in Section 3.5.1 of the FEIS.

Concern 6 - Timber, Forest Products, and Firewood (letter number 974, comment 26)

The Forest Service should revise allowable timber harvest management to comply with the Wild and Scenic Rivers Act. The language used in the draft EIS and Forest Plan suggests a stricter policy than the act.

Response to comment

The Wild and Scenic Rivers Act allows vegetation management including limited timber harvest to protect Outstandingly Remarkable Values (ORVs) in eligible and suitable river corridors, and protect and enhance ORVs in designated river corridors. The wild and scenic river corridors on the Forests list fish species which are listed under the Endangered Species Act as an ORV. Additional protections for ESA listed fish species are warranted within the five designated wild and scenic river corridors. The limitation to management within wild and scenic river corridors are described in Section 5.5.2 of the revised forest plan and in Section 3.6.1 – Designated Areas in the FEIS.

Concern 7 - Timber, Forest Products, and Firewood (letter number 968, comment 7)

Text and maps should be updated to explain the difference, if any, between timber harvest and timber production.

Response to comment

Distinctions between the phrases “timber harvest” and “timber production” are detailed in the timber suitability discussion in Section 3.5.1 of the FEIS. Definitions are also provided in Appendix 2 – Glossary of the revised forest plan. The term “timber production” refers to lands suitable for timber production as determined by the timber suitability analysis. Such lands are exclusively within management area 3. The term “timber harvest” refers to lands that are not suitable for timber production but are lands where timber harvest may occur to accomplish other resource management objectives such as wildlife habitat improvement. Lands suitable for timber harvest are located with management area 2. Reference to timber harvest have been removed from maps illustrating lands suitable for timber production.

Concern 8 - Timber, Forest Products, and Firewood

The Forest Service should develop new standards and guidelines for sanitation and salvage activities across the National Forests. It should revise other plan components to adhere to snag retention and coarse woody debris guidelines that limit timber harvest to sustained yields.

Letter #	Comment #
90	1
764	2
1060	152

Response to comment

The Nez Perce-Clearwater revised forest plan does not provide policy guidance for USDA Forest Service Agency. The 2012 Planning Rule provides the overall direction for development of standards and guidelines. Timber harvest objectives comply with sustained yield limits as described in Appendix B of the FEIS.

Timber volume derived from sanitation and salvage prescriptions are not included in the calculation of projected timber or wood sale quantities as detailed in Forest Service Handbook 1909.12, Chapter 60. This is largely due to the inability to accurately predict the quantities of salvage volume that may be available at any point in time. The quantity of timber salvaged over the past 30 years is approximately 2 percent of acres effected by wildfire as described in Section 3.5.1 of the FEIS.

Plan components related to snag and coarse woody debris management are guided by best available science as described in the Section Forestlands of the FEIS.

Concern 9 - Timber, Forest Products, and Firewood (letter number 89, comment 1 and 2)

In the revised Forest Plan and EIS, the Forest Service should retain the quantitative standards that establish upper limits to protect old-growth, sensitive soils, riparian areas, water quality, and wildlife habitat. Eliminating quantitative standards in the Forest Plan would facilitate an increase in logging.

Response to comment

The revised forest plan contains desired conditions, standards and guidelines for old growth, soils, riparian management areas, water quality and wildlife habitat. Both quantitative and qualitative plan components are derived from analysis presented in the FEIS as well as national policy guidance and best available science. Quantitative and qualitative standards and guidelines specific to old growth, soils, riparian management areas, water quality and wildlife habitat serve as constraints to vegetation management. Vegetation management objectives described in Section 2.3.1 - Forestlands of the forest plan are informed through the natural range of variation analysis which describes a range of forest disturbance thresholds required to maintain ecosystem integrity. Timber harvest levels described in Section 3.5.1 of the FEIS are based on both the principle of disturbance ecology and ecosystem sustainability while providing for economic sustainability. The principle of disturbance ecology recognizes that disturbance processes are necessary for ecosystem functions such as forest succession. Ecosystem sustainability requires long term persistence of old growth, productive soils, functioning riparian management areas, water quality, and wildlife habitats over multiple scales. Economic sustainability requires a long-term sustained yield of forest products which is dependent on ecosystem sustainability.

The Land Management Plan (LMP) contains plan components which integrate social, economic, cultural and ecological considerations and resources. Both the 2012 Planning Rule and FSH 1909.12 focus development and implementation of planning components in the context of desired multiple uses under an integrated framework. The LMP is not an assemblage of unique plan components intended to guide management of individual resources but a collection of integrated plan components to promote multiple use management across all resources. All forest plan desired conditions carry equal weight and attainment of a given desired conditions cannot preclude attainment of another. The LMP is intended to be implemented as a whole and not resource by resource.

Concern 10 - Timber, Forest Products, and Firewood (letter number 16853, comment 2)

The Forest Service should consider the cumulative effects of openings on the landscape and should allow for alternative silvicultural approaches. It should also consider research findings to be consulted for creating stand through landscape-scale heterogeneity of vegetation structure, where feasible.

Response to comment

Effects analysis of forest patch size and vegetation pattern are described in Section 3.2.1 of the FEIS. Analysis procedures are described in Appendix B of the FEIS. Potential silviculture prescriptions are described in Section 3.5.1 of the EIS and Appendix 4 – Management Approaches of the revised forest plan. Site-specific silviculture prescriptions are developed through an interdisciplinary approach during project development. Alternative silviculture treatments are analyzed and considered through the process of silviculture prescription development as described in Forest Service Handbook 2409.17 – Silviculture Practices Handbook. Silviculture prescription development requires review and consideration of best available science as well as interdisciplinary coordination.

Concern 11 - Timber, Forest Products, and Firewood

In order to determine when and where to conduct vegetative management, the Forest Service should conduct a spatially explicit landscape evaluation and focus on previously managed stands with existing road systems.

Letter #	Comment #
672	11
805	33

Response to comment

Site-specific vegetation management projects are developed through spatially explicit landscape evaluations using a variety of spatial analysis tools. Aerial imagery is analyzed in a GIS environment to quantify spatial patterns of forested vegetation along with the Forest Vegetation Simulator Spatial (FVS Spatial) database and field reconnaissance to determine existing conditions on the ground. Vegetation management will be focused on attainment of desired conditions for species composition and size class distribution as described in the forest plan. Plan components are defined at multiple scales including management area and broad potential vegetation type. Past management activities do not preclude inclusion of areas proposed for treatment. Appendix 4 – Management Approaches of the revised forest plan describes project development considerations needed to analyze both project and landscape scale vegetation treatments.

The NRV analysis is focused on natural disturbance events only. Openings in the forest canopy as well as adjacent opening are projected and analyzed over time for common forest metrics such as species composition, size class and density. Landscape heterogeneity is a function of the spatial arrangement of forest openings and forest succession.

Forestlands

Concern 1

The Forest Service should acknowledge that patch and pattern vary by potential vegetation type; the entire Forest Plan fails to provide this information. Additionally, the Forest Service should reevaluate the models used to predict the historical range of variability, because the models are imprecise.

Letter #	Comment #
307	34, 68
805	3, 4, 9
877	32, 306
1060	80, 82

Response to comment

The 2012 Planning Rule and Forest Service Handbook 1909.12 require that plan components address ecosystem integrity through analysis of composition, structure, function and connectivity. Patch size and pattern are important indicators of both forest structure and habitat connectivity. The analysis of average opening patch size and pattern has been updated in Section 3.2.1 and Appendix B of the FEIS.

For a detailed analysis of the estimates for average opening size (patches) please see the document “Using Natural Range of Variation Modeling to Estimate Historic Opening Size on the Nez Perce-Clearwater National Forests” found in the project record. The forestwide average patch size is 350 acres. This forestwide estimate describes the size of forested patches resulting from stand replacing disturbances. Patch sizes specific to each broad potential vegetation type can be found in Appendix B, Table 11. Maximum opening size for regeneration harvest units is 207 acres as described in plan component FW-

STD-TBR-06. Refer to Appendix 4 – Management Approaches of the Forest Plan for a description of how average patch size by broad potential vegetation types is applied to vegetation treatments.

The SIMPPLLE (SIMulating Patterns and Processes at Landscape scaLEs) model was used to project the treatments scheduled by the PRISM (plan-level forest activity scheduling model) model in the context of an uncertain future (Chew et al. 2012). Natural processes, such as fire, succession, insects, and disease, were simulated in a stochastic fashion in and around the PRISM-scheduled treatments to provide a range of possible vegetation conditions for each alternative. These models represent the standard used for modeling effects of alternatives developed under the forest plan revision exercise for USFS Region 1.

These models are tools that provide information useful for understanding vegetation change over time and the relative differences between alternatives. The PRISM and SIMPPLLE models are best used to provide information of comparative value; these models are not intended to be predictive or to produce precise values for vegetation conditions. Out of necessity, the models simplify very complex and dynamic relationships between ecosystem processes and disturbances, such as climate, fire, and succession, and vegetation metrics over time and space. Though best available information, including corroboration with independent data sources, professional experience, and knowledge, is used to build these models, there is a high degree of variability and an element of uncertainty associated with the results because of the ecological complexity and the inability to accurately predict the timing and/or location of future events.

Concern 2

Dominance type objectives for the cold and cool moist potential vegetation types are higher than what is supported by the NRV analysis and size class objectives limit the development of large trees.

Letter #	Comment #
26	1
307	33, 69, 70, 71
873	16, 41
887	4
938	27
1060	15, 35, 77, 78, 79, 88, 90, 123

Response to comment

The 2012 Planning Rule and Forest Service Handbook 1909.12 require that plan components address ecosystem integrity through analysis of composition, structure, function and connectivity. Desired conditions for species composition and size class are informed by the NRV analysis. The forest vegetation modelling process is detailed in Appendix B of the EIS. The NRV analysis which informed the forested vegetation desired conditions for the DEIS was recalculated in order to incorporate an updated climate model considered to be best available science. These efforts resulted in the following:

- Generated an updated natural range of variation (NRV) analysis to incorporate an updated climate model. This updated NRV analysis did not substantially change estimates of species presence or persistence over time. The overall trend is consistent with the effects disclosed in the DEIS. In addition, the updated NRV analysis included an estimate of vegetation conditions within riparian habitats. As a result, vegetation conditions for dominance type, size class and density are now distinguished as either upland or riparian.

- The NRV analysis (appendix B) was recalculated with the SIMPPLLE model to capture key improvements that were made based on internal and external comments. These improvements included:
 - Revised western spruce budworm logic based on Regional entomologist input.
 - Updated fire spread logic and version that allows fire to move realistically across boundaries.
 - Updated geographic extent to reduce model run-time and summarize results on NFS lands.
 - Updated/refined wildlife habitat queries.
 - Vegetation desired conditions were adjusted based on new NRV results. Several desired conditions were also adjusted based on internal and public comments, utilizing BASI. The methods and rationale for desired condition development are detailed in appendix B.
 - The SIMPPLLE modeling for all alternatives was recalculated, to capture the model improvements described for NRV, and to incorporate updated PRISM results (which used updated desired conditions, maps of lands suitable for timber production, and other changes as described in the FEIS Section 3.5.1). Another key improvement was incorporating a range of future fire scenarios to better capture a range of variation and the uncertainty associated with a warming climate, as described in appendix B. Based on the suite of updates made to the modeling process, the trend of some vegetation attributes changed. In all cases, the magnitude of change relative to the resource condition is within the scope of effects disclosed in the DEIS.

Desired conditions for species composition and size class distribution are informed by the NRV analysis but do not exactly fall within the ranges identified in the analysis. Flexibility in assigning desired conditions is necessary to accommodate attainment of other resource desired conditions such as wildlife habitat goals. Updated desired conditions for the cold and cool moist potential vegetation types can be found in the Forestlands Section of the Revised Forest. These desired conditions are compared and discussed relative to existing conditions beginning in Section 3.2.1 of the FEIS.

Specifically, whitebark pine desired conditions within the cold potential vegetation type are more aligned with natural disturbance processes in management area 1. As detailed in Appendix B of the EIS, attainment of whitebark pine desired conditions will rely on artificial regeneration efforts to overcome the effects of whitepine blister rust.

Desired conditions for species composition and size class for the cool moist potential vegetation type is informed by the NRV analysis. Natural disturbance processes are projected to increase in scale for management areas 1 and 2. Increases in disturbance processes such as wildland fire will promote the establishment and maintenance of early seral species over climax species. Mixed severity fire disproportionately effects small diameter trees resulting in an increase in average stand diameter over time.

Monitoring attainment of desired conditions for each broad potential vegetation type is achieved through routine remeasurement of forest inventory analysis (FIA) plots, project level monitoring and continued refinement of the broad vegetation type mapping products. Refer to the Monitoring Plan (Appendix 3 of the revised forest plan) for a detailed list of monitoring protocols and frequencies for each forestwide metric.

Please refer to the FEIS sections 3.2.2 – At-Risk Plant Species and 3.2.9 – Wildlife, for detailed discussions of sensitive and special status species, potential effects from plan implementation, management objectives, and monitoring requirements.

The LMP contains plan components which integrate social, economic, cultural and ecological considerations and resources. Both the 2012 Planning Rule and FSH 1909.12 focus development and implementation of planning components in the context of desired multiple uses under an integrated framework. The LMP is not an assemblage of unique plan components intended to guide management of individual resources but a collection of integrated plan components to promote multiple use management across all resources. All forest plan desired conditions carry equal weight and attainment of a given desired conditions cannot preclude attainment of another. The LMP is intended to be implemented as a whole and not resource by resource.

Concern 3 (letter number 877, comment 807)

The assumptions behind the radical increase in proposed timber sales under every action alternative conflict with the objectives of sustained yield in terms of water quality, fish habitat, wildlife, and economics.

Response to comment

Guidance for the determination of the Nez Perce-Clearwater sustained yield limit and the projected timber and wood sale quantities are detailed in Forest Service Handbook 1909.12 Chapter 60 – Forest Vegetation Resource Management. Calculation of the sustained yield limit is based on all lands suitable for timber production and unsuitable lands where timber harvest may occur to achieve other resource objectives. The sustained yield limit represents the total growth of trees on such lands and is not limited by other land use constraints. It represents the maximum level of harvest that could occur on a sustained basis. This procedure is detailed in Section 3.5.1 of the FEIS. Calculation of the projected timber and wood sale quantities is derived from the PRISM model. The PRISM model generates estimates of harvest levels considering constraints defined in the Forest Plan. This includes constraints related to harvest in riparian areas, limits on the scale of harvest in conservation watershed networks, fisher and lynx habitat requirements, as well as the desired conditions for species composition and size class distribution. The projected timber and wood sale quantities represent the amount of timber available for harvest after all constraints have been satisfied. These calculations are detailed in Appendix B of the FEIS.

The long-term sustained yield capacity calculated for the 1987 Forest Plans was 210 million board feet for the proclaimed Nez Perce National Forest and 429 million board feet for the proclaimed Clearwater National Forest. The allowable sale quantity, as defined for the 1987 Forest Plans, is 108 million board feet on the Nez Perce National Forest and 267 million board feet on the Clearwater National Forest, for a total of 375 million board feet. The actual annual timber volume of timber products offered averaged 46 million board feet for the period 1997 through 2018.

Harvest levels which fall far below the sustained yield limit have greatly impacted forest health and continue to promote uncharacteristic fire behavior which threatens critical wildlife habitat. It would not be possible to obtain the desired conditions for forested vegetation specified in the Forest Plan at such low harvest levels. A minimum level of harvest is required; as indicated by the preferred alternative, to promote ecosystem integrity and reduce the potential of catastrophic loss of wildlife habitat.

Concern 4 (letter number 877, comment 125)

The Forest Service should consider that logging and associated vegetation management coincide with more intense fires, so all alternatives would exacerbate climate change.

Response to comment

The assertion that logging or vegetation management treatments increase the probability of wildfire has no basis in science. Policy governing the management of activity generated fuels such as logging slash is found in Forest Service Handbook 2400 – Timber Management, specifically Section 2436 – Brush Disposal Program. In the simplest terms, fire can only occur if sufficient fuel and fuel conditions are present to promote combustion. The purpose of the brush disposal program, which is applied to every harvest unit, is to dictate the development of a site-specific plan to mitigate the production of activity fuels. Following harvest, fuels are either piled into slash piles and subsequently burned to remove the fuel or fuels are left scattered and a prescribed burn is scheduled to consume the fuel. When biomass markets are available; activity fuels may be managed as biomass which is removed from the site and converted into fuel stock for bioenergy production or other sustainable products. If insufficient fuels are present, then the danger of fire is considered negligible. Please refer to the FEIS Section 3.2.4 – Fire Management, for a detailed discussion of forest fuels and fire management strategies as well as FEIS Section 3.2.10 – Air Quality for a discussion of how the regional airshed is managed.

Geographic Areas-Gospel-Hump

Concern 1:

The Forest Service should comply with the provisions of the National Forest Management Act and protect all roadless areas that are contiguous with the Gospel-Hump Wilderness.

Letter #	Comment #
20	1
887	88, 89
17908	5

Response to Comment

Idaho Roadless Areas that are contiguous with the Gospel-Hump Wilderness are under the direction of the Idaho Roadless Rule. Management Area 2 of the revised land management plan is consistent with the Idaho Roadless Rule.

Concern 2:

The Forest Service needs to comply with NEPA and evaluate the impacts of how site-specific projects in roadless areas of Gospel-Hump may influence decisions.

Letter #	Comment #
877	90

Response to Comment

Site specific NEPA is not addressed under Forest Planning. These are separate NEPA analyses and decisions and would comply with the Idaho Roadless Rule, if applicable.

Geographic Areas-Lower Salmon River

Concern 1:

The Forest Service should designate the Lower Salmon River area as a special management area where unique species are found, and this should take precedence over timber harvest, mining, and recreation in project planning. The Forest Service should fund more research to determine both habitat requirements and management threats to the rare and endemic snail species in the Lower Salmon River area.

Letter #	Comment #
307	30

Response to Comment

The Lower Salmon River Geographic Area contains rich geological complexity, contributing to a biological community that is unique within the plan area. This geographic area contains a large portion of the driest of the warm dry potential vegetation group dominated by ponderosa pine under a frequent low intensity fire return interval. These habitats support species associated with ponderosa pine dominated habitats, including several species of conservation concern. Ponderosa Pine is a focal species in the monitoring plan. Examples of species of conservation concern that depend on this habitat are pygmy nuthatch, the flammulated owl, the fringed myotis, and Lewis’s woodpecker. There are two monitoring elements for ponderosa pine that is common within the Lower Salmon River Geographic Area.

Geographic Areas-Pilot Knob

Concern 2:

The Forest Service should include the plan component guideline under Alternative Y (GA- GDL-PK-01Y) in all of the other alternatives in the final Forest Plan. This is because it is an important step in recognizing the importance of Pilot Knob to the Nez Perce Tribe and charts a path forward to restore the natural character of Pilot Knob.

Letter #	Comment #
307	31
563	14

Response to Comment

This plan component under Alternative Y was analyzed in the FEIS and the Responsible Official has determined that GA-GDL-PK-01 under the Preferred Alternative best meets the needs under the revised land management plan.

Concern 3:

The Forest Service should formally engage the Nez Perce Tribe for a leadership role in developing an action plan and implementation schedule for restoring Pilot Knob. This is because the Forest Service is the only entity that can legitimately articulate a vision for the future of Pilot Knob. The Forest Service should also involve other entities, such as local emergency services, County law enforcement, and communities.

Letter #	Comment #
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717	9-13
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Response to Comment

The Nez Perce-Clearwater has been consulting with the Nez Perce Tribe since 2012 on the development of the revised land management plan. A Pilot Knob action plan would be a stand-alone endeavor unrelated to the Forest Planning process.

Grizzly Bear

Concern 1:

The Forest Service should address the fact that grizzly bears occur on the National Forests and are recolonizing the area. It should analyze the impacts on grizzly bears, including those on recovery zones, migration, connectivity population estimates, and monitoring.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
5	2	683	2	5326	1
58	2	717	141-143	7602	1
99	5	747	5	16962	5
102	3	877	392, 395, 397, 398, 399, 400, 402, 403, 407, 414, 429, 430, 432, 439	17297	4
397	7	1056	1	17462	5
423	7	1065	9-12, 14, 16, 19, 30, 34, 35, 37	17509	4, 17
563	6	1099	10	17945	3
566	2	2300	3	17673	31, 32, 34
575	2	3631	4	17893	5
				17908	4

Response to comment

The FEIS has been updated to show the presence of grizzly bear on the forest. The analysis has become fully developed, and additional species-specific plan components were added to the plan for grizzly bears. The analysis still primarily rests on whether the plan will provide the ecological conditions to contribute to recovery of grizzly bears within the recovery zone, but also evaluates how the Nez Perce-Clearwater provides the ecological conditions to support connectivity to the recovery zone including the potential for the establishment of resident grizzly bears outside the recovery zone. The grizzly bear analysis now includes several spatial overlays of the various land allocations with secure habitat as an indicator, and includes an in-depth evaluation of how plan components would affect conditions for grizzly bears.

Because there are no current grizzly bear populations in this area, there is little scientific information from this area from which to draw inferences. Therefore, the analysis draws from scientific information produced from the other grizzly bear ecosystems in the lower 48 states with the recognition that many aspects of grizzly bear ecology in this area are currently unknown. To compensate, the analysis assumes that grizzly bear behavior, demographics, ecology, and the effects to grizzly bears and their habitat would be similar here as they are in other grizzly bear ecosystems. The analysis is primarily focused on how the

plan would affect the ecological conditions or habitat to support future grizzly bear populations both inside and outside of the Bitterroot Recovery Zone, and how the plan supports ecological conditions to allow connectivity of grizzly bears to become established through migration, dispersal, or gradual expansion. With this emphasis, this analysis also evaluates effects to transient individuals that may be present.

Concern 2:

The Forest Service needs to comply with the Endangered Species Act and include species- specific plan components for grizzly bears. Standards and guidelines must be developed to support the recovery of this species. The lack of analysis for grizzly bears may necessitate a supplementary EIS.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
60	5	946	8	17354	12
308	2	1056	14, 15, 22	17473	3
562	3	1065	2-4, 6-8, 13, 33	17509	14, 16
307	3	3653	1	17673	33, 35
717	144, 145, 147	7176	4	17732	3
805	75	17012	2	17900	3
877	396, 401, 404-406, 408, 413, 415, 423, 435-437	17304	5		

Response to comment

The Forest Service is compliant with the Endangered Species Act and has been in consultation with the USFWS. The LMP contains several plan components for grizzly bear:

FW-DC-WL-06. The grizzly bear Bitterroot Recovery Zone provides the ecological conditions to support recolonization of grizzly bears. Land Management Plan land use allocations provide connectivity to allow secure passage from occupied habitat to the Bitterroot Recovery Zone.

FW-DC-WL-07. The risk of grizzly bear-human conflict is reduced through awareness. The public, Forest Service employees, contractors, volunteers, and permittees are knowledgeable of conflict prevention strategies through education and interpretation.

FW-DC-WL-08. Within occupied grizzly bear habitat, developed recreation sites, administrative sites, and dispersed recreation sites where garbage disposal services are provided, facilities are equipped with necessary infrastructure so that food, garbage, and other attractants can be made inaccessible to grizzly bears to reduce the potential of human-bear conflict.

FW-DC-WL-09. Wide-ranging species are free to move across and between habitats, allowing for dispersal, migration, genetic interaction, and species recruitment.

Per concern statement 1, the analysis in the FEIS was greatly expanded from the DEIS and can be found in Chapter Three.

Concern 3:

The Forest Service needs to address impacts on grizzly bears from recreation, roads, attractants, livestock, hunting, and climate change.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
153	2	805	74	17180	1
465	15	877	393, 409-412, 416, 417, 421, 422, 424-428, 433, 434, 438	17443	3
492	1	1056	16-21	17673	36
572	3	1065	15, 17, 18, 20-31, 36	17868	14
717	136, 139, 140, 146	1089	2		

Response to comment

Effects to grizzly bears were examined in greater detail in the FEIS. Winter recreation may wake up bears in the winter, but information supporting that is not found in the lower 48 states. Interactions with people are by far the leading factors affecting grizzly bear populations. Motorized access routes (roads and trails) detract from secure habitat and has been shown in several studies to displace bears and adversely affect grizzly bear survival because it brings people in proximity to bears. The Interagency Grizzly Bear Committee (1998, 1994) recognized the impacts of human access on grizzly bear habitat. Specifically, motorized vehicle access has been shown to increase human interactions with bears and potentially increase associated grizzly bear mortality risk, increase grizzly bear displacement from important habitats, increase bear habituation to human presence, reduce reproduction, and reduce habitat security. Motorized access routes (roads and trails) and areas of concentrated human use (developed site footprints) detract from secure habitat.

The same likely holds true for grizzly bears that inhabit or pass through the Nez Perce-Clearwater National Forest. Permitted livestock grazing allotments contain live animals, livestock feed and supplements, and occasionally livestock carcasses that may attract grizzly bears into potential conflict situations with people. Developed sites provide places for people to concentrate use, which can contribute disturbance factors that may displace wary bears, while at the same time storing, preparing and eating food, or disposing of garbage, which may act as attractants for less wary bears. Availability of secure habitat, key natural food sources, and human-related attractants, can influence grizzly bear survival, reproductive success, and distribution.

Infrastructure

Concern 1: Infrastructure

The Forest Service should formally define human-made infrastructure as a stressor to better develop mitigation measures to reduce the impacts on wildlife habitats. Additionally, the Forest Service should consider the health impacts on wildlife, plants, and humans from developing communication towers.

Letter #	Comment #
577	13
1067	7

Response to comment

Commenters were concerned whether plan components sufficiently mitigate impacts of infrastructure to effectively maintain the diversity of plant and animal communities and the persistence of native species in the plan area.

Infrastructure is identified as a stressor in the ‘Stressors’ of the FEIS: “Direct human influences, such as roads, infrastructure, pollutants, mineral extraction, and fire exclusion, can disrupt ecological processes and cause further stress to the system. Stressors could intensify as increasing demands and pressures from the public for a variety of multiple uses and ecosystem services that national forest lands provide.”

The revised land management plan (LMP) includes several wildlife-specific plan components to address infrastructure. For example, FW-GDL-WL-01 has been revised to address threats of infrastructure more comprehensively, beyond just the initial citing of structures: “New communication towers, new transmission lines, and associated infrastructure should be located and designed to avoid significant adverse effects on wildlife dispersal, migration, or critical habitat.” Wildlife analyses include infrastructure as one of the modeling parameters (described in section 3.2.9 of the FEIS). The plan components that address potential effects of infrastructure are thoroughly analyzed throughout the Wildlife section of the FEIS.

A LMP does not compel action nor does it authorize, fund, or carry out projects or eliminate the need for site-specific environmental reviews. Future project activities will be guided by the plan components for infrastructure and will be analyzed for consistency with the Plan. Commenters’ requests for effects analysis on communication towers would occur through project-level NEPA rather than the programmatic-level NEPA for the LMP.

The wildlife analysis of the FEIS indicates that plan components sufficiently mitigate impacts of infrastructure to effectively maintain the diversity of plant and animal communities and the persistence of native species in the plan area.

Concern 2:

The Forest Service should manage road systems based on functionality, while minimizing total road areas. This is because they should protect wildlife and reduce overall maintenance costs. The environmental effects from new road development and existing road decommissioning should be evaluated.

Letter #	Comment #
455	4
1051	4, 5

Response to comment

The Forest Service manages the road system according to the 36 CFR §212 -Travel Management Rule. According to the rule analyzing and managing the road systems based on functionality should be addressed in a project level analysis. The Land Management Plan addresses this in:

MA2-GDL-WL-05. To maintain large areas of unfragmented habitat for wide-ranging species, such as elk and grizzly bear, new motorized trails open to the public should not be authorized in Idaho Roadless Areas unless there are adjacent areas of 5,000 acres without open motorized system routes. This guideline does not apply to:

- Community Protection Zones (CPZs) as defined by the Idaho Roadless Rule.
- Areas with existing motorized access that are currently less than 5,000 acres.
- Existing trails that are relocated or reconstructed to mitigate negative impacts to ecological resources.

FW-OBJ-RMZ-01. Improve 300 to 700 acres of riparian habitat every 5 years, through improvements that are intended to meet desired conditions for riparian management zones, such as road obliteration, riparian planting, hardwood restoration, post assisted log structures, beaver dam analogs, and reconnecting floodplains by removing road prisms or berms.

Concern 3: (letter number 1051, comment 7)

The Forest Service should consider paving high traffic roads to help minimize chronic erosion, maintenance costs, dust abatement, and other short-term solutions to ongoing problems.

Response to comment

According to the 36 CFR §212 -Travel Management Rule, this type of road improvement would be assessed individually in a roads analysis at an appropriate scale to address a specific issue such as sediment or heavy use. This is indirectly addressed in:

FW-OBJ-INF-01. Complete 600 miles of road work, such as reconstruction; re-routing; road improvements; decommissioning; or placing roads in intermittent stored service, every 5 years. Priorities shall include reducing effects on desired aquatic and riparian conditions from chronic sediment delivery or potential future road prism failures, including previously decommissioned roads where drainage features have failed.

Concern 1 – Infrastructure-Roads

The Forest Service should conduct a robust analysis for roads and their environmental consequences, using best available science from local areas, to comply with NEPA. Additionally, it should consider climate change, road densities, and direction for decreasing habitat fragmentation, watershed, wildlife, soils, habitat connectivity, and riparian areas and wetlands.

Letter #	Comment #
577	14, 16
877	297, 623, 630-634, 638, 640, 641, 648-654, 659-664, 667, 669, 673, 676
938	16
1115	20
17354	7

Response to comment

The Forest Service manages the road system according to the 36 CFR §212 -Travel Management Rule. This level of analysis is not suitable at the Land Management scale and is directed to be conducted at a project level scale by the Travel management rule. The Land Management Plan team has addressed this throughout the plan and specific detailed analysis is more appropriate at a project scale.

Concern 2- Infrastructure-Roads

Maintenance on the National Forest roads is insufficient. These roads should be maintained to support fire management, recreation, and other forest uses.

Letter #	Comment #
42	6
123	2
315	1
651	1
887	1
17872	7

Response to comment

Road Maintenance is addressed in the Forestwide Desired Conditions and Objectives:

FW-DC-INF-01. The road system serves land management and public needs and purposes. It is interconnected with federal, state, and local public roads to provide access to lands, infrastructure, other land ownerships, and inholdings where appropriate. Although roads maintained for passenger cars meet public road safety standards, roads maintained for high clearance vehicles may have hazards and require operator judgment and skill to negotiate.

FW-OBJ-INF-01. Complete 600 miles of road work, such as reconstruction; re-routing; road improvements; decommissioning; or placing roads in intermittent stored service, every 5 years. Priorities shall include reducing effects on desired aquatic and riparian conditions from chronic sediment delivery or potential future road prism failures, including previously decommissioned roads where drainage features have failed.

Concern 3 – Infrastructure-Roads

The Forest Service should adopt stronger road management direction to achieve a sustainable minimum road system and to meet the substantive requirements of the 2012 Planning Rule.

Letter #	Comment #
877	635, 637, 639, 643, 644, 646, 647, 657, 670-672, 674
8392	1

Response to comment

The Forest Service manages the road system according to the 36 CFR §212 -Travel Management Rule. In 2015 a Forestwide Travel analysis was completed to identify likely needed and likely not needed roads, which is informing decisions on road management. Additional refinements to a road system can be recommended by specific project level analysis and decisions within the project area. It is also addressed in the Land Management Plan in:

FW-DC-INF-01. The road system serves land management and public needs and purposes. It is interconnected with federal, state, and local public roads to provide access to lands, infrastructure, other land ownerships, and inholdings where appropriate. Although roads maintained for passenger cars meet

public road safety standards, roads maintained for high clearance vehicles may have hazards and require operator judgment and skill to negotiate.

FW-OBJ-INF-01. Complete 600 miles of road work, such as reconstruction; re-routing; road improvements; decommissioning; or placing roads in intermittent stored service, every 5 years. Priorities shall include reducing effects on desired aquatic and riparian conditions from chronic sediment delivery or potential future road prism failures, including previously decommissioned roads where drainage features have failed.

FW-OBJ-INF-02. Annually maintain 1,400 miles of operational maintenance level two through five roads.

Concern 4 – Infrastructure-Roads

The Forest Service should identify and remove unauthorized roads and should analyze the extent to which each alternative may contribute to unauthorized roads. In addition, no new roads should be allowed in roadless areas or recommended wilderness areas or for accessing new timber harvest.

Letter #	Comment #
307	113
639	2
877	665, 666
16981	4

Response to comment

In response to the first comment regarding unauthorized routes, the Forest Service manages the road system according to the 36 CFR §212 -Travel Management Rule. According to this rule project level analysis processes should work to identify alterations to the transportation system and identify authorized and unauthorized routes recommend project specific outcomes for the transportation system.

In response to the second comments about the potential for roads in Roadless or Recommended Wilderness the Land Management Plan addresses this in the following ways:

FW-GDL-WTR-06. States Firelines should be located and configured to minimize sedimentation to waterbodies, limit capture of overland and stream flows, and restrict development of unauthorized roads and trails. Firelines should be restored following suppression or prescribed fire activities.

Management Area 2: Recommended Areas and Roadless Areas. The Land Management Plan follows the Idaho roadless rule also known as 36 CFR Part 294 Special Areas; Roadless Area Conservation; Applicability to the National Forests in Idaho; Final Rule, with specific management direction that in outlined in the Management Area 2. Recommended wilderness areas and roadless areas manage roads as follows in the Land Management Plan:

MA2-STD-IRA-01. The provisions in the Idaho Roadless Rule (36 CFR 294 Subpart C) shall take precedence over any inconsistent land management plan component unless and until the rule is amended. Land management plan components that are not inconsistent with the Idaho Roadless Rule will continue to provide guidance for projects and activities within Idaho Roadless Areas and those related to protection of threatened and endangered species (36 CFR 294.28(d)).

Concern 5 – Infrastructure-Roads

The Forest Service should reconsider its approach for road maintenance calculations because the Forest Service receives less funds than they require, and those budget shortfalls are not addressed in the Draft EIS.

Letter #	Comment #
877	636, 655, 656, 658, 668
4261	1

Response to comment

The Land Management Plan does not address issues regarding funding fluctuations. Road maintenance calculations are dependent on market conditions, as such are not addressed in the Land Management Plan.

Concern 6 – Infrastructure-Roads (letter number 877, comments 642, 645, 677)

The Forest Service should implement a direct long-term and forest-wide management of the road system to ensure compliance with current policy and regulatory direction.

Response to comment

The Forest Service manages the road system according to the direction in the 36 CFR §212 -Travel Management Rule. Further travel analysis in project areas will be done at a project level.

Concern 1 – Infrastructure-Roads Decommissioning

Over the life of the Forest Plan, the Forest Service should patrol and prioritize roads for decommissioning to restore natural lands. This would eliminate unnecessary roads and reduce impacts on other National Forest resources, especially in priority watersheds.

Letter #	Comment #
669	5
805	32
939	31
1115	22
16859	5

Response to comment

The Forest Service manages the road system according to the 36 CFR §212 -Travel Management Rule. This rule indicates alterations to travel management should be considered in site specific analysis where authorized and unauthorized routes can be identified and decided upon. The Land Management Plan also addresses this in the sections for Conservation Watershed Network and Infrastructure (Aquatics and Riparian).

Concern 2 – Infrastructure-Roads Decommissioning

The Forest Service should avoid decommissioning roads and trails and should focus on repair, improvement, reconstruction, relocation, or conversion due to the cost, environmental impacts, and reduced access associated with decommissioning.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
53	3	554	2	960	4
346	1	587	5	17362	7
376	3	720	1	17916	30

Response to comment

The Forest Service manages the road system Per the 36 CFR §212 -Travel Management Rule. The Land management plan addresses this in:

FW-DC-INF-01. The road system serves land management and public needs and purposes. It is interconnected with federal, state, and local public roads to provide access to lands, infrastructure, other land ownerships, and inholdings where appropriate. Although roads maintained for passenger cars meet public road safety standards, roads maintained for high clearance vehicles may have hazards and require operator judgment and skill to negotiate.

FW-DC-LND-03. Road and trail rights-of-way provide reasonable public and administrative access to National Forest System lands.

FW-DC-ARREC-01. Recreation facilities and their use, including trails and dispersed sites, have minimal impacts on aquatic resources, including threatened and endangered species, designated critical habitat, and aquatic species of conservation concern.

FW-DC-REC-02. Recreation infrastructure, such as campgrounds, day-use areas, and trails, facilitates visitor enjoyment of the opportunities and experiences provided by the Nez Perce-Clearwater.

FW-DC-REC-04. The type and level of infrastructure, visitor services, and information are sustainable and consistent with the desired recreation opportunity spectrum settings.

FW-DC-REC-07. Cultural resources, such as historic roads and trails, old mining towns and settlements, ranger stations, and fire lookouts, offer visitor opportunities to learn about, connect to, and experience the rich heritage of the Nez Perce-Clearwater.

FW-DC-REC-08. National Historic Trails and other historic travelways, including the Nez Perce National Historic Trail, Southern Nez Perce Trail, Lewis and Clark National Historic Trail, Magruder Road, Lolo Motorway (Forest Road 500), and Elk City Wagon Road, are available to the public to enjoy using a variety of methods both motorized and non-motorized as defined in travel plans. Interpretation and related visitor information is available and enhances visitor appreciation of the outdoors, natural resources, history, and scenic values of these routes while also promoting stewardship and protecting these resources.

FW-DC-REC-09. The Forest’s trail system provides an array of trail classes for a variety of designed uses. Trail systems connect local communities through the Nez Perce-Clearwater, facilitating long-distance travel, as well as loop opportunities to accommodate short-term, day use activities.

FW-DC-REC-10. The designated system of trails provides opportunities for summer and winter motorized and non-motorized recreation with minimal conflict between modes of travel.

FW-DC-REC-11. The Grand Exploration Motorized Trail provides motorized travel connections between community hubs by primarily using existing roads and trails.

FW-DC-REC-12. Trails (e.g., trails converted from roads, user created trails) not needed to serve management or public needs and purposes are absent.

FW-OBJ-INF-01. Complete 600 miles of road work, such as reconstruction; re-routing; road improvements; decommissioning; or placing roads in intermittent stored service, every 5 years. Priorities shall include reducing effects on desired aquatic and riparian conditions from chronic sediment delivery or potential future road prism failures, including previously decommissioned roads where drainage features have failed.

FW-OBJ-INF-02. Annually maintain 1,400 miles of operational maintenance level two through five roads.

FW-OBJ-REC-01. Annually maintain to standard a minimum of 30 percent of National Forest System trail miles.

FW-OBJ-REC-02. Reduce deferred maintenance of trails by five percent, every five years.

FW-STD-REC-01. Construction and reconstruction of recreation facilities and trails shall be compatible with the appropriate recreation opportunity spectrum class and other applicable resource management plans, such as wilderness, recreation corridor, river management, scenic byway, or trail plans.

FW-STD-REC-02. All new or rehabilitated developed recreation facilities, sites, and programs shall comply with applicable federal accessibility guidelines and standards.

FW-GDL-ARREC-05. Trail construction, reconstruction, and maintenance activities should prevent concentrated water from directly entering streams, by hydrologically disconnecting the trails from delivering water, sediment, and pollutants to water bodies.

FW-GDL-REC-01. To compliment the natural setting, to the built environment and resource conditions at new and reconstructed developed recreation sites, administrative facilities, and trails should be consistent with applicable scenic integrity objectives and the Forest Service Built Environment Image Guide. New and reconstructed trails should also be compatible with trail management objectives.

Concern 3 – Infrastructure-Roads Decommissioning

The Forest Service should consider repurposing decommissioned roads to off-highway vehicle trails or nonmotorized routes. This is because decommissioned roads should become high clearance trails for vehicles wider than 50 inches, and the Forest Service must recognize this standard.

Letter #	Comment #
587	17
1076	4
17871	2

Response to comment

The Forest Service manages the road system according to the 36 CFR §212 -Travel Management Rule. This rule indicates alterations to travel management should be considered in site specific analysis where decisions about full sized vehicle or smaller vehicle access can be identified and decided upon.

Concern 4 – Infrastructure-Roads Decommissioning (letter number 873, comment 52)

The Forest Service should use new and inventive ground skidding techniques and should specify where and how they may operate for road decommissioning and closures.

Response to comment

The Forest Service adopts techniques for various management activities based on to best available science, Best Management Practices, and available and emerging technologies. This level of operational prescription is not suitable for a Land Management Plan, as these technologies develop and change over the life of a plan.

Concern 5 – Infrastructure-Roads Decommissioning (letter number 17916, comment 31)

The Forest Service should create a new standard of "no net loss" of motorized opportunities on the National Forests due to the expansive Wilderness designations by Congress. This is because a "no net loss" standard could provide a range of alternatives if a motorized road or trail is closed.

Response to comment

The Forest Service manages the Motorized trail system Per the 36 CFR §212 -Travel Management Rule. The Land management plan addresses this in:

FW-DC-REC-02. Recreation infrastructure, such as campgrounds, day-use areas, and trails, facilitates visitor enjoyment of the opportunities and experiences provided by the Nez Perce-Clearwater.

FW-DC-REC-07. Cultural resources, such as historic roads and trails, old mining towns and settlements, ranger stations, and fire lookouts, offer visitor opportunities to learn about, connect to, and experience the rich heritage of the Nez Perce-Clearwater.

FW-DC-REC-08. National Historic Trails and other historic travelways, including the Nez Perce National Historic Trail, Southern Nez Perce Trail, Lewis and Clark National Historic Trail, Magruder Road, Lolo Motorway (Forest Road 500), and Elk City Wagon Road, are available to the public to enjoy using a variety of methods both motorized and non-motorized as defined in travel plans. Interpretation and related visitor information is available and enhances visitor appreciation of the outdoors, natural resources, history, and scenic values of these routes while also promoting stewardship and protecting these resources.

FW-DC-REC-09. The Forest's trail system provides an array of trail classes for a variety of designed uses. Trail systems connect local communities through the Nez Perce-Clearwater, facilitating long-distance travel, as well as loop opportunities to accommodate short-term, day use activities.

FW-DC-REC-10. The designated system of trails provides opportunities for summer and winter motorized and non-motorized recreation with minimal conflict between modes of travel.

FW-DC-REC-11. The Grand Exploration Motorized Trail provides motorized travel connections between community hubs by primarily using existing roads and trails.

FW-OBJ-REC-01. Annually maintain to standard a minimum of 30 percent of National Forest System trail miles.

FW-OBJ-REC-02. Reduce deferred maintenance of trails by five percent, every five years.

FW-STD-REC-01. Construction and reconstruction of recreation facilities and trails shall be compatible with the appropriate recreation opportunity spectrum class and other applicable resource management plans, such as wilderness, recreation corridor, river management, scenic byway, or trail plans.

Concern 5 (Letter number 1051, Comment 6)

The Forest Service should use more flexibility in its objectives that were specifically tied to the restoration need, level, and location of annual timber harvest. This also pertains to other vegetation management treatments and maintaining or improving sustainable public access and recreation opportunities.

Response to comment

As discussed in the Revised Forest Plan Section 1.2.2-Objectives; “An objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives should be based on reasonably foreseeable budgets (36 CFR 219.7(e)(1)(ii)). Objectives describe the focus of management in the plan area within the plan period. Objectives that are defined as occurring “over the life of the plan” are referring to the first fifteen years of plan implementation”.

Plan component FW-OBJ-INF-01 states the objective for reconstruction or road improvement projects as a rolling five-year average (Complete 600 miles of road work, such as reconstruction; re-routing; road improvements; decommissioning; or placing roads in intermittent stored service, every 5 years. Priorities shall include reducing effects on desired aquatic and riparian conditions from chronic sediment delivery or potential future road prism failures, including previously decommissioned roads where drainage features have failed). Estimates of reconstruction and road improvement needs by alternative are based on the projected timber sale quantity. Actual needs may vary depending on the number and scale of projects implemented on the ground in addition to annual maintenance needs of the open road system. Given that reconstruction and road improvement project needs are defined as an objective provides the flexibility to meet road management needs with planned vegetation treatment schedules and the needs of the public.

Concern 1 – Infrastructure-Trails

The Forest Service should be committed to trail maintenance and the Forest Plan should include a long-term vision to support continued use and development. Additionally, the Forest Service should consider regular maintenance of the Idaho Centennial Trail and should maintain other trails in Wilderness areas and on the National Forests

Letter #	Comment #
970	4
1116	2
3110	18
17349	23

Response to comment

The Land management plan addresses this in:

FW-DC-REC-09. The Forest’s trail system provides an array of trail classes for a variety of designed uses. Trail systems connect local communities through the Nez Perce-Clearwater, facilitating long-distance travel, as well as loop opportunities to accommodate short-term, day use activities.

FW-DC-REC-10. The designated system of trails provides opportunities for summer and winter motorized and non-motorized recreation with minimal conflict between modes of travel.

FW-OBJ-REC-01. Annually maintain to standard a minimum of 30 percent of National Forest System trail miles.

FW-OBJ-REC-02. Reduce deferred maintenance of trails by five percent, every five years.

Concern 2 – Infrastructure-Trails (letter number 717, comments 14-16)

The Forest Service should ensure that the Southern Nez Perce Trail obtains long-term protection, such as by restricting motorized and mechanized recreation. In addition, it should consult with the Nez Perce Tribe to complete a study for the National Register of Historic Places.

Response to comment

In the Land Management plan in the section for Sustainable Recreation Management addresses this in:

FW-GL-REC-01. The Forest Service participates in and supports the nomination of the Southern Nez Perce Trail as a National Historic Trail if proposed by other agencies.

FW-DC-REC-08. National Historic Trails and other historic travelways, including the Nez Perce National Historic Trail, Southern Nez Perce Trail, Lewis and Clark National Historic Trail, Magruder Road, Lolo Motorway (Forest Road 500), and Elk City Wagon Road, are available to the public to enjoy using a variety of methods both motorized and non-motorized as defined in travel plans. Interpretation and related visitor information is available and enhances visitor appreciation of the outdoors, natural resources, history, and scenic values of these routes while also promoting stewardship and protecting these resources.

Concern 3 – Infrastructure-Trails

The Forest Service should establish long-distance trail systems for motorized recreation. This is because the trails would see more use than nonmotorized trails and the Forest Service has already created long-distance trails for hikers. Additionally, these trails should revise the definition of a dual track motorized trail to include a width greater than 50 inches.

Letter #	Comment #
123	3
354	3
567	8, 21
3110	19

Response to comment

The Land Management plan has recognized this and it is addressed in:

FW-DC-REC-11. The Grand Exploration Motorized Trail provides motorized travel connections between community hubs by primarily using existing roads and trails.

Concern 1 – Infrastructure-Facilities

The Forest Service should not construct new commercial structures, reconstruct existing structures, or allow telecommunication towers to be built. This is because they would diminish Wilderness characteristics and harm human and animal health.

Letter #	Comment #
307	116, 119
1100	2

Response to comment

The Selway Bitterroot Designated wilderness says no new buildings, but does not speak to maintenance, reconstruction, or replacement of existing structures. the Plan’s wilderness section says no new building, but is silent to repair, reconstruct, or maintenance, the recommended wilderness section says no new buildings but you can do maintenance. He various other special areas say no new buildings, but are silent to maintenance. The wilderness Plans only address structures in the form of " **as necessary to meet the minimum requirements for the administration of the area for the purpose of this Act**". See also Tables 20, 26, 28, 30, 32, 33, 35, and 37 in the Land Management Plan.

Concern 1 – Infrastructure-Aircraft Landing Strips

The Forest Service should revise FW-DC-REC16 to allow aircraft landing strips, because they provide users with unique recreation activities.

Letter #	Comment #
10	1
17509	8

Response to comment

This component no longer exists as 16 it is now directed to FW-DC-REC14 - I am not sure what their issue is it seems this component does what they are asking for allow for continued use of existing air strips in and outside of wilderness. Maybe they want the potential for more airstrips?

Concern 2 – Infrastructure-Aircraft Landing Strips

The Forest Service should not allow the landing of aircraft and use of drones in recommended Wilderness. This is because aircraft and drones may affect wilderness characteristics. Additionally, aircraft use should be limited to emergency situations, and airstrips outside of the Wilderness area should follow Idaho Aeronautics Network recommendations for safe and functional airstrips.

Letter #	Comment #
307	120, 122
17509	10

Response to comment

The landing of aircraft outside of currently designated Wilderness is based upon the units Travel Management Plan and current CFR’s. The Nez Perce-Clearwater National Forests individual airstrip management plans follow the general format recommended by the Idaho Aeronautics Network both inside and outside of Designated Wilderness. See also table 30 in the Land Management Plan

Concern 1 – Streamside Roads and Trails (letter number 1060, comments 17,111)

To prevent watershed damage, the Forest Service should ensure that a "no net increase" standard is applied to permanent roads within a watershed with sediment problems. In addition, it should reword water guidelines to prevent water contaminated with road debris from entering streams.

Response to comment

Some commenters were concerned about the potential for increases in the road network within watersheds with sediment concerns, and wanted to ensure that wording in guidelines prevented road debris from entering streams.

The Nez Perce-Clearwater expects to maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns. The national forest road system of the future must continue to provide needed access for recreation and resource management, as well as support watershed restoration and resource protection to sustain healthy ecosystems. Future road building would likely be confined to realignment or relocation, although new roads could be constructed to reach currently inaccessible areas.

The Road Management Rule (Rule) was published in the Federal Register on January 12, 2001. The Rule “removes the [prior rule’s] emphasis on transportation development and adds a requirement for science-based transportation analysis.” “The intended effect of this final rule is to help ensure that additions to the National Forest System network of roads are those deemed essential for resource management and use; that, construction, reconstruction, and maintenance of roads minimize adverse environmental impacts; and finally, that unneeded roads are decommissioned and restoration of ecological processes are initiated” (Federal Register Vol. 66, No 9, pg. 3206).

The 2012 planning rule requires forest plans to include plan components that emphasize the maintenance or improvement of water quality (36 CFR 219.8(a)(2)(iii)). The desired conditions for roads in the Land Management Plan are that the transportation system has minimal impacts on aquatic and riparian conditions through reduced hydrologic connectivity of roads to streams, lower sediment delivery to streams, reduced road impact to floodplains, and improved aquatic organism passage, where transportation infrastructure affects these features (FW-DC-ARINF-01); that the transportation network is resilient to the effects of climate change, including the ability to accommodate increased runoff and peak flows that may exceed historic streamflow events (FW-DC-ARINF-02); that roads in the Conservation Watershed Network present minimal risk to aquatic resources (FW-DC-CWN-03); and that roads not needed to serve management and public needs and purposes are absent (FW-DC-INF-02).

To move towards these desired conditions, objective FW-OBJ-INF-01 aims to complete 600 miles of road work under the Preferred Alternative, such as reconstruction, re-routing, road improvements, decommissioning, or placing roads in intermittent stored service, every 5 years. Priorities shall include reducing effects on desired aquatic and riparian conditions from chronic sediment delivery or potential future road prism failures, including previously decommissioned roads where drainage features have failed. Objective FW-OBJ-INF-02 aims to annually maintain 1,400 miles of operational maintenance level two through five roads under the Preferred Alternative. Objective FW-OBJ-CWN-02 proposes stormproofing 10 to 20 percent of roads in Conservation Watershed Network areas prioritized for restoration every 5 years, as funding allows, to benefit threatened and endangered aquatic species. Stormproofing refers to nonrecurring treatments on existing roads that reduce the potential for resource impacts and damage or failure of a road feature or road system, typically resulting from storm events. These treatments relate to open and stored roads and include timely road maintenance; utilizing many key road drainage measures; reducing culvert diversion potential; pulling back marginal fill slopes; using

biotechnical and vegetative slope stabilization and erosion control, gully prevention, bridge maintenance; and many other measures.

Numerous standards and guidelines are proposed to limit the amount of sediment delivery or alteration of hydrologic flow regime from roads, including limits on sidecasting of road material or snow (FW-STD-ARINF-03, FW-GDL-ARINF-07); routing road drainage away from streams and unstable slopes (FW-GDL-ARINF-09, FW-GDL-ARINF-02); requiring upgrading or removal of stream crossings (FW-STD-ARINF-04, FW-GDL-ARINF-03, FW-GDL-ARINF-05, FW-GDL-ARINF-11); avoiding high mass wasting potential areas and wetland areas (FW-GDL-ARINF-04, FW-GDL-ARINF-08); and hardening of stream crossings (FW-GDL-ARINF-06).

Standard FW-STD-ARINF-07 requires that when constructing or reconstructing roads in the Conservation Watershed Network and HUC12 subwatersheds with Endangered Species Act critical habitat or listed aquatic species, projects shall result in a net decrease in the hydrologic connectivity of the road system and stream channel network. Appendix 4 of the Land Management Plan offers a possible management approach that includes methods for decreasing the hydrologic connectivity of the road system.

Additionally, standard FW-STD-WTR-06 requires management activities in watersheds with approved total maximum daily loads to be designed to comply with the total maximum daily load allocations following project implementation. Standard FW-STD-WTR-04 requires projects to restore or not retard attainment of desired condition if aquatic and riparian desired conditions are not being achieved.

Commenters recommended that Guideline FW-GDL-ARINF-01 be reworded to prevent road-related concentrated water, sediment, and associated pollutants from entering streams. The wording for Guideline FW-GDL-ARINF-01 was reworded and the wording “except at designated stream crossings” was deleted. The revised wording is: Construction, reconstruction, and maintenance activities of roads, skid trails, temporary roads, and airstrips, should hydrologically disconnect the drainage system from delivering water, sediment, and pollutants to water bodies to prevent concentrated water from directly entering streams.

Invasive Species

Concern 2: Management Area 1 - Wilderness, Wild, and Scenic Rivers and National Historic Landmark Areas (letter number 877, comment 735)

Under the objectives for Management Area 1 (MA1-OBJ-WLMU-01), the Forest Service should increase the acreage of invasive weed treatment to ensure that the acres invaded per year do not exceed the acres treated per year .

Response to comment

Commenters had questions regarding the objective MA1-OBJ-WLMU-01 (previously MA1-OBJ-ELK-01) for treating invasive species in elk habit in Management Area 1 and whether the number of acres proposed for treatment was adequate. The wildlife section in the Land Management Plan includes a desired condition FW-DC-WLMU-06 for elk habitat quality to not be degraded by invasive species and an objective MA1-OBJ-WLMU-01 to treat 500 acres of invasive weeds in elk habitat every 5 years. As described in the FEIS Invasive Species Affected Environment section, invasive plant species occupy approximately 394,040 acres, or approximately 10 percent of the Nez Perce-Clearwater, as of 2021. Approximately 31 percent of known infestations occur in Management Area 1. Over an eight year period (FY 2015-2022), a total of 77,616 acres of invasive plants were treated on NFS lands on the Nez Perce-Clearwater, averaging approximately 9,700 acres per year. Treatments were primarily chemical herbicide

applications, but also included manual, mechanical, and biological controls. Biological controls used for treating invasive species are often used in backcountry areas associated with Management Area 1. Approximately 830 acres were treated with biological control agents from 2015 to 2022, about 100 acres per year. This number equates to the amount proposed in objective MA1-OBJ-WLMU-01. There would also be opportunities to treat additional acres of invasive species using herbicide treatments.

Concern 1: Terrestrial Ecosystems-Invasive Species

The Forest Service should apply best available science to reduce impacts from invasive species. It also should create enforceable and measurable guidelines and monitoring components to manage invasive species. They are a threat to native species, biodiversity, and habitat function.

Letter #	Comment #
805	97
877	730, 737, 738
938	63
1050	7
1060	93, 74
1115	17

Response to comment

The 2012 Planning Rule identifies invasive species as a “stressor” to natural processes and requires the responsible official to consider stressors when developing plan components for integrated resource management to provide for ecosystem services and multiple uses in the plan area 36 CFR 219.10. The Land Management Plan includes plan components, including standards and guidelines, that would slow the spread of invasive species and introductions of new invaders. The FEIS Invasive Species section discusses each of the plan components associated with invasive species and summarize the risk of invasive species introduction and spread from management activities.

Commentors recommend that an alternative be developed that reduces active management on the Forest and the road system - the only strategy likely to significantly reduce noxious weed impacts. The Nez Perce-Clearwater Forest Plan Revision Team met with hundreds of people in-person in January and February 2018 to discuss "Frameworks for Alternative Development." The feedback gathered at these meetings helped the team shape the alternatives that were included in the FEIS. See Summary of Alternatives to be Analyzed, and "What We Heard During Frameworks for Alternative Development" Letter July 26, 2018. Some individuals wanted some areas of the National Forest to remain free of motorized use and more recommended wilderness areas. An alternative that would prohibit motorized use in all Idaho Roadless Areas was considered but was not analyzed in detail (See FEIS, Chapter 2, Alternatives Analyzed but not Considered in Detail). Other individuals at the public meetings said natural processes should be relied upon to meet desired conditions for forest vegetation and that timber harvest should be limited and fire used more frequently. Alternative Z considers a lesser rate of timber harvest with fewer outputs and fewer acres treated than the other Action Alternatives and is lower than the No Action alternative. Alternative Z also increases the natural ignitions of fire to be used to meet desired conditions in the more roaded front country, not just in the backcountry and wilderness. An alternative that had a lower timber volume output than Alternative Z, or a longer period until attainment of desired conditions, was considered but was not analyzed in detail (See FEIS, Chapter 2, Alternatives Analyzed but not Considered in Detail).

Commenters requested that the potential for invasive species should be considered during fire suppression activities and when planning for the use of natural or prescribed fire. Plan components FW-GDL-FIRE-02 and Guideline FW-GDL-INV-03 provide management direction to reduce the probability of establishment or expansion of invasive plant species. Guideline FW-GDL-INV-03 specifies that when rehabilitating areas burned by wildfire and affected by wildfire suppression, measures should address invasive species management as part of post-fire habitat restoration. Measures refer to best management practices or project specific project design features. Guideline FW-GDL-FIRE-02 requires planned ignitions in areas highly susceptible to weed invasion should be planned and implemented with design features to address the spread of invasive species and that actions must follow national and regional guidelines to prevent invasive species transport on wildland fire mobile equipment.

Commenters expressed concern about limitations on modern tools available to effectively control noxious weeds and invasive species in designated wilderness. The Land Management Plan identified motorized or mechanized equipment, even for administrative purposes, is not suitable in designated wilderness. Suitable treatments include manual/physical action, biological control, and herbicide treatments using non-motorized sprayers.

One commenter was concerned with the spread of invasive species and encouraged the Forest Service to use native plant seed mixes in all restoration work. Forest Service Manual 2070 policy specifies that genetically appropriate native plant materials are given primary consideration for use in the revegetation, restoration and rehabilitation of National Forest System lands. The Northern Region Native Plant Handbook: A Guide to Revegetation with Native Species, the national Native Plant Materials Policy, and the Northern Region Restricted Plant List all encourage the use of native plant materials and restricts the use of certain plant species. The Land Management Plan includes desired conditions for. Plant communities that are comprised of a diverse mix of native grass, forb, shrub, and tree species (FW-DC-TE-03) and that vegetation reflects natural disturbance regimes and the composition, structure, function, and connectivity of native plant communities are appropriate for a given landscape and climatic setting (FW-DC-TE-04). The Land Management Plan also includes guideline FW-GDL-RMZ-07 that specifies that during or after fire suppression activities disturbed areas in riparian management zones should be restored by actions such as scattering slash piles, replacing logs and boulders, scarifying soils, re-contouring terrain, and reseeded with native species. Standard FW-STD-AREM-01 requires reclamation plans to include revegetating mining sites with trees and shrubs or native plant seed.

One commenter recommended adding a measure to the monitoring plan to evaluate how projects are contributing to the spread and establishment of noxious weeds. This evaluation would occur during project level NEPA analysis. As stated in the Land Management Plan's introduction for Invasive Species, the Nez Perce-Clearwater will follow all laws, regulations, and policies that relate to managing National Forest System land. The Land Management Plan is designed to supplement, not replace, direction from these sources. Other Forest Service direction, including laws, regulations, policies, executive orders, and Forest Service directives found in manuals and handbooks, are not repeated in the Land Management Plan. Forest Service policy (FSM 2903) requires determining the risk of introducing, establishing, or spreading invasive species associated with any proposed action, as an integral component of project planning and analysis and, where necessary, provide for alternatives or mitigation measures to reduce or eliminate that risk prior to project approval.

Concern 2: Terrestrial Ecosystems-Invasive Species

The Forest Service has not been able to meet desired conditions for invasive species management, specifically in the context of the agency's proposed increases in resource extraction on the National Forests, which exacerbates the spread of noxious weeds. The Forest Service should provide the National

Forests' weed monitoring and inventory data and effectiveness of various techniques in achieving desired conditions.

Letter #	Comment #
602	3
877	721, 722-729, 731-734, 740-743
1115	18, 19

Response to comment

Commentors stated the Desired Conditions were unattainable and that desired conditions “can be little but wishful thinking”. A desired condition is a description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. Desired conditions are not commitments or final decisions approving projects and activities. The desired condition for some resources may currently exist or may only be achievable over a long time for other resources. Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined but not include completion dates (36 CFR 219.7(e)(1)(i)). Comments received after the release of the draft forest plan and draft environmental impact statement have been used where appropriate to improve the Land Management Plan and have helped inform the final environmental impact statement. The desired conditions were consolidated, and more focus was put on retaining ecosystem resilience and biodiversity. The update desired condition FW-DC-INV-01 emphasizes that invasive species either are not present or occur at low levels to allow watersheds, vegetation communities, and aquatic ecosystems to retain their inherent resilience and resistance to respond and adjust to disturbances. Plant communities retain their historic diversity and provision of values to fauna.

Commenters described the Forest Service's approach to invasive species is a classic case of treating the symptoms while not addressing the cause, especially when most of the management actions proposed in the DFP will work against invasive species desired condition. Ecological sustainability, a central tenet of the 2012 Planning Rule, will remain merely good intention. In FSH 1909.12, chapter 20, section 23.1 the directives set forth requirements to provide for ecological integrity, ecosystem services, and multiple uses in an integrated manner. The Agency vision is for ecosystems in the plan area to have ecological integrity and adaptive capacity. However, not every acre must meet the definition of ecological integrity because some specific areas may not have such capability. The plan area may have overall ecological integrity even when parts of the plan area is occupied by roads, buildings or other uses. The 2012 Planning Rule requires that land management plans provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capability of the plan area (36 CFR 219.10). The FEIS acknowledges that invasive species would continue to have a presence on the Nez Perce-Clearwater landscape as the Forest Service has a multiple use mandate to provide for multiple use and sustained yield of products and services, including recreation, range, timber, watershed, and wildlife and fish purposes.

The 2012 Planning Rule identifies invasive species as a “stressor” to natural processes and requires the responsible official to consider stressors when developing plan components for integrated resource management to provide for ecosystem services and multiple uses in the plan area 36 CFR 219.10. The Land Management Plan includes plan components, including standards and guidelines, that would slow the spread of invasive species and introductions of new invaders. The Plan provides prevention measures to limit invasive species from establishing into new non-infested areas. Management would continue to

follow integrated pest management outlined under Forest Service Manual 2900, which sets forth Forest Service policy, responsibilities, and direction for the prevention, detection, control, and restoration of effects from aquatic and terrestrial invasive species.

To maintain or improve ecological integrity at the landscape scale, the Land Management Plan includes plan components that provide for opportunities for partnerships to support restoring ecological conditions at the appropriate geographic scale (FSH 1909.12, Chapter 20, Section 23.11b (5)(a)(6). Coordination and collaboration with county weed management officials, other agencies, neighboring national forests, private landowners, and interested groups and individuals would be facilitated through active participation in various cooperative weed management areas, participating agreements, and other initiatives. The Nez Perce-Clearwater would work with federal, state, and county agencies, tribes, non-government organizations, permittees, and adjacent landowners to support integrated pest management, including invasive species prevention, early detection, and rapid response, control and containment, restoration and rehabilitation, and inventory and monitoring activities (FW-GL-INV-02).

One commenter offered several references to literature that documents that livestock grazing; roads and use of; timber harvest, and associated skid trails, landings, and haul routes; and any other ground disturbing activity increases invasive species introduction and spread. The Forest Service does not dispute the findings from the literature. Best available scientific information was considered in the analysis in the Invasive Species section of the FEIS and includes similar discussion and literature references.

Commenters had concerns with the lack of evidence in the invasive species DEIS analysis that invasive species control is effectively addressing the problem and that no monitoring information was included in the DEIS. It is Forest Service Policy (FSH 2109.14-53) that post-treatment evaluation be conducted for all projects involving pesticides. Treatment efficacy data transcends into the overall program performance outcome measure. The objective of the treatment effectiveness monitoring is to evaluate performance by measuring the changes in the characteristics of the infestation as a result of treatment activities. By monitoring the treatment results over time, a measure of overall programmatic treatment efficacy can be determined, and an adaptive management process can be used in subsequent treatment activities. In addition, National Invasive Species Program and Budget Guidance requires monitoring treatment effectiveness of 50 percent of acres treated each fiscal year. For example, if 1000 acres were treated in the current fiscal year then 500 acres of any treatment must be monitored for effectiveness. This is documented in the annual accomplishment report. The Invasive Species section of the FEIS was updated to include recent invasive species monitoring information. For the time period 2015 to 2022, the Nez Perce-Clearwater monitored approximately 74,000 acres, or 9,250 average acres annually. Treatment was successful in killing most of the target species population. The efficacy for treatments was on average 89 percent for mechanical/physical treatments and 83 percent for herbicide application treatments. Overall, 76 percent of the treated acres were restored during eight-year time period. An area treated against invasive species has been 'restored' when the targeted invasive species was controlled or eradicated directly as a result of the treatment activity.

Commenters requested Forest monitoring data that shows the efficacy of "design features to address the potential spread of invasive weeds." The Nez Perce-Clearwater does not have monitoring data for design features that address the potential spread of invasive weeds. Forest Service policy (FSM 2903) requires determining the risk of introducing, establishing, or spreading invasive species associated with any proposed action, as an integral component of project planning and analysis and, where necessary, provide for alternatives or mitigation measures to reduce or eliminate that risk prior to project approval. Optional mitigation measures outlined in the Nez Perce-Clearwater National Forests Standardized Mitigation Measures pick list include using Forest Service approved native plant species or non-native annual

species to meet erosion control needs and other management objectives; certifying that rock used for surfacing is free of noxious weed seed, and requiring that all mud, soil, and plant parts are removed from off road equipment before moving into a project area to limit the spread of noxious weeds. All timber sale contracts contain provisions for cleaning equipment so as not to introduce or spread invasive plant seed. The Land Management Plan includes guideline FW-GDL-INV-01 which requires management activities prone to significant soil disturbance or exposure to be planned and implemented with design features to address the potential spread of invasive weeds. The monitoring Plan (Land Management Plan, Appendix 3) includes a monitoring element to determine the extent that project design features are included in decision documents and implemented to reduce the probability of invasive species establishment (MON-INV-3). This would be tracked by summarizing the number of project decisions proposing ground disturbing activities that included design features for invasive species and the number that did not include design features for invasive species. It would also list the design features for invasive species that were included in decision documents AND implemented during project activities.

Commenters expressed concern that the agency did not account for the economic impacts of increased weed treatments, nor of the loss of ecosystem services attributed to noxious weeds being cultivated by management activities. The FEIS Invasive Species section does not summarize the economic impact of invasive weeds, but the introduction acknowledges that controlling invasive species costs land management agencies millions of dollars in treatments. The FEIS Invasive Species section does summarize the risk of invasive species introduction and spread from management activities.

Commenters expressed concern that objective FW-OBJ-INV-01 was not adequate for effectively treating invasive species and requested information on how many annual acres the Nez Perce-Clearwater currently treats. Other commentors had questions about the collection and disclosure of invasive plant species data. As defined in the Land Management Plan, an objective is a concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions and that objectives should be based on reasonably foreseeable budgets (36 CFR 219.7(e)(1)(ii)). Objectives in the plan may be exceeded as funding and capacity allow. Objective FW-OBJ-INV-01 describes the intent for treating 6,000 acres annually to contain or reduce non-native invasive plant density, infestation area, or occurrence, with emphasis given to new invader species. This is a substantial increase in treatment area compared to the existing 1987 forest plans that proposed 250 and 380 acres per decade. The Invasive Species section of the FEIS was updated to include recent invasive species treatment information. Over an eight year period (FY 2015-2022), a total of 77,616 acres of invasive plants were treated on NFS lands on the Nez Perce-Clearwater, averaging approximately 9,700 acres per year. Treatments were primarily chemical herbicide applications, but also included mechanical/physical and biological controls. Treatments were accomplished by forest service employees, and counties and other partners through agreements. The Land Management Plan includes goals to facilitate working with federal, state, and county agencies, tribes, non-government organizations, permittees, and adjacent landowners to support integrated pest management (FW-GL-INV-02), which could increase the ability of the Nez Perce-Clearwater to move towards the invasive species desired condition at a faster rate. Joint inventory and treatment data is stored in the Forest Service Natural Resource Manager's Threatened, Endangered, and Sensitive Plants and Invasive Species database. This database is continually updated. Inventories are publicly available at USDA Forest Service FSGeodata Clearinghouse - Download National Datasets.

One commenter questioned how the agency sees roads as a benefit regarding spread of noxious weeds, rather than the obviously huge part of the problem. The Forest Service was unable to find any reference in the DEIS that stated roads were a benefit regarding spread of noxious weeds. The Invasive Species section in the FEIS explicitly discusses roads, both permanent and temporary, as primary pathways for invasive species establishment and spread. One of the measures for the invasive species analysis was risk

of increased commercial truck traffic associated with vegetation management and risk of opportunity for recreation travel on open roads and trails that serve as a pathway for weed spread. These measures were assessed for each alternative. Although roads are a pathway for invasive species spread, the road system serves land management and public needs and purposes, providing for economic and social sustainability.

Concern 3: Terrestrial Ecosystems-Invasive Species (letter number 1067, comment 5)

Native plants should be planted to increase the grazing value of the land. The commenter questions if invasive poison hemlock poses a risk to livestock and humans.

Response to comment

A commenter wondered how invasive the plant poison hemlock is on the Nez Perce-Clearwater and if there was evidence of impacts to livestock and humans. Poison hemlock (*Conium maculatum*) is included in the State of Idaho Noxious Weeds list under the containment category, with the direction to reduce or eliminate new or expanding weed populations. Poison hemlock is an herbaceous plant that outcompetes native vegetation, decreasing biodiversity. Based on information provided by the Idaho State Department of Agriculture, poison hemlock contains highly toxic alkaloids posing a serious health hazard to livestock and humans, if ingested. Handling plant can also cause skin irritation in humans.

Approximately 70 acres of poison hemlock have been documented and treated on the Nez Perce-Clearwater over the past 20 years. Size of infestation areas ranged from less than one acre to 10 acres. Poison hemlock has a “High” treatment priority on the Nez Perce-Clearwater with the aim to eradicate all new plants. Forest Service Manual 2900 - Invasive Species Management sets National Forest System policy, responsibilities, and direction for the prevention, detection, control, and restoration of the effects from aquatic and terrestrial invasive species. This invasive species systems approach is also outlined in the Forest Service National Strategic Framework for Invasive Species Management (U.S. Department of Agriculture 2013). The Land Management Plan incorporates this direction and the Nez Perce-Clearwater would continue to practice early detection and rapid response invasive species management strategies and treat all known infestations of poison hemlock.

Concern 4: Terrestrial Ecosystems-Invasive Species (letter number 877, comment 739)

The Final EIS should clarify what incentives exist for permittees to manage weeds.

Response to comment

Commenters requested examples of incentives for permittees to prevent the introduction and spread of weeds in livestock grazing allotments. Annual Operating Instructions (AOI) are a measure under Part 2, Clause 8(a) of Term Grazing Permits and are required to be signed by the livestock grazing permittee prior to turn out each grazing season. Through the AOI livestock grazing permittees are informed that weed treatments may occur on their respective grazing allotments by Forest Service personnel and they are further encouraged to “report any new infestations” that they encounter during the grazing season. As a result, it is common practice for permittees to contact the Range Management Specialist about invasive plant species and to discuss whether the permittee would hand pull weeds or leave for Forest-led herbicide treatment. Common knowledge of the spread potential of small, isolated patches that can be controlled by hand pulling also incentivizes the permittee to initiate hand pulling without instruction and to report the location to be monitored to the Range Management Specialist.

The Land Management Plan includes guideline FW-GDL-ARGRZ-01 that requires end-of-season stubble height be 10 to 15 cm (4 to 6 inches) along the greenline and guideline FW-GDL-GRZ-03 that specifies that general upland forage utilization should not exceed 35 to 55 percent to allow forage plants to

maintain vigor, root development, and soil cover. Stubble height and forage utilization monitoring is completed by the Range Management Specialist throughout the season. Retaining vegetation across the allotments would reduce the risk of invasive species introduction and spread. The Monitoring Plan (Land Management Plan, Appendix 3) includes monitoring the acres of invasive plant species infestations and the acres of infestation treated within livestock grazing allotments (MON-GRZ-01).

Concern 5: Terrestrial Ecosystems-Invasive Species (letter number 877, comment 736)

The Forest Service should inspect and decontaminate for aquatic invasive species on water pumps, water tenders, and helicopter buckets during emergency operations as well as non-emergency.

Response to comment

Commenter expressed concern that equipment operated by Forest Service employees and agency-authorized personnel would not be inspected and cleaned for aquatic invasive species during emergency wildland fire operations because FW-GDL-INV-02 only cites non-emergency operations.

Although the management of wildland fires are considered an emergency operation, there are other protocols in place to prevent the introduction and spread of aquatic invasive species during wildland fire suppression incidents. The National Invasive Species Council and Wildland Fire Leadership Council Memorandum (U.S. Department of the Interior 2022) outlines direction for multiple federal agencies to provide support and resources to the integration and coordination of wildland fire and invasive species management efforts. Additionally, the USFS Northern Region is a member of the Northern Rockies Coordinating Group (NRCG) which provides an interagency approach to wildland fire management. In 2022, the NRCG Aviation and Equipment Committees updated their mandatory protocol for preventing the introduction and spread of AIS caused by wildland and aviation fire equipment in a “how to guide” titled Decontaminating Firefighting Equipment to Reduce the Spread of Aquatic Invasive Species (Northern Rockies Coordination Group 2022). The guide provides step-by-step instructions on drafting from a water source, setting up and using a decontamination station, and disposing of products once finished at a site. It is intended to serve as a supplement to the National Wildfire Coordinating Group’s Guide to Preventing AIS Transport by Wildfire Operations (National Wildfire Coordinating Group 2017) and the Northern Rockies Coordinating Group Supplemental (Northern Rockies Coordination Group 2018b). All protocols and practices in the Decontaminating Firefighting Equipment to Reduce the Spread of AIS are supported by the science and literature in the Guide to Preventing AIS Transport by Wildfire Operations, and are mandatory in the Northern Rockies region per the NRCG AIS Directive on Aquatic Invasive Species Protocols (effective March 29, 2018 and reissued June 23, 2022) (Northern Rockies Coordination Group 2018a).

Livestock Grazing

Concern 1:

The Forest Service should make specific changes to the standards and guidelines for grazing to reduce the potential impact on fish, wildlife, and plant species. It should include plan components that broadly protect and manage for sensitive wildlife populations and those to address species-specific concerns.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	114	938	57-59	12936	1-4
805	20,34,36	1050	8	17895	2
877	773, 774, 760	1060	113-116	8392	2

Response to comment

Several Comments were received concerning plan components and potential impacts on fish, wildlife, and plants. The plan provides a suite of plan components for soil, water, fish, wildlife and vegetation providing constraints and measures to reduce potential impacts and protect species. Livestock grazing at the project level would be consistent with the Plan as required by the 2012 Planning Rule. Site specific project level livestock grazing decisions would identify impacts, competing uses, and monitoring as guided by 36 CFR 222.2, FSH 2209.13 Ch. 90, consistent with the Plan.

- FW-GDL-ARGZ-01 provides a value range that provides for a site-specific project decision to identify a value compatible and relevant to reflect existing and natural conditions of the specific riparian area. The Plan has defined the word “retard” as it pertains to the guideline as not disrupting or setting back natural rates of recovery (Chapter 2, pg 238). The guideline as been identified and applied based on best available science as part of the Northern Region Aquatic Restoration Strategy recommendation in coordination with National Marine Fisheries Service.
- FW-GDL-GRZ-03 provides a range that should be considered, though specific values would be applied at the site-specific project level, adapted over time and based site specific ecological conditions.
- FW-STD-ARGR-03 provides that measures are included to protect redd trampling of federally listed fish species or species of conservation concern.
- FW-STD-ARGRZ-02 and FW-GDL-GRZ-01 provides for practices to be modified or limited to not adversely affect aquatic and riparian habitat.
- FW-STD-ARGR-03 has measures to protect federally listed species or species of conservation concern.
- The plan components were designed to accommodate a variety of fluctuations within site-specific needs and includes objectives to maintain animal unit months for economic and social sustainability.
- FW-DC-GRZ-01 provides that within the planning area, the Nez Perce-Clearwater provides forage for domestic livestock grazing consistent with the capacity of the land to produce sustained forage for multiple uses.
- Management Areas within the Plan will be identified in site specific- project decisions and consistent with the Plan as guided by FSH 2209.13 Ch. 90 when assessing resource management, desired and existing conditions to produce sustained forage for multiple uses.

Concern 2 (letter number 877, Comments 775, 776, 781, 782, 786, 788, 790-792):

In the EIS, the Forest Service did not adequately analyze the potential impacts of livestock grazing on climate change. This could worsen soil erosion, increase dust generation, contribute to stream pollution, negatively affect carbon sequestration, and increase greenhouse gas emissions. The Forest Service should incorporate plan components that focus on restoring and maintaining the structure, function, and integrity of ecosystems to improve their resilience to climate change.

Response to comment

The forest recognizes in the climate sections of the plan potential challenges with livestock management and provides possible climate change influences and acknowledges that not all management and climate interactions are fully understood. Chapter 2 of the climate and carbon storage focus area provides physical and biological systems with programmatic desired conditions. The Plan provides components with focus on maintaining the ecological integrity, structure, and function of land area. The level of livestock use,

potential impacts and interactions with soils, water and climate would be identified and analyzed at the site-specific project level as guided by FSH 2209.13.

- Site-specific impacts of livestock use vary as a function of many integrated factors, thus as guided by FSH 2209.13 Ch 90 livestock use and impacts would be identified in site-specific project level decisions.
- Site-specific project level livestock decisions would identify management disturbances with respect to the structure, function and integrity of site-specific ecosystems.
- The Plan identifies lands compatible with broadscale desired conditions. Site specific project level decisions would determine the suitability of livestock grazing within an individual allotment.
- Forest assessments and reports are in the project record.
- The plan provides programmatic goals, objectives, standards and guidelines with site-specific project level decisions identifying climate, vegetation and livestock management consistent with the Plan.

Concern 3:

The Forest Service should not allow livestock or domestic sheep grazing, which could result in negative environmental consequences on numerous natural resources. The Forest Service fails to adequately analyze these potential impacts and does not incorporate plan components to minimize impacts. The Forest Service should allow livestock or feral ungulate use only where it is compatible with maintaining or recovering key ecological functions and native species.

Letter #	Comment #	Letter #	Comment #
96	1	1099	9
475	1	17688	56
877	745-749, 751-758, 763, 768-770, 772, 777-780, 783-785, 787, 793, 794		

Response to comment

Livestock occupancy and use is one of many multiple uses under within the Multiple-Use Sustained Yield Act 1960 and 36 CFR 219.10 providing integrated resource management including forage for grazing. The plan components are programmatic broadscale direction where the site-specific livestock grazing decisions would identify issues and/ or conflicting areas of use and determine the scope of livestock grazing consistent with the plan components as guided by 36 CFR 222.2 and FSH 2209.13 Ch. 90.

Wild horse populations as enacted by the Wildhorse & Burro Act 1971 does not occur within the planning area and wild ungulates are managed by the state in coordination with the Forest Service and the Plan components with regard to effected ecosystems.

- The plan has established plan components where site-specific project level decisions would identify Desired conditions, livestock management strategies and issues that the decision maker analyzes and discloses in adherence to the plan components.
- Suitability of livestock grazing within site-specific areas is completed at the project level.
- Plan components FW-STD-ARGRZ-01, FW-STD-ARGRZ-02, FW-STD-ARGRZ-03, FW-GDL-ARGRZ-01, FW-GDL-ARGRZ-02, FW-GDL-ARGRZ-03 have been established to guide forest wide management within riparian and aquatic ecosystems.

- 36 CFR 219.7(e)(1)(v) provides that suitability determinations need not be made for every activity, suitability of use and occupancy of livestock would be determined at site-specific project level.
- FW-GDL-WLMU-02 provides that fence construction is designed to prevent barriers to wildlife movement.

Concern 4:

The Forest Service should evaluate the ecological costs and appropriateness of livestock grazing on an ecosystem basis, as well as on the plants and wildlife whose habitats are affected. The Forest Service should explain how and when it would determine the suitability of lands for livestock grazing. The Forest Service should include plan components to provide for ecosystem services and multiple use, integrated with other plan components.

Letter #	Comment #
877	764, 771
17595	1
17831	1

Response to comment

The Forest agrees that livestock grazing should be assessed and authorized in a manner determined through the environmental analysis process, in consideration of rangeland vegetation, soil, wildlife, watershed, fisheries, water quality, and other resource conditions as directed by (36 CFR 222.2(c)). Occupancy and use of livestock would be analyzed at the site-specific project level as guided by FSH2209.19 Ch 90,

Chapter 3 of the plan identifies how and when suitability will be determined, and suitability determinations are included in Land Management Plan for particular areas of the Nez Perce-Clearwater where livestock grazing is or is not suitable. The Plan identified that the current active and vacant allotments are a subset of the 1987 Plan and, therefore suitable at the broad programmatic scale. The suitability and appropriateness of livestock grazing would be identified at the site-specific project level as guided by FSH 2209.13 and 36 CFR 219.17 (e)(1)(v).

Concern 5:

The Forest Service should provide methods in the Forest Plan for incorporating the use of grazing as a tool for fuels management. This is because a reduction in animal unit months can increase fuel loads, resulting in more frequent and destructive wildfires.

Letter #	Comment #
33	1
17595	1
17831	1

Response to comment

Livestock grazing has valuable potential within site-specific locations to be used as a tool for vegetation management. The use of livestock grazing for specific vegetation treatments could be analyzed at the project specific level and incorporated into the treatment objective as guided by the NEPA process.

Concern 6:

The Forest Service should not limit livestock grazing. This is because it could negatively affect permittees, result in adverse socioeconomic effects and the loss of maintenance for important infrastructure on the National Forests, affect wildlife habitat, result in the loss of valuable open spaces, and reduce fuel reduction efficiency.

Letter #	Comment #	Letter #	Comment #
65	1	1077	5, 6
805	19, 37, 38, 84	17595	3, 4
877	759	17895	3

Response to comment

Livestock grazing occupancy and use authorizations would be identified at the site-specific project level consistent with the plan as guided by FSH 2209.13 Ch 90. The plan components specific to aquatic ecosystems have been provided to protect fish redds of federally listed species and species of conservation concern with flexibility at the site-specific project level to adapt the appropriate metric value based on site specific conditions while meeting the purpose of the guideline. FW-GDL-ARGZ-01 has been established based on best available science and as part of the Northern Region Aquatic Restoration Strategy in coordination with National Marine Fisheries Service.

The plan acknowledges the social and economic impacts of livestock grazing and as guided by FSH 2209.13 would identify at the site-specific project level whether grazing is an appropriate use or the level of use.

Concern 7:

The Forest Service should allow for greater flexibility regarding grazing and grazing permits in the Forest Plan. Examples of this are allowing for a permit buyout option, changing animal unit months based on existing conditions, retiring vacant grazing leases, and changing seasons of use.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
24	1	17569	1	17889	1, 2
877	744	17595	2		
3631	5	17601	1		

Response to comment

Land management plans (LMPs) determine programmatic direction and guidance for grazing activities by developing plan components – desired conditions, objectives, standards, guidelines, and management area suitability. Such direction is complimented through the development of monitoring requirements. Although an area may be deemed suitable for use by livestock in a LMP, a project-level decision evaluating the site-specific impacts of the grazing activity, in conformance with NEPA, is required in order to authorize livestock grazing on specific allotment(s).

As guided by FSH 2209.13 Ch 90, site-specific project analysis set defined management principles and limits, such as timing, intensity, frequency, and duration of livestock grazing. These limits set objectives that can be checked through monitoring to determine if actions prescribed were followed, and if changes are needed in management. A variety of administrative actions or management flexibilities within the defined limits of the resultant NEPA could be made at the site-specific project level.

Current agency policy and regulation does not afford the opportunity for permit buyouts. Grazing permits are the sole property of the Federal government. They bestow no right or title of interest other than to the United States CFR 222.3(b)). Therefore, the Forest Service does not, and cannot, acknowledge any monetary value of grazing permits.

Waiver of term grazing permits do not influence the agency's decision regarding whether or not to issue a new term grazing permit for the associated allotment(s). Those decisions are based on the applicable environmental analysis and site-specific information related to resource conditions and/or issues 36 CFR 222.2(c). Term grazing permits do not convey any rights, title, or interest to NFS lands and the waiver of term grazing permits do not influence the long-term management of the associated allotment

Concern 8 (Letter 877, comments 761, 762, 789):

The Forest Service should incorporate more detail regarding current Forest Plan and Allotment Management Plan monitoring to support its assertion that each grazing allotment is managed and monitored. The Forest Service should also require annual monitoring and expand what criteria are monitored to assess if standards and guidelines are being met.

Response to comment

Livestock grazing on National Forest System Lands is authorized where land is available for livestock grazing, analyzed and prepared to be consistent with the Land Management Plan (36 CFR 222.2).

Monitoring requirements shall be included in the project-level decision (FSH 2209.13 Ch 90).

Each grazing allotment is managed and monitored as guided in FSH 2209.13 at the allotment project-level to determine if activities are implemented as designed and if activities are effective at meeting objectives; and whether actions are being implemented as planned and meeting criteria the criteria of the Allotment Management Plan.

Concern 9 (letter 1077, comment 4):

The Forest Service should study the potential impacts of Wild and Scenic River recommendations on grazing permittees and grazing along the recommended river segments. It also should communicate and coordinate more with all potentially affected livestock permittees.

Response to comment

Communication and coordination with all livestock grazing permittees occurs on a regular and re-occurring basis. Each allotment is analyzed with careful consideration and cooperation with affected permittees as guided by 36 CFR 222.2 and 222.7. Potential impacts to livestock would be analyzed at the site- specific project level in coordination with effected parties as guided by FSH 2209.13 Chapter 90.

Concern 10 (Letter 877, comment 767):

The Forest Service should provide the suitability analysis referenced in the EIS that was completed as part of the Forest Plan revision to determine the lands suitable or unsuitable for livestock grazing.

Response to comment

The 2012 Planning Rule provides that the determination is not required for each activity, though analysis in the EIS are provided in the project record. Final suitability determinations for specific projects would occur at the project level. 43 U.S.C. §1752(i) provides that the priority and timing for completing each required environmental analysis with respect to a grazing allotment or permit shall be based on: the

environmental significance of the grazing allotment or permit; and the available funding for the environmental analysis. Administrative units would update their Schedule of Proposed Actions to reflect the planned completion date for allotments with no NEPA per a December 21, 2022 Washington Office letter of direction.

A GIS exercise of the capable acres with the suitable acres yields the Capable and Suitable Acres. This analysis is done separately for cattle and for sheep (and possibly for other kinds of animals as needed) and for each alternative (or grouping of similar alternatives) being considered.

The capability and suitability analysis and determination is not a decision to graze livestock on any specific area of land, nor is it a decision about or estimate of livestock grazing capacity. The capability/suitability analysis and determination may or may not provide supporting information for a decision to graze livestock on a specific area.

Any grazing allotment will contain areas that are capable and/or suitable as well as areas that are modeled as being not capable and/or suitable. Since the evaluation is based on a modeling process and is dealing with a variety of complex landscapes, it is inevitable that this intermingling will occur on a land base of any significant size. Therefore, these capability/suitability determinations are not intended to imply that livestock will be precluded from occasionally being found on lands that may be modeled as non-capable or non-suitable.

Together, the capability and suitability analyses can provide information for both Forest Plan level analysis as well as project level analysis and subsequent NEPA decisions. At the project level, rangeland capability and suitability may be reviewed, updated, or made more site-specific, if it is an issue for that project or provides information useful to the decisions being made. For instance, rangelands identified as capable and suitable for domestic livestock grazing in the land and resource management plan may include areas that are not appropriate for domestic livestock grazing when analyzed at the site-specific level.

Livestock Grazing – Sheep Grazing

Concern 1 (Letter 1060, Comment 126):

Without adequate plan components, effective monitoring, or an emergency response plan in place, the revised Forest Plan would not provide conditions for long-term persistence of sheep grazing

Response to comment

The plan provides for long term persistence of domestic sheep grazing provided a risk assessment is completed in areas greater than 16 miles from Bighorn sheep core herd areas and in coordination with the state in FW-GL-WL-01. Site specific project analysis and decision-making would occur guided by FSH 2209.13 Ch. 90 where potential future opportunity of sheep grazing may occur.

Concern 2 (Letters 805, 1077, comments 22, 7):

The Forest Service should revise the standard related to separation of domestic and bighorn sheep to reflect the fact that it does not manage bighorn sheep; instead, it must coordinate with the State of Idaho, permittees, and tribal representatives to implement voluntary best management practices identified in the Idaho Bighorn Sheep Management Plan and Idaho Code 36-106(e)5(E).

Letter #	Comment #
805	22
1077	7

Response to comment

The plan component related to separation of domestic sheep and bighorn sheep is identified to be consistent with the adjacent Payette National Forest to maintain low risk contact (U.S. Department of Agriculture 2010) and based on the Payette analysis and management of the Bighorn sheep core herd management area that overlaps with the Nez Perce-Clearwater National Forest. Rationale is described in Chapter 3 of the FEIS. Also see additional wildlife Bighorn sheep specific response to comments. Coordination would continue for livestock grazing project specific decisions as guided by 36 CFR 222, and plan component FW-GL-WL-01 provides guidance that the Forest Service cooperates and collaborates with state agencies on conservation strategies, recovery plans, habitat management and ecological conditions.

Management Approaches and Possible Actions

Concern 2: (letter number 48, comment 1)

The subbasin watershed analysis area should be reconsidered to accurately summarize total maximum daily loads.

Response to comment

One commenter had concerns about the accuracy of TMDLs determined by Idaho Department of Environmental Quality and the Environmental Protection Agency, specifically how they calculated sediment loads from suction dredge mining, and whether suction dredge mining is considered a point and non-point source pollution. The commenter also requested that TMDLs be established at a smaller scale, such as HUC10 or HUC12.

The Forest Service has no authority to determine the scale in which Total Maximum Daily Loads (TMDL) are addressed. The Forest Service is also not responsible for determining the TMDL allocation. In Idaho, Total Maximum Daily Loads (TMDL) are developed on a subbasin level (HUC08), which means water bodies and pollutants within a hydrologic subbasin are generally addressed in a single document. A subbasin is based on a cataloging unit of the US Geological Survey (USGS) and delineated with an eight number code. As directed by the Clean Water Act, each state agency must develop a total maximum daily load (TMDL) for all the waters identified in the section 303(d) list of impaired waters. A total maximum daily load determines pollutant reduction targets and usually covers a subbasin. In instances where total maximum daily loads include National Forest System lands, the Forest Service serves as a designated management agency through governmental memoranda of understanding. The State of Idaho is the lead agency for total maximum daily load development but must get United States Environmental Protection Agency approval before the total maximum daily load is formalized.

All energy and mineral management activities on National Forest System lands are required to meet applicable environmental protection measures as required by law, regulation, and policy. Proposed energy and mineral activities require approval of a plan of operations, an environmental analysis, and application of best management practices, including those found in the Manual of Best Management Practices for the Mining Industry in Idaho (Idaho Department of Lands 1992).

The Water Resources section in the FEIS and the water quality section in FEIS, Appendix K provide more information regarding total maximum daily loads. The Land Management Plan, Appendix 4 includes a management approach for Water Quality, including guidance on total maximum daily loads.

Management Areas

Concern 1:

The Forest Service should better define the desired conditions, suitable uses, standards, and guidelines for each management area and associated resource.

Letter #	Comment #
877	87, 92
17349	16

Response to Comment

Plan components have been developed that apply to the entire planning area or to part of the planning area. Some plan components apply specifically to a specific management area and those can be found in various resource sections in the revised land management plan.

Concern 2:

The Forest Service should not reduce the management areas in the new Forest Plan. It should develop enough management areas to acknowledge the diversity of the landscape and allow land managers to formulate and execute site-specific prescriptions.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	9	877	91	17175	2
380	1	941	2	17297	7
397	4	946	6	17304	7
465	20	1056	10	17507	1
621	3, 5	1089	5	17733	1
747	3	1099	6		

Response to Comment

Management areas include: (1) Wilderness, Wild and Scenic Rivers, and National Historic Landmark Areas; (2) backcountry; and (3) front country. There are specific plan components that apply to specific management areas in order to guide management of the land and resources of each management area.

Concern 3 (Letter number 1056, comment 11)

Old growth protections are nonexistent in the proposed management area plans. The Forest Service should create a management area that includes old growth management to identify and protect old growth stands and educate the public about the importance of old growth.

Response to comment

The 2012 Planning Rule and Forest Service Handbook 1919.12 – Chapter 20 – Land Management Planning Handbook, requires that forest plans provide for the sustainability of ecosystems and resources; meet the need for forest restoration and conservation, watershed protection, and species diversity and

conservation; and assist the Agency in providing a sustainable flow of benefits, services, and uses of NFS lands that provide jobs and contribute to the economic and social and spiritual sustainability of communities. Specific guidance related to the development of old growth plan components is taken from Green et al., 1992, errata 12/11.

Developed plan components are intended to ensure the retention of resilient old growth cover types to provide habitat elements and to promote long-term recruitment of old growth across the forest. Forest succession and disturbance history affects the old growth cover types occurring on the landscape. Abundance and distribution of old growth forest patches within Management Areas 1 and 2 are defined by both forest succession and natural disturbance processes. Old growth abundance, recruitment and distribution in Management Area 3 is maintained or improved through forest succession, natural disturbance processes and active management. Site specific analysis is required to identify and verify old growth forest patches as part of each project specific analysis. Definitions of habitat types have remained consistent over time. Old growth types are defined by habitat type groupings and specific stand structure metrics such as stand age and canopy structure. The amount and location of old growth cover types may change over time due to both succession and disturbance processes. Additional sections have been added to the Forestlands section of the EIS to clearly define the distinctions between old growth terminology and to provide better resolution of the distribution of old growth cover types common to each broad potential vegetation type group. The Nez Perce-Clearwater management strategy for old growth differs by management area. Management area 1 is influenced by natural processes only. Old growth in management area 2 is influenced mainly by natural processes along with prescribed fire. Limited mechanical treatments may be used where appropriate to achieve plan component MA2-DC-FOR-10. Management area 3 is managed through the application of mechanical treatments and prescribed fire as well as natural disturbances. Fire suppression will continue to be exercised in management area 3 to protect restoration investments. The current distribution of old growth forest cover types by broad potential vegetation type is illustrated in the Forestlands Section (3.2.1) in the EIS. A slightly higher percentage of old growth occurs in management area 3 compared to management areas 1 and 2. This is largely due to fire suppression which has served to protect old growth stands from stand replacing events. Size class distribution affects the size of trees occurring on the landscape. Desired conditions for size class distribution will influence the recruitment of old growth stands over time.

In addition, specific plan component guidelines are defined for management area 2 and 3 (MA2-GDL-FOR-02 and MA3-GDL-FOR-02). A guideline is a constraint on project and activity decision making that allows for departure from its terms, so long as the purpose of the guideline is met. (§ 219.15(d)(3)). Guidelines are established to help achieve or maintain a desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. (36 CFR 219.7(e)(1)(iv)). These guidelines specifically address the management of resilient old growth cover types to promote the desired conditions for maintaining and recruiting old growth forest characteristics.

A large-tree structure analysis has been added to the Forestlands Section of the EIS to both better describe this attribute and to illustrate the relationship between the distribution of large trees and the occurrence of old growth on the forest. The amounts and distribution of old growth on the forest is dependent on the frequency and distribution of large and very large trees as well as disturbance processes which influence large tree development. This relationship is described in detail in the Forestlands Section of the EIS.

On April 20, 2023, the USDA issued a technical report in fulfillment of Biden Executive Order 14072, Section 2(b)¹. This report provides definitions for mature and old-growth forests and an initial inventory of these conditions on lands managed by the Forest Service and Bureau of Land Management. This report

¹ <https://www.fs.usda.gov/sites/default/files/mature-and-old-growth-forests-tech.pdf>

presents the finding that Forest Service and Bureau of Land Management lands combined contain 32.7 +/- 0.4 million acres of old-growth and 80.1 +/- 0.5 million acres of mature forest, representing 18 percent and 45 percent of all forested land managed by the two agencies, respectively. This initial national inventory was conducted by applying the old-growth and mature working definitions to Forest Inventory and Analysis field plot data. To provide the initial inventory, the department provided narratives and working quantitative definitions for old-growth and mature forest for each NFS Region.

To quantify and estimate old growth, the authors of the technical report utilized Old Growth Forest Types of the Northern Region (Green et al. 2011) which has been used to define old growth in the Northern Region for decades. Prior to the mature and old growth report produced in response to President Biden’s Executive Order (U. S. Department of Agriculture and U.S. Department of the Interior 2023), there was not a consistent definition of “mature forest.” The quantitative definition presented in the technical report is considered a “working” definition appropriate for application for the national-scale inventory. As mentioned in the "Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management", the working definitions developed for the national inventory may need “further refinement... to apply working definitions at local scales due to diverse ecology, forest types, site characteristics, and varied management contexts” (U. S. Department of Agriculture and U.S. Department of the Interior 2023). At this time, the working definition has not been refined to the local scale; therefore, we do not currently have a quantitative estimate of mature forest on the Nez Perce - Clearwater National Forest.

Concern 4:

The Forest Service should evaluate activities across all three management areas to ensure that they embrace a holistic planning approach and maintain or restore ecological integrity in the forests.

Letter #	Comment #
938	2

Response to Comment

The emphasis for each of the three management areas differ resulting in plan direction and desired conditions specific to each management area. The management emphasis of Management Area 1 is that natural processes and management actions that mimic natural processes are what drive changes in forested vegetation. Management Area 2 has a strong emphasis on managing for ecological restoration. More intensive management to restore forest structure and composition is feasible here than in what is feasible in Management Area 1. The desired conditions for Management Area 2 are intended to reflect this emphasis on restoration. The emphasis for Management Area 3 is a blend of meeting ecological, economic, and social needs; the components for Management Area 3 are designed to be ecologically appropriate, to provide for timber production, and to provide for meeting other resource needs.

Management Area 2: Backcountry, Idaho Roadless Areas, Recommended Wilderness, Suitable Wild and Scenic Rivers

Concern 1:

The Forest Service should use all tools available, including responsible timber harvest and prescribed burns, as allowed under the Idaho Roadless Rule, to achieve the goals of ecological restoration; this includes protecting watershed health and improving habitat in Management Area 2.

Letter #	Comment #
412	3
805	2
1051	8

Response to Comment

Vegetation management within Idaho Roadless Area will be designed to be consistent with the Idaho Roadless Rule. Depending on the theme, there are exception to the Idaho Roadless Rule for timber harvest and actions incidental to prescribed burning. Management Area 2 plan components comply with the Idaho Roadless Rule.

Concern 3:

The Forest Service should revise and update the plan component language in the draft Forest Plan for Management Area 2 Multiple Uses of Wildlife - Elk.

Letter #	Comment #
17349	14
17688	7, 10, 12

Response to comment

The plan component language for Management Area 2 Multiple Uses of Wildlife- Elk has been updated as follows:

MA2-DC-WLMU-02. Areas at least 5,000 acres in size exist without motorized access open to the public to maintain habitat use by elk. This plan component has some exceptions, but that it would still address impacts to elk from motorized routes in Management Area 2.

MA2-OBJ-WLMU-01. In Management Area 2, 10,000 to 15,000 acres are improved every 5 years through vegetative treatments and wildland fire to improve nutritional forage value for elk. Natural ignitions are used to improve nutritional forage when and where appropriate to contribute to these acres.

MA2-GDL-WLMU-01. To increase available habitat for elk, vegetation management projects designed to improve elk habitat should increase available summer forage in areas of moderate or high nutrition potential.

The Plan is compliant in providing for the diversity and abundance of wildlife under Section 219.9 of the planning rule.

Concern 4:

The Forest Service should revise and update the plan component language in the draft forest plan for Management Area 2 Idaho Roadless Areas to include coordinating with State agencies that have a vested interest in Idaho Roadless Areas.

Letter #	Comment #
805	43
1051	8

Response to Comment

The Idaho State Governor’s Idaho Roadless Commission holds meetings twice a year. These are open to the public and other state agencies can attend to begin coordinating on management actions within Idaho Roadless Areas. Management Area 2 plan components comply with the Idaho Roadless Rule.

Management Area 3: Front Country

Concern 1:

The Forest Service should comply with the directives of the Idaho Roadless Rule and reduce routes in Management Area 3; this is because route densities are too high.

Letter #	Comment #
938	28
17349	24

Response to Comment

All Idaho Roadless Areas are Management Area 2. Direction under Management Area 3 is not applicable under the Idaho Roadless Rule. The land management plan cannot compel action to require the reduction of travel routes.

Concern 2:

The Forest Service should reevaluate which alternative would best retain older growth stands, while meeting the desired conditions for multiple wildlife uses, threatened and endangered species, and habitat connectivity in the draft forest plan.

Letter #	Comment #
307	30
938	1

Response to Comment

The final EIS was updated to include the current distribution of old growth types to natural disturbance regimes including wildfire. The old growth discussion has been expanded to include a discussion relating old growth types to old growth forest cover types and the relationship to dominance types and habitat type groups and included tables to illustrate both the metrics used to define old growth, old growth forest cover types and the disturbance processes which give both rise and decline of old growth on the forest. The preferred alternative will address the wildfire crisis, increase resiliency to climate change, and sustain old growth and mature forests. The preferred alternative was developed to include plan components that provide a suite of aquatic and riparian plan components that contribute to the recovery of ESA listed species, improve aquatic conditions, and provide the ecological conditions to support the persistence of all aquatic dependent species on the Forest.

Concern 3:

The Forest Service should revise and update the plan components language in the draft Forest Plan in Management Area 3 Multiple Uses of Wildlife - Elk.

Letter #	Comment #
17349	15
17688	8, 11, 13

Response to comment

The plan component language for Management Area 3 Multiple Uses of Wildlife- Elk has been updated as follows:

MA3-DC-WLMU-01. Ten to twenty percent of Management Area 3 is in a condition that provides moderate or high-quality nutritional forage for Elk. Areas with moderate or high-quality forage are distributed across the management area, with a portion of the moderate or high quality nutritional forage occurring greater than 0.5 miles from open motorized routes.

MA3-OBJ-WLMU-01. Improve habitat use for elk on 19,000 acres in Management Area 3 with moderate or high potential nutritional resources within 15 years. Treatments are preferentially focused on areas more than one half mile from roads open motorized system routes.

MA3-GDL-WLMU-01. Treatments designed to improve elk habitat should focus on one or more of the habitat covariates likely to improve predicted cow elk body fat condition.

The Plan is compliant in providing for the diversity and abundance of wildlife under Section 219.9 of the planning rule.

Concern 4:

The Forest Service should revise the Recreation Opportunity Spectrum (ROS) in Management Area 3 to be exclusively roaded natural; this is because most of Management Area 3 consists of areas with roads, trails, structures, and signs of past and ongoing activities designed to manage the area, including timber harvest and production.

Letter #	Comment #
16856	2
17355	1

Response to Comment

There are some areas within Management Area 3 that do not meeting the definition of roaded natural. Not every area of Management Area 3 consists of roads, trails, structures, and signs of past and ongoing activities. See the Recreation Opportunity Spectrum maps in Appendix A of the FEIS for the ROS classifications.

Minimization Criteria

Concerns 1, 2, 3, 4 (letter 877 comment 687):

Recreation Access – Motorized Use – General, Motorized Trails, Snowmobiling.

In this letter they contend, in part: “Additionally, to the degree land management plans allocate areas as suitable for motorized use, these allocations are subject to the minimization criteria established in the executive orders. The Draft Plan lacks components incorporating the minimization criteria, which are necessary to meet the 2012 Planning Rule’s sustainability and diversity requirements. Specifically, the

plan must include standards that establish the Forest Service will apply the Executive Order minimization criteria to projects that propose to create or modify off-road vehicle area or trail designations. Application of the criteria requires the Forest Service to demonstrate how each area and trail as well as the aggregate system minimizes – not just considers – impacts to forest resources and other existing and projected recreation uses.”

Response to comment

36 CFR 212 Travel Management; Subpart B Designation of Roads, Trails, and Areas for Motor Vehicle Use, and Subpart C Over-Snow Vehicle Use provide implementing regulations to address the use of off-road - motor vehicles on Federal lands.

At 36 CFR 212.55 criteria are identified for the designation of roads, trails and areas on National Forest System lands. Subpart (b) provides specific criteria for designation of trails and areas. It states:

“In addition to the criteria in paragraph (a) of this section, in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following with the objective of minimizing:

- Damage to soil, watershed, vegetation, and other forest resources;
- Harassment of wildlife and significant disruption of wildlife habitats;
- Conflicts between motor vehicle use and existing or proposed recreation uses of National Forest System lands or neighboring Federal lands; and
- Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands.
- In addition, the responsible official shall consider:
- Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors.”

The Planning Rule, 36 CFR 219 – National Forest System Land Management Planning, provides the process and content requirements to guide the development, amendment, and revision of land management plans.

Forest Service Handbook 1909.12, Chapter – Zero Code provides a definition of Suitability of Lands as; “A determination that specific lands within a plan area may be used, or not, for various multiple uses or activities, based on desired conditions applicable to those lands.” This Chapter also provides a definition of Sustainable Recreation as; “The set of recreation settings and opportunities on the National Forest System that is ecologically, economically, and socially sustainable for present and future generations (36 CFR 219.19)

Land Management Plans are programmatic and do not authorize or prohibit site-specific motorized vehicle use on specific roads, trails or areas. A plan’s identification of certain lands as suitable for motor vehicle use is not a commitment to allow such use but only an indication that the use might be appropriate to guide site-specific designations of motor vehicle use. The requirements at 36 CFR 212.55 to consider effects with the objective of minimizing damage to resources, harassment of wildlife, and recreation conflict applies when making site-specific motor vehicle use designations.

The suite of desired conditions, standards, and guidelines that provide for wildlife diversity, ecological integrity, and sustainable recreation will provide guidance for considering the effects of future motor

vehicle use designations on forest resources and recreation conflicts, as described at 36 CFR 212.55(b). These include the plan components associated with the recreation opportunity spectrum settings, infrastructure, and those that address management risks and stressors to wildlife habitat, connectivity, soil productivity, and aquatic resources.

Analysis documented throughout the Final Environmental Impact Statement and development of the Land Management Plan components demonstrates that these criteria were considered appropriately in the Land Management Plan decision with the objective to guide future site-specific decisions while minimizing the effects on the resources listed in 36 CFR 212.55(b).

Monitoring Plan

Concern 1:

The monitoring plan should include more emphasis on the effectiveness of monitoring, with measurable components to achieve management objectives and facilitate the adaptive management process.

Letter #	Comment #
307	144
621	4
764	20
877	73, 74, 78, 79, 84
938	68
1060	28, 42, 91, 154, 156

Response to Comment

The monitoring program includes monitoring, or the collection of data and information, followed by the evaluation of that information. Monitoring and evaluation are separate, sequential activities required by the National Forest Management Act to determine how well objectives have been met and how closely management standards and guidelines have been applied. Effective land management plan monitoring fosters adaptive management and more informed decisions. Monitoring information should enable the responsible official to determine if a change in plan components or other plan content that guide management of resources on the plan area may be needed (36 CFR 219.12(a)(1)).

Concern 2:

The Forest Service should include in the Final EIS informative front matter to describe what qualified persons would be doing the monitoring, how the monitoring would be accomplished (including use of best available science information and data sources), the use of indicators, and the frequency of monitoring. In addition, acronyms should be spelled out for clarity.

Letter #	Comment #
307	126
764	22, 23
877	75-77, 82, 85, 86, 301
1060	153

Response to Comment

Thank you for your comment. Acronyms throughout the land management plan and FEIS have been spelled out. Monitoring may be the responsibility of the Forest Service, another agency, or may involve multiple agencies and organizations. The land management plan monitoring program addresses the most critical components for informed management of the Nez Perce-Clearwater’s resources within the financial and technical capability of the agency. In some instances available information or data is obtained from other agencies and partnerships to expand these capabilities. The monitoring plan is not intended to depict all monitoring, inventorying, and data gathering activities undertaken on the Nez Perce-Clearwater. Consideration and coordination with broad-scale monitoring strategies, multi-party monitoring collaboration, and cooperation with state agencies where practicable will increase efficiencies and help track changing conditions beyond the national forest boundaries to improve the effectiveness of the plan monitoring program. The monitoring plan sets out the plan monitoring questions and associated indicators and measures. Every monitoring question links to one or more goals, desired conditions, objectives, standards, or guidelines. However, not every plan component has a corresponding monitoring question. The Forest used the best available scientific information in the development of the monitoring plan, giving consideration to expected budgets, and agency protocols. For example, Forest Inventory and Analysis data is the most accurate, reliable, and relevant data source for monitoring terrestrial vegetation conditions because it follows nationwide, statistically based protocols. The monitoring program will include a biennial monitoring evaluation report. The biennial monitoring evaluation report will summarize the results of monitoring, evaluate the data, consider relevant information from broad-scale or other monitoring efforts, and make recommendations to the responsible official. Biennial monitoring evaluation reports help determine if and where changes are needed in plan components, other plan content, and project activities (36 CFR 219.5).

Concern 4:

The Forest Service should add monitoring components to the main text of the revised Forest Plan and should add a link to make the other plan components trackable. Where some resources do not have monitoring components. The Forest Service should cross check the monitoring plan and the revised Forest Plan to ensure that all objectives and monitoring components are consistent.

Letter #	Comment #
764	19, 21
877	68
1060	41, 155

Response to Comment

The monitoring plan is within Appendix 3 of the Land Management Plan. All monitoring elements are linked to specific plan components. Questions and indicators are based on one or more desired conditions, objectives, or other plan components in the LMP, but not every plan component has a corresponding monitoring question (36 CFR 219.12(a)(2)).

NEPA Planning- General Process

Concern 1:

The Forest Service should address cumulative impacts that extend at least 30 years beyond the time frame of the revised Forest Plan.

Letter #	Comment #
1052	2
17885	1
17304	12

Response to Comment

The National Environmental Policy Act requires analysis of direct and indirect effects of the alternatives and no action alternative. 40 CFR 1508.7 discusses the requirements for cumulative effects analysis and the June 24th, 2007 Council on Environmental Quality Guidance Memorandum on Consideration of Past Action in Cumulative Effects guides cumulative effects analysis. FSH1909.15(b) suggests the temporal boundaries for this analysis. Each resource area may define the spatial and temporal boundaries different, if appropriate. The Responsible Official has discretion in the determination of the temporal boundaries. FSH 1909.15(b) states that “The time frames used depend on the duration of effects that the actions produce on the affected resource.”

In general, unless otherwise stated the cumulative effects temporal boundary is the expected maximum duration of the plan, or approximately 30 years. Other land ownerships generally do not have strategic plans extending greater than 30 years and therefore no reasonably foreseeable future actions can be determined on Forest Service or other lands at periods of time longer than 30 years. Impacts of past, present and reasonably foreseeable actions becomes speculative and increasingly indistinguishable as analysis periods increase.

While cumulative effects are increasingly difficult to predict and speculate on as time spans increase, we do have modelling capability to model some resources and display indirect impacts of the revised plan for long periods of time into the future. Wildlife habitat and vegetative composition of the forests are two areas where models can assist us in looking at periods of time long into the future. Appendix B of the FEIS describes the modelling process used, the time frames for which the models were ran and discusses the reliability of these modelled predictions. These timeframes extend (and indirect impacts are described) for several centuries for some modelled resource areas.

The temporal boundary for the cumulative effects analysis is generally the longest expected life of the plan, or 30 years. After the life of the plan, there are no reasonably foreseeable future actions. Therefore, cumulative effects are generally not analyzed for a period greater than 30 years. However, some modelling of indirect impacts does extend many decades longer when computer models can appropriately model actions that may occur during the life of the plan. Appendix B describes modelling used for the FEIS.

Concern 2:

The Draft EIS does not identify a proposed action or preferred alternative. This is problematic because the public likely will not be able to comment on that alternative once it is incorporated into the Final EIS.

Letter #	Comment #
663	3, 4
941	

Response to Comment

The public has requested additional opportunity to comment on the preferred alternative prior to the objection period as a preferred alternative was not identified in the DEIS.

CEQ NEPA regulations (40 CFR 1502.14(e)) require agencies to “Identify the agency’s preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement”.

The executive summary of the DEIS stated (chapter 1.3, proposed action). “A preferred alternative is not identified in the DEIS. Any individual component of any alternative analyzed in the DEIS may be combined into a preferred alternative. A preferred alternative will be identified with the release of the Final Environmental Impact Statement and Draft Record of Decision in 2021”.

Additional clarification was included in the Forest Supervisor’s letter to the public that accompanied the release of the DEIS:

I do not have a preferred alternative at this time. Forest leadership, in conjunction with the Forest Plan Revision team, will be developing the preferred alternative based on your comments. Each alternative was developed to be a set of building blocks-any of these blocks within the range of alternatives analyzed in the DEIS could be recombined to form the preferred alternative.

While a preferred alternative was not identified in the DEIS, as is allowable by NEPA regulations, the public was directly involved in the development of the alternatives analyzed in the DEIS (see DEIS sections 1.4, Scoping and 1.6, Public Involvement and Collaboration. A detailed proposed action was released in 2014 as a scoping document. Based on internal and external scoping comments, that proposed action was determined not to be a viable alternative. As the Forest Service began developing alternatives several opportunities to participate in the development of alternatives was provided starting with the release of the Framework for Alternative Development and continuing with collaborative alternative development workshops. Finally, the draft alternatives to be analyzed in the DEIS were shared publicly eighteen months prior to the release of the DEIS.

It was clearly articulated in public meetings and materials associated with the release of the DEIS that the future preferred alternative would be comprised of any of the individual components of the 4 action alternatives and communicated this with the public consistently. Through this approach we received comments on each alternative and the components therein. Past experience has shown that when we identify a preferred alternative with the DEIS, the public focuses almost all their comments on that one alternative. In our process, we were able to get a more comprehensive look at the public’s sentiments regarding management of the Nez Perce-Clearwater and make a decision based on that more well-rounded public response. Since we received over 22,000 comments during the 120-day comment period, this approach was very successful in soliciting robust public comment on all the alternatives. With this information, the responsible official is much better poised to identify a preferred alternative in the FEIS, as provided for in 40 CFR §1502.14(e).

A preferred alternative has been identified in the FEIS as is allowable by regulation. The public has been given ample opportunity to participate in the process, including opportunities to comment outside formal comment periods and were invited to develop alternatives with the agency. Finally, the preferred alternative is wholly within the range of alternatives analyzed in the DEIS and thus the range of anticipated impacts is also within the range analyzed. The preferred alternative was informed by the ecological, social and economic effects identified in DEIS and was developed, in part, through public comment. All legal and regulatory requirements have been met and the final decision will be better informed because the public, through formal comments, had an opportunity to be part of crafting the preferred alternative.

Concern 3:

The Forest Service should add or strengthen the language on the use of condition based NEPA analysis and communicate its process for site-specific implementation.

Letter #	Comment #
1052	
17885	
17304	

Response to Comment

Condition based management is applied to site specific project level planning when known or expected environmental conditions are examined as well as a range of possible management activities. The LMP defines the desired conditions where the A variety of appropriate treatments would be proposed that meet the purpose and need that is supported by the desired conditions as defined in the LMP. The proposed treatments would then be aligned (post decision but prior to implementation) with the current conditions on the ground using site specific data of these current conditions. The appropriate management activities are assigned for the site conditions at that time according to the selection criteria and range of management activities in the NEPA analysis and decision. The site specific project would be designed to meet the plan components of the current LMP.

2012 Planning Rule

Concern 1:

The Forest Service should review the 2012 Planning Rule and how it conflicts with the Forest Service Manual and Handbook, as mentioned in Section 3.6.2 of the Draft EIS in regard to Wild and Scenic River suitability.

Letter #	Comment #
974	8
17673	4

Response to Comment

Comparing regulations and direction in Forest Service Manual and Handbooks is not a requirement of NEPA or NFMA. The FEIS Chapter 3.6.2 contains analysis of eligible and suitable wild and scenic rivers supported by the information in FEIS Appendix F and comments received through public participation and collaboration.

Concern 2:

The Forest Service has avoided plan-level monitoring by refocusing ecosystem restoration on resiliency and ecosystem function, rather than historical reference.

Letter #	Comment #
877	70

Response to Comment

Appendix 3 of the LMP includes monitoring, or the collection of data and information, followed by the evaluation of that information. Monitoring and evaluation are separate, sequential activities required by the National Forest Management Act to determine how well objectives have been met and how closely management standards and guidelines have been applied.

Concern 1: Sustainability

The Forest Service should emphasize economic and social sustainability to a greater extent, as it appears that the document favors only ecological sustainability in regard to roadless areas, WSR suitability, and other plan components.

Letter #	Comment #	Letter #	Comment #
356	4	1052	63, 64, 65, 66, 67
764	11	3110	1, 24
877	816	17349	20
938	7, 8, 9, 19		

Response to Comment

Plans must include components that guide the contribution to social and economic sustainability to provide people and communities with a range of social, cultural, and economic benefits for present and future generations. Plan components below are designed to provide or contribute to habitat conditions for wildlife, fish, and plants commonly enjoyed and used by the public for hunting, fishing, trapping, gathering, observing, subsistence, and other activities. Plan components related to ecological sustainability and diversity of plant and animal communities also contribute to social and economic sustainability.

Concern 2: Sustainability

The Revised Forest Plan and EIS should include a discussion of an explicit plan disclosing the details on how its version of a restored landscape would be sustained and how special uses would be sustained.

Letter #	Comment #
877	101
887	5

Response to Comment

The land management plan has desired conditions that guide management for the restoration of designated lands. Appendix 4 of the LMP describe some of the possible actions and potential management approaches and strategies the Nez Perce-Clearwater National Forests might undertake to maintain or make progress towards achieving the desired conditions described in the Land Management Plan.

Concern 1: Ecosystem Integrity

Resiliency means different things to different resources at different scales. The Forest Plan should address instances when "resilient" for one resource or wildlife species is not resilient for another.

Letter #	Comment #
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877	99
16862	2

Response to Comment

The Planning Rule defines viable population as “a population of a species that continues to persist over the long term with sufficient distribution to be resilient and adaptable to stressors and likely future environments” (36 CFR 219.9). Resilience is defined as “Influence of disturbance on subsequent stand and landscape structure and composition (DeRose and Long 2014), The capacity of a plant or animal community or ecosystem to maintain or regain normal function and development following disturbance.” The revised plan emphasizes resilience in desired conditions for multiple resources, and includes standards and guidelines as proactive measures to improve ecosystem resilience relative to predicted changing climates. The analysis in Chapter 3 of the EIS discloses the impacts of plan components to resources at the Forestwide scale.

Public Involvement and Collaboration

Concern 1:

Shutdowns due to the Coronavirus restricted the availability of the revised Forest Plan and Draft EIS materials; in addition, the comment period overlapped winter holidays. The Forest Service should extend the comment period for these reasons, to allow the public time to fully review the revised Forest Plan and Draft EIS.

Letter #	Comment #
591	
594	

Response to Comment

The Forest Supervisor extended the comment period by 30 days on April 14, 2020. The DEIS comment period was December 2, 2019 through April 20, 2020.

Purpose and Need

Concern :

The Forest Service should specifically state what information is considered relevant or irrelevant in the purpose and need to change. The purpose and need to change should include the Clearwater Travel Plan.

Letter #	Comment #
680	1
873	4
877	29

Response to Comment

The responsible official “shall review relevant information from the assessment and monitoring to identify a preliminary need to change the existing plan and to inform the development of plan components and other plan content” (36 CFR 219.7 (c)(2)(i)). The need for change includes the administrative consolidation of the Clearwater and Nez Perce National Forests, emphasizing integrated restoration,

providing for ecological, social, and economic sustainability; incorporating current law, regulation, and policy; coordinating with state and local land management planning; and incorporating new information and science in the plan guidance. The Clearwater Travel Plan was assessed at the existing condition and the results of taking No Action is implementing the Clearwater Travel Plan.

Land Management Emphasis-Multiple Use Management

Concern 2:

The Forest Service should not remove any additional lands from multiple-use and should increase the use of lands for timber production, livestock grazing, and recreation.

Letter #	Comment #
470	1
471	1
478	1
491	1

Response to Comment

All lands designated under management area 3 consists of the areas with roads, trails, and structures, as well as signs of past and ongoing activities designed to actively manage the area. This management area provides a wide variety of recreation opportunities, both motorized and non-motorized. Idaho Roadless Areas are designated as management area 2 where each roadless theme as defined by the Idaho Roadless Rule specifies permitted and prohibited actions for timber cutting, roads, and minerals. Land Management Plan suitability for motorized use is determined through the designation of Recreation Opportunity Spectrum classes. Site-specific motorized use designations are determined in travel planning consistent with land management plan direction. Portions of four Idaho Roadless Areas in three areas are selected as recommended wilderness (also under management area 2). The use of motorized equipment and mechanized transport would be suitable for administrative use by agency personnel, partners, and members of the public under agreement with the Nez Perce-Clearwater. All other motorized and mechanized equipment use by the public would not be suitable. All recommended wilderness areas are within existing Idaho Roadless Rule areas, as identified in the Idaho Roadless Rule.

Concern 4:

The Forest Service should use the Idaho Roadless Rule as a planning guideline for managing multiple uses.

Response to Comment

The Idaho Roadless Rule only applies to Idaho Roadless Areas. Management Area 2 complies with the Idaho Roadless Rule.

Land Management Plan

Concern 1:

The revised Forest Plan should include more quantifiable standards and more specific language in all plan components to ensure objective interpretations.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
47	1	877	43, 61	16962	2
60	1	946	2	17297	1
89	2	985	3, 6	17354	4
102	2	1044	2	17507	7
272	1	1056	9	17509	13
307	59	1060	25	17732	1
362	1	1099	2	17733	2
397	5	3110	25	17869	2
455	1	3662	1	17893	1
465	17	3686	1	17898	1
659	2	6945	1	17900	4
747	1	7176	1		
805	8	12883	12		

Response to Comment

Standards or guidelines should not direct or compel processes such as analysis, assessment, consultation, planning, inventory, or monitoring. While there are no specific plan components with quantifiable limits for any given resource during project activities, management approaches in plan appendix 4 outline methods intended to help clarify how the planned outcomes (that is, objectives, desired conditions) in the plan might be achieved.

Concern 2:

The document sections use differing terminology, measurement units, formatting, and writing styles. The plan components should be consistent with the Final EIS and they should be streamlined so that general landscape-level management is captured and consistent between resources.

Letter #	Comment #
805	1
1065	64
3110	66
17916	3, 4, 5, 6, 7, 8, 11, 12

Response to Comment

The final EIS has been edited for consistency of unit measurements. The spatial boundary of the evaluated impacts of the land management plan is the Nez Perce-Clearwater administrative boundary.

Concern 3:

The desired conditions should emphasize natural ecological processes so that resource extraction is not the only achievable desired condition.

Letter #	Comment #
877	95, 98, 102

17673	14
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Response to Comment

A desired condition is a description of specific social, economic, and/or ecological characteristics of the plan area or a portion of the plan area toward which management of the land and resources should be directed. These are the social, economic, and ecological attributes that will be used to guide management of the land and resources of the plan area. They may apply to the entire plan area or to specific geographic or management areas. Desired conditions are not commitments or final decisions approving projects and activities. The desired condition for some resources may currently exist or may only be achievable over a long time for other resources. The Nez Perce-Clearwater may need to adjust the desired conditions if monitoring results indicate they are not achievable in the long-term.

Concern 4:

Plan components in the revised Forest Plan should be consistent with the existing plan to best understand baseline conditions and assess trends.

Letter #	Comment #
877	60, 62, 63, 69, 71, 72

Response to Comment

The revised Forest Plan must be consistent with the 2012 Planning Rule. The 1987 Forest Plans do provide the baseline and No Action alternative to compare the alternatives for the revised Forest Plan alternatives.

Concern 1: Management Approaches

The Forest Service should clarify if the possible actions in Appendix 4 would later be proposed and whether they are optional.

Letter #	Comment #
674	13
1054	22
1060	67, 167, 168

Response to Comment

The 2012 Planning rule does not require management approaches. This is optional content for a revised land management plan (36 CFR 219.7(f)(2)). Appendix 4 of the LMP contains the possible actions and potential management approaches and strategies the Nez Perce-Clearwater National Forests might undertake to maintain or make progress towards achieving the desired conditions described in the Land Management Plan. It is also intended to help clarify how the planned outcomes (i.e., objectives, desired conditions) in the plan might be achieved. The potential management approaches included here may be used to inform future proposed and possible actions. It does not serve as a “to do list” of projects; it does not suggest expected locations or dates of implementation; and it is not an all-inclusive list.

Laws and Policies

Concern 1:

The Forest Service should hold the plan to binding and enforceable standards, rather than guidelines; this is because standards are judicially reviewable under the National Forest Management Act, which protects the decision-making process from political pressure, philosophies, or priorities.

Letter #	Comment #
1060	21, 22, 24

Response to Comment

The Forest Service has carefully considered when to develop a standard and when to develop a guideline. Guidelines are not discretionary. Per the 2012 Planning Rule, a guideline is a constraint on project and activity decision making that allows for departure from its terms, so long as the purpose of the guidelines is met. Guidelines have been revised where necessary to include a statement of intent.

Concern 2:

The Forest Service calculated only the "limit" of timber harvest when using PRISM models; it should be using PRISM modeling to calculate a sustainable yield levels, as required by the Multiple Use Sustained Yield Act.

Letter #	Comment #
42	4
873	13, 14, 15, 47

Response to Comment

Development of the harvest schedule was performed using the PRISM model to maximize potential harvest levels while maintaining ecological integrity and ensuring a long-term sustained yield of timber resources. Refer to Chapter 3.5.1 – Timber of the FEIS for a detailed discussion of how the PRISM model is calibrated and used to derive estimates of timber harvest. The PRISM model uses Forest Inventory and Analysis (FIA) data collected in the field and updated every five years to generate estimates of forest growth rates. The sustained yield of the Forests (261 MMBF/yr.) is based on the total growth rate of all suitable forested lands. The preferred alternative proposes to capture 73-80% of the sustained yield of the Forests.

Concern 3:

The Revised Forest Plan and EIS should include the environmental impact information on protected species and their habitat, specifically regarding their Section 7 consultation with the US Fish and Wildlife Service and Idaho Fish and Game. The Forest Service should include recommended measures to protect fisheries and other species.

Letter #	Comment #
17348	14

Response to Comment

A biological assessment was prepared for all species listed under the Endangered Species Act. Consultation is occurring with US Fish and Wildlife Service and National Marine Fisheries Service. The land management plan includes components that contribute to the recovery of ESA listed species, improve aquatic conditions, and provide the ecological conditions to support the persistence of habitat for viable populations of all aquatic dependent species on the Forest and use these same principles to enhance habitat at the Forest scale. Plan components have been added to support grizzly bear habitat and the plan is consistent with the Northern Rockies Lynx Management Plan.

Concern 4:

The Forest Service should review the RS2477 Route Standing and Executive Order 13855; this is because the Forest Plan calls for closing routes that should be perpetuated for public motorized access and emergency services.

Letter #	Comment #
567	13
587	2

Response to Comment

Designated routes and areas for motorized use are addressed in travel planning. While the Land Management Plan sets the stage for travel planning, the plan is not travel planning and becoming too specific may limit the range of possible solutions during travel planning.

Recommended Wilderness

Concern 3 and 4 – Opposes Recommended Wilderness

These comments express opposition to additional recommended wilderness either generally or focused on specific areas. Many of the comments were specific to the Hoodoo IRA but other specific areas mentioned include Sneakfoot Meadows, North Fork Spruce-White Sand, Pot Mountain, East Meadow Creek, and West Meadow Creek among others.

Generally, these comments are focused more on maintaining opportunities for activities rather than other aspects of the areas themselves. An exception to this is how they provide for the uses of interest. Objections focused on lose of motorized and mechanized access and recreational opportunities, particularly where this activity currently or historically occurred. The opportunity for snowmobiling and mountain biking were most often mentioned, with motorcycle, ATV, and UTV use mentioned less often. Loss of the ability to manage the timber resource, implement ecosystem restoration activities and mining were also mentioned as reasons not to increase the amount of recommended wilderness.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
35	1	570	3	17610	1	17355	2
64	1	573	3,4	17658	2,3	17508	2
78	1	581	4	17746	1	17882	2
101	2,3	587	19,23	17785	1	17906	1
105	1	591	1	17830	1		
108	5	597	1	17871	4,5		

Appendix M: Response to Comments

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
115	1			17884	1,2,3,4,5,6,7		
125	3	617	1	17891	1		
129	2	647	2	17904	1		
131	1	653	1	17914	1		
162	1	655	1	17916	1,25,28,39,93,94,99		
217	1	664	1	84	1		
254	2	668	1	88	1,2		
273	1	674	2	126	2		
281	1	720	3	127	1		
289	3	805	39	164	1		
290	1	993	3	445	2		
313	3,5,6	1060	51	461	1		
325	1	1076	7	497	1		
351	2	1101	1	503	1		
352	1	1112	1	549	1		
356	6	1119	2	573	6		
376	1,2	3110	10,11,57	587	13,18,23,24		
395	1,2,4	3541	1	590	1		
399	1	3609	1,2,3,4	629	16		
420	3	3724	1	631	1		
445	6	14181	1	632	1		
449	1	15386	1	640	1		
450	3	16856	3,4,5,9,10,11	776	2		
452	9,10,11	16945	2	805	86,90		
456	1	16974	1	1028	11		
459	1	17224	1	1050	6		
462	1	17353	5	1076	8		
463	1	17355	3	1077	3		
526	1	17362	3	1105	1		
553	1	17508	3	17018	1		
557	1	17581	1	17258	1		
567	5,22	17594	3	17350	3		

Response to comment

Direction to address these concerns comes from:

36 CFR § 219 Sec. 219.7(v): This regulation requires identification and evaluation of lands that may be suitable for inclusion in the National Wilderness Preservation System and determines whether to recommend any such lands for wilderness designation.

Forest Service Manual 1923 – Wilderness Evaluation, 1923.03 – Policy: This manual directs the agency that all areas that may be suitable for inclusion in the National Wilderness Preservation System must be inventoried and evaluated for recommendation as designated wilderness areas during plan development or revision.

Forest Service Handbook 1909.12 Chap. 70: Provides direction for inventory, evaluation, and management of recommended wilderness areas. That direction also allows for discretion to implement a range of management options as long as they provide for the maintenance and protection of the social and ecological characteristics that are the basis for the wilderness recommendation. It states that plan components must protect and maintain the social and ecological characteristics that provide the basis for recommendation and may include components that:

- Enhance the ecological and social characteristics that provide the basis for designation
- Continue existing uses if such uses do not prevent the protection and maintenance of social and ecological characteristics
- Alter existing uses, subject to valid existing rights
- Eliminate existing uses, subject to valid existing rights

A range of Idaho Roadless Areas were considered in the various alternatives as recommended wilderness areas. In addition, a range of permitted uses and activities in those recommended wilderness areas was also considered.

The FEIS, Appendix E, Manageability, Table 9, identifies factors for assessing manageability and boundaries, including a history of motorized use and emerging mountain bike use. This factor is addressed for each Idaho Roadless Area in terms of miles of motorized and mechanized roads and trails within and adjacent to the IRA, the IRA theme, and adjacent area management direction. The FEIS 3.6.2 identifies five measurement indicators that were developed to address the effects to motorized and mechanized recreational use associated with alternative recommended wilderness areas. These five indicators are presented for each recommended wilderness area included in each alternative. The effects of climate change on forest recreation is mentioned in the FEIS, 3.2.3.

Based on public input, consideration of the findings in the FEIS, and the responsibility to have a Forest Plan that is ecologically, economically, and socially sustainable, the Preferred Alternative identifies three recommended wilderness areas configured from four roadless areas with boundary adjustments. The Preferred alternative finds them as not suitable for uses or activities that would preclude wilderness designation except administrative use of aircraft landing that currently exists, motorized and mechanized tool use, recreation rentals that are currently in use and site-specific building replacement as allowed in Forest Service Handbook 1909.12, Chapter 70.

Additionally, a Recreation Opportunity Spectrum allocation was selected that determines suitability of motorized and non-motorized use across the Forest including all the Idaho Roadless Rule areas. Using the ROS along with the modified boundaries for recommended wilderness areas the Preferred Alternative provides opportunity for wilderness experience along with opportunity for motorized and non-motorized recreation while providing for ecological, economic, and social sustainability.

The Land Management Plan provides management direction that considered the aforementioned analysis and public input and addresses the public comments through Plan components under Sustainable Recreation Management, Recommended Wilderness, and Recreation (Aquatics and Riparian). The Land Management Plan and Record of Decision provide a balance of ecological conditions, management

practices, and a variety of summer and winter recreational opportunities from back-country solitude and adventure, to water-based activities, to various motorized and mechanized activities. The Record of Decision concludes that this balance supports ecologic, economic, and social sustainability on the Forest and in surrounding communities.

Concern 9: (3 comments in letter 877)

The public comments captured in this concern statement contend that the Planning Rule, 36 CFR 219.7, and FSH 1909.12, Chapter 70, require a “re-inventory” and evaluation of lands suitable for inclusion in the National Wilderness Preservation System rather than relying on the Idaho Roadless Rule. One comment states: “Simply put, the assessment seems to have erroneously conflated the Idaho Roadless Rule with the required inventories for Roadless land of wilderness value under NFMA.” And “Instead, the Forest Service chose the worst path, maintaining a fiction that the IRR areas and the Chapter 70 inventory process were one and the same.”

Response to comment

The Planning Rule, 36 CFR 219.5(a) explains that NFS planning “is an iterative process that includes assessment (219.6); developing, amending, or revising a plan (219.7 and 219.13); and monitoring (219.12).

At 219.5(a)(1), it is stated that “Assessments rapidly evaluate exiting information about relevant ecological, economic, and social conditions, trends and sustainability” (Emphasis added).

At 219.6(a)(1) it states that the responsible official shall: “Identify and consider relevant existing information contained in governmental or non-governmental assessments, plans, monitoring reports, studies, and other sources of relevant information.” (Emphasis added)

At 219.6(b) the Planning Rule explains that “the responsible official shall identify and evaluate existing information relevant to the area for the following: (15) Existing designated areas located in the plan area including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas” (Emphasis added).

At 219.7(c)(1), the Rule states; “The process for developing or revising a plan includes: Public notification and participation, assessment and developing a proposed plan...” (Emphasis added)

36 CFR 219.7(c)(2)(v) requires the agency to “Identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation.”

Forest Service Manual 1920.3 – Policy says, in part; “For plan amendments and revisions initiated prior to the issuance of an amended directive. If a plan amendment or a revision has been initiated prior to issuance of the amended directive, the Responsible Official should use the amended directive in any new step or phase of the planning process but **is not required to revise past steps or phases within the process: for example, a completed assessment would not need to be revised to comply with the amended directives** (Emphasis added).

It is clear from this direction that the planning process is grounded in an assessment of existing information to identify and evaluate suitable lands to recommend for wilderness designation. And, given that the Nez Perce-Clearwater Forest Plan revision process began in July 2014, nearly one year prior to issuance of the amended directives at FSH 1909.12, it is also clear that neither the Planning Rule nor the

Forest Service Manual direction require the Forest Service to complete a new inventory (re-inventory) as part of the plan revision process.

The Roadless Area Review and Evaluation (RARE) of 1972 and RARE II of 1978 inventoried the lands encompassed by the Nez Perce–Clearwater National Forest. Through those evaluations, areas were identified to be recommended for wilderness, areas for non-wilderness uses and areas for further study.

In 1978 the Endangered American Wilderness Act (H.R. 3454(95th)), established the Gospel Hump Wilderness. In addition, the Act designated approximately 92,000 acres adjacent to the Wilderness “as generally depicted on said map” as Management Areas to be managed in accordance with a multipurpose resource management plan for multiple uses. The development of this plan was also required by the Act. There are three areas that comprise these Management Areas and are commonly known as Indian Creek, Johns Creek and Tenmile Creek. These areas were brought forward by Friends of the Clearwater during public scoping for the plan revision. However, given that management of these areas had been established through legislation they were not included in the wilderness inventory.

The Act also identified about 45,000 acres, “generally depicted on said map,” as Development Areas to be immediately available for resource utilization under the existing applicable Forest Service land management plans. The Committee on Energy and Natural Resources submitted a report to accompany H.R. 3454. Maps of the areas were included in that report.

That report includes the statement: “the committee expects the Forest Service to cease all further study it might contemplate undertaking with regard to the suitability and desirability of congressional designation of the lands within the ”development” and “management” areas as components of the National Wilderness Preservation System.” These Development Areas included areas adjacent to the east, north and west boundary of the Gospel Hump Wilderness and include the area of Boulder Creek brought forward by Friends of the Clearwater during public scoping for the plan revision. Given the Congressional intent as stated in the Committee on Energy and Natural Resources report, those areas were not included in the wilderness inventory.

Another inventory and review of roadless areas began in 1998, completed in 1999, and culminated in 2001 with Forest Service regulations, through the Roadless Area conservation Rule. This Rule established prohibitions on road construction, road reconstruction, and timber harvesting on those 1999 inventoried roadless areas on National Forest System lands.

In 2008 the Idaho Roadless Rule revisited these areas and established management themes for each. As stated: “This rulemaking relied on the most recent inventory available for roadless areas within each national forest in the State of Idaho. Land management plans were used, as well as other assessments and the inventories associated with the 2000 Roadless Area Conservation Final Environmental Impact Statement. The Agency sought to be particularly sensitive to concerns over the accuracy of the inventories. This final rule uses these inventories as a starting point but also looked at updates identified through land management plan (LMP) revisions. New inventories for northern Idaho forests (Idaho Panhandle, Clearwater, and Nez Perce NFs) currently in LMP revision were also used. These inventories are based on agency direction in Forest Service Handbook (FSH) 1909.12, section 70. Changes to the roadless inventory reflect improvements in mapping and elimination of some areas that had been developed since the last inventory of record and inclusion of some areas after review. Inventories used for this final rule have all received review and comment by the public during the LMP revision process prior to this rulemaking.”

In this forest plan revision process the Forest followed the Planning Rule by completing an assessment using existing information compiled during RARE, RARE II, the Roadless Area Conservation Rule and the Idaho Roadless Rule. Additionally, the Forest solicited public input and provided numerous opportunities to provide that input. As a result of that public participation the following areas were brought forward by the Friends of the Clearwater in their scoping comments, dated November 14, 2014. In that letter, through their own statements, they recognized that they likely would not warrant consideration as recommended wilderness for various reasons. Following are excerpts from that letter:

“Gospel Hump Wilderness Additions. Roadless land that should be added to this inventory was erroneously omitted from the forest plan though included in the draft of RARE II. This includes Johns Creek, Boulder Creek, Indian Creek, and other areas. Ironically, (s)ome of this area was included in the Idaho roadless rule (West Fork Crooked River) while other areas were not.”

“The following areas should be evaluated in the DEIS. They may be over 5,000 acres in size. Regardless, allocating these areas to a non-mechanized protected backcountry category should be done.

Goddard Creek This area occupies the central position between O'Hara Falls and Middle Fork Face. This area contains habitat for unique coastal disjunct species including the rare and declining Pacific dogwood and anadromous fish. It was erroneously removed from the RARE II inventory. Logging has already damaged this area and it may no longer be 5,000 acres in size.

Middle Fork Face This area contains steelhead and important winter range. Some lawless logging under the salvage rider occurred by massive amounts are proposed in the destructive Middle Fork Face and Johnson Bar Salvage proposed logging operation. It may no longer be 5,000 acres in size, though it appears it still is.

Kelly Mountain This area drains into the Salmon east of Riggins. It was studied during RARE II but ignored in the forest plan inventory, probably due to size. However, this steep area may still contain 5,000 acres of land missed by the flawed inventories.

Rudd Moore Lakes. This small area, though less than 5,000 acres, should definitely be allocated to a non-mechanized protected back country area. It could also be evaluated to see if it is a logical addition to the existing White Sand Creek-North Fork Spruce roadless area.

North Siwash. This area appears to be over 5,000 acres. It is north of the Siwash area and may be a part of it. This area needs to be evaluated.

Wendover. This area might be over 5,000 acres. It is the roadless land that runs east and west, just south of the Lolo Motorway. Wendover Ridge is in the center of the area.”

As stated earlier, Indian Creek, Tenmile Creek and Johns Creek were dropped from the inventory because disposition of these areas were legislatively directed, or in the case of Boulder Creek, given Congressional intent for no further consideration as stated in the Committee on Energy and Natural Resources report.

The Forest complied with FSH 1909.12, Chapter 70, 71.1 by considering the other areas brought forward in their scoping comments. That review identified that Goddard Creek and Kelly Mountain were evaluated in RARE II and subsequently dropped as inventoried roadless areas. In review of the Forest Service Activity Tracking System, North Siwash was found to have had timber harvest in each decade from the 1960's through 2009, including clearcuts, shelterwood cuts, salvage cuts, liberation cuts and commercial thinning, resulting in degraded wilderness character. Therefore, there was no reason to

consider any of these areas further. Middle Fork Face, Rudd Moore Lakes and Wendover are all less than 5,000 acres, are not contiguous to any wilderness or recommended wilderness area and were not considered in RARE II. This is discussed in the FEIS, Chapter 2, Alternatives Considered but Eliminated from Detailed Study, and therefore did not warrant any further analysis documented in the FEIS.

Concern(s) 5, 6, 7, 8:

These concern statements are centered on the management of and uses allowed in recommended and existing wilderness areas and less about which areas should or should not be recommended as wilderness (See Concern Statements 1,2,3,4). Some commenters are concerned about RWA boundary location and manageability. Many of the comments support the position that uses inconsistent with wilderness designation should not be allowed in recommended wilderness. Some commenters feel plan components are needed to specifically address those uses that are and are not permitted in these areas. Other commenters feel motorized use, specifically snowmobiles, should be allowed in recommended wilderness areas. Some commenters feel fish and wildlife values are not adequately discussed in the Recommended Wilderness section of the FEIS.

One comment summarizes much of what was presented in the following comments: “RWAs must be managed for social and ecological characteristics that preserve and enhance wilderness character over time” (MWA).

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
36	1	89	3	83	4	680	3
80	1	98	5	452	8	684	1
97	3	307	165	629	1,2,6,8,12	717	47,48,49,50,56,58,78
663	10	569	1	717	43,46	764	5
674	3	570	8,14	938	14,15	805	88
717	85,86,88,92	663	13	Empty cell	Empty cell	1060	50
764	6	674	5	Empty cell	Empty cell	3110	61
877	591,605	717	29,30,32,41,42,45,67,87	Empty cell	Empty cell	17916	96
938	10	805	85	Empty cell	Empty cell	Empty cell	Empty cell
12883	5	877	588,606,607,608,609	Empty cell	Empty cell	Empty cell	Empty cell
16856	12	939	9	Empty cell	Empty cell	Empty cell	Empty cell
17916	95	972	2	Empty cell	Empty cell	Empty cell	Empty cell
Empty cell	Empty cell	17359	3	Empty cell	Empty cell	Empty cell	Empty cell
Empty cell	Empty cell	17373	19	Empty cell	Empty cell	Empty cell	Empty cell
Empty cell	Empty cell	17888	4	Empty cell	Empty cell	Empty cell	Empty cell

Response to comment

36 CFR § 219 Sec. 219.7(v): This regulation requires identification and evaluation of lands that may be suitable for inclusion in the National Wilderness Preservation System and determines whether to recommend any such lands for wilderness designation.

Forest Service Manual 1923 – Wilderness Evaluation, 1923.03 – Policy: This manual directs the agency that all areas that may be suitable for inclusion in the National Wilderness Preservation System must be inventoried and evaluated for recommendation as designated wilderness areas during plan development or revision.

Forest Service Handbook 1909.12, Chapter 70 provides direction for inventory, evaluation, and management of recommended wilderness areas. That direction identifies improvements that may be present within an area and still be considered for recommendation. Those improvements include, but are not limited to, certain roads, structures, vertical structures, airstrips, heliports, range improvements and evidence of present and past activities that may be considered by some as non-conforming uses. Additionally, that direction also allows for discretion to implement a range of management options as long as they provide for the maintenance and protection of the social and ecological characteristics that are the basis for the wilderness recommendation. It states that plan components must protect and maintain the social and ecological characteristics that provide the basis for recommendation and may include components that:

- Enhance the ecological and social characteristics that provide the basis for designation
- Continue existing uses if such uses do not prevent the protection and maintenance of social and ecological characteristics
- Alter existing uses, subject to valid existing rights
- Eliminate existing uses, subject to valid existing rights

A range of Idaho Roadless Areas were considered in the various alternatives as recommended wilderness areas. In addition, a range of permitted uses and activities in those recommended wilderness areas was also considered. The FEIS Sustainable Recreation section 3.4.2 discusses the effects from these alternatives on motorized and non-motorized activities.

The FEIS Wildlife Section 1.1 discusses and analyses the effects of the alternatives on ecological sustainability, integrity, and the ecological conditions for wildlife in the plan area. The Planning Rule defines Ecological conditions as:

“The biological and physical environment that can affect the diversity of plant and animal communities, the persistence of native species, and the productive capacity of ecological systems. Ecological conditions include habitat and other influences on species and the environment. Examples of ecological conditions include the abundance and distribution of aquatic and terrestrial habitats, connectivity, roads and other structural developments, human uses, and invasive species.”

Four hundred and ninety references to recommended wilderness are made throughout the FEIS Wildlife Section 3.2.9. As example, the analysis includes the following statements:

“Factors that vary by alternative include those for recommended wilderness, suitability of uses within recommended wilderness, suitable wild and scenic rivers, the recreation opportunity spectrum, fire and fuels treatments, access, acres of vegetation restoration, acres of timber harvest, and the maximum size of regeneration harvest units.”

“This analysis assumes that the river habitat in Management Areas 1 and 2 will function in their natural range of variability while those in Management area 3 will operate in a degraded state that should improve over time under the aquatics plan components. Many activities and threats that have impacted rivers are not allowed, are restricted, or are allowed only under specific conditions or circumstances

within Management Areas 1 and 2. Thus, about 66.6 percent of the river habitats are relatively well protected from many threats.”

“Direction in the Recommended Wilderness section of the Land Management Plan would have beneficial consequences for aquatic and riparian wildlife habitats. This direction would prevent or restrict many known threats to these habitats from occurring. This direction would apply to those habitats already located within Idaho Roadless Rule areas and would be similar or slightly more protective of these resources than Idaho Roadless Rule direction.”

“Land allocations vary by alternative in how they provide for connectivity. Of greatest conservation value related to connectivity are recommended wilderness, but to a lesser extent suitable and eligible wild and scenic rivers, and research natural areas.”

These are just a few of the references to recommended wilderness in this section of the FEIS. Commenters are encouraged to read the wildlife section in its entirety to understand the relationship between wildlife and recommended wilderness Plan direction.

Additionally, a Recreation Opportunity Spectrum allocation was selected that determines suitability of motorized and non-motorized use across the Forest including all the Idaho Roadless Rule areas. Using the ROS along with the modified boundaries for recommended wilderness areas the Preferred Alternative provides opportunity for wilderness experience along with opportunity for motorized and non-motorized recreation while providing for ecological, economic, and social sustainability. Refer to the FEIS, Sustainable Recreation, Appendix E, and project record for supporting analysis of this determination.

Concerns regarding boundaries and manageability can be found in Appendix E for each Idaho Roadless Rule Area as it is one of the five characteristics to be considered for potential suitability for inclusion in the National Wilderness Preservation System.

Based on public input, consideration of the findings in the FEIS, and the responsibility to have a Forest Plan that is ecologically, economically, and socially sustainable, the Preferred Alternative identifies three recommended wilderness areas configured from four roadless areas with boundary adjustments. The Preferred alternative finds them as not suitable for uses or activities inconsistent with wilderness designation except administrative use of aircraft landing that currently exists, motorized and mechanized tool use, recreation rentals that are currently in use and site-specific building replacement as allowed in Forest Service Handbook 1909.12, Chapter 70.

Concern(s) 1,2 – Supports Recommended Wilderness

The comments received included in this concern statement are centered on determining which areas should be recommended for wilderness and why. The extensive comments received demonstrate the high level of interest in this decision and represent a wide array of recommendations and reasons for them. Many commenters in this Concern Statement support all or nearly all Idaho Roadless Areas recommended for wilderness. A majority support Hoodoo, Mallard- Larkins, and Meadow Creek roadless areas, although all roadless areas are mentioned or singled out in the various responses. Areas adjacent to Gospel Hump were also mentioned several times.

Commenters’ rationale for recommendation as wilderness include numerous ecological, cultural, historical, and social resources and values. Conservation of species diversity, wildlife habitat and connectivity, ecological integrity, effects of climate change, opportunity for solitude and primitive and unconfined quiet recreation, evidence of cultural and historical heritage, and opportunity to engage in

Appendix M: Response to Comments

traditional practices and activities are principle among the reasons given to support recommended wilderness.

Concern Statement 2 contains comments that are more specific to the Hoodoo Idaho Roadless Area although the sentiments expressed are the same as expressed in Concern Statement 1. The second table below identifies letters sorted to concern statement 2 that are not included in concern statement 1. The response to comments below is applicable to both.

Comments that oppose all or some areas designated as recommended wilderness are found in Response to Comments – Wilderness 3 and 4.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
12	1	321	1	832	1	12	1
15	1	351	1	840	2	15	1
24	2	394	2	866	1	24	2
32	3,4	414	1	877	See separate response	32	3,4
43	1	415	1	889	1	43	1
51	1	436	1,2,3	939	8,39,40,41,42	51	1
58	1	437	1	962	12	58	1
60	8	441	1	968	12	60	8
61	3,4,5,6,7	446	1	972	1	17869	5
62	1	465	9,12	992	1	17877	1
63	1	507	1	1007	1	17879	4
83	1	513	1	1044	1	17893	7
90	3	525	1,2,3,4,5	1054	16	17901	1,6
97	1	529	14,16	1055	2		
98	1,4	549	3,5	1056	27,29,31		
109	11	556	1,2	1072	1		
143	2	562	2	1080	1		
144	1,2,3	563	11,13	1089	8		
151	1	566	1	1091	1		
156	1	570	1,2,4,9,10,11,13,16	1093	1		
158	1	572	1	1097	1		
189	1	607	2	1098	2,3		
192	2	629	7,10,14,15,17	1109	2		
206	1,3	630	1	1110	4		
207	1,2	645	1	1115	4		
218	1	652	1	1121	4		
219	1	657	1,2	3631	2,3		
241	4	666	4	3675	1		
245	1	672	7,8,9,10	4767	2		

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Letter #	Comment #	Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
246	2	674	4,7,8	6106	2		
247	1,3	680	2,4,5	7009	1		
252	2	682	1,5,7	7098	2		
259	1	687	2,3,4	7602	3		
267	1	715	1	8492	1		
272	5,6	717	1,24,37,38, 40,66,68,69 ,71,72,74,8 0,89,90,91, 100,101	12735	1		
283	1	723	1	12883	1,2,3,4		
288	1	724	1,2	16856	8		
307	19,97,162	764	4	16861	2		
311	1	804	4	16981	2		
318	1	813	1	17304	8		
90	5	297	1	510	1	852	2
119	1	301	1	521	1	853	1
122	1	302	1	547	1	855	1
130	1	309	1	560	1	857	1
135	3	316	1	575	1	877	595,599,61 2, 610
148	1	317	1	602	1	883	1
152	1	327	1	611	1	899	1
153	4	328	1	624	1	900	1
154	1	331	1	635	1	914	1
157	1,2	332	1	644	1	915	1
159	1	335	1	662	2	918	1
160	2	338	1	669	3	921	1
161	1	350	1	678	1	924	1
170	1	364	1	679	1	925	1
173	1	367	1	688	1	931	1
175	1	369	1	696	1	932	1
176	1	370	1	698	1	938	11,12,13
178	1	371	1,2	704	1	939	10,11
181	1	391	1	705	1	942	1
183	2	393	1	707	1	948	1
184	1	397	2	710	1	964	1
185	1	402	1	717	2,17,18,19, 22,21,22,23 ,25,26,27,2 8,31,44,51, 53,70,76,81 ,82,84,129, 130	966	1
188	2	406	1	789	1	978	1

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Letter #	Comment #	Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
190	1	408	1	805	81	986	1
191	1	409	1	817	1	996	1
198	1	420	1,2	818	2	1008	1,2
215	1	423	1	821	1	1011	1
230	1	424	1	825	1	1017	1
231	1,2	427	1,2	826	1	1024	1
240	2	433	1	834	1	1034	1
243	1	440	3	839	2	1041	4
256	1	448	1	843	1	1042	1
260	2	466	1	848	1	1049	1
262	1	468	1	852	2	1054	17,19,20
275	1	498	1	853	1	1056	23,24
1060	52	17349	3				
1062	1	17359	4,5,6,7				
1064	1	17389	1				
1066	1	17443	1				
1084	1	17452	1				
1090	1	17628	1				
1092	3	17639	1				
1098	1	17673	5,8				
1099	11	17691	2,3				
1101	2	17816	1				
1103	1	17820	1				
1104	2	17826	1				
1105	3,5	17888	2,3				
1109	1	17901	3				
1116	1	17911	1				
1118	1	17916	2,91,98				
3111	1						
5911	1						
6887	1						
15367	1						
16855	1,2						

Response to comment

Direction to address these concerns comes from:

36 CFR § 219 Sec. 219.7(v): This regulation requires identification and evaluation of lands that may be suitable for inclusion in the National Wilderness Preservation System and determines whether to recommend any such lands for wilderness designation.

Forest Service Manual 1923 – Wilderness Evaluation, 1923.03 – Policy: This manual directs the agency that all areas that may be suitable for inclusion in the National Wilderness Preservation System must be inventoried and evaluated for recommendation as designated wilderness areas during plan development or revision.

Forest Service Handbook 1909.12, Chapter 70 - Wilderness provides the process for identifying and evaluating lands that may be suitable for wilderness designation and determining whether to recommend any such lands for designation. The four primary steps outlined in this direction include inventory, evaluation, analysis, and recommendation. The results of these steps are documented in the FEIS Appendix E, and throughout several sections of the FEIS, Biological Assessment, Record of Decision, and Land Management Plan.

The process began by considering existing, relevant information as documented in the 2014 Nez Perce-Clearwater Assessment 15.0 for Designated Areas. Additional areas submitted by commenters were also considered. Using the five wilderness characteristics it was determined that the 34 areas identified under the Idaho Roadless Rule met these characteristics and the other, public-recommended areas did not meet these criteria or had Congressional management direction not consistent with wilderness designation. Thirty-three of the 34 Idaho Roadless Areas (IRA) were then analyzed to determine which should be considered as recommended wilderness.

The wilderness inventory, evaluation, and analysis process is included within Appendix E. Areas brought forward by the public are addressed in the FEIS Chapter 2, dismissing them from further consideration in any alternative.

A range of Idaho Roadless Areas were considered in the various alternatives as recommended wilderness. Analysis of roadless areas for wilderness recommendation is addressed in 3.6.2 Recommended Areas in the FEIS and Appendix E to the FEIS. In addition, discussion of effects of the Land Management Plan are found through the Plan, FEIS, and associated appendices and include consideration of recommended wilderness. Examples of specific areas include sections: 3.2.3 Climate Change; Appendix G - Climate Change Adaptation Strategies: 3.2.8 Aquatic Ecosystems and Fisheries, and; 3.2.9 Wildlife.

Section 3.2.3 states; “the Land Management Plan includes management direction that directly aligns with the adaptation actions outlined in the Forest Service Climate Adaptation Plan. Although not specifically mentioned, most of the physical and biological ecosystem desired conditions in the Land Management Plan were developed to facilitate natural ecological processes and create healthy ecosystems, which are more resilient and better adapted to changing climate.

Appendix G discusses consideration of how climate may change in the future in the context of resource management that was incorporated into the development of the Nez Perce-Clearwater Land Management Plan. Plan direction includes strategies to help address the uncertainties associated with a changing climate and its potential impacts on ecosystems. Strategies included in the Land Management Plan focus on promoting resilience to change, creating resistance to change, and enabling forests to respond to change (Millar et al. 2007). See Appendix G for examples of climate change adaptation strategies and the plan components that support the strategies.

One example is Appendix G, Key Ecosystem Component: Forest Vegetation and Ecosystem Processes climate adaption strategies states: “Maintain and create areas where ecological processes are generally allowed to function with minimal human influence: All alternatives address this strategy through land allocations including recommended wilderness and associated Land Management Plan direction. The strategy is addressed by developing Land Management Plan direction to provide a range of areas that

have different management intensities and potential human influences – some areas may serve as “baselines” for understanding how ecological systems function and respond, such as current and recommended wilderness areas, and other areas provide more opportunity for active and adaptive management approaches to gain understanding of potential ways to address impacts of climate changes on the ecosystem.” time

The wildlife section of the FEIS includes 490 references to recommended wilderness. These references can be found in sections specific to wildlife species and their habitat as well as comparisons between alternatives. Following are a few examples but it is necessary to review the entire wildlife section to get a complete understanding of how recommended wilderness was considered as related to wildlife.

The wildlife environmental consequences section of the FEIS states; “The preferred alternative would change the boundaries of two recommended wilderness areas important to mountain goats. Those include the Hoodoo and Mallard Larkin recommended wilderness areas. Areas within these recommended wilderness areas will be suitable for summer motorized only in limited circumstances consistent with the Idaho Roadless Rule, and unsuitable for winter motorized uses. Therefore the associated motorized suitability would help protect mountain goat habitat. The change in the boundary might facilitate or make enforcement of illegal winter motorized restrictions more challenging, however, illegal motorized use is enforced by law enforcement, and the Forest Service provides users with information about where winter motorized uses are allowed or prohibited. Note that the plan does not authorize motorized uses, and a subsequent decision with associated environmental analysis is required to authorize such uses. The increase in the amount of recommended wilderness would have beneficial environmental consequences on mountain goats, furbearers, elk, and other ungulates and predatory big game, as described below.”

The wildlife environmental consequences section of the FEIS states; “While there are few plan components specific to mountain goats, alternatives for recommended wilderness and motorized over snow travel suitability within recommended wilderness has potential impacts to mountain goats. Mountain goats are sensitive to disturbance and tend to leave suitable habitats if disturbed. The effects are particularly acute during the winter when mountain goats may not be able to travel through deep snow. Alternatives for recommended wilderness in the Hoodoo area, the Mallard-Larkin area, Moose Mountain, and Bighorn Weitas would include several mountain goat herds, including some of the largest herds in the plan area. Allowing these areas to be open to motorized over snow travel could potentially expose mountain goats to this disturbance.”

The wildlife environmental consequences section of the FEIS states: “Plan components for recommended wilderness vary by alternative. Differences in plan components by alternative have virtually no differences in the effects on aquatic wildlife habitats because recommended wilderness management is very similar to Idaho Roadless Rule management.”

Section 3.2.8 Aquatic Ecosystems and Fisheries includes Recommended Wilderness in comparison of alternatives. It includes this concluding statement; “The relatively high forest-wide proportion of riparian areas that are within designated wilderness, Idaho roadless, and recommended wilderness, which are expected to have low to no harvest or other land management activities, would provide a high degree of protection to riparian conditions and associated ecological values, including wildlife and aquatic habitat, under all the action alternatives. Existing and recommended wilderness would generally provide the highest degree of protection because human actions are the most restricted in these areas.”

The analysis of recommended wilderness contained in these and other sections of the FEIS, as well as analysis of other resources and values throughout the FEIS and project record support the recommendations for wilderness in the Record of Decision as well as development of Land Management

Plan components that direct and constrain management activities as related to Idaho Roadless Areas and areas recommended for wilderness designation. Additionally, a Recreation Opportunity Spectrum allocation was selected that determines suitability of motorized and non-motorized use across the Forest including all the Idaho Roadless Rule areas. Using the ROS along with the modified boundaries for recommended wilderness areas the Preferred Alternative provides opportunity for wilderness experience along with opportunity for motorized and non-motorized recreation while providing for ecological, economic, and social sustainability.

Concern Statement: Wilderness 1 Friends of the Clearwater (letter number 87, comments 583, 586, 592, 596, 597, 600, 604, 611))

The issues raised by these comments focus on the wilderness recommendation process including the inventory process and range of alternatives. The commentors contend that use of the Idaho Roadless Rule inventory does not meet a “required inventory process,” also referred to as a re-inventory, nor do they include specific areas not selected in the IRR inventory. They further contend that the range of alternatives is inadequate to meet NEPA requirements, in part because there is no alternative that includes all roadless areas as recommended wilderness. They also state that the LMP does not commit to protecting areas recommended as wilderness because of the permissions in the Idaho Roadless Rule.

Response to comment

Forest Service Handbook 1909.12, Chapter 70 provides direction for inventory, evaluation and management of recommended wilderness areas. Sections 71.1 and 71.2 provide the following direction;

“The Interdisciplinary Team should start the inventory process by considering existing, relevant information identified during the assessment phase (FSH 1909.12, ch. 10), including information about designated areas (such as inventoried roadless areas), transportation infrastructure (such as road maintenance levels), and past or pending wilderness recommendation proposals. Building on this information and any additional public input (sec. 70.61 of this Handbook), the Interdisciplinary Team should apply the criteria and steps identified in section 71.2 of this Handbook to create the inventory.”

“Include an area in the inventory when:

1. The area meets the size criteria defined in section 71.21 and has no improvements; or
2. The area meets the size criteria defined in section 71.21 and is consistent with the improvements criteria defined in sections 71.22a and 71.22b.

After applying the size and improvements criteria, the Responsible Official shall also review the information provided through public participation during the assessment or as part of the wilderness recommendation process (sec. 70.61 of this Handbook), including areas that have been proposed for consideration as recommended wilderness through a previous planning process, collaborative effort, or in pending legislation. The Responsible Official may include in the inventory additional areas identified as part of that review that do not meet the criteria in sections 71.21 and 71.22 of this Handbook, for the purpose of carrying such areas forward to the evaluation step.”

A range of Idaho Roadless Areas was considered in the various alternatives as recommended wilderness areas. Additionally, an alternative that includes all Idaho Roadless Rule areas and an alternative that includes areas recommended through public participation are addressed in the FEIS, Chapter 2, Section – Alternatives Considered but Eliminated from Detailed Study. The narrative explains the rationale why

these alternatives were not carried forward and the analysis satisfies the requirements of FSH 1909.12, Chapter 70 and addresses the issues raised by the commentor.

Concern 9 – Wilderness (3 comments in letter number 877)

The public comments captured in this concern statement contend that the Planning Rule, 36 CFR 219.7, and FSH 1909.12, Chapter 70, require a “re-inventory” and evaluation of lands suitable for inclusion in the National Wilderness Preservation System rather than relying on the Idaho Roadless Rule. One comment states; “Simply put, the assessment seems to have erroneously conflated the Idaho Roadless Rule with the required inventories for Roadless land of wilderness value under NFMA.” And “Instead, the Forest Service chose the worst path, maintaining a fiction that the IRR areas and the Chapter 70 inventory process were one and the same.”

Response to comment

The Planning Rule, 36 CFR 219.5(a) explains that NFS planning “is an iterative process that includes assessment (219.6); developing, amending, or revising a plan (219.7 and 219.13); and monitoring (219.12).

At 219.5(a)(1), it is stated that “Assessments rapidly evaluate exiting information about relevant ecological, economic, and social conditions, trends and sustainability.” (Emphasis added)

At 219.6(a)(1) it states that the responsible official shall: “Identify and consider relevant existing information contained in governmental or non-governmental assessments, plans, monitoring reports, studies, and other sources of relevant information.” (Emphasis added)

At 219.6(b) the Planning Rule explains that “the responsible official shall identify and evaluate existing information relevant to the area for the following: (15) Existing designated areas located in the plan area including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas.” (Emphasis added)

At 219.7(c)(1), the Rule states; “The process for developing or revising a plan includes: Public notification and participation, assessment and developing a proposed plan . . .” (Emphasis added)

36 CFR 219.7(c)(2)(v) requires the agency to “Identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation.”

Forest Service Manual 1920.3 – Policy says, in part; “For plan amendments and revisions initiated prior to the issuance of an amended directive. If a plan amendment or a revision has been initiated prior to issuance of the amended directive, the Responsible Official should use the amended directive in any new step or phase of the planning process but is not required to revise past steps or phases within the process: for example, a completed assessment would not need to be revised to comply with the amended directives. (Emphasis added)

It is clear from this direction that the planning process is grounded in an assessment of existing information to identify and evaluate suitable lands to recommend for wilderness designation. And, given that the Nez Perce-Clearwater Forest Plan revision process began in July 2014, nearly one year prior to issuance of the amended directives at FSH 1909.12, it is also clear that neither the Planning Rule nor the Forest Service Manual direction require the Forest Service to complete a new inventory (re-inventory) as part of the plan revision process .

The Roadless Area Review and Evaluation (RARE) of 1972 and RARE II of 1978 inventoried the lands encompassed by the Nez Perce–Clearwater National Forest. Through those evaluations, areas were identified to be recommended for wilderness, areas for non-wilderness uses and areas for further study.

In 1978 the Endangered American Wilderness Act (H.R. 3454(95th)), established the Gospel Hump Wilderness. In addition, the Act designated approximately 92,000 acres adjacent to the Wilderness “as generally depicted on said map” as Management Areas to be managed in accordance with a multipurpose resource management plan for multiple uses. The development of this plan was also required by the Act. There are three areas that comprise these Management Areas and are commonly known as Indian Creek, Johns Creek and Tenmile Creek. These areas were brought forward by Friends of the Clearwater during public scoping for the plan revision. However, given that management of these areas had been established through legislation they were not included in the wilderness inventory.

The Act also identified about 45,000 acres, “generally depicted on said map,” as Development Areas to be immediately available for resource utilization under the existing applicable Forest Service land management plans. The Committee on Energy and Natural Resources submitted a report to accompany H.R. 3454. Maps of the areas were included in that report.

That report includes the statement: “the committee expects the Forest Service to cease all further study it might contemplate undertaking with regard to the suitability and desirability of congressional designation of the lands within the “development” and “management” areas as components of the National Wilderness Preservation System.” These Development Areas included areas adjacent to the east, north and west boundary of the Gospel Hump Wilderness and include the area of Boulder Creek brought forward by Friends of the Clearwater during public scoping for the plan revision. Given the Congressional intent as stated in the Committee on Energy and Natural Resources report, those areas were not included in the wilderness inventory.

Another inventory and review of roadless areas began in 1998, completed in 1999, and culminated in 2001 with Forest Service regulations, through the Roadless Area conservation Rule. This Rule established prohibitions on road construction, road reconstruction, and timber harvesting on those 1999 inventoried roadless areas on National Forest System lands.

In 2008 the Idaho Roadless Rule revisited these areas and established management themes for each. As stated: “This rulemaking relied on the most recent inventory available for roadless areas within each national forest in the State of Idaho. Land management plans were used, as well as other assessments and the inventories associated with the 2000 Roadless Area Conservation Final Environmental Impact Statement. The Agency sought to be particularly sensitive to concerns over the accuracy of the inventories. This final rule uses these inventories as a starting point but also looked at updates identified through land management plan (LMP) revisions. New inventories for northern Idaho forests (Idaho Panhandle, Clearwater, and Nez Perce NFs) currently in LMP revision were also used. These inventories are based on agency direction in Forest Service Handbook (FSH) 1909.12, section 70. Changes to the roadless inventory reflect improvements in mapping and elimination of some areas that had been developed since the last inventory of record and inclusion of some areas after review. Inventories used for this final rule have all received review and comment by the public during the LMP revision process prior to this rulemaking.”

In this forest plan revision process the Forest followed the Planning Rule by completing an assessment using existing information compiled during RARE, RARE II, the Roadless Area Conservation Rule and the Idaho Roadless Rule. Additionally, the Forest solicited public input and provided numerous opportunities to provide that input. As a result of that public participation the following areas were

brought forward by the Friends of the Clearwater in their scoping comments, dated November 14, 2014. In that letter, through their own statements, they recognized that they likely would not warrant consideration as recommended wilderness for various reasons. Following are excerpts from that letter:

“Gospel Hump Wilderness Additions. Roadless land that should be added to this inventory was erroneously omitted from the forest plan though included in the draft of RARE II. This includes Johns Creek, Boulder Creek, Indian Creek, and other areas. Ironically, (s)ome of this area was included in the Idaho roadless rule (West Fork Crooked River) while other areas were not.”

“The following areas should be evaluated in the DEIS. They may be over 5,000 acres in size. Regardless, allocating these areas to a non-mechanized protected backcountry category should be done.

Goddard Creek This area occupies the central position between O'Hara Falls and Middle Fork Face. This area contains habitat for unique coastal disjunct species including the rare and declining Pacific dogwood and anadromous fish. It was erroneously removed from the RARE II inventory. Logging has already damaged this area and it may no longer be 5,000 acres in size.

Middle Fork Face This area contains steelhead and important winter range. Some lawless logging under the salvage rider occurred by massive amounts are proposed in the destructive Middle Fork Face and Johnson Bar Salvage proposed logging operation. It may no longer be 5,000 acres in size, though it appears it still is.

Kelly Mountain This area drains into the Salmon east of Riggins. It was studied during RARE II but ignored in the forest plan inventory, probably due to size. However, this steep area may still contain 5,000 acres of land missed by the flawed inventories.

Rudd Moore Lakes. This small area, though less than 5,000 acres, should definitely be allocated to a non-mechanized protected back country area. It could also be evaluated to see if it is a logical addition to the existing White Sand Creek-North Fork Spruce roadless area.

North Siwash. This area appears to be over 5,000 acres. It is north of the Siwash area and may be a part of it. This area needs to be evaluated.

Wendover. This area might be over 5,000 acres. It is the roadless land that runs east and west, just south of the Lolo Motorway. Wendover Ridge is in the center of the area.”

As stated earlier, Indian Creek, Tenmile Creek and Johns Creek were dropped from the inventory because disposition of these areas were legislatively directed, or in the case of Boulder Creek, given Congressional intent for no further consideration as stated in the Committee on Energy and Natural Resources report.

The Forest complied with FSH 1909.12, Chapter 70, 71.1 by considering the other areas brought forward in their scoping comments. That review identified that Goddard Creek and Kelly Mountain were evaluated in RARE II and subsequently dropped as inventoried roadless areas. In review of the Forest Service Activity Tracking System, North Siwash was found to have had timber harvest in each decade from the 1960's through 2009, including clearcuts, shelterwood cuts, salvage cuts, liberation cuts and commercial thinning, resulting in degraded wilderness character. Therefore, there was no reason to consider any of these areas further. Middle Fork Face, Rudd Moore Lakes and Wendover are all less than 5,000 acres, are not contiguous to any wilderness or recommended wilderness area and were not considered in RARE II. This is discussed in the FEIS, Chapter 2, Alternatives Considered but Eliminated from Detailed Study, and therefore did not warrant any further analysis documented in the FEIS.

Concern 1: Recommended Wilderness Process (letter number 805)

The Forest Service should clarify what water rights might exist in or downstream of roadless areas, as mentioned in Appendix E.

Response to comment

The public has requested clarification on what water rights might exist in or downstream of roadless areas. Forest Service Manual 2500, Chapter 2540 provides direction for water uses and development on national forest lands. Federal law protects possessors and owners of rights to water for mining, agriculture, manufacturing or other purposes. The water rights protected are those vested and accrued by priority of possession, and recognized and acknowledged by local customs, laws and court decisions. Regarding water rights in wilderness areas, Section 4(d)(6) of the Wilderness Act provides a statement on state water laws - "Nothing in this Act shall constitute an express or implied claim or denial on the part of the Federal Government as to exemption from State water laws." This implies that the status quo applies regarding water rights.

There are approximately 250 existing water rights within roadless areas on the Nez Perce-Clearwater. Wilderness designation does not affect existing water rights. A wilderness bill signed into law in the future bears that future priority date, junior to all existing water rights. Thus, wilderness water rights do not supplant other, more senior rights. In addition, wilderness water rights apply only to unappropriated water. A wilderness water right only ensures that when water is available, wilderness gets its fair share. Wilderness water rights are in-stream flow rights. They are not consumptive water rights, meaning that the water flows through wilderness, and then flows out, unpolluted and available for other uses. In sum, wilderness water rights fully respect other water rights on the stream. They cannot disrupt existing rights, facilities or project operations.

This information has been added to Appendix E. Classifying a roadless area as recommended wilderness or designating an area as wilderness would not affect existing water rights.

Research Natural Areas

Concern 1

The Forest Service should consider additional areas or modifications as designated Research Natural Areas. This is because these areas provide for unique habitat, meadows, and other natural features.

Letter #	Comment #
307	25
570	6
877	819
17500	1, 4
17645	1
17901	5

Response to comment

There are five new proposed research natural areas under the revised land management plan that are categorized as follows: Two proposed research natural areas that were in the current forest plan, one expansion of a designated research natural area, and two new candidate research natural areas are

included under the action alternatives. Specialists from the Nez Perce-Clearwater and U.S. Forest Service Northern Regional Office, with research scientists from the Rocky Mountain Research Station, have identified the lands on the Nez Perce-Clearwater that possess characteristics that make them suitable for research natural area establishment. The potential for additional research natural areas in the future would exist under any alternative. The network of research natural areas (both designated those proposed under the revised land management plan) would contribute to the understanding of key ecosystems and plant communities by being part of the broader array of sites that are designated across other National Forests in the region.

Risk Management and Safety

Concern 1: (letter number 103, comment 1)

The Forest Service should ensure that funds for search and rescue and education are available, and it should consider the implications of providing mechanized public use in remote areas. This is because recreationists would increase, as population grows, and there would be an increase in search and rescue efforts.

Response to comment

Visitor use is expected to continue to increase, especially general use and day-use. Motorized activity use such as utility task vehicle, or UTV use, and demand may increase as that demand increases in Idaho and neighboring states. Access for this and other emerging uses, such as mountain bikes, electric bicycles, and over-the-snow motorcycle-snowmobile hybrid devices, also known as snow bikes, has been widely used requested by recreationalists who seek these activities. The Forest analyzed impacts to natural resources, user conflicts, and user safety in a variety of natural settings across the Forest. Each of the alternatives analyzed take into consideration these elements.

The recreation opportunity spectrum framework, required to be incorporated into the Land Management Plan by the 2012 Planning Rule, takes into consideration, access to a variety of recreational opportunities on the forest, but also considers impact to resources, and user conflicts. Desired recreation opportunity spectrum classes would aid in managing both existing and emerging recreation uses.

Executive Order 11644, as amended establishes policy and procedure “that will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands.”

The role of the Forest Service in S&R is one of developing and supporting strong local leadership. This requires maintaining liaison with the County Sheriff departments. The Forest Service may temporarily take the lead role where quick response is needed; however, the lead role will be maintained only until local responsible authorities are available to take over leadership. The Forest Service shall then revert to a supportive role and provide assistance, i.e., radios, maps, boats, airplanes, supplies and technical specialists.

Search and Rescue (SAR) operations on National Forest lands in Idaho County fall under the jurisdiction of the County Sheriff (U.S. Forest Service Manual 1599). The Sheriff’s Department personnel are trained for and have the responsibility for conducting SAR operations. The U.S. Forest Service role is one of support and cooperation with local officials. The following are a few of the ways that the Forest Service provides support to local SAR efforts.

- Providing personnel with specialized expertise, and equipment (helitack qualified personnel, public information, enforcement, ATVs, pack and saddle stock, climbing rope, snowmobiles and snowmobile freight sled, avalanche rescue gear, etc.).
- Assisting with radio communications:
- Providing training to SAR personnel including use of maps, GPS, compass, avalanche awareness training, as well as special considerations for resource protection such as Leave No Trace, wilderness, heritage, Threatened and Endangered species and other special emphasis areas.

2012 Planning Rule (36 CFR 219): This rule states that in developing a proposed plan revision, plan components must include sustainable recreation, including recreation settings, opportunities, access, and scenic character. Recreational opportunities could include non-motorized, motorized, developed, and dispersed recreation on land, water, and air.

Executive Order 11644, as amended: This order establishes policy and procedure “that will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands.”

Concern 1: (letter number 108, comment 3)

The Forest Service should consider health safety concern conflicts between different recreationists, such as hikers and mountain bikers.

Response to comment

Potential of user conflicts between recreation user groups has been analyzed across each of the proposed alternatives in the DEIS. The safety and health of recreationalists is a consideration when analyzing for conflicts between different user groups. The Forest analyzed impacts to natural resources, user conflicts, and user safety in a variety of natural settings across the Forest. Each of the alternatives analyzed take into consideration these elements.

The recreation opportunity spectrum framework, required to be incorporated into the Land Management Plan by the 2012 Planning Rule, takes into consideration, access to a variety of recreational opportunities on the forest, but also considers impact to resources, and user conflicts. Desired recreation opportunity spectrum classes would aid in managing both existing and emerging recreation uses.

2012 Planning Rule (36 CFR 219): This rule states that in developing a proposed plan revision, plan components must include sustainable recreation, including recreation settings, opportunities, access, and scenic character. Recreational opportunities could include non-motorized, motorized, developed, and dispersed recreation on land, water, and air.

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Roadless Area

Concern 1, 2, 3, 4, 5, 6, 7 - Hoodoo Idaho Roadless Area in Wilderness:

These comments refer to the management of the Hoodoo Idaho Roadless Area. Hoodoo related comments were pervasive throughout various categories of comments received including Wilderness, Recreation Access-Motorized Use, General, Motorized Trails, Snowmobiling, and Idaho Roadless Areas. Letters listed below are only those letters that were specifically categorized to the Hoodoo IRA, aka The Great Burn. The Hoodoo area received the most comments of all the IRAs. These concern statements encompass those comments and the comments received in the other categories.

The focus of these comments is what, where and when access and recreational activities should be allowed in the Hoodoo Idaho Roadless Area and what, if any of the area should be recommended for wilderness. Sentiments, concerns, opinions, advice, and recommendations varied from; “The entire Hoodoo Roadless Area must remain non-motorized in perpetuity!” to “Historic motorized uses and activities pre-existing RWA designation should be restored and allowed until Congress directs otherwise.” Topics of discussion revolve around use of over-snow vehicles including snowmobiles and snow-bikes, motorcycles, mountain bikes, ebikes, any other motorized or mechanized activities that might be imagined, as well as hiking, skiing and snowshoeing. Issues, positions, reasons, and rationale regarding these activities include many aspects of the ecological, economic, and social sustainability of the Hoodoo IRA, associated wildlife, local communities, and communities of interest. Most of these comments are value-based, many are science based, and many are expressed from personal experience in the area. Generally, all the comments reflect what the commenters feel is the highest and best use of the Hoodoo IRA.

Ecological concerns focus on wildlife habitat use and behavior, and impacts associated with the different recreational activities. This concern is reflected, as example, in the comments, “The Great Burn recommended wilderness area is perfectly situated on the landscape to provide a critical piece of landscape-level connectivity for wide-ranging animals such as grizzly bears, lynx and wolverines.” “Snowmobile use will force out wolverines, lynx and many other wildlife dependent on not being disrupted by human activity.” And “Classify the Great Burn Area as wilderness to protect declining populations of mountain goats, lynx and wolverine and maintain the grizzly migration corridor.”

Economic concerns mention the contributions of recreation to local communities. Comments such as, “Another thing to consider is the support to the local economy snowmobilers and snow-bikers bring. We frequent fuel stations, grocery stores, restaurants, parts stores, mechanics' shops and hotels/motels.” “In recent years the economies of Idaho and Montana have demonstrated how eco-tourism and the availability of wild areas attract more and more people who value those wild and serene areas for the solitude they offer.” And “Limiting motorized and bicycle access by adding wilderness would be detrimental to local economies as well. Motorized recreation contributes an average of \$62 million to the seven local counties that surround the Nez Perce-Clearwater National Forest. Limiting motorized access would be absolutely crippling to these communities.”

Social related comments discuss lifestyles and traditional and contemporary recreational activities. Such as, “The Great Burn, or the Hoodoo Roadless Area, is a spectacular and unique winter recreation area for motorized sledders. It provides riders with an experience of solitude, challenge and untouched opportunity.” “Snowmobiling and the Great Burn RWA -The Great Burn RWA is 200,000 acres with no winter trails. You find your own snowmobile route(s), which makes it a unique experience. -Snowmobiles have accessed the area since the mid 80's. -Some easier to reach spots were accessed by snowmobiles in the late 70's. -Motorcycles accessed the area until the early 2000's when the FS cut them off. One popular

Appendix M: Response to Comments

motorcycle trail went up Kelly Creek. The Stateline trail was another popular trail.” “I'd like to see the boundary of the Great Burn RWA adjusted to allow for existing and historical mountain bike access on existing single track routes like the Stateline Trail (Tr 738).” And, “Hikers, backpackers, equestrians, and sportsmen are drawn to the area. Extending from Hoodoo Pass to Schley Mountain, the Stateline Trail and its arterial trails offer access to beautiful high mountain lakes and ridgelines with views in all directions. Anglers use the Kelly Creek Trail from the bridge upstream to Hanson Meadows to enjoy more solitary pursuits of cutthroat trout.”

In summary, the focus of these comments is what, where and when access and recreational activities should be allowed in the Hoodoo Idaho Roadless Area and what impacts a decision would have on the ecological, economic, and social sustainability of the area. Approximately 77 percent of the letters received were supportive of recommending all or a majority of the Hoodoo IRA for wilderness. Approximately 22 percent supported the area to remain open to motorized and mechanized recreation, with a majority of these comments primarily for over-snow vehicle use.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
12	1	188	2	313	5
36	1	189	1	316	1
60	8	190	1	317	1
61	5	191	1	325	1
62	1	192	3	327	1
64	1	198	1	328	1
83	4	206	3	331	1
88	2	207	1,2	335	1
90	4	217	1	338	1
98	1	218	1	356	6
105	1	219	1	364	1
115	1	220	1	367	1
116	1	230	1	369	1
119	1	231	2	370	1
122	1	240	2	371	1,2
125	3	241	3	376	1
127	1	243	1	391	1
130	1	245	1	393	1
135	3	246	2	394	1,2
143	1	247	3	399	1
151	1,2	252	2	402	1
154	1	256	1	406	1
156	1	259	1	409	1
157	1,2	260	2	414	1
158	1	262	1	415	1
159	1	273	1	424	1
160	2	275	1	427	1
161	1	281	1	433	1
162	1	283	1	436	1

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Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
173	1	297	1	437	1
175	1	301	1	440	1
178	1	302	1	445	6
184	1	309	1	446	1
185	1	311	1	448	1
449	1	653	1	843	1
456	1	657	1	848	1
462	1	662	2	852	2
463	1	664	1	853	1
468	1	668	1	855	1
507	1	672	7	857	1
510	1	678	1	866	1
513	1	679	1	883	1
525	1,2,3,4,5	680	3	888	1
526	1	682	1	889	1
529	14,15,16	687	3	899	1
539	1	688	1	900	1
547	1	69	1	914	1
549	3	698	1	915	1
553	1	704	1	918	1
556	1	705	1	921	1
560	1	710	1	924	1
563	12	715	1	925	1
566	1	717	2,75,76,77,78,80, 81,82,83,85,86,87	931	1
570	1,2,3,4	720	3	932	1
575	1	723	1	939	40
581	4	724	1	942	1
587	19	789	1	948	1
590	1	813	1	964	1
591	1	815	1	966	1
602	1	817	1	968	12
611	1	818	2	972	1
617	1	821	1	978	1
621	1	825	1	986	1
624	1	826	1	992	1
629	9	832	1	993	3
630	1	834	1	996	1
644	1	839	2	1007	1
647	2	840	2	1008	1,2
1011	1	15367	1	1072	1

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Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
1017	1	15386	1	1076	8
1024	1	16855	1	1080	1
1028	1	16856	5,9	1084	1
1034	1	16861	2	1090	1
1042	1	16945	1	1091	1
1049	1	16974	1	1092	3
1054	20,27	17018	1	17389	1
1056	28,29	11224	1	17443	1
1062	1	17353	5	17452	1
1066	1	17359	4,6,7	17508	1
17581	1	1093	1	17628	1
17588	1	1097	1	17639	1
17610	1	1098	1	17658	2,3
1112	1	1101	1,2	17691	3
1118	1	1103	1	17816	1
1119	2,10	1104	2	17820	1
3110	57	1105	3	17826	1
3609	1,2	1109	1	17830	1
17871	5	6887	1	17884	5
17879	5	12883	2	17904	1
17914	1	17916	2,25		

Response to comment

The Hoodoo Idaho Roadless Area on the Nez Perce-Clearwater is 153,900 acres of the 252,000-acre Hoodoo Roadless Area, commonly referred to as The Great Burn. For decades, this area has been popular with a variety of interest groups and users of the area, and controversial over its highest and best use. Because of the diverse ecological and social values and interests, a plethora of regulation had to be considered in conducting the analysis and informing the final decision. Recognizing this abundance of law, regulation and directives that resource specialists had to consider, following is a sample of the most relevant, and influencing regulation guiding the Land Management Plan Revision process, i.e. The Planning Rule (36 CFR 219) and Forest Service Handbook 1909.12- Land Management Planning Handbook.

The Planning Rule (36 CFR 219.10(a)) requires that a plan include plan components including standards or guidelines for integrated resource management to provide for ecosystem services and multiple use including outdoor recreation. 36 CFR 219.10(b)(1) states “The Plan must include plan components, including standards and guidelines, to provide for: (i) Sustainable Recreation; including recreation settings, opportunities and access; and scenic character...”

The Planning Rule (36 CFR § 219 sec. 219.7(2)(v)) requires that the agency “identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation.”

Forest Service Handbook 1909.12, Chapter 10, 13.41 directs the agency to identify and evaluate; a. the types of recreational opportunities including both motorized and non-motorized opportunities, and; d. the

nature, extent, and condition of trails, roads, facilities, and other transportation and other infrastructure to provide recreational access. FSH 1909.12, Chapter 20, 23.23a, 1(a) directs the agency to review information from the assessment, the need for change and distinctive roles and contributions related to recreational settings, opportunities and access in the plan area. And, to consider public preferences or demand for recreational opportunities.

Forest Service Handbook 1909.12, Chapter 70 provides direction for the recommended wilderness area process. Section 73 discusses the analysis process and includes direction to describe an area's characteristics that provide the area's suitability for inclusion in the National Wilderness Preservation System.

Forest Service Manual 1923 – Wilderness Evaluation, 1923.03 – Policy: This manual directs the agency that all areas that may be suitable for inclusion in the National Wilderness Preservation System must be inventoried and evaluated for recommendation as designated wilderness areas during plan development or revision.

Forest Service Handbook 1909.12 Chap. 70: This direction contains the framework for evaluating and recommending lands for inclusion in the National Wilderness Preservation System.

FSH 1909.Chapter 23.13- Species-Specific Plan Components for At-risk Species, states “to provide for ecological conditions necessary to maintain the persistence or contribute to the recovery of native species within the plan area, including at-risk species identified in assessment.”

FSH 1909.Chapter 23.23-Fish, Wildlife, and Plants, states “plan components shall take into account plants, wildlife and fish, and related uses, that contribute to local, regional, and national economies in a sustainable manner and consider fish and wildlife species and habitat and habitat connectivity.”

As previously stated, comments regarding ecological sustainability focused on wildlife and the effects of recreation on a variety of species. The FEIS, Appendix C- Wildlife Species and Habitat Summary provides a list of species observed on the Nez Perce-Clearwater, with a brief description of their habitat.

The FEIS, Chapter 3.2.9.-Wildlife, provides in-depth analysis of the wildlife resource on the Nez Perce-Clearwater and wildlife relationships to their habitats and ecological conditions on the Forest. This analysis evaluates terrestrial and aquatic wildlife species, and the sufficiency of plan components and alternatives to meet the substantive requirements of the 2012 Planning Rule under sections 219.8, 219.9 and 219.10, and associated directives as they relate to wildlife. Briefly, the analysis considered the scope and severity of threats to various wildlife species across the planning area by examining species' habitat, and habits, under the different management schemes, uses and activities in the alternatives. This included the location, size and configurations of recommended wilderness, designated wilderness, Idaho Roadless Rule areas, and Recreation Opportunity Spectrum class allocations. Throughout the analysis, reference is made to recreational uses and potential effects to wildlife. As example, for Canada lynx the analysis identifies winter and summer recreation as potentially causing loss of habitat, behavioral responses to human disturbance, or snow compaction. However, the analysis concluded, in part, “the level and distribution of winter recreation is not likely to negatively impact the overall lynx population, although there is some risk of injury or mortality to individual lynx.”

The section on Wolverine discusses recreational use in wolverine habitat, recognizing that most of the wolverine habitat already falls within either designated wilderness or Idaho Roadless Rule areas, and that the amount and location of area recommended as wilderness, and the uses allowed within that area affect the amount of wolverine habitat. Therefore, a key indicator is the scope of disturbance and the severity of

that disturbance by alternative. The scope is determined by extent and the severity of the effects as influenced by the severity of disturbances or extent it would reduce wolverine habitat. The analysis recognized that the Hoodoo roadless area contributes the most acres of female wolverine habitat – a critical feature to wolverine success. Concluding that the severity of impacts to wolverine are influenced by winter disturbance in portions of the Hoodoo area.

Similarly, section 3.2.9 includes in-depth analysis for Grizzly bear. As stated, the analysis evaluated the effects of alternatives and plan components on grizzly bear that may be present, and the effects on connectivity and future potential occupancy of the Bitterroot Recovery Area. The analysis recognized that, “Interactions with people are by far the leading factors affecting grizzly bear populations. Motorized access routes, such as roads and trails, detract from secure habitat...” The analysis included management area allocations, and the location, size and configurations of recommended wilderness, designated wilderness, Idaho Roadless Rule areas, and Recreation Opportunity Spectrum class allocations in the alternatives. The FEIS, Appendix E provides information for each Idaho Roadless Area. Included in that information are descriptions for the wilderness characteristics of apparent naturalness; opportunity for solitude or primitive and unconfined recreation; sufficient size; ecological, geological or other features of scientific, educational, scenic or historical value; and manageability.

The FEIS, Chapter 3.6.2 – Recommended Areas, compares indicators that were developed based on the issue statements developed from the scoping comments and comments made to the draft wilderness evaluation to show how elements are affected by recommended wilderness management area allocation:

- Changes in wheeled motorized opportunities compared with the existing condition
- Changes in motorized over-snow vehicle opportunities compared with the existing condition
- Changes in trail miles that allow mechanized transport compared with the existing condition
- Changes in amount of commercial use of permanent structures
- Acres of underrepresented ecological groups of the National Wilderness Preservation System

Chapter 3.6.2 also discusses the wilderness characteristics for the combination of Idaho Roadless Areas recommended for wilderness in each alternative. These characteristics include, apparent naturalness, solitude and primitive and unconfined recreation, areas less than 5,000 acres, presence of ecological, geological or other features of scientific, educational, scenic or historical value, and manageability to preserve wilderness characteristics. It was not possible to make a direct comparison of these characteristics between alternatives to identify which alternative provides the greatest overall contribution to wilderness characteristics, unless one was to assume that it is simply based on the number of acres of recommended wilderness in each alternative. However, since all characteristics are not equal on all acres, and each area possesses varying amounts of each characteristic in various places, that is an erroneous assumption. Therefore, the narratives in the FEIS are intended to provide general descriptions that give an overall picture that each alternative contributes to the wilderness characteristics of the Nez Perce-Clearwater.

The FEIS, Chapter 3.8.1 -Economic Sustainability describes the economic conditions of the affected environment using key indicators of economic sustainability. It describes how key benefits of the Nez Perce-Clearwater currently contribute to economic sustainability of beneficiaries, both locally and at a broader scale, and evaluates the potential economic impacts of the proposed Land Management Plan and alternatives on local beneficiaries and the general public.

In the Summary of Consequences, it states; “Under the No Action alternative through Alternative Z, the Nez Perce-Clearwater would continue to provide the full suite of economic benefits which currently contribute to economic sustainability. The relative magnitude of contributions to economic sustainability vary by alternative. In this analysis, contributions to economic sustainability are made clear as hinging on choices around timber, vegetation, and designation of lands as being suitable for timber management.” And, “Given the diversity of management preferences across both local and national stakeholder groups, it is not possible to unequivocally identify which action alternative provides the greatest overall contribution to economic sustainability for all stakeholders across all possible economic benefits, market and non-market.”

The FEIS, Chapter 3.8.2 – Social Sustainability describes the social conditions of the affected environment using key indicators of social sustainability. It describes how key benefits of the Nez Perce-Clearwater currently contribute to social sustainability of beneficiaries, both locally and at a broader scale, and evaluates the impacts of the alternatives on the benefits the Nez Perce-Clearwater provides to local beneficiaries and the general public.

The analysis indicated, “Stakeholders across the secondary social analysis area hold diverse values and preferences for management. A majority of survey respondents share a common vision of the most important purposes of their local, federal public lands. This vision includes: protecting air and water quality, protecting wildlife habitat, protecting rare and endangered species, preserving areas for scientific study, providing scenic beauty, preserving wildlands, and providing recreational opportunities. Economic priorities, including timber, tourism and mining, were very or extremely important to a subset of respondents, and at least moderately important to the majority of respondents.”

Related to recreation, it states, “Recreation is an important benefit to local communities, national publics and even international publics. Recreation is as an economic driver in some communities that contributes to a sense of place and local heritage and provides opportunities for exercise and stress relief, which in turn contributes to human health. Recreation opportunities are also important for tourism and attracting new residents to communities within the primary analysis area. As human populations continue to grow, there will be added pressure on existing opportunities, potential for crowding, and limitations on opportunities for solitude in more popular locations. Contributions vary depending on the type of recreation opportunities people prefer.”

In the Summary of Consequences, it states, “Under all alternatives, the Nez Perce-Clearwater would continue to provide the full suite of social benefits which currently contribute to social sustainability, as described in the Affected Environment section. The relative magnitude of contributions to social sustainability vary by alternative. In this analysis, contributions to social sustainability are operationalized as key social benefits which enhance the quality of life of local stakeholders and the public at large. The relative differences in contributions to social sustainability among alternatives vary by stakeholder group as some stakeholders prioritize certain key forest benefits over others.

Given the diversity of management preferences across both local and national stakeholder groups, it is not possible to unequivocally identify which alternative provides the greatest overall contribution to social sustainability for all stakeholders.”

The Nez Perce-Clearwater recognized the diversity of interests regarding the Hoodoo IRA. In consideration of this, the analysis included a No Action alternative and five action alternatives that address them. One alternative has no wilderness recommendation, and five alternatives have various configurations of a Hoodoo recommended wilderness. The analysis also included a variety of Recreation Opportunity Spectrum classes with different motorized uses found suitable in and out of recommended

wilderness. Ultimately, the Preferred Alternative strives to strike a balance between the varied interests and concerns. Please refer to the FEIS, Record of Decision, and the Revised Land Management Plan to see how these were addressed.

Concern 1,2,3,5,6 - Idaho Roadless Areas:

These comments focus on a variety of issues around Idaho Roadless Areas Many of the comments are similar to those addressed in Concern Statement Wilderness 1 and 2, and Wilderness 3 and 4. These statements include recommendations of areas as recommended wilderness, support or opposition to various activities in recommended wilderness, and maintaining IRAs open to active management and motorized recreation.

Other comments are concerned about the activities permitted under the Idaho Roadless Rule as compared to those activities suitable in recommended wilderness. Suggesting that reliance on the Idaho Roadless Rule in areas not recommended for wilderness is insufficient to protect the resources and backcountry opportunities these roadless areas provide.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
99	1	968	9	567	6
110	1	979	4	604	1
150	1	1056	25,26,32	628	2
272	4	1099	12	639	4
307	124,163,168	7176	6	717	59,60
465	4,8,11	16859	3	962	13
468	2	17349	26	17673	10,13
528	5	17354	11	17868	2
17898	5	17899	4	17916	101,103,104,105

Response to comment

Forest Service Handbook 1909.12, Chapter 70 provides direction for inventory, evaluation and management of recommended wilderness areas. Chapter 70, 72.1 – Evaluation of Wilderness Characteristics, directs the Interdisciplinary Team to evaluate all areas included in the inventory to determine potential suitability for inclusion in the National Wilderness Preservation System using criteria included in the Wilderness Act. Paraphrased, that criteria includes apparent naturalness; opportunity for solitude or for a primitive and unconfined type of recreation; how areas less than 5,000 acres would be practicable; ecological, geological or other features of value, and; manageability.

Chapter 70, 73 – Analysis, provides direction for analysis of those areas that were evaluated and carried forward in the NEPA analysis. That direction indicates that all lands included in the inventory and subsequent evaluation do not need to be included in the NEPA analysis. The direction further states: “For each evaluated area or portions thereof that are not included in an alternative in the applicable NEPA analysis, the Responsible Official shall document the reason for excluding it from further analysis.”

Chapter 70, 74 – Recommendation, provides direction for the decision whether to recommend specific areas for inclusions in the National Wilderness Preservation System, direction for areas not recommended for inclusion and management of recommended areas. That direction allows for discretion to implement a range of management options as long as they provide for the maintenance and protection of the social and

ecological characteristics that are the basis for the wilderness recommendation, and may include components that:

- Enhance the ecological and social characteristics that provide the basis for designation
- Continue existing uses if such uses do not prevent the protection and maintenance of social and ecological characteristics
- Alter existing uses, subject to valid existing rights
- Eliminate existing uses, subject to valid existing rights

The Idaho Roadless Rule provides State-specific direction for the conservation and management of inventoried roadless areas within the State of Idaho. The Idaho Roadless Rule established five management themes for each roadless area which outlines the permitted and prohibited actions for timber cutting, roads and minerals. The proposed themes span a continuum that includes at one end a restrictive approach emphasizing passive management and natural restoration approaches, and on the other end, active management designed to sustain forests, rangelands, and grasslands. Most recommended areas in the various alternatives come from the wildland recreation, special areas and primitive IRR themes. These themes provide limited exceptions for road construction and reconstruction, timber harvest and minerals activities thereby limiting opportunity for active restoration except using fire, thereby reducing potential impacts to wildlife and other natural resources. Some recommended areas in the alternatives include the Idaho Roadless Rule Backcountry Restoration theme. The Rule is less restrictive on management activities that may occur in the Backcountry Restoration theme as compared to the other themes.

The FEIS at section 3.6.1 discusses the affected environment and environmental consequences of Idaho Roadless Areas by alternative. Section 3.6.2 discusses the affected environment and environmental consequences for recommended areas by alternative. Included in that section is discussion of consequences in terms of the indicators selected for comparison as well as wilderness character, between alternatives. The FEIS at Sections 3.2.7 and .8 discuss the potential consequences to water resources, aquatic ecosystems and fisheries and Section 3.2.9 discusses effects to wildlife, of the various alternatives including the preferred alternative. These analyses recognize and consider the nearly 1.5 million acres of roadless area and the potential management actions within these IRAs when considering the effects on these water, aquatic and wildlife resources.

The revised Land Management Plan includes numerous plan components to ensure integration of social, economic and ecological considerations to guide future actions and decision-making to achieve desired conditions across the forest. These include plan components for Management Area 2: Recommended Areas and Roadless Areas. These plan components ensure maintaining roadless area characteristics and values in Idaho Roadless Areas consistent with management direction in the Idaho Roadless Rule, and protecting and maintaining the social and ecological characteristics that provide the basis for wilderness recommendation in the recommended areas.

Additional Plan Components are found throughout the Revised Land Management Plan that provide direction for specific resources to ensure their continued protection and sustainability. Collectively, these plan components ensure that management direction for lands in Management Area 2, along with the Idaho Roadless Rule, are sufficient to protect wildlife and other natural resources. This is evidenced, as example, by findings in the FEIS wildlife section Conclusions which states; “Even with increased areas suitable for motorized uses, the plan area would follow Idaho Roadless Rule restrictions that would restrict roads, manage designated and recommended wilderness to maintain wilderness character, and authorize motorized access only after a site-specific analysis. Since roads are prohibited, the key consideration would be the future creation and use of motorized trails within Management Area 2, which

is mostly composed of Idaho Roadless Rule areas. In these cases, plan direction in the multiple uses elk section limit motorized trails so that they would have to maintain areas 5000 acres or larger without motorized access on either side of the new trail. This plan component would restrict where and how much new motorized access there would be in Management Area 2 and still maintain many areas as secure habitats. Thus, the plan area would provide the ecological conditions for connectivity into the Bitterroot Recovery Area.”

The revised Land Management Plan does not find suitable any uses in recommended areas that would preclude an area from wilderness designation. The revised plan does allow for recreation rentals, administrative use of aircraft landing, administrative motorized and mechanized tool use and site-specific building replacement.

The documentation for dropping roadless areas from further consideration in the FEIS can be found in the FEIS Appendix E: Recommended Wilderness Inventory, Evaluation and Analysis; Conclusions and Recommendations. The Record of Decision provides rationale for dropping roadless areas analyzed in the FEIS from consideration as recommended wilderness areas. That rationale is based on the information provided throughout the FEIS, primarily sections 3.2.4, 3.2.9, 3.2.11, 3.4.2, 3.6.2, 3.8.1, and 3.8.2, and Appendix E considering a comparison of the measurement indicators that were developed based on the issue statements and discussion of wilderness characteristics for each Idaho Roadless Area in each alternative.

Scenery

Concern 1: (letter number 307, comment 11)

The Forest Service should consolidate existing Forest Plan management areas in a single management area to emphasize scenic values. The proposed Forest Plan Management Areas Management Area-2 and Management Area-3 primarily stress timber harvest and prescribed burning and are insufficient to adequately address the Concerns associated with maintaining scenic objectives.

Response to comment

Forest Service policy requires that the agency inventory and manage scenic resource values on all acres of Forest Service managed public lands. The draft revised Nez Perce – Clearwater forest plan replaces the Visual Management System with the Scenery Management System (SMS), which is the agency’s latest science in fulfilling its legal requirements for managing scenic resources. SMS provides a systematic approach to inventory, assess, define, and monitor both existing and desired scenic resource conditions on forest system lands.

SMS is described in Agriculture Handbook Number 701, Landscape Aesthetics – A Handbook for Scenery Management (U.S. Department of Agriculture 1995). Additional information about SMS is contained in FSM 2380 The 2012 Planning Rule requires that the plan must include components, including standards or guidelines, to provide for scenic character (36 CFR 219.10(b)(1)(i)). SMS is the framework for developing plan components related to scenic character.

A key part of SMS is the identification and mapping of scenic integrity objectives. As explained in Landscape Aesthetics, the frame of reference for measuring achievement of scenic integrity objective levels is the scenic character being viewed. Scenic integrity objective levels range from very high to unacceptably low and are the desired condition for the degree of deviation from a landscape’s scenic character. SMS incorporates the degree of public importance placed on scenery viewed from travelways and use areas when developing scenic integrity objectives. During the SMS inventory process, travelways

and use areas were categorized into three categories according to the importance of scenery to constituents: (1) high, (2) moderate, and (3) low. Appendix J: Scenery Management System Mapping Process to the FEIS details how travelways and recreation areas were categorized (Appendix J-6). So, while Management Areas are not allocated in the draft revised Nez Perce – Clearwater forest plan specifically for scenic values, visibility from travelways and use areas informs scenic integrity objectives. Scenic integrity objectives are overlaid onto Management Area direction to protect scenic resources during project level planning.

The FEIS, Chapter 3.4.3 addresses the scenery resource. Here, it is pointed out that the analysis focuses on three main components of managing the scenery resource. First, determining the existing condition of scenic quality across the Nez Perce-Clearwater. Second, determining the desired condition, measured by desired scenic character descriptions, of scenery in the future. And third, determining the potential effects of the proposed alternatives on the desired scenic character. The analysis reviews the alternatives in the context of the forest plan components. Scenic integrity objectives as displayed in maps in Forest Plan Appendix 1 along with land management plan components found in the Land Management Plan provide guidance in the planning, design, and implementation of management actions to meet desired scenic character of any given area. Therefore, the development of separate management areas was not warranted.

Social Sustainability

Concern 1: (Comment 11 in letter number 764)

Finally, we assume Table 7 "Summary of Consequences by Alternative" on page 69 of the DEIS, ranks the "Relative Benefit to People" of wildlife populations as a measure of the potential effects on the social values of hunting and trapping opportunity. We believe a table that summarizes the relative consequences between alternatives according to the "Relative Benefit to Wildlife" is needed to provide a balanced perspective between social, economic, and eco- logical values - and help ensure a balanced decision is made on final plan components.

Response to comment

This table in the DEIS summarizes the consequences between alternatives on how they may benefit wildlife populations that are commonly enjoyed or used by the public as described above. The 2012 Planning Rule requires forest plans to provide for social, economic, and ecological sustainability within Forest Service authority and consistent with the inherent capability of the plan area (Section 219.8). The responsible official is also required to consider habitat conditions for wildlife, fish, and plants commonly enjoyed and used by the public for hunting, fishing, trapping, gathering, observing, subsistence, and other activities (36 CFR 219.9 -219.10).

The FEIS states the decision for the revised plan will examine and consider the potential ecological and biological impacts as well as the economic and social impacts to the Nez Perce Tribe, local counties, the broader regional level, and the nation (Section 1.2.1). The FEIS evaluates how the suite of plan components and alternatives may impact social, economic, and ecological conditions associated with wildlife Section of chapter 3. The section Abundance and Diversity of Wildlife, addresses the effects to wildlife and their habitat from the suite of plan components and range of alternatives considered in the Revised Forest Plan and provides a summary of consequences and benefits in a narrative format.

Concern 2: (Comment 63 in letter number 1052)

The analysis and comparison of effects to Social Sustainability are misleading and incomplete. This section makes the claim that Alternative X (highest timber output and motorized use) would have the

highest "contributions to integrity and resiliency of watersheds" and also fisheries. The only rationale for this claim seems to be that Alternative X includes restoration objectives slightly higher than other alternatives. However, this does not account for cumulative effects of increased timber harvest, road building, and motorized use. We find it hard to believe that Alternative X, with zero Recommended Wilderness or Suitable Wild and Scenic Rivers, would also contribute to highest contributions to watershed resiliency and fisheries, as this contradicts the best available science. The DEIS correctly demonstrates the degree of uncertainty; "It is unknown if these objectives are sufficient to achieve aquatic desired conditions over the next 30 years, particularly in light of projected increases in timber harvest, but the monitoring plan contains elements to address trends in aquatic habitat.

Response to comment

The Social Sustainability Section summarizes the expected impacts to key social benefits, including fish, clean water, and water supply, that the Nez Perce-Clearwater provides, and explores how those impacts may affect contributions to social sustainability. More details and analysis of effects for fish, clean water, and water supply are provided in the Water Resources (Section 3.2.7) and analysis sections Fisheries (Section 3.2.8).

FEIS table 121 assigns a rating of moderate, high, or highest to each alternative for the following measurement indicators: watershed condition, water quality, water quantity, and riparian areas, wetlands, and floodplains. A value of highest is assigned to Alternative X for each measurement indicator in Table 121, supporting the claim that Alternative X would have the highest contributions to integrity and resiliency of watersheds. The rating acknowledges that Alternative X would have the highest potential risk to aquatic indicators, water quality and quantity, and riparian areas, wetlands, and floodplains, while also having the highest restoration potential for water quality, riparian areas, wetlands, and floodplains, rate of improvement for all watershed condition framework indicators and rate of vegetation improvement to create healthy forests resilient to disturbances and climate change (Section 3.2.7 and 3.2.8).

Consequences are described for the following measurement indicators: PIBO Indicators - watershed condition and trend and effects to aquatic species. The alternatives are expected to maintain existing stream conditions, maintain existing improving trends, and initiate improving trends in some watersheds where conditions have been static (Section 3.2.8).

Although areas of minimal human development such as designated wilderness and inventoried roadless areas are often sources of high-quality runoff (Brown and Binkley 1994); Section 3.2.8), there is no scientific information that indicates a wilderness recommendation, or a determination of wild and scenic river suitability improves watershed and fisheries resilience. Regardless, of whether recommended for wilderness or not, inventoried roadless areas will be managed per the Idaho Roadless Rule, which provides regulatory direction that will continue to minimize human development. While the Wild and Scenic Rivers Act requires protection of water quality and outstandingly remarkable values such as fisheries, that protection is provided through plan components for all aquatic riparian areas, regardless of river suitability.

The summary of consequences for Section 3.2.8 consider cumulative effects and include timber harvest, roads, and motorized use. The comparison of alternatives in the Social Sustainability Section (3.8.2) considered timber harvest and motorized use in addition to the variations in restoration objectives, stating, "higher levels of expected timber harvest and motorized use under Alternative X are not expected to reduce the magnitude of the Nez Perce-Clearwater's contributions to clean water as best management practices will be implemented in road and trail construction and maintenance" (Section 3.8.2).

Alternative X and the preferred alternative provide high opportunities for watershed restoration across the plan area. Thus, providing the greatest potential for watershed and fisheries resilience.

The plan EIS appropriately acknowledges the uncertainty of effects given the broad, programmatic scale of the analysis. The sections cited previously in this response predict effects of each alternative based on the cited scientific literature, over 20 years of PIBO monitoring, and the professional expertise of the interdisciplinary planning team.

Concern 3: (Comment 3 in letter number 17353)

The analysis should note the social sustainability benefits that bolster community capacity. Living wage jobs provide families with financial security that enable them to build social capital. Social capital in rural communities can make or break programs that are reliant on volunteers to support program delivery (94-H leaders, coaches for athletics, governance committee participation, etc.). During the mid-1990's communities were encouraged to diversify and build on tourism. The analysis should note the importance of tourism to the region. According to data compiled by the Idaho Department of Labor, in 2019 tourism accounted for 5,677 jobs in the NPCNF region and \$247 million in gross domestic spending.

Response to comment

Social capital and ability to bolster community capacity is discussed in the Social Sustainability section (3.8.2) of the FEIS. "Social sustainability" under the 2012 Planning Rule refers to the capability of society to support the network of relationships, traditions, culture, and activities that connect people to the land and to one another and support vibrant communities (36 CFR 219.19 § 219.8 Sustainability). The Social Sustainability section (3.8.2) assessed key social benefits the Nez Perce-Clearwater provides that contribute to the social sustainability of the area of influence, or the affected communities and beneficiaries, by enhancing the quality of life of the public. Quality of life in the Social Sustainability assessment included but was not limited to, employment, safety, and health (3.8.2).

Population change was used as an indicator of social sustainability. An area with rapid declines or increases in population may have trouble providing adequate public services, indicating lower levels of social sustainability. Areas with long-term growth indicate higher levels of social sustainability. The Social Sustainability assessment identified employment opportunities as the main way the alternatives could potentially impact quality of life due to the associated population increase. Since the employment opportunities affected by the alternatives comprise a small fraction of overall employment in the primary analysis area, any associated short-term gains in populations are not expected to significantly affect quality of life in the area (Section 3.8.2). This conclusion was based on the analysis of potential economic impacts of the proposed plan and alternatives provided in the Economic Sustainability section (Section 3.8.1).

The Economic Sustainability section recognized the economic benefit and value of Nez Perce lands and operations to other industries including travel and tourism (3.8.1). The analysis included 11 counties in Idaho and Montana connected to the National Forest through means of economic resource trade, commuting, recreation, and other means of economic interaction (3.8.1). The presence of the travel and tourism industry in private employment was provided for each county in Table 461 (3.8.1). The analysis recognized the demand recreation opportunities for local and non-local visitors puts on goods and services from the travel and tourism industries. While all alternatives were estimated to produce more jobs and income over current levels, estimates for recreation related job and income levels did not change between alternatives (3.8.1).

Soils

Concern 1: Terrestrial Ecosystems – Soils Resource

The Forest Service should apply best available science to reduce impacts to Soils Resources and create enforceable and measurable desired conditions, standards, guidelines, and monitoring components to manage soils (including standards for impacts that cause soil compaction). The revised Forest Plan should utilize Federal best management practices for soils.

Letter #	Comment #
307	49
717	194, 195, 196
877	83, 163, 164, 165, 166, 169, 180, 191, 192, 193, 194, 197, 198, 201, 207, 208, 209, 210, 213, 214, 217, 220, 221, 222, 223, 224, 225, 227, 228, 229, 231
3110	31

Response to comment

Commenters had questions or concerns about Detrimental Soil Disturbance (DSD) and R1 Soil Quality Standards (SQS). These included questions or concerns regarding lack of quantitative measure for a Detrimental Soil Disturbance standard and general lack of enforceable and measurable desired conditions, standards, guidelines, and monitoring components to manage soils. Additionally, commenters had questions on whether the soils standards apply to livestock grazing and concerns with use of harvest equipment on steeper slopes. Commenters also requested the Forest Service incorporate federal best management practices for soils and include them as forest plan standards.

The National Forest Management Act of 1976 requires the Forest Service to “develop a management program based on multiple-use, sustained-yield principles,” while at the same time, “the Forest Service has the responsibility and opportunity to assure a national natural resource conservation posture that will meet our citizens’ needs in perpetuity.” Multiple use includes timber harvesting and livestock grazing as well as recreation, fisheries, wildlife, etc. Inherent in some of the activities, allowed by law, is the creation of some ground disturbance. The 15 percent maximum detrimental soil disturbance level in “activity areas” is an acknowledgement that there will be some unavoidable ground disturbance associated with providing goods and services to the American public. A maximum allowable level of detrimental soil disturbance set at 15 percent is not a “watering down” of the statutory requirement, but is part of the balancing required to meet the combined statutory requirements of providing goods and services for the American public while preserving the productive capacity of the soil resource. The concept of detrimental soil disturbance is based on persistent soil disturbance that in most instances will disappear over time. Only in rare cases does the level of detrimental soil disturbance within an activity area represent what might be called permanent land degradation, where targeted land remediation actions need to be taken to restore both land productivity and soil health.

Soil quality standards do have inherent assumptions and flaws; however, they present a consistent approach for assessing and quantifying management activity impacts on soil. The Forest Service has determined the 15 percent detrimental soil disturbance standard is a valuable tool to help land managers limit the extent and severity of soil disturbance created in activity areas. Ultimately, project-level soils analysis would consider site constraints consistent with land management plan direction to interpret long-term impacts to soil productivity.

Since the mid-1990s, physical soil disturbance has been the focus of soil management on National Forest Service lands. In 2010, the Forest Service Manual Chapter 2550 titled Soil Management was revised at the national level and R1 Supplement FSM 2500-2014-1 was updated in 2014. The emphasis of soil management was changed to include long-term soil quality and ecological function. The manual defines six soil functions: soil biology, soil hydrology, nutrient cycling, carbon storage, soil stability and support, and filtering and buffering. These functions all contribute to ecological resilience.

The Land Management Plan focuses on outcomes to achieve meeting soil desired conditions. One of the desired conditions toward which management would be directed is that soil productivity and function contributes to the long-term resilience of ecosystems (FW-DC-SOIL-01). To achieve or move towards this desired condition, the Land Management Plan includes standard FW-STD-SOIL-01, which requires land management activities to be designed and implemented in a manner that maintains soil function and productivity. The Nez Perce-Clearwater plans to adhere to Northern Region Supplement FSM 2500-2014-1 as a management approach to quantitatively meet standard FW-STD-SOIL-01. The Forest Plan also augments the quantitative standards in the Northern Region Supplement FSM 2500-2014-1 by introducing soil function indicators to better portray the effects and recovery time of restoration treatments (Land Management Plan, Appendix 4). Furthermore, the Forest Plan goes beyond the Northern Region Supplement FSM 2500-2014-1 by encouraging a mixed approach for avoidance and restoration to mitigate vegetation management activities as described in the FEIS Soils Resource Environmental Consequences section and in potential management approaches in Land Management Plan, Appendix 4.

The Nez Perce-Clearwater recognizes that soil standards in the Northern Region Supplement FSM 2500-2014-1 have assumptions and flaws as described in Page-Dumroese et al. 2000 and Miller et al. 2010 (see FEIS Soils Methodology section). However, the use of standards at the bare minimum present a consistent approach for assessment and quantifying management activity impacts on soil that was missing in soil assessments during the earlier part of the last plan. As noted in the FEIS Soils Resource, Methodology section, the use of disturbance criteria that are used in the Northern Region Supplement FSM 2500-2014-1 standards relate to the Forest Service's Long-Term Soil Productivity Study that was started in the early 1990s. This experiment has tested compaction, displacement, and organic matter removal to determine lasting effects on soil productivity. The results help validate thresholds used for soil disturbance.

The 2012 planning rule requires Land Management Plans to include plan components to maintain or restore soils and soil productivity, including guidance to reduce soil erosion and sedimentation (36 CFR 219.8(a)(2)(ii)). The Land Management Plan contains plan components to maintain and restore soil resources that were developed using best available science, including a standard requiring the use of best management practices for soils. The Land Management Plan also includes management approaches and monitoring elements for soil resources. Desired conditions in the Soil Resource section of the Land Management Plan direct management to conserve soil productivity and function to provide for long-term resilience of ecosystems. Standards and guideline are designed to minimize detrimental impacts from management activities, retain organic material, and restore soil function. The definition for soil productivity was changed in the Glossary, Appendix 2 to be consistent with the definition found in Forest Service Manual 2500, Chapter 2550 Soil Management. The FEIS describes in detail how these components are expected to maintain and improve soil productivity (See Soil Resources section, Environmental Consequences). Management approaches for soil resources (Land Management Plan, Appendix 4) provide additional detail on potential management approaches that could be used to implement the plan direction. Monitoring elements for soil resources are included in the Monitoring Plan (Land Management Plan, Appendix 3). Table 6 outlines the variety of plan components associated with soil resources and the associated management approaches and monitoring elements.

Table 6. Plan components, potential management approaches, and monitoring elements to maintain or restore soil resources

Soil Topic	Plan Components (Land Management Plan)	Potential Management Approaches for Soils (LMP, Appendix 4)	Soil Monitoring (LMP, Appendix 3)
Soil productivity and Function, including restoration	FW-DC-SOIL-01 FW-OBJ-SOIL-01 FW-STD-SOIL-01 FW-STD-SOIL-02 MA2 and MA3-GDL-SOIL-01 MA2 and MA3-GDL-SOIL-02 MA2 and MA3-GDL-SOIL-03 MA2 and MA3-GDL-SOIL-05	Soil Productivity and Function, including the Nez Perce-Clearwater Approach to Assessing Soil Function analytical tool Re-use of Impaired Soil Areas Restoration of Soil Impairment from Past Management Activities Soil Rehabilitation	MON-SOIL-01, Soil Productivity and Function MON-SOIL-03, Soil Restoration
Organic Material	FW-DC-SOIL-02 FW-GDL-SOIL-02 MA2 and MA3-GDL-FOR-01	Ground Cover Targeted Disturbance	MON-SOIL-02, Forest Floor Conditions
Sensitive Soils	FW-DC-SOIL-03 FW-GDL-SOIL-01 MA2 and MA3-GDL-SOIL-04	Volcanic Ash Soils Mass Movement Areas Soils with High Burn Severity	MON-SOIL-04, Slope failures and terrain stability MON-SOIL-05, Soils with Ash Cap MON-SOIL-06, Severely Burned Soils
Best Management Practices	FW-STD-SOIL-03	Best Management Practices	MON-SOIL-01, Soil Productivity and Function

Commenters also had concerns with accountability of soil guidelines and how they would be measurable. Guidelines are established to help achieve or maintain a desired conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. Every project and activity must be consistent with the applicable plan components. The accountability is that to show Land Management Plan consistency, the guideline must be followed. Additionally, implementation and effectiveness of guidelines are included in the Monitoring Plan (Land Management Plan, Appendix 3).

Commenters requested the Forest Service incorporate federal best management practices for soils and include them as forest plan standards. The Land Management Plan includes Standard FW-STD-SOIL-03, which requires the use of best management practices during implementation of land management activities. The use of best management practices is the primary mechanism for mitigating impacts to resources from Forest management actions. Best management practices utilized on the Nez Perce-Clearwater Forest come from federal and state direction, such as national best management practices outlined in Volume 1: National Core BMP Technical Guide (U.S. Department of Agriculture 2012a); Forest Service Handbook 2509.22, R1/R4 Soil and Water Conservation Practices (U.S. Department of Agriculture 1988) Idaho Forest Practices Act (IDAPA 20.02.01); and the Idaho Forestry Best Management Practices Field Guide (University of Idaho Extension Office 2015). The best management practices included in these reference are numerous and should not be included as standards in the Land Management Plan as a one size fits all methodology. Best management practices should be selected for based on the specific activity, site conditions, and risk of impact. Examples of best management practices that could be used include utilizing erosion control measures on exposed soils; seeding or planting vegetation on exposed or disturbed soils; or stockpiling topsoil and ash cap so that it could be replaced after project completion. In some instances, project specific design features could be developed and used to address site specific resource concerns. Appendix 4 of the Land Management Plan includes a potential

management approach for use of best management practices during implementation of land management activities. The implementation of best management practices is a measurement included in the monitoring plan (MON-SOIL-01).

Commenters had questions or concerns regarding the continued use of slope limitations despite the advances of logging equipment and at the opposite spectrum the concern that the allowance of ground based equipment operating on slopes that are greater than what have traditionally been operated on would impact long term soil productivity. Although the Nez Perce-Clearwater acknowledges the changes and capabilities associated with timber extraction, the Forest recognizes the concern with harvesting timber on steeper slopes. The current 1987 forest plan do not have a slope restriction for timber harvest equipment. Project design measures that have been included in vegetation management projects have traditionally limited ground based equipment to slopes less than 35 percent, but allowed for exceptions following site specific field review. The Land Management Plan includes guideline MA2 and MA3-GDL-SOIL-01, which limits ground-based equipment used for vegetation management to slopes less than 45 percent and limits log skidding equipment to slopes less than 35 percent. Using limitations similar to those described in the Idaho Forest Practices Act best management practices handbook (University of Idaho Extension Office 2015). Guideline MA2 and MA3-GDL-SOIL-01 allows for exceptions to be authorized where soil, slope, and equipment are determined appropriate to maintain soil functions. Decisions regarding slope limitations for ground-based equipment on slopes greater than 45 percent would be made on a site-specific basis in order to take into account differing soil conditions, including the protection of sensitive soils.

Effects to soils from the use of newly developed types of logging equipment on steeper slopes are not well understood, but the Forest would take an iterative approach to adapt and learn from new ground-based harvesting techniques through the use of monitoring and developing project specific best management practices for newly designed harvesting systems. Appendix 3 of the Land Management Plan contains a monitoring element to evaluate the status of soil productivity and function after project activities (MON-SOIL-01). One of the measures is to account for the amount of detrimental soil disturbance effects in areas with greater than 35 percent slope where ground-based equipment was utilized for timber harvest. The Potential Management Approach for Soil Productivity and Function (Land Management Plan, Appendix 4) offers strategies to assess and protect soils on steeper slopes and to prevent erosion.

There was concern that the Forest Plan soils standards do not apply to livestock grazing. The Land Management Plan soil desired conditions and soil standards and guidelines do apply to livestock grazing, particularly FW-STD-SOIL-01 and FW-STD-SOIL-02. Livestock grazing allotments are considered an activity area as defined by Forest Service Manual Supplement No. 2550-2014-1. The Effects to Soil Resource from Other Resources discussion in the FEIS Soils Resource section describes the impacts to soils caused by livestock grazing and how the plan components help achieve or maintain the desired conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. See also the response to Concern 2 regarding soil function, which discusses the Nez Perce-Clearwater Approach to Assessing Soil Function, a potential analytical tool that is included in Management Approaches (Land Management Plan, Appendix 4). This analytical tool assesses biologic integrity, soil stability, and hydrologic function, incorporating best available scientific information; for example, the multi-agency technical reference Interpreting Indicators of Rangeland Health (Pellant et al. 2020) compiled by the Bureau of Land Management to help determine rangeland soil conditions.

Commenters questioned what the Nez Perce-Clearwater had done to meet the requirements stated in Northern Region Supplement FSM 2500-2014-1. The Nez Perce-Clearwater currently follows the

protocol outlined in the Northern Region Supplement FSM 2500-2014-1 and the Region 1 Approach to Soils NEPA Analysis (U.S. Department of Agriculture 2011a) for every project. The scope and scale of the soil monitoring depends on the risk to soils. The Northern Region Supplement FSM 2500-2014-1 is used as a means to evaluate Forest Plan compliance; compliance with the standards infers compliance to Forest Plan standards for maintaining soil productivity. Additionally, the Nez Perce forest plan has an explicit threshold for cumulative effects to soils that projects must comply. Training for soil specialists is provided on the Forest, as well as through Northern Region ad hoc trainings and mentoring. Between 2011 and 2017, post-activity soil disturbance was monitored on 140 activity units associated with 24 timber sales on the Nez Perce-Clearwater (Bergstrom 2018). This effort resulted in approximately 3,200 acres being assessed using the national soil disturbance monitoring protocol (Page-Dumroese et al. 2006). The Affect Environment in the Soils Resource section of the FEIS provides soil monitoring information that has occurred on the Nez Perce-Clearwater. Additionally, the USFS Long Term Soil Productivity Experiment was initiated to help advance validation monitoring on the premise that soil type is a main factor for determining effects. However, the use of soil type remains difficult given coarse mapping and therefore, local interpretations that account for the suite of soil forming factors remains the most effective method for assessing compliance. For regional reporting purposes, the Forests in the Northern Region now report their monitoring for a regional view of compliance as of fall 2020.

Concern 2: Terrestrial Ecosystems – Soils Resource

The alternatives analysis should address maintaining soil productivity, in large enough geographic areas, to insure ecological sustainability including avoiding permanent impairment of the land and soil. The Forest Service should consider the cumulative effects of past and proposed soil disturbances to ensure that soil productivity would be maintained.

Letter #	Comment #
113	1
717	193
877	167, 168, 179, 181, 185, 186, 187, 189, 190, 199, 200, 202, 203, 206, 211, 212, 215, 216, 218, 219, 232, 233
1089	3

Response to comment

Commenters had questions or concerns about soil productivity. These included questions or concerns regarding meeting NFMA; soil restoration; scale of analysis and accounting of soil disturbance; and lack of consideration for a wider range of indices that encompass soil productivity, such as the presence of noxious weeds or maintenance of soil biological crusts. Additionally, they requested that Long-term Soil Productivity (LTSP) experiment results should be included and considered in the soils resource analysis.

The National Forest Management Act (16 USC 1604) stipulates to: “ensure...evaluation of the effects of each management system to the end that it will not produce substantial and permanent impairment of the productivity of the land.” 16 USC 1600, Section 6 (g)(3)(C) and “ensure that timber will be harvested from National Forest System lands only where- (i) soil, slope, or other watershed conditions will not be irreversibly damaged...” 16 USC 1604 (g)(3)(E). Laws are generally not repeated or referenced in the language of land management plans unless there is an issue that merits a reference to the direction of the law. The Land Management Plan includes NFMA language directly in the plan as a standard and as directed by the 2012 Planning Rule (36 CFR 219.11(d)(2)). Standard FW-STD-TBR-03 specifies that timber shall not be harvested on lands where soil, slope or other watershed conditions may be irreversibly

damaged, as identified in project specific findings. Standard FW-STD-SOIL-01 directs land management activities to be designed and implemented in a manner that maintains soil function and productivity.

Some commentors requested additional quantified soils effects analysis be included in the FEIS. The Council on Environmental Quality has indicated that programmatic effects analysis must provide sufficient detail to foster informed decision-making that reflects broad environmental consequences from a wide-ranging Federal program. Site- or project-specific impacts need not be fully evaluated at the programmatic level when the decision to act on a site development or its equivalent is yet to be made (CEQ 2014). Quantifying the current levels of detrimental soil disturbance or loss of soil productivity due to future land management actions is not feasible at this point of analysis as locations, specific activities, and timing of those activities is unknown and any estimated quantification would be highly speculative and not provide meaningful information to the decisionmaker. Analyses of specific soil conditions and disturbance are more appropriate during implementation of the land management plan at the site-specific project level.

Commenters requested that the soil analysis address the extent of soil disturbance at a watershed scale. Using a watershed level metric is difficult since the watershed percentages are insensitive typically to project scale disturbance. Accounting for administrative sites, developed and dispersed recreation sites, roads and trails, and assumed remnant skidding surfaces and landings from past harvest activities, generally amounts to less than 5 percent area for a HUC12 sized watershed, typically 10,000 to 40,000 acres. Total soil resource commitment is the conversion of a productive site to an essentially non-productive site for a period of more than 50 years. These include intensively developed sites such as mines, developed recreation sites, administrative sites, rock quarries, and trails or system roads (R1 Supplement FSM 2500-2014-1). These areas are not considered part of the productive land base, as soil quality and function are impaired. The amount of total soil resource commitment on the Nez Perce-Clearwater was assessed at the HUC12 scale and ranged from 0 to 4 percent of the watershed acres. Other methods do exist that use detrimental soils as a watershed scale metric, such as the California based Region 5 Eroded Road Acre method (USDA 1999). However, the calibration is specific to the California locale. In the Northern Region, project level water resources analysis for sediment share the same idea by accounting for disturbed surfaces in calculations (Elliot 2013). The Land Management Plan, Appendix 4 includes a management approach for assessing water yield and peak flow at the HUC12 scale, which incorporates the amount of roads and trails in the watershed as part of the evaluation. The Nez Perce-Clearwater would account for these watershed level influences during project planning.

Commenters requested that the results from the Long-term Soil Productivity (LTSP) experiment be included in the soil resource analysis. A discussion summarizing the results of the Long-term Soil Productivity (LTSP) experiment was added to the FEIS Soils Resource section. The Forest Service initiated the Long-Term Soil Productivity (LTSP) experiment to investigate the linkage between pulse soil disturbance and forest productivity as a research response to the National Forest Management Act (1976) to manage forests in a manner that protected the productivity of the land. Results of the study were meant to validate operational standards used by the national forests to monitor soil quality (Powers et al. 1998). The study is in its 25th year, although results were collectively last published for the 10-year readings in 2005. Additionally, the experiment has inference with a research site located on the neighboring Idaho Panhandle National Forest, along with a range of study sites in the western US across variety of soil types and climates. Many published works have resulted from this large-scale study that give insight on below ground effects from compaction and organic matter removal (Page-Dumroese et al. 2010). Study findings underscore the differences in response, based on site and soil type (Powers et al. 2005);(Siegel-Issem et al. 2005);(Page-Dumroese et al. 2010). For example, organic matter removal can have more profound impacts on poor, infertile soils such as granitic soils. The LTSP studies generally found that the impacts of

compaction and organic matter removal depend on the site, but the retention of the forest floor was very important for recovery. Drawing from 100 sites across the US and Canada, more generally in the west the impacts of compaction by itself were modest on soil nutrition factors and tree growth (Busse et al 2021, Wallace et al. 2021). Across the western sites, differences from whole tree and bole only harvests were subtle compared to unharvested controls, but when the forest floor was removed along with whole tree harvest, nutrient differences were significant (Busse et al. 2021, Kersey and Myrold 2021).

Commenters had concerns about noxious weed infestations and the impact to soil productivity. Commenters also requested analysis to quantify the loss of soil productivity attributable to noxious weeds. Forest Service Manual 2900 – Invasive Species Management – sets National Forest System policy, responsibilities, and direction for the prevention, detection, control, and restoration of the effects from aquatic and terrestrial invasive species, including vertebrates, invertebrates, plants, and pathogens. This invasive species systems approach is also outlined in the Forest Service National Strategic Framework for Invasive Species Management (U.S. Department of Agriculture 2013). Invasive species management activities on the Nez Perce-Clearwater are currently guided by conditions and constraints of specific Environmental Impact Statements or Environmental Assessments for management and treatment of invasive species (See FEIS Invasive Species section). These would be reviewed for consistency with the Land Management Plan after approval, and updated if needed, but would continue to be used to contribute to the achievement of desired conditions related to invasive species.

The Land Management Plan includes soil plan components to limit new soil disturbance and restore soil disturbance created from past management activities. Soil disturbance and loss of ground cover can lead to introduction and expansion of invasive plant species. The soil plan components would facilitate managing for conditions where native plants could out compete noxious weeds as disturbed areas recolonize with vegetation. The impacts of noxious weeds are complicated to address over the different soil types and elevation ranges; projects scale assessments best address these impacts. That said, general valuation statements that noxious weeds decrease soil productivity is not straight forward. In general, most of the invasive plant species on the forest compete well in open and drier environments.

The Effects to Soils Resources from Invasive Species Management in the Soils Resources section of the FEIS discusses the effects to soil resources from the introduction and expansion on invasive plant species, as well as the impacts from treatment of invasive plant species. The Invasive Species section in the FEIS describes the existing condition of invasive species on the Nez Perce-Clearwater and outlines how plan components in the Land Management Plan would drive the management of invasive species. Invasive species plan components aim to slow the introductions and spread of new invaders, as well as prevent existing invasive species from establishing to new non-infested area. Invasive plant inventories for the Nez Perce-Clearwater record 80 different invasive plant species, occupying approximately 394,040 acres, or approximately 10 percent of the Nez Perce-Clearwater. Objective FW-OBJ-INV-01 proposes to treat 6,000 acres annually to contain or reduce non-native invasive plant density, infestation area, or occurrence. By limiting soil disturbance and utilizing the prevention, detection, control, and restoration strategies for managing invasive species, soil productivity is expected to be maintained or improved. Quantifying the current levels of detrimental soil disturbance or loss of soil productivity due to noxious weeds forestwide is neither possible given the lack of site-specific data for many areas at the forestwide scale, nor would it provide a meaningful analysis of effects on productivity given the variations of landform, topography, soil type, and climatic conditions. Analyses of specific soil conditions and disturbance caused by invasive plant species are more appropriate during implementation of the land management plan at the site-specific project level.

Commenters had concern with the maintenance of soil biological crusts. Biological soil crusts are part of the soil biome that includes above- and below-ground microbes, invertebrates, algae, liverworts, bryophytes, and assorted living forms that thrive on the soil surface and within the rhizosphere. The Land Management Plan acknowledges the importance of organic substrate and soil medium where these vital soil lifeforms grow by including FW-DC-SOIL 02. The desired condition is that soil organic matter and down woody material support healthy microbial populations, protect soil from surface erosion, facilitate soil moisture retention, provide nutrients, and maintain soil development and biochemical processes. Desired conditions for grasslands and shrublands also recognize biological soil crusts (FW-DC-GS-01, FW-DC-GS-02, and FW-DC-GS-03). By providing for the maintenance of litter and ground cover (FW-GDL-SOIL-02), conserving soil productivity and function (FW-STD-SOIL-01), and managing for desired conditions, the Nez Perce-Clearwater would contribute towards sustaining biological soil crusts.

Commenters requested that the Forest Service consider the cumulative effects of past and proposed soil disturbances to ensure that soil productivity would be maintained. The Land Management Plan would require all management activities be designed and implemented in a manner that maintains soil function and productivity (FW-STD-SOIL-01). The plan focuses on outcomes to achieve this standard through a mix of mitigation that includes avoidance, logging systems design, retaining sufficient organic matter and coarse wood on the soil surface, and actively reclaiming past and current impaired soils on skid trails, log landings, and temporary roads. Damage to soils would be limited by:

- Using existing or past disturbed areas (MA2 & MA3-GDL-SOIL-02), which would be restored after use.
- Treating areas of impaired soil function from past management activities to restore long-term soil productivity and function (MA2 & MA3-GDL-SOIL-03).
- Decommissioning temporary roads to restore soil function (MA2 & MA3-GDL-SOIL-05).
- Rehabilitating soil function created through future management activities to maintain long-term soil productivity (FW-STD-SOIL-02).

See the Soil Productivity and Function under Effect Common to All Action Alternatives in the FEIS Soil Resources section for the complete analysis on amount and type of soil restoration. To initiate recovery of impaired soils created from timber harvest, the Land Management Plan would require active restoration of newly created impaired soils (FW-STD-SOIL-02), which is estimated to be about 555 to 2,100 acres annually depending on alternative. Calculations assumed a 15 percent creation and restoration of detrimental soil disturbance for every acre of timber harvest proposed. Estimated soil restoration acres of soils impaired from past management activities were calculated using a 2 percent factor for every acre of timber harvest proposed. Actual restoration acres would depend on the timber harvest area, the extent of existing soil disturbance, and the degree harvest activities impair soils.

Additionally, MA2 and MA3-GDL-SOIL-03 specifies that areas of impaired soil function from past management activities should be treated to facilitate long-term soil productivity and function. Old yarding templates and landing areas not used by current timber sales would be reclaimed as part of a net improvement approach. Based on public comment, the objective for soil restoration was changed to only include soil impairment from past management actions. Objective FW-OBJ-SOIL-01 proposes to restore 175-200 acres of soil impaired from past management actions within timber harvest units annually. This soil restoration would occur either within or adjacent to timber harvest units. Other soil improvements outside of timber harvest activity units would be achieved through FW-OBJ-WTR-05, and FW-OBJ-RMZ-01.

The Land Management Plan, Appendix 4 includes potential management approaches for re-use of impaired soil areas, restoration of soil impairment from past management activities, and soil rehabilitation for newly created soil disturbance. The Land Management Plan, Appendix 3 includes monitoring elements for soil productivity and function (MON-SOIL-01) and soil restoration (MON-SOIL-03).

Some commenters had concern with the discussion in the DEIS Soils Resource section regarding soil restoration and the description of the Lloyd et al., 2013 findings. The Nez Perce-Clearwater agrees that the Lloyd et al., 2013 research does not link metrics used to evaluate recovery trajectories following road removal to Detrimental Soil Disturbance (DSD) measures or even include DSD in the research. The Nez Perce-Clearwater tried to be explicit in how research was incorporated and referenced. The following is clarification of how the Nez Perce-Clearwater used this research to inform the understanding of management impacts to soil quality and soil productivity. First, it is worth emphasizing the DSD is only one measure of soil productivity. The National Forest Management Act focuses on maintain soil productivity. Like all Forests in the Northern Region, the Nez Perce-Clearwater uses DSD as a means of evaluating how management actions alter soil productivity and the potential for recovery of soil productivity and function following management actions. Lloyd et al., 2013 focuses on evaluating recovery trajectories following different methods for reclaiming and restoring forest roads.

Decommissioning of surplus forest roads has been a core element of the Forest's watershed restoration program for nearly 20 years. The recontouring techniques used for decommissioning roads for watershed restoration are analogous to the recontouring methods used to remove temporary roads following harvest projects that are now standard practices on the Forest. The Soil Resource section of the FEIS highlights the key metrics used by Lloyd et al., 2013 to evaluate recovery of soil quality and function: infiltration rates, soil bulk density, soil organic matter, pools of nitrogen and carbon, and net nitrogen mineralization rates. These measures directly relate to measures of soil productivity and function and can inform how Forest Managers characterize impacts of road building on soil function and the potential for recovering soil function and productivity if the roads are recontoured following project use.

Rather than conclude that Lloyd et al., 2013 eliminates detrimental soil disturbance, the Forest tried to be explicit regarding the research and how it aids in the understanding of which elements of soil function and productivity may be improved following temporary road decommissioning. The Timber Harvest section of the Effects to Soil Resources from Management of Other Resources in the FEIS Soil Resources section, includes the statement: "Temporary roads, excavated skid trails, and landings are considered 100 percent detrimental disturbance with reduced soil productivity until vegetation, organic matter, and hydrologic function are restored. The greatest disturbance associated with the activities is the displacement or mixing of the topsoil, including the Mazama ash cap, during excavation. Restoration following use would promote recovery of soil structure, water infiltration, aeration, root penetrability, and soil biological activity, as observed using road decommissioning techniques on the Nez Perce-Clearwater (Lloyd et al. 2013)". The Lloyd et al., 2013 research supports the conclusion that recontouring roads will put these areas on a trajectory toward recovery. While the statement does not state or conclude that this means temporary roads will no longer be considered Detrimental Soil Disturbance, in fact, we are clear that temporary roads do constitute 100 percent detrimental soil disturbance. Ultimately, if restoration techniques are implemented, roaded areas would recover at a faster rate and over time to a state where soil productivity and function are no longer impaired. When recovery occurs, the area would no longer be considered to be contributing to detrimental disturbance.

Some commenters had concerns with how the soil productivity and function would be measured and monitored. Because soil function is difficult to measure in the field, the Forest developed an analytical tool called the Nez Perce-Clearwater Approach to Assessing Soil Function, which is included in Management Approaches (Land Management Plan, Appendix 4). FSM Chapter 2550 Soil Management

defines soil function as any ecological service, role, or task that soil performs. The FSM identifies six soil functions: soil biology, soil hydrology, nutrient cycling, carbon storage, soil stability and support, and filtering and buffering.

The tool groups the six functions into three primary sections with readily observed indicators. Soil function is categorized as functioning properly, functioning at risk, and impaired function. It is generally assumed that soils categorized as Class 0 and 1 in the Forest Soil Disturbance Monitoring Protocol (Page-Dumroese et al. 2009a, b) are functioning properly, soils categorized as Class 2, or Class 3 soils that have received restoration treatments are functioning at risk, and soils categorized as Class 3 that have not received restoration treatments are considered as having impaired function. The soil function assessment relies on evaluating the treated ground relative to adjacent untreated areas. These pairwise comparisons allow simple diagnostics without needing to create site potential characteristics across the diverse Nez Perce-Clearwater landscape. The indicators can relate to several functions. For example, an intact forest floor bolsters biologic function with carbon, ensures against water loss, and ameliorates soil temperatures for growth. However, the forest floor also serves as effective ground cover that stabilizes sites against wind and water erosion. The indicator thresholds were derived from Lloyd et al (2013) that includes road decommissioning data measured on the Nez Perce-Clearwater, the Forest Disturbance Monitoring Protocol (Page-Dumroese et al. 2009b), the Indicators for Rangeland Health (Pellant et al. 2020), and erosion data from Water Erosion Prediction Project, Disturbed WEPP (Elliot et al. 2000).

Soil productivity and function is included in the Monitoring Plan (Land Management Plan, Appendix 3) as question MON-SOIL-01. The percent detrimental soil disturbance and the percent areal extent of soils functioning properly, functioning at risk, not functioning would be reported by project and summarized in the Biennial Monitoring Evaluation Report. The monitoring evaluation report is used to inform adaptive management of the plan area and will be made available to the public.

Concern 3: Terrestrial Ecosystems – Soils Resource

The Forest Service should retain sufficient amounts and types of organic matter and consider carbon sequestration and climate change effects. Ectomycorrhizal networks are essential for the development of forest ecosystems, their presence is a good indicator of a healthy functioning forest soil.

Letter #	Comment #
877	162, 171, 173, 174, 177, 178, 196, 226
7176	7
17354	8
17898	6

Response to comment

Commenters had concerns about retaining sufficient amounts and types of organic matter and that the Draft Forest Plan does not address or consider soil biological function, including concerns about carbon sequestration and climate change effects. The Land Management Plan includes plan components to retain organic matter and ground cover, limit soil disturbance, and restore disturbed soils; all which would maintain or improve soil biological function and store carbon. The FEIS and associated appendices include various sections addressing climate change and carbon storage and how those relate to soil resources.

The Land Management Plan explicitly addresses soil biological function and soil microbial populations by including desired condition FW-DC-SOIL-02, which states that soil organic matter and down woody

material support healthy microbial populations, protect soil from surface erosion, facilitate soil moisture retention, provide nutrients, and maintain soil development and biochemical process. Ectomycorrhizal activity in forest soils is important to nutrient and water uptake by conifers, conifer health, and forest resiliency. Ectomycorrhizae rely on organic matter in the rhizosphere to hold and fuel the exchange of nutrients and water. Optimal levels of coarse woody debris for soil productivity in the Northern Rocky Mountains were derived using ectomycorrhizal fungi propagules as a bioindicator (Graham et al. 1994). Also, research in the Pacific Northwest and British Columbia recommends leaving stumps and downed wood for biological legacy, which includes ectomycorrhizae, for reforestation after forest timber harvest (Wiensczyk et al. 2002, Molina et al. 2011).

Regional direction found in R1 Supplement FSM 2500-2014-1 (U.S. Department of Agriculture 2014b) for organic material recommends following guidance outlined in Graham et al. (1994), which recommends maintaining between 7 to 33 tons per acre of coarse wood material depending on habitat type, moisture regime, and aspect. The Land Management Plan establishes coarse woody debris requirements for vegetation management and prescribed fire activities (MA2 and MA3-GDL-FOR-01) based on potential vegetation types (PVT) which align with recommendations in the data provided in Graham et al. (1994). Ranges vary from 7 to 15 tons per acre in warm dry forests to as much as 17 to 33 tons in warm moist forests. Guideline FW-GDL-SOIL-02 establishes a post-implementation ground cover target of 85 percent aerial extent to retain soil moisture, support soil development, provide nutrients, and reduce soil erosion.

The Soils Resource section in the FEIS speaks to soil biological function in the Affected Environment portion, as well as how coarse wood material and organic matter contribute to soil productivity. Additional information regarding coarse wood material was added to the FEIS based on Forest Service data collected through Forest Inventory and Analysis (FIA). The Environmental Consequences section describes potential impacts to soil function and how the above plan components would maintain or improve soil function.

As discussed under Concern 2, The Nez Perce-Clearwater Approach to Assessing Soil Function is included in Management Approaches (Land Management Plan, Appendix 4). This analytical tool could be used to assess soil function, including soil biology. Additionally, the management approach for ground cover in the Soils Resource section and the management approach for targeted disturbance in the Forest Lands section of Appendix 4 offer potential strategies for retaining coarse wood material and other organic material. Post-treatment forest floor condition is included in the Monitoring Plan (Land Management Plan, Appendix 3) as question MON-SOIL-02. The amount of coarse wood material and percent aerial extent of ground cover and litter would be reported by project and summarized in the Biennial Monitoring Evaluation Report. The monitoring evaluation report is used to inform adaptive management of the plan area and will be made available to the public.

The potential impacts of climate change are uncertain and complex in relation to soil microbial populations and other soil biological functions. The Soil Resources section of the EIS discusses potential climate change impacts to soils. The Climate Change and Forest Carbon section of the FEIS discusses the current and potential future climatic conditions. The section states that different models do have different climate predictions but that all the models do predict an average annual increase in temperature which will influence soil moisture. The desired conditions for the Soil Resource (along with all the natural resource areas) were developed to facilitate ecological processes and create healthy ecosystems, which are more resilient and better adapted to changing climate. The Climate Change and Forest Carbon section of the FEIS further outlines how managing for maintenance or restoration of several of the desired condition in the Land Management Plan could support diversity across PVTs, increase resiliency of forest

landscapes, and sustain long-term resilience of ecosystems. These actions would allow for a diverse population of microbial communities throughout the Forest and by creating resilient ecosystems, increasing microbial resilience and improving soil biological functions.

Appendix G to the FEIS describes potential climate change adaptation strategies to help sustain the fundamental ecological functioning terrestrial ecosystems, which could benefit soil microbial communities overall. Appendix G links Land Management Plan components to the adaptation strategies outlined in Climate Change Vulnerability and Adaptation in the Northern Rocky Mountains (Halofsky et al. 2018a) (2018a, b).

The Climate Change and Forest Carbon section of the FEIS also outlines the desired conditions for forest carbon overall, discusses how carbon is stored in the Forest, and summarizes impacts of management activities on forest carbon. The desired condition for forest carbon is that carbon storage and sequestration potential are sustained through maintenance or enhancement of ecosystem biodiversity and function, and forests are resilient to natural disturbance processes and changing climates (FW-CARB-DC-01). The Land Management Plan includes other plan components that maintain or improve carbon storage, including those directly related to soils. FW-DC-SOIL-01 and FW-STD-SOIL-01 plan components describe desired condition and directs management activities to be designed and implemented in a manner that maintains soil function and productivity. The soil carbon pool accounted for 23 percent of the carbon stock on the Nez Perce-Clearwater in 2013. Guideline MA2 and MA3-GDL-FOR-01 sets coarse wood material requirements to ensure sufficient levels of organic materials. Down wood material stores carbon, accounting for 5 percent of the carbon stock on the Nez Perce-Clearwater in 2013. FW-DC-SOIL-02 and FW-GDL-SOIL-02 plan components describe desired condition and sets an 85 percent target for effective ground cover, such as litter, fine and coarse wood material, or vegetation, all which store carbon. Forest floor, down wood, and understory carbon pools accounted for 25 percent of the carbon stock on the Nez Perce-Clearwater in 2013.

The Nez Perce-Clearwater also completed a carbon assessment after the release of the DEIS. It is included as Appendix J in the FEIS. The assessment uses a framework provided by the Forst Service’s Office of Sustainability and Climate to summarize mid- to broad level forest carbon information for every region and individual national forest and assess baseline forest carbon stocks. The methodology and models used to develop the data included in the assessment are well documented. The carbon inventory methodology is consistent with that used for the EPA’s U.S. Greenhouse Gas Inventory. The assessment shows that that carbon stocks on the Nez Perce-Clearwater increased from 1990 to 2013 and that approximately 55 percent of forest carbon is stored in soil, belowground live biomass, forest floor, and down wood material.

Concern 4: Terrestrial Ecosystems – Soils Resource

The Forest Service should protect sensitive soils and impose limits for timber harvest and road building on sensitive soils.

Letter #	Comment #
877	153, 184, 188, 195, 204, 205

Response to comment

Commenters are concerned about Sensitive Soils. These included questions or concerns regarding the definitions and process for determining which soils are sensitive and what protections they require, especially landslide prone soils, ash capped soils, and high burn severity soils.

Soil desired conditions in the Land Management Plan set an expectation that management would conserve soil function and even improve conditions where soils are impaired, this would apply to sensitive soil types across the Forest. The protection of sensitive soils is used as an indicator in the Soils section of the FEIS and specific management approaches have been developed for each sensitive soil type within the Forest. The specific soil types of concerns brought up by commenters include ash cap soils, severely burned soils and landslide prone soils. Each of these soil types is discussed in detail in the Affected Environment section of the Soils portion of the FEIS. Definitions and processes for determining where these sensitive soil types are located are outlined, as well as discussions on the specific effects that could occur from management actions. Mapping and field verification of these soil types would be refined on a site specific basis during project level analysis.

As stated in the FEIS Soils Resources section, because volcanic ash cannot be replaced, the effects of displacement or erosional losses of the ash cap can be permanent. The Land Management Plan includes desired condition FW-DC-SOIL-03 to direct management to protect volcanic ash soils and states “volcanic ash influenced soils are intact and retain unique properties, including high soil porosity and high water and nutrient holding capacity.” Further standard FW-STD-SOIL-03 states that project specific best management practices and design features shall be incorporated into land management activities. This would further protect volcanic ash soils at the project level. Land Management Plan, Appendix 4 includes a potential management approach for volcanic ash soils to better protect these sensitive soil types. The Monitoring Plan (Land Management Plan, Appendix 3) includes monitoring elements to track activities on these sensitive soil types (MON-SOIL-05).

The protections afforded to landslide prone soils and severely burned soils are discussed in detail in the Environmental Consequences section of the Soils FEIS. The desired condition for soils is that. Soil productivity and function contributes to the long-term resilience of ecosystems (FW-DC-SOIL-01). To better achieve this desired condition and to maintain soil stability guideline FW-GDL-SOIL-01 specifies that ground-disturbing management activities not occur on field verified mass movement areas if they have the potential to trigger a slope failure. Vegetation management activities may be authorized to provide for long-term slope stability. Field verification and other mapping tools would be utilized to identify these sensitive soil types and provide for long term site stability and soil productivity. The Potential Management Approach for Mass Movement Areas (Land Management Plan, Appendix 4) offers a variety of tools, references, and indicators that could be used to identify mass movement areas on the Nez Perce-Clearwater at a project level, in order to address concerns regarding implementation of FW-GDL-SOIL-01. The Monitoring Plan (Land Management Plan, Appendix 3) includes monitoring elements to track activities on these sensitive soil types (MON-SOIL-04). The Land Management Plan glossary was amended for the terms Mass Movement and Landslide Potential.

To maintain long-term soil productivity, guideline MA2 and MA3-GDL-SOIL-04 requires that when conducting post wildland fire vegetation management, activities should avoid permanent soil impairment on soils that have verified high soil burn severity. The plan component gives the latitude necessary to address these circumstances when harvesting in burned areas. Impacts to soils would be addressed at the site-specific level in the project analysis. Fire salvage operations typically have greater mitigation features in order to protect the soil resource. Regardless of the situation, the soil desired condition in the plan (FW-DC-SOIL-01) sets forth the expectation that management would conserve soil productivity and function. Standards and guidelines give sideboards to meet this desired condition by limiting the extent and intensity of disturbance and, where necessary, by addressing currently impaired soil functions to improve long-term soil conditions. Standard FW-STD-SOIL-03 requires following best management practices and other design features when conducting land management activities to protect soil resources. Standard FW-STD-SOIL-02 requires impaired soil function created through management activities to be rehabilitated to

reestablish soil function to the appropriate site potential. Land Management Plan, Appendix 4 includes a potential management approach for severely burned soils to better protect these sensitive soil types. The Monitoring Plan (Land Management Plan, Appendix 3) includes monitoring elements to track activities on severely burned soils (MON-SOIL-06).

Species of Conservation Concern

Concern 1: Species of Conservation Concern

The Forest Service should expand the list of species of conservation concern to include the black-backed woodpecker and northern bog lemming. The regional foresters' list should also be included. The coarse filter that the Forest Service uses should be supplemented with the best available scientific information presented in these comments. Monitoring should be a plan component for species of conservation concern.

Letter #	Comment #
805	45, 56
877	344, 346, 347, 349-351, 353, 354, 356, 358, 419, 517
1110	2

Response to comment

Commenters take issue with the process for identifying species of conservation concern (SCC). The 2012 Planning Rule (36 CFR 219) defines a species of conservation concern as "a species, other than a federally recognized threatened, endangered, proposed or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area" (36 CFR 219.9(c)).

The process used for identifying plant and animal species of conservation concern for the Northern Region is at <http://bit.ly/NorthernRegion-SCC>. The process documents listed for the Nez Perce-Clearwater National Forest include the steps taken to identify species of conservation concern and clarify how the directives on species of conservation concern identification (Forest Service Handbook 1909.12, chap. 10, secs. 12.52 through 12.53) were interpreted and applied. Step G of the "Nez Perce - Clearwater National Forest Plan Revision's Species of Conservation Concern Identification Process" includes considering regional forester's sensitive species for SCC status: "Regional Forester's sensitive species in the plan area and on adjoining National Forests in other regions (i.e., R1 Bitterroot and Idaho Panhandle, R4 Payette, and R6 Wallowa-Whitman). The planning directives do not require consideration of this category. However, it was adopted to compensate for the absence of SCC on adjoining units, which the directives recommended for consideration, but have not yet been identified." Regional forester sensitive species were assessed for whether they meet the "substantial concern about the species' capability to persist over the long-term in the plan area" (36 CFR 219.9). This analysis is provided in the species evaluation spreadsheet, located here:

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd687138.xlsx

The blackbacked woodpecker (*Picoides arcticus*) was assessed for suitability as a species of conservation concern. No substantial concern was found to warrant SCC status due to stable populations, abundant

habitat (current and predicted), and the large amount of designated Wilderness where the primary threat of fire salvage logging is not allowed. Supporting references used to inform this this determination are provided in the species evaluation spreadsheet.

The northern bog lemming (*Synaptomys borealis*) is not known to occur in the plan area and therefore is exempt from consideration as an SCC (36 CFR 219.9).

Concern 2: Species of Conservation Concern

The Forest Service should include species-specific plan components for each species of conservation concern, as required by the 2012 Planning Rule. Also, the list of species of conservation concern is inadequate and fails to include management constraints or protections for these species.

Letter #	Comment #
307	72, 73, 79
764	8
805	55
877	343, 352, 357
1110	1
12883	14
17297	6
17349	5

Response to comment

Several comments questioned whether the identification of species of conservation concern (SCC) is consistent with the 2012 Planning Rule, and if sufficient plan components are in place to provide persistence of SCC.

The 2012 Planning Rule does not require species-specific plan components for each SCC. The directives state “The plan components developed for ecosystem integrity and ecosystem diversity (sec. 23.11) are expected to provide the ecosystem (coarse-filter) approach to maintaining the persistence of native species within the plan area, including the at-risk species identified during the assessment... When the evaluation reveals that plan components for ecosystem integrity and ecosystem diversity or other plan components would not provide the ecological conditions necessary for one or more at-risk species, the responsible official shall develop additional species-specific plan components for those individual species (fine filter)” (FSH 1909.12 23.13). Therefore, species identified as SCC do not necessarily need species-specific plan components if coarse-filter plan components are expected to provide the ecosystem integrity and diversity. An additional table has been added to Appendix C of the FEIS (Wildlife Species and Habitat Summary) that provides a complete crosswalk of which plan components are expected to address threats to SCC.

The determination of SCC is made by the Regional Forester based on whether species meet the “substantial concern about the species’ capability to persist over the long-term in the plan area” (36 CFR 219.9). The Nez Perce-Clearwater National Forest’s process for identifying SCC is summarized in the “Species of Conservation Concern Identification Process for the Nez Perce - Clearwater National Forest Plan Revision” document and the associated species evaluation spreadsheet, available here:

<https://www.fs.usda.gov/detail/r1/landmanagement/planning/?cid=fseprd500402>.

The process for identification of species of conservation concern (SCC) is consistent with the 2012 Planning Rule, and sufficient plan components are in place to provide persistence of SCC through a coarse- and fine-filter approach consistent with the direction in FSH 1909.12 sections 23.11 and 23.13.

Concern 3: Species of Conservation Concern

The Forest Service should address impacts on species of conservation concern from recreation, roads, soil disturbance, logging, hunting, and illegal activities.

Letter #	Comment #
764	9
877	355

Response to comment

Commenters identified several threats of multiple use activities on species of conservation concern (SCC) and questioned whether sufficient plan components are in the Land Management Plan (LMP) to mitigate these stressors.

The 2012 Planning Rule requires that plan components must provide for multiple uses and ecosystem services within Agency authority and inherent capability of the plan area as described in Section 219.10 of the Planning Rule. The plan must include plan components, including standards or guidelines, for integrated resource management to provide for ecosystem services and multiple uses in the plan area. Each of the multiple use activities identified by commenters (motorized and non-motorized recreation, timber harvest, and hunting-related activities) has associated plan components for integrated resource management to provide for ecosystem services and multiple uses in the plan area. For example, plan component FW-DC-ARREC-01 identifies a desired condition that “Recreation facilities and their use, including trails and dispersed sites, have minimal impacts on aquatic resources, including threatened and endangered species, designated critical habitat, and aquatic species of conservation concern,” with associated objectives and guidelines. Plan component FW-DC-WLMU-01 identifies a desired condition that “Habitat supports opportunities for hunting, fishing, trapping, gathering, observing, photography, subsistence, cultural interactions, and the exercise of treaty reserved rights. Wildlife is distributed in habitats within their respective seasonal ranges.” Several wildlife-specific plan components (e.g., FW-DC-WL-02, FW-DC-WL-03, FW-DC-WL-04, FW-GDL-WL-04, MA2-GDL-WL-05) serve to mitigate stressors of multiple use to SCC. Tables in the FEIS provide summaries of plan components specific to species of conservation concern. Effects of multiple uses on specific species identified by commenters are thoroughly analyzed in the FEIS, as identified below:

- Harlequin duck: section 3.2.9 of FEIS
- Fisher: section 3.2.9 of FEIS
- American marten and Pacific marten: Section 3.2.9 of the FEIS (analyzed within the “Forested habitats” grouping)
- Mountain goat: Section 3.2.9 of FEIS
- Wolverine: Section 3.2.9 of the FEIS

The wildlife analysis of the FEIS indicates that the plan components provide the ecological conditions necessary to provide for persistence of at-risk species within the plan area.

Concern 1: Species of Conservation Concern – Identification of Species of Conservation Concern

The Forest Service should include the following in its identification of species of conservation concern: north goshawk, pine marten, bog lemming, Idaho giant salamander, Coeur d'Alene salamander, western skink, boreal owl, western pearlshell, peregrine falcon, bald eagle, black swift, black-backed woodpecker, common loon, western toad, ring-neck snake, and rare land snails and slugs.

Letter #	Comment #
805	78
1060	54, 149
17879	3

Response to comment

Commenters requested several additional species be identified as species of conservation concern (SCC). The 2012 Planning Rule (36 CFR 219) defines SCC as "a species, other than a federally recognized threatened, endangered, proposed or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area" (36 CFR 219.9). The Forest's process for identifying SCC is summarized in the "Species of Conservation Concern Identification Process for the Nez Perce - Clearwater National Forest Plan Revision" document and the associated species evaluation spreadsheet. Below are brief summaries of why these specific species have not been identified as species of conservation concern.

- Coeur d'Alene Salamander (*Plethodon idahoensis*): No substantial concern; species is relatively common and widely distributed in the plan area, and there are no known significant threats.
- Idaho Giant Salamander (*Dicamptodon aterrimus*): Species is well distributed in the plan area and is abundant in appropriate habitat. No evidence of downward trend.
- Ring-necked Snake (*Diadophis punctatus*): Insufficient information on distribution, abundance, population trend, habitat trend, habitat use, and threats. Life history information does not indicate substantial concern.
- Western Toad (*Anaxyrus boreas*): No substantial concern; Species is relatively common and widely distributed in the plan area, and there is no evidence of significant threats in the plan area.
- Western Pearlshell (*Margaritifera falcata*): In person discussions with Nez Perce Tribal Fisheries Staff, and Nez Perce National Forest Aquatic Staff. Both cited recent personal knowledge (last 5 years) of local populations in both managed and unmanaged habitat on forest that numbered in the 10's of thousands of individuals with all age classes present.
- Bald Eagle (*Haliaeetus leucocephalus*): No substantial concern. Species is secure in plan area due to stable and well distributed populations, stable habitat, and no threats relevant in or to the plan area.
- Blackbacked Woodpecker (*Picoides arcticus*): No substantial concern due to stable populations, abundant habitat (current and predicted), and the large amount of designated Wilderness where the primary threat of fire salvage logging is not allowed.
- Boreal Owl (*Aegolius funereus*): No substantial concern because habitat is at the high end of HRV, with most of that occurring within Wilderness and Idaho Roadless areas.
- Common Loon (*Gavia immer*): Species is not established or becoming established in the plan area.

- Peregrine Falcon (*Falco peregrinus*): Species is uncommon but has no relevant threats that would be expected to affect long-term persistence.
- Rare land snails and slugs (*Oreohelix* spp., *Hemphillia* spp., *Udosarx* spp., etc.): Several species of land snails and slugs were assessed; see species-specific rationale in the evaluation spreadsheet. Note that a fine-filter plan component also exists for endemic land snails (GA-DC-SR-03).
- American Marten and Pacific Marten (*Martes americana* and *M. caurina*): Species is secure in the plan area; it is well distributed and relatively common; no major threats to populations or habitats; no other life history or other factors that lead to substantial concern.

The above species were all included in the species evaluation spreadsheet and analyzed in the for whether they meet the “substantial concern about the species’ capability to persist over the long-term in the plan area” (36 CFR 219.9). The process and rationale for determining species of conservation concern status of these and other species on the Nez Perce-Clearwater National Forest is provided at: <https://www.fs.usda.gov/detail/r1/landmanagement/planning/?cid=fseprd500402>. Column L of the spreadsheet provides rationale for why these species did not meet the criteria for “substantial concern.”

American goshawk (*Accipiter atricapillus*) and Western skink (*Plestiodon skiltonianus*) occur within the plan area but did not have NatureServe ranks or other criteria to warrant inclusion in the list of species to consider for SCC status based on the criteria outlined in the “Species of Conservation Concern Identification Process for the Nez Perce - Clearwater National Forest Plan Revision.” American goshawk and Western skink have NatureServe ratings of G5S3 (globally secure; state vulnerable) and G5S4 (globally secure; state apparently secure), respectively.

Black swift (*Cypseloides niger*) and the northern bog lemming (*Synaptomys borealis*) are not known to occur in the plan area and therefore are exempt from consideration as an SCC (36 CFR 219.9).

Concern 2: Species of Conservation Concern – Identification of Species of Conservation Concern

Species of conservation concern replace sensitive species under the 2012 Planning Rule, but the Forest Service should identify these sensitive species and include a detailed analysis of each. This is to ensure that they do not become threatened or endangered.

Letter #	Comment #
805	78
1060	54, 149
17879	3

Response to comment

Several commenters were concerned as to whether species identified as Regional Forester’s sensitive species (RFSS) are adequately analyzed to prevent future federal ESA-listing (FSH 1909.12, ch. 10, sec. 12.55).

The Nez Perce-Clearwater National Forest’s process for identifying SCC is summarized in the “Species of Conservation Concern Identification Process for the Nez Perce - Clearwater National Forest Plan Revision” document and the associated species evaluation spreadsheet, available here: <https://www.fs.usda.gov/detail/r1/landmanagement/planning/?cid=fseprd500402>. Step G of the SCC identification process includes considering RFSS for SCC status: “Regional Forester’s sensitive species in the plan area and on adjoining National Forests in other regions (i.e., R1 Bitterroot and Idaho Panhandle,

R4 Payette, and R6 Wallowa-Whitman). The planning directives do not require consideration of this category. However, it was adopted to compensate for the absence of SCC on adjoining units, which the directives recommended for consideration, but have not yet been identified.” Regional forester sensitive species were assessed for whether they meet the “substantial concern about the species’ capability to persist over the long-term in the plan area” (36 CFR 219.9). This analysis is provided in the species evaluation spreadsheet.

Within the FEIS, RFSS that were not carried forward as species of conservation concern are analyzed according to habitat groupings consistent with the coarse-filter approach in § 219.9 of the 2012 planning rule. Evaluation of how the coarse filter would provide for the diversity and abundance of wildlife is found in the “Diversity and Abundance of Wildlife” section of the FEIS (3.2.9). Appendix C of the FEIS has been revised to include two new tables (Table 2 and Table 19) that help show how the wildlife analysis was performed, including for RFSS. Table 2 shows how individual species were assigned to habitat groupings and subgroupings to facilitate coarse filter ecosystem analysis. For example, Western Toad is a RFSS and is identified in Table 2 of Appendix C as being associated with “Aquatic, wetland, water and riparian habitats.” This crosswalks with the analysis in section 3.2.8. of the FEIS. This same analytical process was applied to each other RFSS suspected or known to occur within the plan area. Table 19 has also been added to Appendix C to show the effects determinations for RFSS, based on analysis in the “Diversity and Abundance of Wildlife” section of the FEIS (3.2.8).

RFSS were a category included in the identification of SCC and analyzed in the FEIS (Appendix C, Tables 2 and 19). Available conservation strategies for RFSS have been considered and integrated, as appropriate, into the plan components of the forest plan, supporting the biodiversity requirements of the 2012 planning rule and contributing to the prevention of federal listings.

Concern 1: Species of Conservation Concern – Bighorn Sheep

The Forest Service should conduct an annual review of the core home ranges, as populations begin to recover. It should also analyze migration corridors and the potential for genetic drift between herds. Populations should be monitored.

Letter #	Comment #
307	151
717	155, 156
1060	126
17649	4

Response to comment

The State of Idaho Department of Fish and Game is the responsible agency for monitoring populations and genetic drift. The Forest Service is responsible for maintaining suitable habitat. Habitat will be monitored according to the monitoring plan.

Concern 2: Species of Conservation Concern – Bighorn Sheep

To prevent pathogen transmission, the Forest Service should strengthen plan components regarding pack goats and domestic sheep and should review guidelines related to domestic goat packing. It also should create standards that would not permit pack goats in areas where effective separation could not be maintained. The Forest Service should create standards that allow for an emergency response when there could be a conflict between domestic sheep and bighorn sheep.

Letter #	Comment #
307	77
171	154
938	48, 66
1054	6
1060	129, 130
1067	2
17349	7
17679	2, 3

Response to comment

The Land Management Plan clarifies that pack goat use is not restricted as a use by the public in the plan area, including within bighorn sheep habitats, because, while there is some risk, the probability of pathogen transmission from pack goats to bighorn sheep is likely lower than from sheep grazing. The risk is reduced for multiple reasons having to do with differences in how pack goats are handled and cared for and because the numbers of pack goat users is low. In addition, some evidence suggests pathogens from goats may not be as dangerous to bighorn sheep compared to those from domestic sheep.

The LMP contains the following standard: FW-STD-WL-02. To prevent disease transmission between wild sheep and domestic sheep and goats, domestic sheep and goat grazing (excluding pack goats) shall not be authorized in or within 16 miles of bighorn sheep occupied core herd home ranges.

Additionally, the LMP contains the guideline: FW-GDL-WL-04. New authorizations and permit reauthorizations for domestic goat packing should follow best management practices and include provisions to prevent disease transmission between domestic goats and bighorn sheep.

Concern 1: Species of Conservation Concern – Harlequin Duck

The Forest Service should monitor and address suitable habitat for this species when discussing Wild and Scenic Rivers. The Forest Service should include species-specific plan components for the harlequin duck.

Letter #	Comment #
307	147
877	298
951	1
3110	63

Response to comment

Several commenters questioned whether sufficient plan components are in place to support the persistence of Harlequin Duck within the plan area, and if the monitoring plan is adequate.

Harlequin ducks were recommended as a potential species of conservation concern (SCC) through the SCC analysis process (available here: <https://www.fs.usda.gov/detail/r1/landmanagement/planning/?cid=fseprd500402>) and were identified by the Regional Forester as a final SCC.

As described in the wildlife analysis (section 3.2.9), at-risk species including harlequin ducks are addressed through a coarse- and fine-filter approach consistent with the direction in FSH 1909.12 sections 23.11 and 23.13. The directives state “The plan components developed for ecosystem integrity and ecosystem diversity (sec. 23.11) are expected to provide the ecosystem (coarse-filter) approach to maintaining the persistence of native species within the plan area, including the at-risk species identified during the assessment... When the evaluation reveals that plan components for ecosystem integrity and ecosystem diversity or other plan components would not provide the ecological conditions necessary for one or more at-risk species, the responsible official shall develop additional species-specific plan components for those individual species (fine filter)” (FSH 1909.12 23.13). Species identified as SCC do not necessarily need species-specific plan components if coarse-filter plan components are expected to provide the ecosystem integrity and diversity. Appendix C of the FEIS provides a threats assessment of the harlequin duck (Table 9 of the FEIS Appendix C). An additional table has been added to Appendix C of the FEIS (Wildlife Species and Habitat Summary) that provides a complete crosswalk of how plan components address these threats.

In terms of monitoring, 36 CFR 219.12 directs that a land management plan must contain a plan monitoring program and FSH 1909.12, chapter 30 provides further guidance for developing a plan monitoring program. One of the eight required items in the monitoring plan (36 CFR 219.12(a)(5)), is to assess “the status of a select set of the ecological conditions required under 36 CFR 219.9 to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern.” There is not a requirement to monitor the status of individual species, but in some cases individual species may be used to infer the integrity of the larger ecological system to which it belongs.

In the monitoring plan (Appendix 3 of the Land Management Plan), monitoring question MON-WL-03 uses occupancy of harlequin ducks to assess the effectiveness of plan component FW-DC-WL-02 that “Ecological conditions across NPCLW area provide for, or contribute, to the persistence of populations of species of conservation concern over the long term, with sufficient distribution to be resilient and adaptable to stressors and likely future environments.” The monitoring question and indicators for harlequin ducks (Table 1, Appendix 3 of the Land Management Plan) are consistent with the direction for plan monitoring requirements in the 2012 Planning Rule (36 CFR 219.12) and FSH 1909.12, chapter 30.

Concern 1: Species of Conservation Concern – Mountain Quail

The Forest Service should clarify if the mountain quail receives habitat protection outside its historical natural range. Additionally, the Forest Service should address what actions it would take to restore habitat and should determine the current number of acres protected.

Letter #	Comment #
307	148
877	541, 545-547

Response to comment

Issues were raised regarding whether sufficient plan components are in place to support the persistence of mountain quail within the plan area, or if plan components for this species are only applicable to certain geographic areas. Commenters also asked for more specificity on habitat restoration actions to benefit this species.

Plan components and effects to mountain quail are summarized in section 3.2.9 of the FEIS.

In the monitoring plan (Appendix 3 of the Land Management Plan), monitoring question MON-WL-04 uses occupancy of mountain quail to assess the effectiveness of plan component FW-DC-WL-02 that “Ecological conditions across NPCLW area provide for, or contribute, to the persistence of populations of species of conservation concern over the long term, with sufficient distribution to be resilient and adaptable to stressors and likely future environments.”

Commenters requested what actions it would take to restore mountain quail habitat. However, the Land Management Plan (LMP) does not authorize any activities or compel the FS to specific actions. The LMP directs the outcome of management but does not describe specific actions to achieve those outcomes. For example, objective GA-OBJ-SR-01 in the LMP is that "100 acres of mountain quail habitat are restored in each five-year period." This objective is adequate as-is because the LMP is not intended to prescribe what actions will be taken to accomplish that habitat restoration. The way in which the restoration will occur will be determined through project-level NEPA rather than the programmatic-level NEPA for the LMP. Appendix 4 of the Land Management Plan (LMP) describes some of the possible actions and potential management approaches and strategies the Nez Perce-Clearwater National Forests might undertake to maintain or make progress towards achieving the desired conditions described in the LMP. It is also intended to help clarify how the planned outcomes (i.e., objectives, desired conditions) in the plan might be achieved.

Concern 2: Species of Conservation Concern – Mountain Quail (letter number 877, comments 542, 543, 548)

The Forest Service should clarify how it would protect mountain quail habitat from livestock impacts. Additionally, it should clarify why mountain quail are not assigned to riparian habitat.

Response to comment

Commenters questioned whether sufficient plan components are in place to support the persistence of mountain quail within the plan area, particularly riparian and shrub habitat.

As a species of conservation concern identified by the Regional Forester, mountain quail are analyzed both with habitat groupings and individually. The individual analysis is in section 3.2.9 of the FEIS. Between DEIS and FEIS, additional rationale has been added to the wildlife analysis to better explain why mountain quail were assigned to non-forested vegetation habitat group for coarse filter analysis: “In many parts of its range, mountain quail occur in uplands as well as within riparian areas but in Idaho, the shrub habitats the species prefers is often within riparian areas more than in other parts of its range. Therefore, the key common features are shrub habitats in forested, non-forested, and riparian vegetation.” Although mountain quail are grouped into the non-forested vegetation habitat group, coarse-filter plan components in the ‘Aquatic Ecosystems’ section for riparian areas also provide for mountain quail habitat. The LMP also contains plan components for livestock grazing specific to aquatic ecosystems (e.g., FW-STD-ARGRZ-01, FW-STD-ARGRZ-02, FW-GDL-ARGRZ-01, FW-GDL-ARGRZ-02, FW-GDL-ARGRZ-03). The analysis in the FEIS (section 3.2.9) concludes that “While these measures won’t prevent all effects from grazing, they should serve to reduce impacts to mountain quail habitat and balance sustainable livestock grazing with riparian vegetation health.” The analysis indicates that the Land Management Plan is expected to provide the ecological conditions to contribute to the long-term persistence of mountain quail, including in riparian areas.

Concern 3: Species of Conservation Concern – Mountain Quail (letter number 577, comment 544)

The Forest Service should clarify how fire suppression and increased wildland fires benefit mountain quail habitat.

Response to comment

The issue raised by this comment is whether sufficient plan components are in place to maintain viable populations of mountain quail within the plan area, particularly regarding fire suppression since wildfire may be beneficial for mountain quail habitat.

As a species of conservation concern identified by the Regional Forester, mountain quail are analyzed in section 3.2.9 and Appendix C of the FEIS. The analysis recognizes uncertainty exists in our understanding of mountain quail ecology and that it is “probably the least-studied upland game bird in the United States.” The analysis identifies several threats to mountain quail habitat both within and outside the plan area, while acknowledging that several aspects of how mountain quail respond to these threats is unknown. Additional language has been added to the analysis that references recent scientific literature suggesting that mountain quail respond positively to fires. Fire exclusion and uncharacteristic fire (including via invasive plant establishment that can change fire frequency) are included as potential threats to habitat in section 3.2.9, as well as Appendix C of the FEIS (Crosswalk of How Plan Components Address Threats to At-Risk Wildlife). Forest plan components that address the threat of fire exclusion, particularly those within the Warm Dry Broad Potential Vegetation types, include FW-DC-FIRE-01, FW-DC-FIRE-02, FW-DC-FIRE-04, FW-OBJ-FIRE-01, FW-OBJ-FIRE-02, FW-OBJ-FIRE-03, FW-STD-FIRE-01, FW-GDL-FIRE-01, GA-DC-SR-02, GA-OBJ-SR-01. These plan components are expected to support the persistence of mountain quail within the plan area, and objectives for fuels and vegetation would help restore early seral conditions used by this species (Table 19, Appendix C FEIS).

Concern 1: Species of Conservation Concern – White-Headed Woodpecker (letter number 877, comments 532, 536, 538, 540)

The Forest Service should clarify how many acres are important for the white-headed woodpecker in ponderosa pine habitat and what areas of the National Forests the species has been found in. Additionally, the Forest Service should clarify the science used when analyzing the species' preferred habitat type.

Response to comment

The white-headed woodpecker is a Species of Conservation Concern and Regional Forester's Sensitive Species. Commenters were concerned that grouping this species within the “open forest habitat” group does not fully capture the full range of its habitat features, and therefore the coarse filter approach does not adequately provide for this species' viability.

The directives state “The plan components developed for ecosystem integrity and ecosystem diversity (sec. 23.11) are expected to provide the ecosystem (coarse-filter) approach to maintaining the persistence of native species within the plan area, including the at-risk species identified during the assessment... When the evaluation reveals that plan components for ecosystem integrity and ecosystem diversity or other plan components would not provide the ecological conditions necessary for one or more at-risk species, the responsible official shall develop additional species-specific plan components for those individual species (fine filter)” (FSH 1909.12 23.13).

The white-headed woodpecker has remained grouped within ‘open forest habitat’ in the FEIS due to the studies cited within the “habitat preferences” subsection of section 3.2.9 of the FEIS (e.g.,(Miller and Carlisle 2018); however, the analysis recognizes that the species uses both open and closed forest.

Adjustments to the SIMPPLLE modeling for white-headed woodpecker habitat were made in the FEIS. A model (Miller and Carlisle 2018) was used to calibrate and validate the query for dry forest/large tree species query in SIMPPLLE. Previously, in the DEIS, SIMPPLLE modeling suggested that the habitat for the white-headed woodpecker would continue to decline under the plan. However, adjustments in the model changed the model results. This updated modeling supports the conclusion that the white-headed woodpecker habitat would increase under the preferred alternative.

Table 211 of the FEIS summarizes how coarse-filter plan components are expected to restore habitat for white-headed woodpeckers. The “effects” column of this table that summarizes the effects of the plan components has been bolstered. The wildlife analysis, including revised modeling efforts, indicates that plan components for ecosystem integrity and ecosystem diversity would provide the ecological conditions necessary for this at-risk species.

Concern 2: Species of Conservation Concern – White-Headed Woodpecker

The Forest Service should clarify the monitoring plan with Boise State University and should address the cost and study plan.

Letter #	Comment #
307	146
877	537

Response to comment

Appendix 3 mentions an occupancy study for white-headed woodpecker done in cooperation with Boise State University. Further details will be provided a future date once the monitoring agreement is finalized and implemented.

Concern 1: Species of Conservation Concern – Fisher

Habitat descriptions for fishers are incomplete or inadequate, and the Forest Service should update them to include more specific components, such as tree diameter and cover, and include other vegetation classes outside of the warm moist type. The Forest Service should address any concerns that the fisher does not occur on the National Forests.

Letter #	Comment #
307	74-76
717	161
805	23
877	481, 482, 487, 488, 491, 492, 495,

Response to comment

Habitat descriptions are found in detail in the FEIS. There is specific detail regarding denning. Female fisher use large diameter live trees and snags with cavities for denning and rearing of young and have

been reported to use a wide variety of tree species (Raley et al. 2012). A key feature of these trees is that they are large diameter dead or partially dead trees often reported to have cavities and heart rot, suggesting that damage and decay play critical roles in the suitability of habitat for reproduction. Thus, retaining and promoting ecological processes that result in the recruitment of trees with these features is important to the conservation of reproductive habitat for fisher (Raley et al. 2012). Fishers selects areas with higher amounts of coarse woody debris, large downed trees, and standing large diameter live trees or snags with cavities which are used for resting, denning, refuge from predators, and thermal regulation, (Jones 1991, Heinemeyer 1993);(Jones and Garton 1994, Weir and Harestad 2003);(Weir et al. 2011);(Raley et al. 2012). Several studies have suggested that the abundance of these structures to potentially be a limiting factor for fishers (Zielinski et al. 2004, Powell and Zielinski 1994, U.S. Department of the Interior 2011, Spencer et al. 2008). Even when using younger forests in winter, studies note the importance and use of large diameter trees, snags, and downed wood (Jones and Garton 1994). Fishers forage in both mature and younger forests and are more tolerant of early seral conditions while foraging but are widely reported to avoid openings. Moist forested habitats with continuous overhead cover and riparian zones are frequently used (Vinkey 2003) and stream courses may be used as travel corridors (Jones 1991).

It is also stated in the LMP: The Nez Perce-Clearwater National Forests and Southern Idaho Panhandle National Forests are the primary areas that support fisher in the U.S. Forest Service Northern Region (Krohner 2020). The fisher is a forest-dependent species that evolved in the Northern Rocky Mountains in a complex landscape mosaic shaped by regularly occurring environmental influences on its preferred habitat, such as fire, tree disease, and wind-throw. Fishers are associated with areas of high cover and structural complexity in large tracts of mature and old-growth forests (Powell and Zielinski 1994, Sauder and Rachlow 2014, Schwartz et al. 2013). Other important site characteristics include the presence of nearby water, slope, elevation, and snow characteristics (U.S. Department of the Interior 2011, Olson et al. 2014).

Additionally there is a desired condition specific to fisher: FW-DC-WL-04. The Nez Perce-Clearwater provides the ecological conditions for the long-term persistence of fisher, whose habitat generally follows the distribution of the warm moist potential vegetation type. Patches of tall forest cover approximately 50 percent of the warm moist broad potential vegetation type group, consistent with the desired conditions. Stands of tall forests, distributed across the warm moist broad potential vegetation type, provide coarse woody debris and multiple denning and resting habitat canopy layers (Sauder and Rachlow 2014, Sauder 2014).

Concern 2: Species of Conservation Concern – Fisher

The desired conditions for fishers are inadequate to ensure their persistence, and the Forest Service should draft plan components that specify standards.

Letter #	Comment #
307	8, 150
717	163, 164
877	485, 486, 489, 490, 493, 494, 499, 500
1065	67

Response to comment

In addition to desired conditions, fishers benefit directly from the snag retention guidelines:

Fishers are dependent upon hollow trees and snags for reproduction, protection from predators, and shelter. They are known to prefer areas with more large trees, increased snags, and more downed wood. The Forest Plan provides plan components for retention of snags which vary by alternative. MA2 and MA3-GDL-FOR-05 identify the amount and distribution of snags required to be retained when managing forested habitats. The amount of snags differs by broad potential vegetation type (PVT) as specified by size and overall number of snags retained. Snags are required to be retained within the project area but not necessarily within the treatment units. If existing snags are not sufficient, then additional live leave trees are required. The guideline is informed by average number of snags found in Forest Inventory and Analysis data as published in Bolenbacher (2009).

MA3-GDL-FOR-05 varies by alternative in that Alternative Z requires retention of snags at least 10 inches as specified by Bolenbacher (2009). The other alternatives require snag retention of snags at least 15 inches but does not require retention of snags smaller than this size. The average number of snags at least 10 inches is much higher than the number of snags at least 15 inches. For example, in the warm moist broad PVT, the number of snags 15 inches and greater including snags 20 inches and more totals 19 combined, whereas if snags at least 10 inches were required to be retained in addition, it would add 16 additional snags per acre. These additional snags would better provide for more potential denning sites and coarse woody debris to support fisher habitat after timber activities than alternatives that the require only retention of snags 15 inches or greater. Retention of snags and live retention trees are a factor in the effects that timber activities have on fisher habitat and the speed at which these habitats recover and whether an area harvested by timber activities continue to support fisher habitat use as described above for effects of Timber Suitability. The Preferred Alternative does not require retention of snags 10 inches and greater. Desired conditions for snags are focused on managing the current and future snag pool to promote snag retention by considering spatial distribution, snag density, size class distribution, snag species, and safety. The targets for snag retention for each broad PVT group are intended to be applied at the project level. Individual stand level snag densities may contribute to project level targets. The intent is not to normalize snag retention and recruitment at the per acre level but to achieve a project level target which reflects natural disturbance patterns. In addition, the plan has desired conditions that encourage large diameter living trees be present, such as MA3-DC-FOR-02, FW-DC-FOR-08, MA3-DC-FOR-04, MA3-DC-FOR-06, that encourage live tree retention and can contribute to future snags. Alternatives that retain more snags would be better for fisher than those with less, but all alternatives should retain snags at the project level at levels similar to the averages found within each broad potential vegetation type (Bolenbacher 2009). The retention of snags, live leave trees, and downed wood would help provide for fisher habitat in project areas managed by timber activities.

Concern 3: Species of Conservation Concern – Fisher

Threats to the fisher have not been adequately addressed, and the Forest Service should address threats from trapping, climate change, and habitat loss due to logging.

Letter #	Comment #
717	162
877	480, 483, 484, 496, 497, 498

Response to comment

Threats to fisher are analyzed in detail in Chapter 3 of the FEIS. This includes harvest, climate change, and impacts from vegetation management. Figure 66 and Table 187 detail impacts from past vegetation management. Tables 189 and 190 include information on recreation impacts.

Generally speaking, timber harvest or production activities may alter fisher habitat. Within stands at smaller scales, timber activities can alter seral stages, stand densities, tree species composition, amount of overhead canopy, reduce habitat complexity, reduce den structures, change understory conditions, and change amounts of coarse woody debris. As fishers mostly use mature forest with high canopy cover, the changes affect fisher habitat use until stands regrow to the point where they provide foraging conditions or resting or denning structures.

Incidental trapping may be an important source of mortality, particularly where populations are small and fragmented. Idaho prohibits trapping of fisher so all mortality of fishers from trapping is through incidental captures in pursuit of other species or illegal trapping. The Forest Service has no control over incidental trapping.

Staffing

Concern 3:

The Forest Service should incorporate volunteers in restoration, such as those in areas affected by motorized recreation, or other activities, such as nonmotorized trail maintenance and building riparian buffers. Commenters asked for additional support in maintaining nonmotorized trails.

Letter #	Comment #
17868	6

Response to Comment

The revised land management plan encourages partnerships to achieve goals and desired conditions.

Terrestrial Ecosystems

Concern 1:

The plan components in Section 2.1, Terrestrial Ecosystems, contain redundancies and errors in labeling, and they are often too specific, creating redundancy. The Forest Service should combine or eliminate some of these plan components.

Letter #	Comment #
1060	68, 69, 71

Response to Comment

Thank you for your comment. Plan components across the entire land management plan have been updated to address redundancies and errors.

Concern 2: (letter number 1060, comments 29, 70)

The Forest Service should include an additional guideline or standard to address critically imperiled species, including those with uncommon habitat elements.

Response to comment

As described in the wildlife analysis (section 3.2.9), at-risk species are addressed through a coarse- and fine-filter approach consistent with the direction in FSH 1909.12 sections 23.11 and 23.13. The directives state “The plan components developed for ecosystem integrity and ecosystem diversity (sec. 23.11) are expected to provide the ecosystem (coarse-filter) approach to maintaining the persistence of native species within the plan area, including the at-risk species identified during the assessment... When the evaluation reveals that plan components for ecosystem integrity and ecosystem diversity or other plan components would not provide the ecological conditions necessary for one or more at-risk species, the responsible official shall develop additional species-specific plan components for those individual species (fine filter)” (FSH 1909.12 23.13).

Desired condition FW-DC-TE-02 and guideline FW-GDL-TE-01 are examples of fine-filter components that provide direction for the long-term persistence of groups of endemic species associated with specific uncommon habitat elements (mineral licks, talus slopes, fractured wet bedrock, rocky outcrops, scree slopes, waterfalls, and geologic inclusions). These components are not intended to provide for all at-risk species. At-risk species not associated with these uncommon habitat elements are addressed through many other plan components at both the ecosystem-level (e.g., FW-DC-WL-02, FW-DC-WL-03, FW-GDL-WL-01, FW-GDL-WL-02) and species-level (e.g., FW-DC-WL-04, FW-DC-WL-05). Appendix C of the FEIS (Wildlife Species and Habitat Summary) provides a complete crosswalk of at-risk species, threats to their habitat, key ecosystem characteristics of habitats, and how plan components provide for those habitats and address threats to at-risk species.

The full suite of plan components is designed to provide for the persistence of native species within the plan area, including at-risk species. The FEIS has a new table in Appendix C (Wildlife Species and Habitat Summary) to show how the different plan components address threats to at-risk species.

Sustainable Recreation

Concern GEM Trail 1, 2 and Sustainable Recreation 1:

These comments express the value of expanding the Grand Exploration Motorized (GEM) trail to support community sustainability. They state, in part, the Elk City to Florence trail would most likely cross Johns Creek, which needs an ROS setting that allows for the construction of this trail. In addition to this area, the Smith Ridge connector needs an ROS setting that allows for its construction. An additional question regarding the GEM Trail was “How will fish and wildlife habitat be protected along the Grand Exploration Motorized (GEM) trail? Similar comments regarding the effects to fish and wildlife from connecting trail systems to local communities were included in the Sustainable Recreation 1 concern statement.

Letter #	Comment #	Letter #	Comment #
307	94,98,99	1076	12
395	6	17362	8
587	36	17916	38

Response to comment

The Planning Rule (36 CFR 219.10(a)) requires that a plan include plan components including standards or guidelines for integrated resource management to provide for ecosystem services and multiple use

including outdoor recreation. 36 CFR 219.10(b)(1)(i) states “Sustainable Recreation; including recreation settings, opportunities and access; and scenic character...”

Forest Service Handbook 1909.12, Chapter 10, 13.41 directs the agency to identify and evaluate; a. the types of recreational opportunities including both motorized and non-motorized opportunities, and; d. the nature, extent, and condition of trails, roads, facilities, and other transportation and other infrastructure to provide recreational access. FSH 1909.12, Chapter 20, 23.23a, 1(a) directs the agency to review information from the assessment, the need for change and distinctive roles and contributions related to recreational settings, opportunities, and access in the plan area. And, to consider public preferences or demand for recreational opportunities.

Land Management Plans do not make site specific decisions regarding motorized access which are appropriately addressed through travel management planning. However, suitability for motorized and non-motorized opportunities and access is provided in the Land Management Plan through identification of Recreation Opportunity Spectrum classes (ROS). Suitability of lands for motorized and non-motorized opportunities and access vary by ROS class, by alternative. This can be found in the FEIS 3.4.2 – Sustainable Recreation. The Preferred Alternative identifies an ROS configuration across the Nez Perce-Clearwater landscape that provides a spectrum of opportunity and access to meet current and anticipated recreational uses, while providing for the social, economic, and ecological health of the forest and surrounding communities. This section indicates that the Preferred Alternative allocates approximately 55 percent of the Nez Perce-Clearwater for summer motorized use and 60 percent for winter motorized use.

The FEIS Appendix A, Summer and Winter ROS maps assign ROS class distribution across the Forest by alternative. The Land Management Plan, Appendix 1 shows the ROS class distribution for the preferred alternative. These maps show the Johns Creek and Smith Ridge areas mentioned in these concern statements allocated to Semi-primitive motorized ROS. This ROS class indicates these areas are suitable for construction and use of motorized trails. Subsequent travel management planning will be necessary to make a final decision, consistent with Land Management Plan direction as per the appropriate ROS class, approving or not approving such trails and any appropriate access infrastructure.

Regarding protection of fish and wildlife along the GEM Trail, the Land Management Plan, Aquatic Ecosystems and Wildlife sections include numerous Plan Components directed at the protection of these resources. As appropriate, these plan components, apply to the GEM Trail as well as any other road and trail across the Forest.

These Plan components include but are not limited to:

- FW-GDL-ARREC-04. To reduce trail-related mass wasting and sediment delivery to watercourses, new and relocated trails should not be constructed on lands with high mass wasting potential.
- FW-GDL-ARREC-05. Trail construction, reconstruction, and maintenance activities should prevent concentrated water from directly entering streams, by hydrologically disconnecting the trails from delivering water, sediment, and pollutants to water bodies.
- FW-GDL-ARREC-06. To maintain channel stability and reduce sediment delivery to watercourses, when constructing or reconstructing trails, fords should be hardened to protect the stream bed, banks, and approaches.

MA2-GDL-WL-01. To maintain large areas of unfragmented habitat for wide-ranging species, such as elk and grizzly bear, new motorized trails open to the public should not be authorized in Idaho Roadless

Areas unless there are adjacent areas of 5,000 acres without open motorized system routes. This guideline does not apply to:

- Community Protection Zones (CPZs) as defined by the Idaho Roadless Rule.
- Areas with existing motorized access that are currently less than 5,000 acres.
- Existing trails that are relocated or reconstructed to mitigate negative impacts to ecological resources.

MA2-DC-WLMU-02. Areas at least 5,000 acres in size exist without motorized access open to the public to maintain habitat use by elk.

Commenters are encouraged to review the FEIS and Land Management Plan sections on Sustainable Recreation, Aquatics, and Wildlife to understand the analysis and effects of the GEM trail and the Forest trail system on these resources.

Concerns 1, 2, 3 for Mechanized Use and Mountain Bike:

These letters specifically address and support the use of mechanized equipment, primarily mountain biking, in recommended wilderness areas. As represented in these concern statements, these comments mentioned the use of mountain bikes in general and, more specifically, in Idaho Roadless Areas considered for recommended wilderness. Many of these commenters specifically requested the State Line Trail, Trail 738, adjacent to and within the Hoodoo IRA, be restored, open and maintained for mountain bike use, or they mentioned other specific trails within the Hoodoo RWA to provide loop opportunities. These are in addition to the numerous comments received related to recommended wilderness that often mentioned mechanized and motorized use in these areas, most of which were opposed to mountain bikes within RWAs, many specifically mentioning the Hoodoo IRA.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	118	970	1,2,3	1119	3
645	2	973	1	1120	1
649	1	977	1	16874	1
686	1,2	981	1	16884	1
794	1,2	1009	1	16894	1
814	1	1029	1	16914	1
863	1	1031	1	16923	1
875	1	1036	1	16983	1
876	1,2	1041	1,2,3	17288	1
943	1	1045	1	17726	1
944	1	1078	1	17746	2
945	1	1082	1	17747	1
950	1	1106	1	17762	1
952	1	1108	1	Empty cell	Empty cell
955	1	1111	1	Empty cell	Empty cell
957	1	1113	1	Empty cell	Empty cell
959	1	1114	1	Empty cell	Empty cell

Response to comment

Direction related to recreational trails in Land Management Planning is found in FSH 1909.12, Chapter 20, 23.23L(3) that directs the Plan to include desired conditions for recreation trails, may include objectives and may identify the types of trails and recreational use that are suitable or not suitable in a management or geographic area. FSH 1909.12, Chapter 20, 23.23A (2)(a), states that the agency must include desired conditions using mapped desired recreation opportunity spectrum classes.

The FEIS analyzed six alternatives in detail. Alternative Z included language that would allow mechanized, and motorized, travel in RWAs. Under this alternative up to 389 miles could be open to mechanized transport.

The Preferred Alternative does not find RWAs suitable for recreational or public use of mechanized or motorized equipment or travel. However, it does find RWAs suitable for administrative use of mechanized and motorized equipment.

As discussed in the FEIS – Chapter 3.6.2 and the Record of Decision, the Preferred Alternative adjusts the boundary of the Hoodoo IRA to exclude from recommended wilderness the area around the State Line Trail, the area north of and around the Fish Lake basin and an area generally south of Blacklead Mountain and Williams Peak. As shown on the ROS map for the preferred alternative, these areas are classified in summer as semi-primitive, non-motorized, with trail 419 to Fish Lake remaining semi-primitive motorized. In winter, the area to the north of, and around, Fish Lake and South of Blacklead Mountain is semi-primitive motorized and the area along the Stateline Trail remains semi-primitive non-motorized.

Concerns 1, 2, 3, 4: Pack Goats

These comments are centered on the recreational use of pack goats. Many comments refer to the risk of transmission of pathogens, primarily pneumonia but also secondary pathogens, from pack goats to bighorn sheep, and the science used by the Forest Service in its analysis. Most commenters contend that there is little to no risk of disease transmission and some offer findings from research to support this contention. Others contend that there is significant risk of pathogen transmission from pack goats to bighorn sheep, a species of conservation concern. Bighorn sheep are also a species used by the public for hunting, and wildlife watching. Those opposed suggest that pathogens threaten long term persistence of bighorn sheep. The significance of this concern is whether, or which, restrictions should be imposed on recreational use of pack goats to prevent disease transmission while ensuring long term persistence of bighorn sheep. Sentiment runs from no restrictions are necessary, to implementation of provisions to prevent pathogen transmission, to exclusion of pack goats within 16 miles of bighorn sheep occupied core herd home ranges.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
1	1	55	1	314	1
2	1	92	2	587	8
3	1	100	1	717	157,158,159,160
5	1,2	117	1,2	1060	3
8	1	132	1	1067	1
11	1,4,5,6,7	211	1	17628	4
13	1	237	1	Empty cell	Empty cell
14	1	239	1	Empty cell	Empty cell

Response to comment

The 2012 Planning Rule, 36 CFR 219, Section 219.8 – Sustainability, requires that Land Management Plans must provide for social, economic, and ecological sustainability within Forest Service authority and consistent with the inherent capability of the plan area.

Section 219.9 of the Planning Rule – Diversity of Plant and Animal Communities, provides direction to maintain diversity of animal communities and the persistence of native species by providing for ecosystem integrity, ecosystem diversity, and additional species-specific plan components as necessary for the long-term persistence of Species of Conservation Concern.

The Planning Rule at Section 219.10 – Multiple Use, specifies; “While meeting the requirements of 219.8 and 219.9, the plan must provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capability of the plan area.....The responsible official shall consider:.....(5) Habitat conditions, subject to the requirements of § 219.9, for wildlife, fish, and plants commonly enjoyed and used by the public; for hunting, fishing, trapping, gathering, observing, subsistence, and other activities collaboration with federally recognized Tribes, Alaska Native Corporations, other Federal agencies, and State and local governments)....(6) Land status and ownership, use, and access patterns relevant to the plan area.... (7) Reasonably foreseeable risks to ecological, social, and economic sustainability... (10) Opportunities to connect people with nature.”

Forest Service Handbook 1909.12, Chapter 20, 23.11 – Plan Components for Ecosystem Integrity and Diversity, provides implementing direction to meet the Planning Rule. As described in the Planning Rule and in the Directives, plan components developed for ecosystem integrity and ecosystem diversity are expected to provide for ecological conditions necessary to maintain the long-term persistence of species of conservation concern.

Forest Service Handbook 1909.12, Chapter 20, 23.21a – Multiple Uses, 23.21b – Ecosystem Services and 23.23a – Sustainable Recreation Resources and Opportunities to Connect People with Nature, provide guidance for implementing 36 CFR 219.10. These Directives require that the Land Management Plan includes plan components for integrated resource management to provide for ecosystem services and multiple use.

The FEIS, Section 3.2.9- Wildlife evaluates terrestrial and aquatic wildlife species, including birds, mammals, reptiles, amphibians, and some invertebrates. The analysis evaluates the sufficiency of plan components and alternatives to meet the substantive requirements of the 2012 Planning Rule under sections 219.8 – Sustainability, 219.9 – Diversity of Plant and Animal Communities, and 219.10 – Multiple Use and associated directives as they relate to wildlife. Section 219.10 requires the deciding official to consider habitat conditions, subject to the requirements of § 219.9 for wildlife, fish, and plants commonly enjoyed and used by the public for hunting, fishing, trapping, gathering, observing, subsistence, and other activities.

Discussion of Bighorn Sheep can be found in the FEIS, Chapter 3.2.9. Following is a brief synopsis of that analysis.

Bighorn sheep habitat on the Nez Perce-Clearwater is generally associated with the Idaho Batholith break lands in the Salmon and Selway River basins. Bighorn sheep also occur within the Snake River canyon and may be found in the plan area between the Snake River over from Hells Canyon and the lower Salmon River canyon, and potentially in the Hoodoo recommended wilderness area. Bighorn sheep typically inhabit rugged, rocky grasslands and open forests from low elevation river canyons to alpine

areas. Four bighorn sheep population management units contain a total of approximately 400 bighorn sheep on lands managed by the Nez Perce-Clearwater. The population management units include the Lower Salmon, Lower Panther-Main Salmon, Selway, and Hells Canyon. Bighorn sheep areas on the Nez Perce-Clearwater are generally within protected areas, such as wilderness, wild and scenic river corridors, or roadless rule areas.

While many factors may contribute to bighorn sheep population dynamics, the primary limiting factor for Rocky Mountain bighorn sheep in the plan area is disease. Domestic sheep, goats, and other exotic relatives of bighorn sheep carry pathogens that can be lethal to a large proportion of the bighorn population during an outbreak and can have lasting effects on population performance through lower lamb survival. The FEIS references several scientific studies regarding contact between domestic goats and bighorn sheep leading to a pneumonia outbreak. While there is conflicting research, the analysis supports the contention that Bighorn sheep are susceptible to infections from pathogens carried by domestic goats.

Rising recreational use of pack goats into rugged, remote areas such as those used by bighorn sheep may increase contact between pack goats and bighorn sheep that would otherwise be isolated from domestic goat herds. While the practice is growing, current pack goat recreational use is conducted by relatively few forest visitors. When examined from a risk assessment perspective, there would be an unlikely to rare probability of disease transmission coupled with potentially serious to catastrophic consequences to bighorn sheep populations in the area.

Disease transmission to bighorn sheep can be controlled by maintaining separation between bighorn sheep, and domestic sheep and goats. Therefore, the Land Management Plan proposes that the only current sheep allotment on the Forest to be unsuitable for sheep grazing and to be closed after site-specific decision. The Land Management Plan also includes plan component FW-STD-WL-02 to ensure separation of domestic sheep and goats.

The Forest Supervisor considered all the factors related to the social, economic, and ecological aspects of the presence of bighorn sheep, as well as the use of recreational pack goats on the Forest. She considered all the information and comments received through public participation, collaboration with engaged citizens, and cooperation with other local, state, federal and tribal partners. She considered the factors that could influence pack goat/bighorn sheep contact, including: the scattered and limited areas of bighorn sheep populations on the Forest; bighorn sheep habitat use and behavior; the Forest area available for use by recreational pack goat enthusiasts away from bighorn sheep habitat; the relatively small, although increasing, number of recreational pack goat users; the accepted practices of recreational pack goat users in managing pack goats during pack trips, and; pack goat behavior. Based on this information, it was determined that there is a low probability of potential contact between recreational pack goats and bighorn sheep and therefore low potential for transmission of disease-causing pathogens between the species. Consequently, the only limitation on pack goats in the Land Management Plan is Plan Component FW-GDL-WL-05 that applies when their use requires a special use permit.

The direction regarding bighorn sheep, domestic sheep and goats, and pack goats can be found in the Revised Land Management Plan 2.3-Wildlife, supported by analysis in the FEIS, section 3.2.9- Wildlife, and FEIS Appendix C- Wildlife Species and Habitat Summary.

Concern Sustainable Recreation 2:

These comments focus on the adequacy of the Land Management Plan to provide for sustainable recreation and ecological sustainability; stating that the Plan must include plan components to ensure

achievement of ecological integrity, sustainability, and diversity as well as providing for sustainable recreation. And that the DEIS fails to provide for, consider, or analyze plan components that provide for sustainable recreation. The Recreation Opportunity Spectrum was also mentioned as an appropriate way to balance ecological and recreation sustainability.

Letter #	Comment #	Letter #	Comment #
307	94,98	877	678,679
587	28	939	43
717	138	1050	19

Response to comment

Title 36 Code of Federal Regulations Part 219, the 2012 Planning Rule, defines sustainable recreation and outlines the required content of land management plans, including those related to sustainable recreation. Part 219.19 – Definitions, Sustainable Recreation is defined as “the set of recreation settings and opportunities on the National Forest System that is ecologically, economically, and socially sustainable for present and future generations.”

Forest Service Manual 2310 – Sustainable Recreation Planning, provides recreation planning-related policy, direction, and guidance that integrates recreation with other multiple uses and resource values, to achieve desired and sustainable social, economic, and ecological outcomes.

At FSM 2310.2-Objectives, the direction states, in part; “to be sustainable, recreation settings, opportunities, and benefits must: be compatible with other multiple uses; protect cultural and natural resources; and be responsive to public demands while complementing recreation opportunities of the broader landscape; and garner the support, advocacy, and shared stewardship of the public.” And, that “sustainable recreation settings, opportunities, and benefits are the result of integrating recreation-related issues, concerns, and opportunities with those of other multiple uses and resource values.”

Forest Service Handbook 1909.12 provides the implementing directives for the 2012 Planning Rule. The directives provide direction and guidance to address sustainable recreation in land management plans and identify other relevant directives related to recreation.

The FEIS analyzes the effects of the No Action Alternative and five action alternatives, including the Preferred Alternative. The effects analysis covers the ecological and recreational attributes found on the Nez Perce-Clearwater. Analysis of the affected environment and environmental consequences for each alternative, including the effects of ROS classifications is presented in the FEIS, Chapter 3. Consistent with manual direction, the recreation opportunity spectrum (ROS) for summer and winter was delineated for each alternative and is displayed in the FEIS Appendix A. As discussed in the sustainable recreation section at section 3.4.2, the desired recreation opportunity spectrum varies by alternative to address the diversity of opinions received from the public, as well as to fully analyze resource impacts from changes in the amount of available motorized versus non-motorized acres. These changes are based on management area allocations by alternative. The recreation opportunity spectrum can be used to show the general effect of alternatives to recreation settings, opportunities, and access across the Nez Perce-Clearwater.

The Recreation Opportunity Spectrum only determines areas suitable and not suitable for motorized activities. Current or subsequent travel planning decisions would provide site-specific direction for where motorized recreational uses can take place. As such, site-specific impacts cannot be determined at the Land Management Plan level but would be assessed during site-specific planning. The array of ROS

classes in the alternatives demonstrates consideration of sustainable recreation in terms of social, economic, and ecologic sustainability. Please refer the FEIS section 3.4.2 for a complete discussion of sustainable recreation and the recreation opportunity spectrum.

Regarding Land Management Plan Components, FSH 1909.12, Chapter 20, 23.23a requires that a plan include plan components including standards or guidelines to provide for sustainable recreation including recreation settings, opportunities and access, and scenic character. At FSH 1909 12, Chapter 20, 23.23a 1(d) it states, in part; “At the forest scale, sustainable recreation is derived through the integrated planning process and emerges as the resultant set of desired recreation opportunity spectrum classes.” It goes on to say, “The interdisciplinary team should be proactive in developing a coherent system of sustainable and socially compatible recreation opportunities.”

The Revised Land Management Plan at 4.3 – Sustainable Recreation Management contains twenty-two plan components as well as management action suitability determinations regarding sustainable recreation. These include goals, desired conditions, standards, guidelines and suitability determinations for developed recreation sites and recreation opportunity classes. I will not repeat all of those plan components here but suffice it to say they were developed to guide recreation related projects to ensure the recreation resources, infrastructure, settings and opportunities are maintained, protected or improved in a sustainable manner, and work with other resource plan components to ensure ecological, economic and social sustainability of the Nez Perce-Clearwater and the surrounding communities.

Other resource sections also have plan components that directly relate to recreation activities and improvements to ensure the protection and sustainability of their specific resource integrated with the recreation resource. I will not repeat all these, but a few examples include:

Section 2.1.2 – Biophysical Features, FW-GDL-BIOPHY-03. “To protect significant cave resources, those identified as such under the federal Cave Resources Protection Act should not be signed, disclosed on maps, mentioned in brochures, or have monument markers.”

Section 2.2.8 – Recreation (Aquatics and Riparian), FW-DC-ARREC-01, “Recreation facilities and their use, including trails and dispersed sites, have minimal impacts on aquatic resources, including threatened and endangered species, designated critical habitat, and species of conservation concern.”

Section 2.3 – Wildlife, FW-GDL-WL-05, “New authorizations and permit reauthorizations for domestic goat packing should include provisions to prevent disease transmission between domestic goats and bighorn sheep.”

Section 2.3.2 – Multiple Use Wildlife, MA2-DC-ELK-02, “Areas at least 5000 acres in size exist without motorized access open to the public to maintain habitat use by elk. Areas of high and moderate nutrition potential remain unfragmented by new motorized trails.”

Section 4.1 – Cultural Resources, FW-GDL-CR-02, “Recreation management activities at developed and dispersed recreation sites that adversely affect historic properties should have those effects resolved/mitigated.”

These are examples to show the integration of multiple resource plan components to provide for sustainable recreation and ecological sustainability. Commenters are encouraged to refer to the Land Management Plan for a complete listing of all Land Management Plan components.

Concern Primitive ROS-1: (letter number 717, comment 134)

Correct the winter Recreation Opportunity Spectrum setting for Rapid River to be classified as Primitive across all alternatives because the Hells Canyon National Recreation Act and its implementing regulations prohibit motorized and mechanized travel in Rapid River at all times of the year.

Response to comment

The Hells Canyon National Recreation Area Act of 1975, PL 94-199, establishing the Hells Canyon National Recreation Area, includes the Rapid River Wild and Scenic River and includes the following statement: “Sec. 3. (a) Subsection 3(a) of the Wild and Scenic Rivers Act (82 Stat. 906) is hereby amended by adding at the end thereof the following clauses: · "(11) Rapid River, Idaho.-The segment from the headwaters of the main stem to the national forest boundary and the segment of the West Fork from the wilderness boundary downstream to the confluence with the main stem, as a wild river. And “Sec 3(b) The segments of the Snake River and the Rapid River designated as wild or scenic river areas by this Act shall be administered by the Secretary in accordance with the provisions of the 'Wild and Scenic Rivers Act (82 Stat. 906). . .”

The Hells Canyon National Recreation Area, Comprehensive Management Plan states: “Although the HCNRA is administered by the WWNF, the Nez Perce and Payette National Forests coordinate with the WWNF to manage the portions of the HCNRA in Idaho. The Land Management Plans for the Nez Perce and the Payette National Forests provide direction to administer those portions of the HCNRA according to the Land Management Plan for the WWNF (USDA 1990 as amended).” That Plan provides the following direction: “Roa-S6: The use of motorized and mechanical equipment on designated Forest Service roads, trails, and backcountry airstrips is prohibited on wild and scenic river segments classified "wild" except as provided for by the authorized office upon a determination that such use is necessary for the administration of the river or to protect and enhance the values for which the river was designated as provided in the Imnaha River Wild and Scenic River Management Plan (USDA 1993), the Wild and Scenic Snake River Recreation Management Plan (USDA 1999), and in this plan for the Rapid River corridor. (Public LURs, 36 CFR 292.44(b)(2), Imnaha WSR Plan, Snake River Plan)

Forest Service Handbook 1909.12, Chapter 80 provides direction for Wild and Scenic River Classification Criteria for Wild, Scenic and Recreational River Areas – 82.8 – Exhibit 1. As per that direction, “Wild rivers are generally inaccessible except by trail. No roads, railroads, or other provision for vehicular travel are permitted within the river area.” This direction does not distinguish between motorized and mechanized vehicles.

Under the Recreation Opportunity Spectrum, two ROS classes are not suitable for motorized use - semi-primitive non-motorized and primitive. All alternatives considered in detail, including the Preferred Alternative, include an ROS class of semi-primitive non-motorized for Rapid River, thus, meeting the intent and direction of both the Hells Canyon National Recreation Area Act and the Wild and Scenic Rivers Act for motorized vehicles. This can be found in Appendix A – Maps, for summer and winter ROS. ROS does not address limitations on non-motorized use except within designated wilderness.

The FEIS, section 3.6.1.– Designated Wild and Scenic Rivers, discusses the Rapid River Wild and Scenic River. In the discussion regarding the Effects to the Resource from Other Resources, Recreation and Access, consistent with the HCNRA ACT, Comprehensive Management Plan, it is stated that the use of motorized and mechanical equipment on designated Forest Service roads, trails, and backcountry airstrips is prohibited on wild and scenic river segments classified "wild" except as provided for by the authorized office upon a determination that such use is necessary for the administration of the river or to protect and enhance the values for which the river was designated.

Appendix M: Response to Comments

The Revised Land Management Plan, Section 5.5.2- Designated Wild and Scenic Rivers contains the following plan component: MA1-STD-DWSR-01. Management activities in designated wild and scenic river corridors shall comply with their individual comprehensive management plan.

Considering all this direction, changes to the winter ROS is not necessary or appropriate.

Concern Statements - Recreation Access - Motorized Use - General, Motorized Trails, Snowmobiling-1, 2, 3, 4 and Trails 3

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
52	1	17453	3	109	7
63	2	17508	1	112	1
67	1	17603	1	123	1
77	2	17604	1	137	1
80	3,4	17628	2	139	1
88	3,4	17645	2	160	1
316	20	17649	1,2	165	1
567	14,15,16,17,20,21	17673	3,7,12	166	1
581	1	17688	4,57,58	167	1
587	16	17830	2	168	1
669	4	17835	1	169	1
674	6	17868	7,8	182	1
694	1	17869	1	232	1
717	131	17872	6	244	1
841	1	17892	3	254	1
1092	1	17916	24 comments	260	1
3110	13,19	7	1	263	1
8392	4	12	2	264	1
15386	2	32	1	282	1
16858	1	43	1	289	1
17297	9	84	1	307	96,111,117
17309	1	93	1,5	332	2
17337	1	94	1	340	1
17355	4	97	2	346	2
17358	1	98	3	363	1
17362	1,4	101	1	372	2
17382	1	105	2	379	1
395	5,7,8,9,10	671	1	1105	2
410	1	685	1	1110	5
411	1	687	5	1115	3
412	4	597	1		
430	1,2	712	1		
440	1	716	1		

Appendix M: Response to Comments

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
462	3	717	135,137		
464	1	764	7		
468	3	805	29		
500	1	847	1		
507	2	867	1		
529	1,5,12,17,20,29, 30	877	32 comments		
534	1	889	2		
554	1	906	1		
558	1	914	3		
561	1	929	1		
562	4	930	1		
564	1,2	960	5		
567	1,2,3,7,18,19	968	11		
568	1	976	1		
572	2	978	2		
573	2,7	992	2		
587	20,29	993	1		
598	1	1016	1		
603	1	1020	1		
605	1	1021	1		
609	1	1033	1		
628	1	1035	1		
638	1	1039	1		
639	1	1068	6		
647	1	1076	11		
654	1	1086	1		
660	2	1092	2		
661	1	1097	2		
667	1,2	1103	2		

Response to comment

Direction related to recreational trails in Land Management Planning is found in FSH 1909.12, Chapter 20, 23.23L(3) that directs the Plan to include desired conditions for recreation trails, may include objectives and may identify the types of trails and recreational use that are suitable or not suitable in a management or geographic area. FSH 1909.12, Chapter 20, 23.23A(2)(a), states that the agency must include desired conditions using mapped desired recreation opportunity spectrum classes and (d) should include suitability determinations for motorized recreation consistent with the desired recreation opportunity spectrum.

The 2005 Travel Management Rule (36 CFR part 212) directs national forests to designate a sustainable system of roads, trails, and areas that are open for motor vehicle use and prohibit use of motor vehicles

off the designated system or outside the designated area. As per this direction, decisions regarding motorized use of specific roads and trails is accomplished through travel management planning which is a separate process from Land Management Planning. The Clearwater NF recently completed travel planning and the Nez Perce NF was in process. This is addressed in the Land Management Plan, Section 1.6, Alternatives Considered but Eliminated from Detailed Study –An Alternative that specifies desired (or mandated) motorized road and trail densities across the Forest. This states, in part, “While the Land Management Plan sets the stage for travel planning, the plan is not travel planning and becoming too specific may limit the range of possible solutions during travel planning.”

The analysis shows that, under the Preferred Alternative, approximately 55% of the Forest is suitable for summer motorized recreation and approximately 60% is suitable for winter motorized recreation. However, suitability only determines appropriateness of lands for various uses or activities. This should not be taken to mean that all these acres would have motorized recreation occurring on them. Many factors limit where motorized travel can occur including terrain, vegetation, weather and snow conditions, as well as restrictions imposed by Plan Components and the Idaho Roadless Rule. Site specific, or road or trail specific, decisions outside the scope of land management planning will be made through travel management planning that more specifically analyzes and addresses these factors.

Consistent with agency direction, the Land Management Plan Revision process utilized the Recreation Opportunity Spectrum to identify areas suitable for summer and winter motorized recreation for each alternative analyzed, including the Preferred Alternative. This addresses comments related to motorized access that were broader in scope. This is found in the FEIS, 3.4.2 – Sustainable Recreation. Section 3.4.2 states, in part, “The desired recreation opportunity spectrum varies by alternative to address the diversity of opinions received from the public, as well as to fully analyze resource impacts from changes in the amount of available motorized versus non-motorized acres.” Comparative analysis between alternatives to and from summer and winter motorized recreation is presented in this section.

Additional analysis related to the effects of motorized access on numerous wildlife species can be found throughout the FEIS 3.2.9 - Wildlife. As example, the elk analysis under the section on Recreation and Access Management states, in part, “Elk avoidance of all-terrain vehicles and dirt bikes on motorized trails has been shown to be similar to or greater than the avoidance of forest roads open to public motorized access (Wisdom et al. 2004), and “Motorized over snow travel within winter range for big game could be detrimental to winter survival. While in the summer, elk might move in response to motorized use, in winter they often do not have other places to go because of deep snows. In the Preferred Alternative, some areas used by big game were identified as not suitable for winter recreation to help protect wintering big game. Fortunately, most snowmobiling is not desirable in the same areas as those providing for big game winter range.” Commenters are encouraged to read the Sustainable Recreation and Wildlife sections of the FEIS and Land Management Plan components for Sustainable Recreation to fully understand the analysis and rationale for the Record of Decision.

Many comments included in this concern statement were focused on specific activities or specific roads, trails or areas. However, the Land Management Plan decision is strategic in nature. The Plan does not authorize projects, activities or site-specific prohibitions, commit the Forest Service to take action, or dictate day-to-day administrative activities needed to carry on the Forest Service’s internal operations. The land management plan programmatic management direction will be implemented through planning, implementation, and monitoring of site-specific activities. Site-specific analysis in compliance with the NEPA will need to be conducted for prohibitions or activities to take place on the ground in compliance with the broader direction of the Land Management Plan.

Based on the analysis as documented in the project record, the Land Management Plan components were developed to provide ecological integrity that preserves the myriad of plant and animal species found in the planning area while providing a diversity of motorized and non-motorized recreation access and opportunity which, in turn, supports a range of social and economic benefits.

Commenters are encouraged to review the Land Management Plan components and FEIS analysis sections on sustainable recreation, aquatics, wildlife, et.al. for an understanding of the effects to and from motorized access to these resources and how Plan components address effects.

Concern Statements: Recreation Opportunity Spectrum 1, 2, and 4

These comments focused on ensuring that the Recreation Opportunity Spectrum promotes a balance of recreational opportunities between motorized and non-motorized opportunities, providing ROS settings that ensure sustainable recreation. Several letters mentioned analyzing the effects of motorized travel on wildlife. Many letters recommended ROS classes for specific Idaho Roadless Areas or by management area.

Some comments focused on specifics of the Recreation Opportunity Spectrum (ROS) classes, suggesting new classes, changes to the meaning of the classes, or changes to activities suitable or not suitable within those classes. Such as suggesting addition of direction for mechanical uses within some classes. The Recreational Opportunity Spectrum is national direction provided through the ROS Users Guide. Changes to this national direction are outside the scope of this Land Management Plan revision and therefore are not addressed in the FEIS or the following response to comments.

Letter #	Comment #
307	95
529	2,3,4,7,9,10,11,13
567	9
587	11,12,14,15
717	126,127,128,133
805	79
877	680,681,682,683,698
938	21
3110	16,20
16856	1,6
17355	5
17509	12

Response to comment

The 2012 Planning Rule (36 CFR 219.10(b)(i) states, in part: The plan must include plan components, including standards or guidelines, to provide for: Sustainable recreation; including recreation settings, opportunities, and access; and scenic character. Recreation opportunities may include non-motorized, motorized, developed, and dispersed recreation on land, water, and in the air.

Implementing direction is found in FSH 1909.12, Chapter 20, section 23.23a. Included in that direction, at 23.23a2a, it states: The Plan “must include desired conditions for sustainable recreation using mapped desired recreation opportunity spectrum classes. This mapping may be based on management areas,

geographic areas, designated areas, independent overlay mapping, or any combination of these approaches.”

The FEIS, Chapter 2. Alternatives discusses the development of the alternatives. This explains that the range of alternatives developed and presented is based on a preliminary evaluation of the information gathered from public and internal comments and the purpose and need for the project. All alternatives were developed to meet agency responsibility to be ecologically, socially and economically sustainable as per the Planning Rule. While all alternatives provide a wide range of ecosystem services and multiple uses, each alternative emphasizes specific land and resource uses and de-emphasizes other uses in response to the revision topics. Therefore, the alternatives present a range of possible management options from which to choose.

The forest identified four significant issues through scoping. Issue 2 is related to recreation and access management and states: “The proposed action may not adequately apportion motorized and non-motorized recreation access opportunities in the front country (MA3) and backcountry (MA2) areas across the Nez Perce-Clearwater.”

The FEIS at 3.4.2 states: “The Forest Service utilizes a framework called the recreation opportunity spectrum, which describes different settings across the landscape and the attributes associated with those settings. The recreation opportunity spectrum has six distinct classes in a continuum that describe settings ranging from highly modified and developed to primitive and undeveloped (Clark and Stankey 1979);(U.S. Department of Agriculture 1982).

The FEIS at 3.4.2 states: "In addition to the goal of providing access to the forest and within the forest, the Forest Service also strives to provide opportunities for recreationists to obtain satisfying recreational experiences by offering choices in both types of settings and activities."

In consideration of this goal, the alternatives analyzed include differing configurations of ROS across the landscape that provide motorized and non-motorized opportunities. The Preferred Alternative has a mosaic of ROS settings that provide a variety of motorized and non-motorized recreational opportunity considering social, economic and ecological values.

The FEIS at 3.2.9 discusses and analyzes effects to wildlife from a variety of management actions including recreation and access management. While this analysis is not discussed in terms of ROS classes, it does address effects of motorized and non-motorized recreation on wildlife. These types of activity would coincide with the appropriate ROS class.

The Land Management Plan component FW-DC-REC-02 states: “Recreation opportunities are available across a variety of settings that foster quality year-round developed and dispersed experiences, as well as motorized and non-motorized opportunities as described by the desired recreation opportunity spectrum (ROS). These settings reflect the integration of other resource values in a sustainable manner with the desired recreation opportunities, access, facilities, and infrastructure provided within those settings.”

Land Management Plan component FW-GDL-WLMU-01 states: “When implementing projects, consider taking action to improve effectiveness of road closures and other travel plan decisions to reduce unauthorized motorized use.”

Land Management Plan component FW-GDL-WLMU-03 states: “In order to reduce disturbance to wintering big game during their most challenging season, management activities should not be authorized in big game winter range between December 1 and March 15th.”

Land Management Plan component MA2-DC-ELK-02 states: “areas at least 5000 acres in size exist without motorized access open to the public to maintain habitat use by elk. Areas of high and moderate nutrition potential remain unfragmented by new motorized trails.”

In consideration of the issues brought forward, analysis regarding the interaction between recreation and wildlife was completed and documented in the FEIS 3.2.9 - Wildlife. This analysis focused on areas utilized by at-risk wildlife species as well as elk winter range, and areas preferred by summer and winter motorized recreationists. The result of the original and additional analysis is reflected in the ROS classes as depicted in Land Management Plan maps.

Concern Statements: Recreation Opportunity Spectrum 3 (letter number 587, comment 15)

This concern statement is focused on the appropriateness of the Recreation Opportunity Spectrum classes and snowmobiling. They suggest that the Forest adopt an additional Recreation Opportunity Spectrum class, unique to snowmobiling in certain settings called “Primitive Motorized.”

Response to comment

Forest Service Handbook 1909.12, Chapter 20, 23.23a discusses sustainable recreation including recreation settings, opportunities and access. That direction states that the plan must include desired conditions for sustainable recreation using mapped desired recreation opportunity spectrum classes. And should include suitability determinations for motorized recreation including over the snow vehicles consistent with the desired ROS class.

The Recreation Opportunity Spectrum (ROS) is a system for classifying and managing recreation opportunities based on the following criteria: physical setting, social setting, and managerial setting. The concept of a Recreation Opportunity Spectrum is national in scope and used by numerous federal and state agencies. For the Forest Service, this concept is inculcated in management principles and use through the ROS Users Guide.

The ROS classifies forest service lands into six management class categories defined by setting and the probable recreation experiences and activities it affords. These nationally defined classes include Urban, Rural, Roaded Natural, Semi-Primitive Motorized, Semi-Primitive Non-Motorized and Primitive. ROS is the primary tool for providing recreation input to Land Management Planning.

The FEIS at 3.4.2 states: “The Forest Service utilizes a framework called the recreation opportunity spectrum, which describes different settings across the landscape and the attributes associated with those settings. The recreation opportunity spectrum has six distinct classes in a continuum that describe settings ranging from highly modified and developed to primitive and undeveloped (Clark and Stankey 1979, U.S. Department of Agriculture 1982).”

Development of a new ROS class is beyond the scope of this Land Management Plan. However, a forest may develop ROS subclasses to further define the setting or opportunity associated with a specific physical, social or management component within the class. It is important to note that any such subclass must be consistent with, and support the character and objectives for the setting, and opportunity and experience of the class; it is not intended to provide exceptions to those characteristics. By definition, the Primitive ROS class has no motorized activity. Therefore, a subclass of Primitive Motorized is not consistent with or support this ROS class and is not warranted or appropriate.

Concern Statement: Scenic Integrity Objectives 1 (1 comment in letter # 307)

This comment states: Different management practices are needed in the visual travel corridor. Identification of these areas in a separate management area is important to meet visual quality objectives and account for the different management practices that will be necessary to achieve both visual management and vegetative treatment objectives.

Response to comment

Forest Service Handbook 1909.12, Chapter 20, 23.23f, provides direction for scenery, aesthetic values, viewsheds and geologic features. This section iterates that the Planning Rule requires that the plan must include components, including standards or guidelines, to provide for scenic character (36 CFR 219.10(b)(1)(i)). The handbook points out that the Scenery Management System (SMS) is the framework for developing plan components related to scenic character.

The Scenery Management System is found in Agriculture Handbook Number 701, Landscape Aesthetics – A Handbook for Scenery Management. A key part of this sophisticated system is the identification and mapping of scenic integrity objectives. As explained in this handbook, the frame of reference for measuring achievement of scenic integrity levels is the valued attributes of the existing landscape character being viewed. Scenic integrity levels range from very high to unacceptably low. The SMS recognizes the importance of travelways and use areas in identifying the landscape character being viewed and directs that they be identified and classified in order to determine which existing observer positions to use in the landscape visibility analysis. The SMS also emphasizes that viewsheds are specific elements to be considered because they describe areas seen from certain view locations such as roads, trails, or campgrounds, i.e. travelways and use areas.

The FEIS, Chapter 3.4.3 addresses the scenery resource. Here, it is pointed out that the analysis focuses on three main components of managing the scenery resource. First, determining the existing condition of scenic quality across the Nez Perce-Clearwater. Second, determining the desired condition, measured by desired scenic character descriptions, of scenery in the future. And, third, determining the potential effects of the proposed alternatives on the desired scenic character. The analysis reviews the alternatives in the context of the Land Management Plan components. Scenic integrity objectives as displayed in maps in Land Management Plan Appendix 1 along with land management plan components found in the Land Management Plan provide guidance in the planning, design and implementation of management actions to meet desired scenic character of any given area. Therefore, the development of separate management areas was not warranted.

Concern Statement: Semi-Primitive Non-Motorized-2 (letter number 877, comment 2)

Modify the definition for the Semi-Primitive Non-Motorized classification to make it clear that electric bicycles are not included.

Response to comment

The Forest Service has interpreted e-bikes as motor vehicles as that term has been defined under the 2005 Travel Management Rule (36 CFR 212.1). The TMR defines “motor vehicle” as “any vehicle which is self-propelled, other than: (1) a vehicle operated on rails; and (2) any wheelchair or mobility device, including one that is battery-powered, that is designed solely for use by a mobility-impaired person for locomotion, and that is suitable for use in an indoor pedestrian area.” 36 CFR 212.1

E-bikes have a motor, thereby are self-propelled, and are not covered by the exception in the definition stated above. Therefore, the Forest Service currently manages electric bicycles (e-bikes) and electric

mountain bikes (eMTB) as motorized vehicles. Table note 3 to Table 321 in the FEIS, Chapter 3.4.2 – Sustainable Recreation clarifies that e-bikes are considered as motorized vehicles. With this in mind, by definition, e-bikes and e-mountain bikes would be suitable in Rural, Roaded Natural and Semi-Primitive Motorized ROS classes and not suitable in Semi-Primitive Non-Motorized and Primitive ROS classes. A modification of the definition is not appropriate or necessary.

Concern Statement: Trails 1, 3

Letter #	Comment #
970	4
1116	2
3110	18,19
17349	23

Response to comment

Direction regarding trail design and maintenance is provided in Forest Service Handbook 2309.18

Decisions regarding trail maintenance levels, schedules and priorities are management operational decisions and/or site-specific decisions beyond the scope of this Land Management Plan. However, the Land Management Plan does provide Plan components that addresses trail maintenance. These are found in: FW-OBJ-REC-01. Annually maintain to standard a minimum of 30 percent of National Forest System trail miles. And FW-OBJ-REC-02. Reduce deferred maintenance of trails by five percent, every five years.

Terrestrial Ecosystems

Concern 1:

The plan components in Chapter 2.1, Terrestrial Ecosystems, contain redundancies and errors in labeling, and they are often too specific, creating redundancy. The Forest Service should combine or eliminate some of these plan components.

Letter #	Comment #
1060	68, 69, 71

Response to Comment

Thank you for your comment. Plan components across the entire land management plan have been updated to address redundancies and errors.

Concern 2: (letter number 1060, comments 29, 70)

The Forest Service should include an additional guideline or standard to address critically imperiled species, including those with uncommon habitat elements.

Response to comment

As described in the wildlife analysis (section 3.2.9), at-risk species are addressed through a coarse- and fine-filter approach consistent with the direction in FSH 1909.12 sections 23.11 and 23.13. The directives state “The plan components developed for ecosystem integrity and ecosystem diversity (sec. 23.11) are expected to provide the ecosystem (coarse-filter) approach to maintaining the persistence of native

species within the plan area, including the at-risk species identified during the assessment... When the evaluation reveals that plan components for ecosystem integrity and ecosystem diversity or other plan components would not provide the ecological conditions necessary for one or more at-risk species, the responsible official shall develop additional species-specific plan components for those individual species (fine filter)” (FSH 1909.12 23.13).

Desired condition FW-DC-TE-02 and guideline FW-GDL-TE-01 are examples of fine-filter components that provide direction for the long-term persistence of groups of endemic species associated with specific uncommon habitat elements (mineral licks, talus slopes, fractured wet bedrock, rocky outcrops, scree slopes, waterfalls, and geologic inclusions). These components are not intended to provide for all at-risk species. At-risk species not associated with these uncommon habitat elements are addressed through many other plan components at both the ecosystem-level (e.g., FW-DC-WL-02, FW-DC-WL-03, FW-GDL-WL-01, FW-GDL-WL-02) and species-level (e.g., FW-DC-WL-04, FW-DC-WL-05). Appendix C of the FEIS (Wildlife Species and Habitat Summary) provides a complete crosswalk of at-risk species, threats to their habitat, key ecosystem characteristics of habitats, and how plan components provide for those habitats and address threats to at-risk species.

The full suite of plan components is designed to provide for the persistence of native species within the plan area, including at-risk species. The FEIS has a new table in Appendix C (Wildlife Species and Habitat Summary) to show how the different plan components address threats to at-risk species.

Vegetation Management

Concern 1: (letter number 307, comment 39)

The harvest outputs shown in Appendix B of the Draft EIS are not consistent with the objectives in the draft Forest Plan and suggest that more acreage would be required in Management Area 2. The Forest Service should reconsider treatment acres in each management area to ensure consistency between the Draft EIS and revised Forest Plan.

Response to comment

Based on both public comment and internal review processes; numerous edits have been made to the Revised Forest Plan and supporting Environmental Impact Statement and supporting appendices.

Approximately 46 percent of management area 2 is classified as unsuitable lands where timber harvest may occur. The 2008 Idaho Roadless Rule dictates that only 1 percent of these lands may be harvested per decade and that any such harvest results from forest restoration treatments intended to protect or enhance resource values other than timber. Refer to the EIS Timber section 3.5.1 for a full breakdown of unsuitable lands by management area. Approximately 16 percent of management area 3 is classified as unsuitable lands where harvest may occur. These management area 3 lands are primarily associated with the outer portion of riparian zones. These outer riparian zone acres are subject to the same restrictions as those acres within management area 2; management objectives are not focused on timber management. On portions of the forest classified as unsuitable lands where timber harvest may occur the intent is to allow natural processes such as wildfire to play a dominant role in achieving desired conditions. These lands are expected to respond under a more natural fire regime and recover to a species composition dominated by seral species. To facilitate this transition the forest plan expresses objectives to plant seral species such as ponderosa pine, western larch and western white pine following wildland fires.

Appendix B Table 13 is replaced with Table 15 and refers to MA3 only. Estimate of acres has been updated through updated suitability analysis (GIS). Treatment objectives for harvest and prescribed

burning are updated in Formulation of Alternatives section of Appendix B and the Objectives Tables of the Revised Forest Plan.

PRISM model inputs for amount of wildland fire on the landscape by MA and PVT group are illustrated in Tables 42 through 57 of Appendix B.

Available treatment prescriptions by dominance type and PVT group can be found in Appendix B, Table 38 – Available prescriptions used in the PRISM model. Available silviculture prescriptions are specific to each dominance type / broad potential vegetation type group combination. Even-aged regeneration harvest prescriptions are applied on approximately 65 percent of the treated acres by the PRISM model which reflects the current average for regeneration harvest prescriptions.

Potential harvest acreages are a function of the pace and scale strategy of each action alternative. Desired conditions and constraints on timber harvest are applied equally across all alternatives. Variation in harvest schedules between alternatives is a function of the amount of area classified as suitable for timber production and unsuitable lands where timber harvest may occur to accomplish other resource objectives as well as the pace and scale of restoration defined for each alternative. All lands within management area 2 are classified as unsuitable for timber production. A subset of these lands are classified as unsuitable lands where harvest may occur to accomplish other resource objectives based on the theme of the Idaho Roadless Area and constraints of open road system proximity. Refer to the Timber Suitability Section of the EIS for a discussion of the timber suitability analysis. Unsuitable lands where timber harvest is allowed and lands suitable for timber production by alternative are described in the Timber Suitability Section of the EIS.

The PRISM model is used to generate estimates of the harvest schedule needed to accomplish desired conditions for each alternative. Desired conditions for forested vegetation are informed by the natural range of variation. The natural range of variation analysis and results are presented in Appendix B, NRV Results. The vegetation management strategy and analysis units associated with each alternative is presented in Appendix B. Analysis units describe the metrics and constraints imposed on the PRISM model and are applied consistently across all alternatives.

The Nez Perce- Clearwater is currently working with Idaho Fish and Game to map existing aspen clones. Aspen generally occurs as scattered clones intermixed with conifer species. Aspen dominance has declined due to multiple factors such as natural forest succession and reduce disturbance resulting from fire suppression. Most mapped aspen clones occur within MA2. Prescribed fire will be the primary tool used to accomplish aspen restoration objectives. Mechanical treatments may also be used to remove conifer species from aspen clones. Aspen objectives are developed by applying a one (1) percent objective for all MA 2 and MA 3 lands and dividing by the number of years projected to attain desired condition specific to each alternative. The totals acres of both MA 2 and MA 3 combined is 2,707,419 acres. The value is the same for all alternatives. The rate of change or “pace” to achieve desired conditions varies for each alternative. For Alternative Z, this is 100 years. The resulting annual treatment objective is 271 acres per year. Given that 100 years is the approximate life span of aspen, this alternative will accomplish less aspen restoration and will further jeopardize the continued existence of aspen on the forest.

Plan components for the retention of old growth forest cover types are the same for all alternatives. Plan components MA2 and MA3-DC-FOR-10, MA3-STD-FOR-01, MA2 and MA3-GDL-FOR-02, MA2 and MA3-GDL-FOR-03, MA2 and MA3-GDL-FOR-04 are designed to promote resilient old growth cover types across all PVT groups. Desired conditions for size class distribution are illustrated in the Land Management Plan and include FW-DC-FOR-05 (Table 4), FW-DC-FOR-08 (Table 6), FW-DC-FOR-11

(Table 8), and FW-DC-FOR-12 (Table 10) are designed to provide recruitment of larger size classes to provide opportunities for old growth and niche habitat recruitment.

Concern 1 – Terrestrial Ecosystems – Old Growth

The Draft Forest Plan allows logging of old growth forest but does not provide measurable, enforceable or sufficient standards to protect existing old growth. Old growth protections do not address minimum quantities required to support old growth dependent species, rare plant communities, water resources and carbon sequestration as described by best available science.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
23	2	717	206, 207, 208	7176	8
24	3	877	329, 337, 321, 328, 325, 341, 324, 335, 339, 331, 333, 336, 338, 318, 320, 322, 317, 323, 316, 332, 313, 334, 319, 340, 327, 330, 342, 326, 314, 315,	17304	4
60	2	887	3	17462	4
276	4	938	29, 30, 31	17507	5
307	42, 41, 36, 46, 40, 132, 133	941	5	17733	4
397	6	968	3	17868	11
465	14	1054	14, 15	17898	7
683	1	1099	7	17910	1

Response to comment

The 2012 Planning Rule and Forest Service Handbook 1919.12 – Chapter 20 – Land Management Planning Handbook, require that forest plans provide for the sustainability of ecosystems and resources; meet the need for forest restoration and conservation, watershed protection, and species diversity and conservation; and assist the Agency in providing a sustainable flow of benefits, services, and uses of NFS lands that provide jobs and contribute to the economic and social and spiritual sustainability of communities. Specific guidance related to the development of old growth plan components is taken from Green et al., 1992, errata 12/11.

In general, old growth stands are in the late stages of stand development and are distinguished by old trees and related structural attributes. These old growth stands are typically distinguished from earlier structural stages by combinations of characteristics such as tree age, tree size, number of large old trees per acre, and stand density expressed as basal area. Specific values for these attributes vary by broad potential vegetation type (revised forest plan appendix B section 1.2). Tables 43 to 45 in the FEIS (section 3.2.1, pages 229 to 230) display the minimum criteria for old growth across the range of potential vegetation types on the Forest. Old trees (more than approximately 150 years old, depending on the old growth type) regardless of their size offer important ecological functions (FEIS appendix C) and size is only one criterion used to define old growth types. That said, there are plan components in place to retain old growth. Standard MA3-STD-FOR-01 directs management to maintain and increase resilient and underrepresented old growth over time. Guidelines MA2 and MA3-GDL-FOR-02 and MA2 and MA3-

GDL-FOR-04 ensures that all management actions in old growth are undertaken with the express purpose of increasing or restoring resistance and resiliency of old growth stands while guidelines MA2 and MA3-GDL-FOR-03 would further protect old growth from fragmentation resulting from permanent road construction. Desired conditions and guidelines for noxious weed management (FW-DC-INV-01, FW-GDL-INV-01) further enhances protections for old growth stands including the potential noxious weed spread resulting from temporary or permanent road construction and maintenance. In addition, plan components that describe within-stand characteristics protect large live legacy trees on the landscape and large tree structure in order to provide structural diversity, wildlife habitat, future snags, aquatic and rare native plant communities, and potential for future late-seral forest conditions (MA3-GDL-FOR-06, FW-DC-FOR-04, FW-DC-FOR-07, FW-DC-FOR-10, MA1 and MA2-DC-FOR-09 and MA3-DC-FOR-07, FW-DC-TE-01 through 05) as well as current and desired conditions outlined in the FEIS section 3.2.1.

A large-tree structure analysis has been added to Section 3.2.1 of the FEIS to both better describe this attribute and to illustrate the relationship between the distribution of large trees and the occurrence of old growth on the forest. The amounts and distribution of old growth on the forest is dependent on the frequency and distribution of large and very large trees as well as disturbance processes which influence large tree development. This relationship is described in detail in Section 3.2.1 of the FEIS.

Because the definition of old growth requires such fine-scale data, it was not possible to accurately model either the natural range of variation or future trajectory of old growth (FEIS appendix B). However, the historic condition of the large size class condition, a subset of which would have been old growth, is estimated and disclosed (FEIS section 3.2.1, and FEIS appendix B). The FEIS discloses existing levels of old growth by cover type and broad potential vegetation type at the forestwide scale and describes why this is appropriate given available data (section 3.2.1). Section 3.2.1 in the FEIS describes why it is not possible to predict future old growth levels with an acceptable degree of precision, but notes that implementation of the plan is expected to result in maintaining the current amount of old growth on the Forest commensurate with disturbance regimes. The FEIS provides a modeling analysis and results related to late successional forest (large size classes). The analysis discloses predicted percentages in the very-large size class condition over time and predicts an increasing trend in all alternatives and in all potential vegetation types (section 3.2.1; appendix B). Appendix B of the FEIS describes the methods used to model future vegetation conditions and model limitations.

Monitoring protocols for old growth within Region 1 are found in “Northern Region Old Growth Inventory and Monitoring Strategy” as well as the rationale for using FIA data to generate estimates of old growth and snags “Application of Forest Inventory and Analysis (FIA) Data to Estimate the Amount of Old Growth Forest and Snag Density in the Northern Region of the National Forest System” both located in the project record. The monitoring plan (appendix 3) of the revised forest plan lists monitoring plan components for forest vegetation including old growth (MON-FOR-05). In addition to long term monitoring of old growth forest; project specific old growth inventory by qualified personnel is required as per Region 1 guidance. Over the last twenty years there has been very little change in the forestwide percentage of old growth occurring on the Nez Perce-Clearwater.

The FEIS (section 3.2.9, Terrestrial Habitats) discusses species that utilize coniferous forests. Some wildlife species tend to use old growth forest disproportionately to its availability, however there are no old growth-obligate species on the Forest. Analysis in FEIS sections 3.2.9 and appendix C describe how plan components designed to maintain or increase old growth on the Forest will benefit wildlife species that may use old growth, as will additional plan components designed to maintain key habitat elements such as large and very-large trees.

The FEIS (section 3.2.7, Water Resources) outlines the current and projected indicators for water resources in term of both water quality and water quantity, effects of implementing the revised forest plan and stressors affecting water resources. There is no corollary between old growth and water resources. The greatest threat to both water resources and old growth is uncharacteristic wildland fire effects driven by climate change. Plan components FW-DC-WTR-01 and 02, are designed to ensure that water resource concerns are addressed at the project level scale. Carbon sequestration is addressed in the FEIS section 3.2.3. Late seral, near climax and climax old growth stages are considered carbon sinks while mid climax is carbon neutral and late climax emits more carbon per decade than is stored on a per acre basis. The greatest threat to the old growth carbon sink is uncharacteristic wildland fire resulting from climate change driven changes to disturbance regimes.

The revised forest plan contains plan components which integrate social, economic, cultural and ecological considerations and resources. Both the 2012 Planning Rule and FSH 1909.12 focus development and implementation of planning components in the context of desired multiple uses under an integrated framework. The revised forest plan is not an assemblage of unique plan components intended to guide management of individual resources but a collection of integrated plan components to promote multiple use management across all resources. All forest plan desired conditions carry equal weight and attainment of a given desired conditions cannot preclude attainment of another. The revised forest plan is intended to be implemented as a whole and not resource by resource.

Concern 2 - Terrestrial Ecosystems – Old Growth

The Draft Forest Plan confuses “(species) forest types” with “old growth types” and fails to provide specific areas for old growth forest protection or how it should be managed to promote ecosystem health. Old growth habitat may or may not meet the definition of old growth forest , so the Forest Service should provide criteria to define it, as well as desired versus undesired old growth types.

Letter #	Comment #
307	42, 132, 133
452	16
666	3
877	316, 317, 318, 321, 322, 323, 324, 325, 326, 327, 330, 331, 334, 335, 341, 342
17893	8

Response to comment

Both the 2012 Planning Rule and Forest Service Handbook 1919.12 – Land Management Planning Handbook are used to develop plan components for forested vegetation including stands exhibiting old growth characteristics. Plan components developed in the Nez Perce-Clearwater Forest Plan are designed to maintain ecosystem integrity at multiple scales while providing for ecological, social and economic sustainability. Plan components illustrated in Section 3.2.1 – Forestlands of the Forest Plan provide for long term persistence of old growth cover types at both project level and landscape scales. The portion of the Nez Perce-Clearwater that is subject to harvest represents 26 % of the total forest area as illustrated in FEIS Section 3.5.1, Table 357. Natural disturbance process will continue to dominate the composition, structure, function and connectivity of the forestwide landscape. As such, existing old growth patches are minimally impacted by forest management activities at the forestwide scale.

Because the definition of old growth requires such fine-scale data, it was not possible to accurately model either the natural range of variation or future trajectory of old growth (FEIS appendix B; FEIS section

3.2.1). However, the historic condition of the large size class condition, a subset of which would have been old growth, is estimated and disclosed (FEIS section 3.2.1, and FEIS appendix B). The FEIS discloses existing levels of old growth by cover type and broad potential vegetation type at the forestwide scale and describes why this is appropriate given available data (section 3.2.1). Section 3.2.1 in the FEIS describes why it is not possible to predict future old growth levels with an acceptable degree of precision, but notes that implementation of the plan is expected to result in maintaining the current amount of old growth on the Forest commensurate with disturbance regimes. The FEIS provides a modeling analysis and results related to late successional forest (large size classes). The analysis discloses predicted percentages in the very-large size class condition over time and predicts an increasing trend in all alternatives and in all potential vegetation types (section 3.2.1; appendix B). Appendix B of the FEIS describes the methods used to model future vegetation conditions and model limitations.

Green et al. represents the best-available science for identifying old-growth stands in the Northern Region. The definitions provided in Green et al. are used because the Forest requires a standardized, statistically quantifiable, and measurable set of characteristics to identify old growth at the project scale as well as for forestwide monitoring at the broad potential vegetation type scale (FEIS, section 3.2.1 and Land Management Plan Appendix 3).

Further, as explained in the FEIS (sections 3.2.1, 3.2.6, 3.2.9 and 3.5.1), the revised plan recognizes the values of forest attributes beyond those which meet the Green, et al. definition, such as plan components associated with forest size classes, very large tree components, and snags and down wood. This includes direction that recognizes these attributes and their potential contribution to future old growth habitat, such as by desired conditions (FW-DC-FOR-01 through 13 and FW-DC-WL-01 through 04) and guidelines for snags (MA3-GDL-FOR-05), live tree retention (MA3-GDL-FOR-06, and downed coarse woody material (MA3-GDL-FOR-01) within harvest units.

Plan components specific to each management area define old growth retention and recruitment strategies. Plan components MA2-DC-FOR-10 and MA3-DC-FOR-10 provide desired conditions for the retention and recruitment of old growth specific to management areas 2 and 3. In addition plan components MA2-GDL-FOR-02, MA2-GDL-FOR-03, MA2-GDL-FOR-04 and MA3-GDL-FOR-02, MA3-GDL-FOR-03, MA3-GDL-FOR-04 provide specific guidance for the protection and maintenance of resilient old growth cover types.

The revised forest plan provides direction for the management of old growth which is integrated with other plan components (within-stand characteristics, density, size class distribution, and landscape pattern and patch size) to achieve resilient vegetation desired conditions, including maintaining old growth habitat over time (FEIS section 3.2.1 and appendix B). Given this strategy, the plan includes a standard (MA3-STD-FOR-01) that addresses both resilient and underrepresented old growth types. Establishing desired condition for forest vegetation characteristics informed by NRV estimates including old growth is appropriate and describes the envelop of ecological conditions that recognize the full range of natural biological diversity. Standards constrain how management is conducted rather than compel a specific outcome. Therefore, establishing a standard for the future amount of desired old growth would not be appropriate.

The term “species” is not used in discussions of forest types or old growth discussions in general. The term “species” should not be confused with the concept of dominance type. Please refer to the discussion presented in Section 3.2.1 under Dominance Types, which illustrates the definition of this concept and how it is used in vegetation analysis. The concept of dominance type is corollary to the concept of old growth cover type as presented in Green et al. Dominance refers to the plurality of a species or species mix exhibited in a given patch of trees. For example, old growth types 4A and 4B may occur as any

number of old growth cover types such as Douglas-fir, grand fir, western larch, Engelmann spruce/subalpine fir, western hemlock, western white pine, or ponderosa pine. The old growth cover type reflects the dominant species occurring in the stand. The dominant species is a result of the interplay between succession and disturbance influencing a given stand over time.

The FEIS (section 3.2.9, Terrestrial Habitats) discusses species that utilize coniferous forests. Some wildlife species tend to use old growth forest disproportionately to its availability, however there are no old growth-obligate species on the Forest. Analysis in FEIS sections 3.2.9 and appendix C describe how plan components designed to maintain or increase old growth on the Forest will benefit wildlife species that may use old growth habitat, as will additional plan components designed to maintain key habitat elements such as large and very-large trees.

The phrase “desirable old growth” has been replaced with the phrase “resilient old growth” which more accurately describes the desired conditions for old growth as well as describes the natural range of variation of old growth cover types occurring within the fire regimes of the Nez Perce-Clearwater.

The revised forest plan contains plan components which integrate social, economic, cultural and ecological considerations and resources. Both the 2012 Planning Rule and FSH 1909.12 focus development and implementation of planning components in the context of desired multiple uses under an integrated framework. The revised forest plan is not an assemblage of unique plan components intended to guide management of individual resources but a collection of integrated plan components to promote multiple use management across all resources. All forest plan desired conditions carry equal weight and attainment of a given desired conditions cannot preclude attainment of another. The revised forest plan is intended to be implemented as a whole and not resource by resource.

Concern 3 - Terrestrial Ecosystems – Old Growth

The Forest Service should disclose the effects of permanent versus temporary roads on old growth patch size (fragmentation), edge effects, invasive plants, recruitment of old growth patches and any mitigations related to route selection and construction.

Letter #	Comment #
717	208
877	320, 339
938	31
1054	15

Response to comment

Forest plans do not authorize any specific actions. The effects of permanent versus temporary roads on old growth, potential for fragmentation of habitat and any mitigations related to route selection would be disclosed in project specific NEPA documents and subject to public review and comment. Clearly the effects of a temporary road are temporary and the effects of a permanent road are permanent as it relates to potential fragmentation of old growth habitat. The construction or reconstruction of any road (temporary or permanent) may increase edge effect and the potential for invasive weeds and the need to mitigate any effects disclosed in project level NEPA analysis and decision. Again these potential effects would be disclosed in any project specific NEPA documents and are subject to public review and comment.

Revised Forest Plan guidelines MA2 and MA3-GDL-FOR-03 provide guidance for the protection of old growth forest and old growth habitat from fragmentation resulting from permanent road construction. Desired conditions and guidelines for noxious weed management (FW-DC-INV-01, FW-GDL-INV-01) further enhances protections for old growth stands including the potential noxious weed spread resulting from temporary or permanent road construction, reconstruction and maintenance. Fire suppression will remain as a management tool within management area 3. Old growth stands are regarded in the same manner as all other forest patches (stands) in that fire suppression will be used to retard the spread of wildland fire to protect surrounding resources.

The revised forest plan provides direction for the management of old growth which is integrated with other plan components (within-stand characteristics, density, size class distribution, and landscape pattern and patch size) to achieve resilient vegetation desired conditions, including maintaining old growth habitat over time (FEIS section 3.2.1 and appendix B). Given this strategy, the plan includes a standard (MA3-STD-FOR-01) that addresses both resilient and underrepresented old growth types. Establishing desired condition for forest vegetation characteristics informed by NRV estimates including old growth is appropriate and describes the envelop of ecological conditions that recognize the full range of natural biological diversity.

The recruitment of old growth patches is dependent on the screening criteria presented in Green et al. 1992, errata 11/12 and subject to field verification. Plan components MA2-DC-FOR-10 and MA3-DC-FOR-10 promote the recruitment of old growth patches for resilient and underrepresented old growth cover types.

A forestwide opening patch size analysis “Using Natural Range of Variation Modeling to Estimate Historic Opening Size on the Nez Perce-Clearwater National Forests” is included in the project record. This analysis details the methods and assumptions related to estimating opening patch size metrics at the forestwide scale. Old growth patches are subject to the same disturbance regime dynamics that influence all forest cover types, size classes and structural stages.

Concern 4 - Terrestrial Ecosystems – Old Growth

The Forest Service should disclose old growth inventory procedures and verification processes and detail rational for minimum and maximum old growth patch sizes.

Letter #	Comment #
307	41
877	332, 333, 336, 338
946	7
17297	2

Response to comment

Forest plans do not authorize any specific actions. The effects of timber harvest (logging) on old growth forest would be disclosed in project specific NEPA documents and subject to public review and comment. The 2012 Planning Rule and Forest Service Handbook 1919.12 – Chapter 20 – Land Management Planning Handbook, require that forest plans provide for the sustainability of ecosystems and resources; meet the need for forest restoration and conservation, watershed protection, and species diversity and conservation; and assist the Agency in providing a sustainable flow of benefits, services, and uses of NFS lands that provide jobs and contribute to the economic and social and spiritual sustainability of

communities. Specific guidance related to the development of old growth plan components is taken from Green et al., 1992, errata 12/11.

Because the definition of old growth requires such fine-scale data, it was not possible to accurately model either the natural range of variation or future trajectory of old growth (FEIS appendix B; FEIS section 3.2.1). However, the historic condition of the large size class condition, a subset of which would have been old growth, is estimated and disclosed (FEIS section 3.2.1, and FEIS appendix B). The FEIS discloses existing levels of old growth by cover type and broad potential vegetation type at the forestwide scale and describes why this is appropriate given available data (section 3.2.) Section 3.2.1 in the FEIS describes why it is not possible to predict future old growth levels with an acceptable degree of precision, but notes that implementation of the plan is expected to result in maintaining the current amount of old growth on the Forest commensurate with disturbance regimes. The FEIS provides a modeling analysis and results related to late successional forest (large and very large size classes). The analysis discloses predicted percentages in the very-large size class condition over time and predicts an increasing trend in all alternatives and in all potential vegetation types (section 3.2.1; appendix B). Appendix B of the FEIS describes the methods used to model future vegetation conditions and model limitations.

Green et al. represents the best-available science for identifying old-growth stands in the Northern Region. The definitions provided in Green et al. are used because the Forest requires a standardized, statistically quantifiable, and measurable set of characteristics to identify old growth at the project scale as well as for forestwide monitoring at the broad potential vegetation type scale (FEIS, section 3.2.1 and Land Management Plan Appendix 3).

Old growth is inventoried through systematic remeasurement of forest inventory analysis plots. This process is described in Section 3.2.1 and Appendix B of the FEIS. An inventory data analysis software package (R1 SDB Estimator) has been developed by the Agency to assist in developing estimates from inventory data. The minimum screening criteria for old growth presented in Green et al. is used to estimate potential old growth frequency and distribution by management area. Verification of old growth patches is done at project specific scales and conducted by certified silviculturists.

The minimum old growth patch that can be tracked with inventory procedures is 5 acres. There is no upper limit on old growth patch size. The average patch size analysis presented in Section 3.2.1, of the FEIS provides an estimate of the average patch size by broad potential vegetation type.

A forestwide opening patch size analysis “Using Natural Range of Variation Modeling to Estimate Historic Opening Size on the Nez Perce-Clearwater National Forests” is included in the project record. This analysis details the methods and assumptions related to estimating opening patch size metrics at the forestwide scale. Old growth patches are subject to the same disturbance regime dynamics that influence all forest cover types, size classes and structural stages.

The FEIS (section 3.2.9, Terrestrial Habitats) discusses species that utilize coniferous forests. Some wildlife species tend to use old growth forest disproportionately to its availability, however there are no old growth-obligate species on the Forest. Analysis in FEIS sections 3.2.9 and appendix C describe how plan components designed to maintain or increase old growth on the Forest will benefit wildlife species that may use old growth, as will additional plan components designed to maintain key habitat elements such as large and very-large trees.

The revised forest plan contains plan components which integrate social, economic, cultural and ecological considerations and resources. Both the 2012 Planning Rule and FSH 1909.12 focus development and implementation of planning components in the context of desired multiple uses under an

integrated framework. The revised forest plan is not an assemblage of unique plan components intended to guide management of individual resources but a collection of integrated plan components to promote multiple use management across all resources. All forest plan desired conditions carry equal weight and attainment of a given desired conditions cannot preclude attainment of another. The revised forest plan is intended to be implemented as a whole and not resource by resource. On April 20, 2023, the USDA issued a technical report in fulfillment of Biden Executive Order 14072, Section 2(b)². This report provides definitions for mature and old-growth forests and an initial inventory of these conditions on lands managed by the Forest Service and Bureau of Land Management. This report presents the finding that Forest Service and Bureau of Land Management lands combined contain 32.7 +/- 0.4 million acres of old-growth and 80.1 +/- 0.5 million acres of mature forest, representing 18 percent and 45 percent of all forested land managed by the two agencies, respectively. This initial national inventory was conducted by applying the old-growth and mature working definitions to Forest Inventory and Analysis field plot data. To provide the initial inventory, the department provided narratives and working quantitative definitions for old-growth and mature forest for each NFS Region.

To quantify and estimate old growth, the authors of the technical report utilized Old Growth Forest Types of the Northern Region (Green et al. 2011) which has been used to define old growth in the Northern Region for decades. Prior to the mature and old growth report produced in response to President Biden's Executive Order (U. S. Department of Agriculture and U.S. Department of the Interior 2023), there was not a consistent definition of "mature forest." The quantitative definition presented in the technical report is considered a "working" definition appropriate for application for the national-scale inventory. As mentioned in the "Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management", the working definitions developed for the national inventory may need "further refinement... to apply working definitions at local scales due to diverse ecology, forest types, site characteristics, and varied management contexts" (U. S. Department of Agriculture and U.S. Department of the Interior 2023). At this time, the working definition has not been refined to the local scale; therefore, we do not currently have a quantitative estimate of mature forest on the Nez Perce - Clearwater National Forest.

Concern 5 - Terrestrial Ecosystems – Old Growth (letter number 452, comment 6)

Not all large tree stands currently meet old growth requirements; however, since the revision is set to cover 50 years, the Forest Service should recognize the possibility that large trees, in the range of 20-plus inches, could be exceeded toward the end of that period.

Response to comment

The 2012 Planning Rule and Forest Service Handbook 1919.12 – Chapter 20 – Land Management Planning Handbook, require that forest plans provide for the sustainability of ecosystems and resources; meet the need for forest restoration and conservation, watershed protection, and species diversity and conservation; and assist the Agency in providing a sustainable flow of benefits, services, and uses of NFS lands that provide jobs and contribute to the economic and social and spiritual sustainability of communities. Specific guidance related to the development of old growth plan components is taken from Green et al., 1992, errata 12/11.

A large-tree structure analysis has been added to Section 3.2.1 of the FEIS. This analysis illustrates the current distribution of large and very large trees on the Nez Perce-Clearwater as well as the relationship between large/very large trees and old growth stands. Existing conditions for large and very large trees is

² <https://www.fs.usda.gov/sites/default/files/mature-and-old-growth-forests-tech.pdf>

also compared to the projection of frequency and distribution of trees within the SIMPPLLE model environment.

Desired conditions for size class distribution defines the desirable range of size classes specific to each broad potential vegetation type. Desired conditions for size classes are informed by the natural range of variation analysis. The quantities and distribution of large and very large trees within management area 3 is approximated more efficiently than management areas 1 and 2 due to the ability to regulate size classes through vegetation management. Natural disturbance processes dominate the size class distributions within management areas 1 and 2. Given that desired conditions for size class are informed by the NRV analysis; it follows that desired conditions for size class are maintained through natural disturbance events for management areas 1 and 2.

While the vegetation analysis considers effects up to 50 years in the future, the land management plan is scheduled to be revised every 15 years.

Concern 1- Terrestrial Ecosystems – Forested Vegetation

The Forest Service should achieve desired conditions determined by best available science through management. This should be achieved through responsible timber harvest and prescribed burns, as allowed under the Idaho Roadless Rule, with monitoring and evaluating quantifiable and enforceable standards. The Forest Service should evaluate the effectiveness of its various treatments on hundreds of thousands of acres already burned or logged since the existing Forest Plan was adopted.

Letter #	Comment #	Letter #	Comment #
4	2	968	1
49	3	1054	10
873	9, 11, 48	1060	46
877	33, 65, 66, 119, 150, 796, 802, 804, 805, 806	16853	3
938	22, 25, 26		

Response to comment

The 2012 Planning Rule and Forest Service Handbook 1919.12 promote the adoption of the concept of natural range of variation as a foundation for development of desired conditions. The natural range of variation concept is considered best available science (Haugo and Welch, 2013), (Hessburg et al. 2015) for developing estimates of ecological systems and functions. Natural Range of Variation estimates of forest metrics provide an envelope of conditions (ranges) under which forested ecosystems are resilient and sustainable. Desired conditions for forested vegetation were developed using natural range of variation analysis. Section 3.2.1 – Forestlands of the FEIS describes the existing conditions for forested vegetation and provides estimates of desired conditions for species composition, size class distribution and forest density based on natural range of variation analysis. Appendix B of the FEIS details the natural range of variation analysis procedures and results as derived from the SIMPPLLE model.

The assessment of the differences between existing conditions as described on Section 3.2.1 of the FEIS and the natural range of variation ranges represents the degree of departure from sustainable ecological conditions. Management objectives illustrated in the Forest Plan represent the minimum level of forest management needed to move forested vegetation towards the desired conditions.

Management areas are largely defined through existing land use allocation designations such as wilderness designations and the suitability analysis. The suitability analysis was undertaken in accordance with specifications and procedures defined in Forest Service Handbook 1909.12 – Chapter 60 – Forest Vegetation Resource Management. This analysis defined what lands are suitable for timber production and which are not. Management areas are defined in detail in Section 3.2.1 of the FEIS. Natural ecological processes play the dominant role in management areas 1 and 2 (69 percent of the forested landscape). All lands suitable for timber production occur in management area 3. Proposed management activities within management area 3 include both mechanical vegetation treatments such as timber harvest and prescribed fire treatments. The amount of treatment and treatment types projected in plan objectives is directly related to the degree of departure from the natural range of variation and the time frame under which treatments will occur. The time frame varies for each alternative. Monitoring and evaluation of ecological conditions and attainment of desired conditions is assessed over multiple scales. Forest composition, structure and density are assessed at the project level scale. Ecosystem function and connectivity are assessed at the HUC 12 watershed scale.

All plan components for forested vegetation are quantifiable. Plan components such as standards are strictly enforceable (FSH 1909.12 Section 2.13 – Standards) and the purpose of each guideline must be met (FSH 1909.12 Section 22.14 – Guidelines).

The comparison of existing conditions and the natural range of variation process described above serves to evaluate the extent to which past management activities have affected the forested landscape. This analysis revealed that the forest continues to be departed from the natural range of variation ranges for species composition, size class distribution and density. This departure is largely due to two main issues; management at insufficient scales and aggressive fire suppression over the last 100 years. The forestwide average patch size is 79 acres as compared to the natural range of variation analysis of 350 acres. The average patch size within management area 3 resulting from regeneration harvest is 22 acres. For a detailed analysis of the estimates for average opening size (patches) please see the document “Using Natural Range of Variation Modeling to Estimate Historic Opening Size on the Nez Perce-Clearwater National Forests” found in the project record.

Concern 2 - Terrestrial Ecosystems – Forested Vegetation

The presence of fire indicates high degrees of ecosystem function, so forest manipulation should replicate natural processes, such as fire.

Letter #	Comment #
877	795, 799, 800, 803
938	24

Response to comment

Desired conditions for forested vegetation are developed under the concept of the natural range of variation. This process is defined in both the 2012 Planning Rule and in Forest Service Handbook 1909.12. The natural range of variation analysis described in FEIS Sections 3.2.1 and 3.5.1 describe the important role wildfire plays in maintaining ecosystem functions. Refer to FEIS Section 3.2.4 – Fire Management for a discussion of fire regimes of the Nez Perce-Clearwater. The combination of mechanical harvest treatments, prescribed fire and natural wildfire are modelled with both the PRISM and SIMPPLLE models to approximate the total level of disturbance needed to maintain ecosystem processes and functions. The PRISM and SIMPPLLE models are described in Appendix B of the FEIS.

Concern 3 - Terrestrial Ecosystems – Forested Vegetation

The Forest Service should reduce the size and number of clear cuts, require logging debris to be scattered, and replant to promote an ecosystem and not a tree farm. Clear cutting exacerbates climate change and increases the chances that diseases will jump from human to animal .

Letter #	Comment #
805	10
8392	3
17304	3

Response to comment

The size and number of clearcuts are not predetermined but are based on the broad potential vegetation type and the species or species mix of trees that are to be regenerated or retained. The silviculture prescription for each management unit is determined to best meet the desired conditions for the site as well as to meet other resource concerns and objectives. This includes species selection that is best suited for the site to promote long term resiliency. Over the last 30 years; clearcut even-aged treatments have been utilized on roughly 50 percent of the acres treated (see FEIS Section 3.5.1, Table 351). The minimum amount of coarse woody debris to retain on site following either mechanical or prescribed fire treatments is described in FEIS Section 3.5.1. Table 354. Refer to FEIS Chapters 3.2.6 – Soil Resources and 3.2.11 – Ecological Sustainability for discussion of the importance of retaining downed woody debris for promoting and maintaining long term site productivity.

There is no empirical evidence to suggest that clearcutting at localized scales influences climate change. To the contrary, the rapid increase in CO2 absorption associated with young forests will help to moderate the atmospheric balance of CO2.

Concern 4 - Terrestrial Ecosystems – Forested Vegetation

The Forest Service’s creation of large patch sizes increases current maximum opening sizes, which is incongruous with the way it mapped the Potential Vegetation Type. These large openings should be used for regeneration harvests that mimic the Historical Range of Variation and should be used to provide forage for big game species. Effective Potential Vegetation Type monitoring should be in place and needs thorough review and consideration with best available science.

Letter #	Comment #	Letter #	Comment #
307	131	938	33
873	42	1060	48
877	797	17350	2

Response to comment

The analysis of average patch size has been updated in Appendix B of the FEIS. For a detailed analysis of the estimates for average opening size (patches) please see the document “Using Natural Range of Variation Modeling to Estimate Historic Opening Size on the Nez Perce-Clearwater National Forests” found in the project record. The forestwide average patch size remains the same at 350 acres. This forestwide estimate describes the size of forested patches resulting from stand replacing disturbances. Patch sizes specific to each broad potential vegetation type can be found in Appendix B, Table 11. Maximum opening size for regeneration harvest units is 207 acres as described in plan component FW-

STD-TBR-06. Refer to Appendix 4 – Management Approaches of the Forest Plan for a description of how average patch size by broad potential vegetation types is applied to vegetation treatments.

Forest Plan components FW-DC-ELK-01, FW-DC-ELK-02 and management area specific desired conditions for big game will provide direction for the development of project specific goals and objectives. The scale of proposed vegetation treatments under the revised Forest Plan will both improve overall forage availability and increase nutritional resources for big game. Improvement of big game habitat will result from both mechanical vegetation treatments such as timber harvest and from prescribed fire.

Monitoring attainment of desired conditions for each broad potential vegetation type is achieved through routine remeasurement of forest inventory analysis (FIA) plots, project level monitoring and continued refinement of the broad vegetation type mapping products. Refer to the Monitoring Plan (Appendix 3 of the revised forest plan) for a detailed list of monitoring protocols and frequencies for each forestwide metric.

Concern 5 - Terrestrial Ecosystems – Forested Vegetation (letter number 452, comment 13)

The Draft EIS should revise and replace western Hemlock with Mountain Hemlock in Chapter 3 of the EIS. This is an error because western Hemlock is rare on the Forest.

Response to comment

Western hemlock has been replaced with mountain hemlock throughout the document where appropriate. Estimates of western hemlock are generally combined with estimates for western red cedar. This is due to the relative rarity of western hemlock on the forest (< 2 percent) as well as overlapping habitat types.

Concern 1 – Terrestrial Ecosystems – Non-forested Terrestrial Vegetation, Grasslands, Shrublands, and Meadows

The Forest Service should apply management objectives that increase the number of acres treated for conifer encroachment. It should promote an increase in the composition of shrubs and early seral grasses and forbs in critical large mammal habitat, while maintaining adequate cover for thermal refugia and concealment.

Letter #	Comment #
1050	16
1060	92
1115	16

Response to comment

The 2012 Planning Rule and Forest Service Handbook 1919.12 encourage the adoption of the concept of natural range of variation as a foundation for development of desired conditions. The natural range of variation concept is considered best available science (Haugo and Welch, 2013), (Hessburg et al. 2015) for developing estimates of ecological systems and functions. Desired conditions for forested and non-forested vegetation were developed using natural range of variation analysis. Section 3.2.1 – Forestlands of the FEIS describes the existing conditions for forested and non-forested vegetation and provides estimates of desired conditions for species composition, size class distribution and forest density based on

natural range of variation analysis. Appendix B of the FEIS details the natural range of variation analysis procedures and results as derived from the SIMPLLE model.

Available data to describe vegetation conditions are insufficient to describe the degree of departure from the natural range of variation for conifer encroachment. At the programmatic level, we recognize that conifer encroachment exists. Conifer encroachment will be addressed at the project specific NEPA analysis level. To address this issue; plan component FW-OBJ-GS-01 is intended to provide focus for non-forested vegetation management and planning specific to conifer encroachment. This component represents a minimum level of restoration for conifer encroachment.

Plan components for species composition and size class distribution illustrated in the revised forest plan provide for the maintenance of non-forested vegetation patches as well as transitional patches of early seral species and size classes. Refer to Section 2.1.3 – Forestlands of the revised forest plan for a description of plan components specific to species composition and size class distribution as well as Section 2.1.5 – Meadows, Grasslands, and Shrublands for a description of desired conditions and objectives for the development, retention and maintenance of non-forested plant communities.

Plan component MON-MGS-02 requires periodic assessments of non-forested riparian habitats and includes evaluation of plan component FW-OBJ-GS-01. Wetland and riparian vegetation monitoring are also addressed in the Water and Aquatic Resources (WTR), Riparian Management Zones (RMZ), Aquatic and Riparian Livestock Grazing (ARGRZ), and Livestock Grazing (GRZ) sections.

Concern 1 - Terrestrial Ecosystems - Snags

Minimum snag requirements, optional guidelines and monitoring components, and distribution requirements of snags among the alternatives are too vague, and they leave room for loophole exploitation, such as meeting snag requirements by counting adjacent uncut stands. These guidelines and requirements should be revised to effectively protect snags and associated habitat.

Letter #	Comment #	Letter #	Comment #
49	1	877	172, 175, 176, 182, 183, 363, 364, 365, 366, 367, 368, 369, 370, 371, 624, 625, 626, 627, 628
307	43, 45, 102	938	32
717	201, 202, 203, 205	1060	83, 84, 85, 86, 87
805	11	1110	3

Response to comment

Snag retention is important for both wildlife species and long term soil productivity.

The 2012 Planning Rule and Forest Service Handbook 1919.12 – Chapter 20 – Land Management Planning Handbook, requires that forest plans provide for the sustainability of ecosystems and resources; meet the need for forest restoration and conservation, watershed protection, and species diversity and conservation; and assist the Agency in providing a sustainable flow of benefits, services, and uses of NFS lands that provide jobs and contribute to the economic and social sustainability of communities.

Developed plan components are intended to ensure the retention of the desired number of snags per unit area to provide habitat elements and to promote long-term recruitment of coarse woody debris. Dominance type affects the species of snags occurring on the landscape, as well as the duration of snags. Seral species snags tend to remain standing for longer periods than snags derived from climax species, with the exception of western red cedar. Size class distribution affects the size of snags occurring on the landscape. Desired conditions for size class distribution will influence the average snag diameter available for recruitment. Snag recruitment is affected by and influences disturbance regimes.

Tree mortality results from a host of factors. Moisture stress due to droughty conditions may cause mortality, particularly within dense stands. Stand density may promote mortality due to competition for moisture and sunlight. Small scale disturbances, such as endemic levels of insect and disease agents, are constantly causing natural levels of mortality. Wildland fire is the major cause of mortality which disproportionately affects small diameter trees and can consume snags of any size.

Plan components for ecological integrity including plan components specific to snag retention and recruitment are required to take into account the interdependence of ecosystems, impacts from and to the broader landscape, system drivers and stressors including climate change, and opportunities to restore fire adapted ecosystems and for landscape scale restoration (36 CFR Part 219, §219.8, FSH 1909-12-23.1). Plan components FW-DC-FOR-05, FW-DC-FOR-08, FW-DC-FOR-11 AND FW-DC-FOR-12 are desired conditions which promote the retention of very large (20 inch diameter at breast height) trees to promote habitat diversity and large diameter snag recruitment. Plan components related to within stand characteristics for each broad potential vegetation type (FW-DC-FOR-04, FW-DC-FOR-07, FW-DC-FOR-10 and MA1-DC-FOR-09) promote retention of existing live legacy trees and snags which have persisted from previous disturbance events. These desired conditions promote retention of large diameter trees and snags important for wildlife habitat and to provide for future snags and long-term soil productivity. Snag retention is specifically addressed for management area 3 with plan component MA3-DC-FOR-11. For management area 3 snag retention is focused on the diversity and distribution of existing snags. Taken together these desired conditions illustrate a commitment to both retain and recruit sufficient snags to maintain ecosystem integrity. This commitment is verified through periodic monitoring and project specific NEPA documentation.

In addition, specific plan component guidelines are defined for management area 2 and 3 (MA2-GDL-FOR-05 and MA3-GDL-FOR-05). A guideline is a constraint on project and activity decision making that allows for departure from its terms, so long as the purpose of the guideline is met. (§ 219.15(d)(3)). Guidelines are established to help achieve or maintain a desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. (36 CFR 219.7(e)(1)(iv)). These guidelines specifically address the distribution of existing snags within a project area and relate to specific snag retention numbers for each broad potential vegetation type. The intent of these guidelines is to promote a natural distribution of snags on the landscape. Snags are not evenly distributed on a landscape. Natural disturbances and disturbance patterns dictate the diversity and distribution of snags. Snag recruitment for management area 3 is addressed through plan component guideline MA3-GDL-FOR-06. This guideline promotes the retention of an average of three live trees per acre (7 trees per acres for alternative z) to serve as future snags and focuses on the retention of the largest trees available with the greatest potential to become snags.

The number of snags retained per acres expressed in MA2-GDL-FOR-05 and MA3-GDL-FOR-05 are derived from analysis of R1 Forest Inventory and Analysis data for the Nez Perce-Clearwater. Snag density analysis was conducted under the protocols developed by Bollenbacher, Bush and Lundberg,

2009. The determination of snag retention numbers per acre expressed in Table 13 of the Forest Plan are documented in the project record (FIA Hybrid data/FEIS Reports/Snags).

Maintaining snags on the landscape is an integral part of maintaining long term site productivity by providing biomass and organic material to the forest floor to support soil formation processes as well as providing habitat for numerous vertebrate and invertebrate animals. Plan component guidelines MA2-GDL-FOR-01 and MA3-GDL-FOR-01 focuses on the retention of coarse woody material to promote long term site productivity. These guidelines are based on the recommendations of Graham et al., 1994. See the FEIS Chapter 3.2.3 Climate Change and Forest Carbon and FEIS appendix D for a detailed discussion of carbon stocks for the Nez Perce-Clearwater. See the Soils Resource section of the revised forest plan for plan components intended to sustain the long-term health and sustainability of soils.

The LMP contains plan components which integrate social, economic, cultural and ecological considerations and resources. Both the 2012 Planning Rule and FSH 1909.12 focus development and implementation of planning components in the context of desired multiple uses under an integrated framework. The LMP is not an assemblage of unique plan components intended to guide management of individual resources but a collection of integrated plan components to promote multiple use management across all resources. All forest plan desired conditions carry equal weight and attainment of a given desired conditions cannot preclude attainment of another. The LMP is intended to be implemented as a whole and not resource by resource.

Snags-2 Moved to Wildlife Response

Concern 2 (Snags 3) - Terrestrial Ecosystems – Snags (letter number 877, comments 372, 373)

The Forest Service should consider an alternative for timber harvesting that retains the natural processes that create snags and down wood habitats, to comply with the National Forest Management Act.

Response to comment

Both the 2012 Planning Rule and Forest Service Handbook 1919.12 – Land Management Planning Handbook comply with the National Forest Management Act of 1976. These documents provide the policy direction under which forest plans are developed. Plan components developed in the Nez Perce-Clearwater Forest Plan are designed to maintain ecosystem integrity at multiple scales while providing for ecological, social and economic sustainability. Plan components illustrated in Forestlands section of the Forest Plan provide for long term persistence of snags, recruitment snags, large diameter trees, and coarse woody debris at both project level and landscape scales. The portion of the Nez Perce-Clearwater that is subject to harvest represents 26 % of the total forest area as illustrated in Production of Natural Resources – Timber section of the EIS. Natural disturbance process will continue to dominate the composition, structure, function and connectivity of the forestwide landscape. As such, existing snags, snag recruitment and amounts of coarse woody material available for long term soil productivity are minimally impacted by forest management activities at the forestwide scale.

Concern 3 - Terrestrial Ecosystems – Snags (letter number 717, comment 204)

The Forest Service should retain all snags for wildlife benefit unless a snag poses a risk to human life or safety. These snags should be felled and left on-site, where appropriate, to provide coarse woody debris.

Response to comment

Snag retention within management area 3 must meet several land management objectives resulting from the integration of plan components across multiple resource areas. Retention of all snags within a harvest unit is not desirable due to the increased risk of uncharacteristic wildland fire behavior and potential threats to public safety. The intent of plan components MA2 AND MA3-GDL-FOR-05 is to achieve a balance between providing wildlife habitat, structural diversity, and long term site productivity with the need to protect investments in regeneration, movement of forested vegetation towards desired conditions as well as to provide for public safety. The number of snags retained via the plan components is based on the natural range of variation for snags created through natural disturbance processes. Plan component MA3-GDL-FOR-07 is intended to provide additional snag recruitment where such retention does not conflict with other desired conditions.

Water Resources

Concern 1: Draft EIS-Appendix K, Water Resources and Fisheries (letter number 805, comment 93)

The Forest Service should update Appendix K to provide accurate information for licensed water rights and permits and minimum stream flow water rights for eligible Wild and Scenic Rivers.

Response to comment

Commenters requested the water rights section of Appendix K be updated with current information and clarifying language. Forest Service Manual 2500, Chapter 2540 provides direction for water uses and development on national forest lands. Water rights for the Nez Perce-Clearwater are administered by the Forest Service Northern Region regional office in close coordination with the State of Idaho. Water rights are enforced by the State.

The state of Idaho identified erroneous material and provided the most current information. The outdated information was deleted and the following information was added to Appendix K: The Snake River Basin Adjudication was an administrative and legal process that began in 1987 to determine the water rights in the Snake River Basin drainage. The Final Unified Decree for the Snake River Basin Adjudication was signed on August 25, 2014.

The water rights process section in FEIS, Appendix K was also update using information from the water rights brochure from the Idaho Department of Water Resources website: <https://idwr.idaho.gov/files/water-rights/water-rights-brochure.pdf>. The definition of “license” was changed.

Section 13(c) of the Wild and Scenic Rivers Act expressly reserves the quantity of water necessary to protect river values, including water quality and flow-dependent outstandingly remarkable values, to achieve the purposes of the Act. This reservation of water is called a federal reserved water right and is generally adjudicated in a state court (e.g., basin-wide adjudication). The designation does not supersede existing, valid water rights and establishes a priority date coincident with the river's date of designation into the National Wild and Scenic Rivers System.

The priority date is the date when the water right was established, and it determines who gets water when there is a shortage. If there is not enough water available to satisfy all of the water rights, then the oldest (or senior) water rights are satisfied first and so on (in order) until there is no water left. When there is not enough water to satisfy all the water rights, new (or junior) water rights holders do not get water.

Also, a table was added to FEIS, Appendix K that identifies active decreed water rights for minimum instream flow for wild and scenic rivers on the Nez Perce-Clearwater. For each of the designated wild and scenic rivers the federal reserved water rights and stream flow amount are identified, as well as the associated stream name (tributary to wild and scenic river) and State of Idaho reserved water rights.

In summary, information concerning water rights was updated in the FEIS and appendices to ensure that those documents contain the most up-to-date and accurate information.

Concern 1: Draft Plan - Water Resources and Fisheries (letter number 17348, comment 5)

The tables in Appendix 6 should be updated to include human populations served by the public water systems and to ensure that the drinking water sources listed in Table 5 are accurate.

Response to comment

The U.S. Environmental Protection Agency identified erroneous material in Draft Forest Plan, Appendix 6 and Draft EIS, Appendix K, and provided more current information.

The tables titled Public water systems that have surface water intakes on Forest lands or have surface water source water protection areas that extend onto Forest lands and tables titled Public water systems that have groundwater intakes or delineated zone of contribution located within Nez Perce-Clearwater lands have all been updated in Land Management Plan, Appendix 6 and FEIS, Appendix K. Updates include the populations served by public water systems directly depend on the ecosystem services of safe drinking water provided by the Nez Perce-Clearwater. There are 13 public water systems that have surface water intakes located on Nez Perce-Clearwater lands or have surface water source water protection areas that extend onto Forest lands. These public water systems serve approximately 22,650 people. There are 28 public water systems withdrawing groundwater from wells and springs within Nez Perce-Clearwater lands or have groundwater source water protection areas that extend onto Forest lands. These public water systems serve approximately 6,240 people.

The tables were updated to include the most current information obtained from Idaho Department of Environmental Quality records. Specifically, the information for the City of Pierce (public water system number 2180027) was updated to show Pierce obtains their drinking water from Orofino Creek, rather than from the Clearwater River. Pierce also obtains water from Cannel Creek, but the surface water source water protection area does not extend onto the Nez Perce-Clearwater.

Wild and Scenic Rivers

Concern(s) 1, 2, 4, 5: (letter numbers 24, 70, 422, 570, 717, 974, 1052, 17181, 17354)

Concern 1: The Forest Service should recommend all 89 eligible rivers for designation in order to increase protections of their outstanding remarkable values.

Concern 2: The Forest Service should add plan components to meet the requirements of the 2012 Planning Rule to provide management direction not only for eligible rivers, but also for suitable and designated wild and scenic rivers.

Concern 4: The Forest Service should update the Wild and Scenic River alternatives analysis to include a comparison of Alternative A against the action alternatives to ensure a comprehensive analysis.

Concern 5: The Forest Service should revise Alternative X because State and local governments lack the authority to protect free-flowing rivers and streams from dams and water diversions. Only wild and scenic rivers designation would accomplish this objective.

Response to comments

These concern statements represent the sentiment expressed in numerous form letters, represented by letters 24, 70 and 422, as well as the other unique letters listed above. These letters support maintaining the eligibility status of all 89 rivers identified as eligible and protecting their water quality, free flowing condition and their ORVs. Many of the individual comments contend there is no reasonable basis for selection of a subset of the rivers and that only wild and scenic river designation would protect the free-flowing character from dams and diversions, in part because the state and local governments lack authority to provide such protection. Some support including all eligible rivers as suitable under the Wild and Scenic Rivers Act with plan components to protect their water quality, free flowing condition and their ORVs.

Many contend that eligibility must remain in place for all 89 eligible streams, and those streams must be protected as eligible through plan components, regardless of any findings of suitability. This contention is based on the belief that the statement in the DEIS has no legal or regulatory basis and conflicts with the 2012 Planning Rule. That statement reads; "Once a wild and scenic rivers suitability study is complete, eligible rivers found not suitable need not be managed under interim protection measures."

Additionally, some contend that the agency does not have the authority to make agency-initiated suitability determinations during this plan revision process. Stating that the planning rule does not provide a regulatory basis for conducting a suitability determination during forest planning. And, insisting that conducting Wild and Scenic suitability determinations as part of forest planning in a manner that erases eligibility would violate the 2012 planning rule, federal law, Agency practice, and the intent of the Wild and Scenic Rivers Act.

The Wild and Scenic Rivers Act, 5(d) (1): "In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic, and recreational river areas, and all river basin and project plan reports submitted to the Congress shall consider and discuss any such potentials. The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic, and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved."

The Planning Rule at 219.7(c)(2)(vi) directs the agency to "Identify the eligibility of rivers for inclusion to the National Wild and Scenic Rivers system, unless a systematic inventory has been previously completed and documented and there are no changed circumstances that warrant additional review."

Additionally, 219.10(b)(1)(v) states that the Plan must include plan components, to provide for; "Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system."

Forest Service Handbook 1909.12, Chapter 80 provides guidance for identifying and evaluating potential additions to the National Wild and Scenic River System on NFS lands.

Section 80.1 cites the authority given in the Wild and Scenic Rivers Act of October 2, 1968, section 5(d)(1); paraphrasing that authority that Federal agencies are to identify and evaluate additional potential rivers for inclusion in the system during Agency planning.

Section 80.2 states; “The objective of chapter 80 is to provide guidance on the determination of eligibility, suitability, and recommendation for designation of wild and scenic rivers for legislatively mandated or Forest Service-identified study rivers. The chapter also describes interim protection measures applied to eligible and suitable rivers and the process to submit a recommendation for designation of a wild and scenic river.”

Section 83 states; “Any eligible river may be studied for its suitability for inclusion in the National system at any time. Rivers may be studied for suitability as part of a plan development or revision, as part of a plan amendment, in conjunction with a project decision, or in a separate study.”

Section 84.3 states; “A river determined through a suitability study to be not suitable shall no longer be considered eligible and interim protection measures no longer need to be applied to those rivers.”

Throughout the comment letters there is a theme that the only way to protect water quality, free flowing condition, outstandingly remarkable values, and other resource values is through designation as eligible or suitable. This is expressed through statements such as the form statement, “I am writing to ask that all 89 streams that you have found eligible for Wild and Scenic designation remain protected as eligible in the new forest plan, and to voice support for their designation. I ask that you protect these streams as eligible by withdrawing your proposed suitability determinations from all alternatives in your draft analysis and plan. Alternately, you could simply maintain eligibility protections for streams you find unsuitable.” These comments seem to omit recognition of the many other laws and regulations that apply to the waters of the United States, or the values associated with them. Nor do they give recognition of the administrative practices available to the agency to provide additional protections. Following is a partial list of the laws and regulations governing the agency’s obligations to protect rivers and aquatic resources within its purview.

Organic Administration Act of 1897: This act states that one aspect of the mission of the national forests is to “provide favorable conditions of water flow.”

Department of Agriculture Organic Act of 1944: This act provides direction on the establishment and protection of water rights.

Clean Water Act: The Federal Water Pollution Control Act, or Clean Water Act, is the principal law regulating discharges of pollutants to the waters of the United States. It provides direction intended to restore and maintain the chemical, physical, and biological integrity of the nation’s waters.

Multiple-Use Sustained-Yield Act of 1960: Congress has affirmed the application of sustainability to the broad range of resources over which the Forest Service has responsibility. The Multiple-Use Sustained-Yield Act confirms the Forest Service’s authority to manage the national forests and grasslands “for outdoor recreation, range, timber, watershed, and wildlife and fish purposes” (16 U.S.C. § 528) and does so without limiting the Forest Service’s broad discretion in determining the appropriate resource emphasis or levels of use of the lands of each national forest and grassland.

Endangered Species Act of 1973, as amended: Section 7(a)(1): supports biotic sustainability by requiring that “all... federal agencies shall... utilize their authorities in furtherance of the purposes of this act by carrying out programs for the conservation of endangered species and threatened species.” Section 7(a)(2) includes direction that federal agencies, in consultation with the U.S. Fish and Wildlife Service,

will not authorize, fund, or conduct actions that are likely to jeopardize the continued existence of any threatened or endangered species or result in the destruction or adverse modification of their critical habitat.

The National Forest Management Act (16 U.S.C. 1600–1614, August 1974, as amended 1976, 1978, 1980, 1981, 1983, 1985, and 1990): This act directs the Forest Service to manage for a diversity of habitats to support viable populations (36 CFR § 219.19), and recognizes the fundamental need to protect and, where appropriate, improve the quality of soil, water, and air resources (Section 5(C)).

36 CFR part 219, subpart A: This regulation provides integrated resource management for multiple use. It states the responsible official shall consider:

Aesthetic values, air quality, cultural and heritage resources, ecosystem services, fish and wildlife species, forage, geologic features, grazing and rangelands, habitat and habitat connectivity, recreation settings and opportunities, riparian areas, scenery, soil, surface and subsurface water quality, timber, trails, vegetation, viewsheds, wilderness, and other relevant resources and uses.

36 CFR 219.20: Requires conservation and protection of soil and water resources.

36 CFR 219.8 – Sustainability - (a)(4): Requires the Chief of the Forest Service to establish requirements for national best management practices for water quality in the Forest Service Directive System.

36 CFR 251.9: Authorizes the Chief of the Forest Service to enter into agreements with municipalities to restrict the use of National Forest System lands from which water is derived to protect the municipal water supplies.

2001 Roadless Area Conservation Rule (36 CFR § 294 subpart B; 66 FR 3244-3273): This rule includes a prohibition on road construction and road reconstruction in inventoried roadless areas and prohibits timber cutting, sale, or removal except in certain circumstances.

2012 Planning Rule: The rule requires Forests to maintain the diversity of plant and animal communities and support the persistence of native species within the plan area. Forests are directed to use a “complementary ecosystem and species-specific approach to provide for the diversity of plant and animal communities” and to maintain species persistence in their planning.

FSM 2670: As an implementing rule of the 1976 National Forest Management Act, FSM 2670 requires federal land managers to maintain viable populations of all native and desirable non-native species, with special care taken to assure that federally listed species can recover. Actions that may cause a species to become listed as threatened or endangered are to be avoided.

Forest Service Manual 2380: This manual outlines Forest Service policy and direction for the management of scenic resources.

Forest Service Manual section 2380.31: This manual requires the use of the basic concepts, elements, principles, and variables defined in the ‘Agriculture Handbook 701 – Landscape Aesthetics: A Handbook for Scenery Management’ (U.S. Department of Agriculture 1995), referred to as the scenery management system (SMS).

Snake River Recovery Plan (Snake River Basin Steelhead and Snake River Spring/Summer Chinook Salmon): The National Marine Fisheries Service has released final recovery plans for Snake River spring/summer Chinook salmon and steelhead in 2017 (National Oceanographic and Atmospheric Agency 2017).

Columbia River Bull Trout Recovery Plan and Recovery Unit Implementation Plans: The Columbia River bull trout recovery plan was completed in 2015. Recovery actions were developed in cooperation with federal, state, tribal, local, and other partners.

PACFISH/INFISH Amendments: In the early 1990s, concerns about stream habitat degradation in the western United States, as well as the potential loss of salmon, trout, and char populations, increased (Nehlsen et al. 1991, Rieman and McIntyre 1993)). In response, the Forest Service and Bureau of Land Management completed three broad reaching documents that amended forest plans across the west to improve their conservation function.

Idaho Department of Fish and Game Five-year Fisheries Management Plan (2019–2024): This management plan includes statewide principles related to management of fisheries and habitat; public involvement; rules such as fishing regulations; access; importation and introductions; cooperation with other agencies, Indian Tribes, outfitters, and guides; habitat restoration and protection; and mitigation.

Nez Perce Tribe Department of Fisheries Resource Management Plan (2013–2028): The Nez Perce Tribe’s Fisheries Resource Management Plan includes a set of management goals and management objectives to achieve those goals. Management objectives include those related to achievement of escapement goals for anadromous fish, including habitat management of key populations within the Nez Perce-Clearwater such as Lolo Creek, the Potlatch River, the Upper South Fork Clearwater River, the Lochsa River, Meadow Creek, Moose Creek, and the Upper Selway River. Habitat management objectives include emphasis on watershed restoration within a “ridge-to-ridge” management philosophy where stream habitat is degraded. Fish management goals are consistent with those described in the Idaho Department of Fish and Game five-year management plan and within the Snake River recovery and implementation plans (National Oceanic and Atmospheric Administration 2016), as the Nez Perce Tribe has worked closely with these agencies.

While this list is not all inclusive it does demonstrate that there are numerous rules and regulations governing federal actions, in part, related to the management and protection of resource values associated with rivers, streams and other water bodies. Simply put, there are many safeguards in place to address the concerns raised in these comments that don’t demand determination of a river as eligible or suitable as a Wild and Scenic River. The application and effect of these rules and regulations are documented throughout the FEIS and guide development of Forest Plan components as documented in the Forest Plan.

Concern 3: (letter numbers 164, 873, 3110)

The Forest Service should limit the amount of recommended Wild and Scenic Rivers due to impacts of designation on economic activities such as logging and mining.

Response to comment

The Forest developed and analyzed in detail an alternative that did not include any rivers as eligible or suitable. Alternative X responded to a number of state and local plans, which call for few or no areas of recommended wilderness and fewer or no additional eligible or suitable wild and scenic rivers. This alternative was developed on the basis of internal and external input, including collaboration on alternative development. All alternatives, including Alternative X, met a minimum bar of being ecologically, socially, and economically sustainable per the 2012 planning rule. Furthermore, each alternative contributes to rural prosperity.

Concern 6: (letter numbers 3110)

The Forest Service should not consider mine tailing an ORV because it would create conflict between the protection of other river values, threatened and endangered species, and the Clean Water Act.

Response to comment

Mine tailings are not explicitly tied to the presence of an ORV for the cultural or historical category. As an example, the cultural ORV for the South Fork of the Clearwater is dependent on the areas outstanding collection of mining sites and features, along with the townsite of New Golden and its surrounding history. No rivers that were evaluated as eligible or suitable Wild and Scenic Rivers had an ORV that was chosen based on the sole presence of tailings piles. FSH 1909.12, Chapter 82.73a outlines criteria setting minimum thresholds for establishing ORVs. These criteria may be modified, and additional criteria may be included to make them more meaningful in the region of comparison. The ORV for historic and cultural values contain important evidence of historic or prehistoric use by humans. These sites may have national or regional importance for interpreting history or prehistory. Furthermore, specific to history, sites or features should be associated with a significant event, an important person or a cultural activity of the past that is now rare or unique in the region.

Concern Statement: Wild and Scenic Rivers 1

The comments included in this concern statement express the sentiment in numerous form letters, as well as the other unique letters listed below. These letters support maintaining the eligibility status of all 89 (sic 88) rivers identified as eligible and protecting their water quality, free flowing condition and their ORVs. Many of the individual comments contend there is no reasonable basis for selection of a subset of the rivers and that only wild and scenic river designation would protect the free-flowing character from dams and diversions, in part because the state and local governments lack authority to provide such protection. Some support including all eligible rivers as suitable under the Wild and Scenic Rivers Act with plan components to protect their water quality, free flowing condition and their ORVs.

Many contend that eligibility must remain in place for all 89 eligible streams, and those streams must be protected as eligible through plan components, regardless of any findings of suitability. This contention is based on the belief that the statement in the DEIS has no legal or regulatory basis and conflicts with the 2012 Planning Rule. That statement reads; "Once a wild and scenic rivers suitability study is complete, eligible rivers found not suitable need not be managed under interim protection measures."

Additionally, some contend that the agency does not have the authority to make agency-initiated suitability determinations during this plan revision process. Stating that the planning rule does not provide a regulatory basis for conducting a suitability determination during Land Management Planning. And, insisting that conducting Wild and Scenic suitability determinations as part of Land Management Planning in a manner that erases eligibility would violate the 2012 planning rule, federal law, Agency practice, and the intent of the Wild and Scenic Rivers Act.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
17	2	440	2	12861	1
23	1	442	1	17181	2
35	1	445	3	17238	1
36	1	465	5	17304	9
41	1	544	1	17354	13
49	1	549	9	17362	6

Appendix M: Response to Comments

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
61	9	556	3	17570	1
66	1	563	15	17639	3
67	1	566	4	17673	21,22,23
70	1	570	5	17733	5
72	2	587	25,26,27	17862	1,2,3,5,8,12
75	1	602	2	17871	7
80	1	621	7	17877	2
83	2	659	1	17900	2
90	2	663	16	17901	4,8,9,10
97	4	682	4,6		
98	6,7,8	717	23 comments		
99	2	804	1,2,3		
109	8,9,10	805	40,42		
124	1	817	2		
130	2	818	1		
135	1,2	824	1		
153	3	839	3		
157	3	840	1		
158	2	872	2		
160	6	877	810,811,812,813	160	6
164	1	901	2	164	1
169	2	938	18	169	2
170	2	939	12,13,44,45,46	170	2
178	2	954	1,2	178	2
181	2	960	1	181	2
184	2	974	27 comments	184	2
192	1	996	2	192	1
206	2	1015	1	206	2
217	3	1049	2	217	3
240	1	1051	9	240	1
243	2	1052	21 comments	243	2
246	1	1054	26,27,29	246	1
247	2	1061	1,2,3,4,5,7,8,9,10,11		
272	8	1066	2		
297	2	1076	9		
307	15,123,167	1077	4		
309	2	1089	6		
321	6,7	1098	4,5		
323	1	1104	1		

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
328	2	1115	10		
338	2	1118	2		
370	2	1121	1		
387	1	2523	1		
392	1	2764	1		
395	11	3110	6,39,40,44,48, 49,50,51,54,55 ,56		
422	1	3112	2		
427	3	12883	7,8		

Response to comment

The Wild and Scenic Rivers Act, 5(d) (1) states: “In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic and recreational river areas, and all river basin and project plan reports submitted to the Congress shall consider and discuss any such potentials. The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved.”

The Planning Rule at 219.7(c)(2)(vi) directs the agency to “Identify the eligibility of rivers for inclusion to the National Wild and Scenic Rivers system, unless a systematic inventory has been previously completed and documented and there are no changed circumstances that warrant additional review.”

Additionally, 219.10(b)(1)(v) states that the Plan must include plan components, to provide for; “Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system.”

Forest Service Handbook 1909.12, Chapter 80 provides guidance for identifying and evaluating potential additions to the National Wild and Scenic River System on NFS lands.

Section 80.1 cites the authority given in the Wild and Scenic Rivers Act of October 2, 1968, section 5(d)(1); paraphrasing that authority that Federal agencies are to identify and evaluate additional potential rivers for inclusion in the system during Agency planning.

Section 80.2 states; “The objective of chapter 80 is to provide guidance on the determination of eligibility, suitability, and recommendation for designation of wild and scenic rivers for legislatively mandated or Forest Service-identified study rivers. The chapter also describes interim protection measures applied to eligible and suitable rivers and the process to submit a recommendation for designation of a wild and scenic river.”

Section 83 states; “Any eligible river may be studied for its suitability for inclusion in the National system at any time. Rivers may be studied for suitability as part of a plan development or revision, as part of a plan amendment, in conjunction with a project decision, or in a separate study.”

Section 84.3 states; “A river determined through a suitability study to be not suitable shall no longer be considered eligible and interim protection measures no longer need to be applied to those rivers.”

Throughout the comment letters there is a contention that the only way to protect water quality, free flowing condition, outstandingly remarkable values and other resource values is through designation as eligible or suitable. This is expressed through statements such as the form statement, “I am writing to ask that all 89 streams that you have found eligible for Wild and Scenic designation remain protected as eligible in the new Land Management Plan, and to voice support for their designation. I ask that you protect these streams as eligible by withdrawing your proposed suitability determinations from all alternatives in your draft analysis and plan. Alternately, you could simply maintain eligibility protections for streams you find unsuitable.”

It is recognized that designation of a river as Wild and Scenic by Congressional action provides the greatest assurance that dams and other water diversions would not be constructed within that river corridor. However, the comments received give no recognition of the many other laws and regulations that apply to the waters of the United States or the values associated with them. Nor do they give recognition of the administrative practices available to the agency to provide additional protections. Following is a partial list of the laws and regulations governing the agency’s obligations to protect rivers and aquatic resources within its purview:

Organic Administration Act of 1897: This act states that one aspect of the mission of the national forests is to “provide favorable conditions of water flow.”

Department of Agriculture Organic Act of 1944: This act provides direction on the establishment and protection of water rights.

Clean Water Act: The Federal Water Pollution Control Act, or Clean Water Act, is the principal law regulating discharges of pollutants to the waters of the United States. It provides direction intended to restore and maintain the chemical, physical, and biological integrity of the nation’s waters.

Multiple-Use Sustained-Yield Act of 1960: Congress has affirmed the application of sustainability to the broad range of resources over which the Forest Service has responsibility. The Multiple-Use Sustained-Yield Act confirms the Forest Service’s authority to manage the national forests and grasslands “for outdoor recreation, range, timber, watershed, and wildlife and fish purposes” (16 U.S.C. § 528) and does so without limiting the Forest Service’s broad discretion in determining the appropriate resource emphasis or levels of use of the lands of each national forest and grassland.

Endangered Species Act of 1973, as amended: Section 7(a)(1) supports biotic sustainability by requiring that “all . . . federal agencies shall . . . utilize their authorities in furtherance of the purposes of this act by carrying out programs for the conservation of endangered species and threatened species.” Section 7(a)(2) includes direction that federal agencies, in consultation with the U.S. Fish and Wildlife Service, will not authorize, fund, or conduct actions that are likely to jeopardize the continued existence of any threatened or endangered species or result in the destruction or adverse modification of their critical habitat.

The National Forest Management Act (16 U.S.C. 1600–1614, August 1974, as amended 1976, 1978, 1980, 1981, 1983, 1985, and 1990): This act directs the Forest Service to manage for a diversity of habitats to support viable populations (36 CFR § 219.19), and recognizes the fundamental need to protect and, where appropriate, improve the quality of soil, water, and air resources (Section 5(C)).

36 CFR part 219, subpart A: This regulation provides integrated resource management for multiple use. It states the responsible official shall consider:

Aesthetic values, air quality, cultural and heritage resources, ecosystem services, fish and wildlife species, forage, geologic features, grazing and rangelands, habitat and habitat connectivity, recreation settings and

opportunities, riparian areas, scenery, soil, surface and subsurface water quality, timber, trails, vegetation, viewsheds, wilderness, and other relevant resources and uses.

36 CFR 219.20: Requires conservation and protection of soil and water resources.

36 CFR 219.8 – Sustainability - (a)(4): Requires the Chief of the Forest Service to establish requirements for national best management practices for water quality in the Forest Service Directive System.

36 CFR 251.9: Authorizes the Chief of the Forest Service to enter into agreements with municipalities to restrict the use of National Forest System lands from which water is derived to protect the municipal water supplies.

2001 Roadless Area Conservation Rule (36 CFR § 294 subpart B; 66 FR 3244-3273): This rule includes a prohibition on road construction and road reconstruction in inventoried roadless areas and prohibits timber cutting, sale, or removal except in certain circumstances.

2012 Planning Rule: The rule requires Forests to maintain the diversity of plant and animal communities and support the persistence of native species within the plan area. Forests are directed to use a “complementary ecosystem and species-specific approach to provide for the diversity of plant and animal communities” and to maintain species persistence in their planning.

FSM 2670: As an implementing rule of the 1976 National Forest Management Act, FSM 2670 requires federal land managers to maintain viable populations of all native and desirable non-native species, with special care taken to assure that federally listed species can recover. Actions that may cause a species to become listed as threatened or endangered are to be avoided.

Forest Service Manual 2380: This manual outlines Forest Service policy and direction for the management of scenic resources.

Forest Service Manual section 2380.31: This manual requires the use of the basic concepts, elements, principles, and variables defined in the ‘Agriculture Handbook 701 – Landscape Aesthetics: A Handbook for Scenery Management’ (U.S. Department of Agriculture 1995), referred to as the scenery management system (SMS).

Snake River Recovery Plan (Snake River Basin Steelhead and Snake River Spring/Summer Chinook Salmon): The National Marine Fisheries Service has released final recovery plans for Snake River spring/summer Chinook salmon and steelhead in 2017 (National Oceanographic and Atmospheric Agency 2017)).

Columbia River Bull Trout Recovery Plan and Recovery Unit Implementation Plans: The Columbia River bull trout recovery plan was completed in 2015. Recovery actions were developed in cooperation with federal, state, tribal, local, and other partners.

PACFISH/INFISH Amendments: In the early 1990s, concerns about stream habitat degradation in the western United States, as well as the potential loss of salmon, trout, and char populations, increased (Nehlsen et al. 1991); (Rieman and McIntyre 1993)). In response, the Forest Service and Bureau of Land Management completed three broad reaching documents that amended Land Management Plans across the west to improve their conservation function.

Idaho Department of Fish and Game Five-year Fisheries Management Plan (2019–2024): This management plan includes statewide principles related to management of fisheries and habitat; public

involvement; rules such as fishing regulations; access; importation and introductions; cooperation with other agencies, Indian Tribes, outfitters and guides; habitat restoration and protection; and mitigation.

Nez Perce Tribe Department of Fisheries Resource Management Plan (2013–2028): The Nez Perce Tribe’s Fisheries Resource Management Plan includes a set of management goals and management objectives to achieve those goals. Management objectives include those related to achievement of escapement goals for anadromous fish, including habitat management of key populations within the Nez Perce-Clearwater such as Lolo Creek, the Potlatch River, the Upper South Fork Clearwater River, the Lochsa River, Meadow Creek, Moose Creek, and the Upper Selway River. Habitat management objectives include emphasis on watershed restoration within a “ridge-to-ridge” management philosophy where stream habitat is degraded. Fish management goals are consistent with those described in the Idaho Department of Fish and Game five-year management plan and within the Snake River recovery and implementation plans (National Oceanic and Atmospheric Administration 2016), as the Nez Perce Tribe has worked closely with these agencies.

While this list is not all inclusive it does demonstrate that there are numerous rules and regulations governing federal actions, in part, related to the management and protection of resource values associated with rivers, streams and other water bodies. Simply put, there are many safeguards in place to address the concerns raised in these comments that don’t demand determination of a river as eligible or suitable as a Wild and Scenic River. The application and effect of these rules and regulations are documented throughout the FEIS and guide development of Land Management Plan components as documented in the Land Management Plan.

The FEIS Chapter 3.6.2 contains analysis of eligible and suitable wild and scenic rivers supported by the information in FEIS Appendix F and comments received through public participation and collaboration.

The Land Management Plan includes components addressing all resource values found on the Forest as well as the Forest’s ability to contribute to economic and social sustainability of local communities and forest visitors. Many of these Plan components have direct and indirect applicability to the rivers and stream on the Forest regardless of eligible and suitable determinations.

The Appendix to the Record of Decision regarding Wild and Scenic River Suitability provides the rationale for determination of suitability for each of the 88 rivers included in the analysis documented in the FEIS and Appendix F. As explained in the ROD, the decision serves to strike a balance of resource management to provide for ecological, economic and social sustainability for the Forest resources and surrounding communities.

Concern Statement: Wild and Scenic Rivers 2

The comments included in this concern statement focus on the adequacy of Land Management Plan components to protect rivers’ free-flowing character and outstandingly remarkable values of eligible and suitable rivers.

Letter #	Comment #
939	48
974	1,26,40
1052	38,39,40,43

Response to comment

There are numerous rules and regulations governing federal actions, in part, related to the management and protection of resource values associated with rivers, streams and other water bodies. Without providing an exhaustive list of these regulations suffice it to say there are many safeguards in place to address the concerns raised in these comments that don't demand determination of a river as eligible or suitable as a Wild and Scenic River and would apply to all rivers on the Nez Perce-Clearwater. While all of these regulations are relevant, the most applicable in addressing this concern statement include:

The Planning Rule at 219.8(a) states: "Plan must include plan components, including standards or guidelines, to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including plan components to maintain or restore structure, function, composition, and connectivity . . ."

The Planning Rule at 219.10(b)(1)(v) states: "The Plan must include plan components, including standards or guidelines, to provide for: "(v) Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system."

Forest Service Handbook 1909.12, Chapter 20 provides the planning requirements of the Planning Rule and the procedures for developing, amending, and revising land management plans. Section 22 provides the requirements for integrated plan content. It states, in part: "Plan components should provide a strategic and practical framework for managing the plan area. Plan components should be applicable to the resources and issues of the plan areas . . ." "As a whole, the set of plan components must provide for social, economic and ecological sustainability and multiple uses." And ""The integration of plan components means that all plan components work together toward achieving or maintaining desired conditions."

Following this direction, the application and effect of these rules and regulations are documented throughout the FEIS and guide development of the Land Management Plan components as documented in the Land Management Plan.

As example, the FEIS at 3.2.7 – Water Resources and 3.2.8 – Aquatic Ecosystems and Fisheries, explains "The approach used in this analysis is to take a programmatic look at the outcomes that may result from implementing the proposed management direction in each alternative. For estimating the effects at the programmatic Land Management Plan level, the assumption has been made that the types of resource management activities allowed under the plan's direction are reasonably foreseeable future actions to achieve the goals and objectives." It goes on to say "The following indicators were used to compare and contrast differences within between alternatives associated with water resources:

Watershed condition – This indicator addresses overall health of sub-watersheds (HUC12) and watershed condition classification. How measured? Measured by Watershed Condition Framework classification - how will land management plan improve/reduce watershed condition class indicators. Number of Priority watersheds improved - varies by alternative.

Water quality – This indicator addresses the expressed alteration of physical, chemical, and biological components of water quality. How measured? Qualitatively measure of sediment delivery, water temperature, and contaminants; number of streams on IDEQ integrated report, Number of streams not meeting beneficial uses.

Water quantity – This indicator addresses changes to the natural flow regime with respect to the magnitude, duration, or timing of the natural streamflow hydrograph. How measured? Qualitatively measure forested vegetation openings, interruption of natural flow regime, and consumption of water supply.

Riparian areas, wetlands, and floodplains – This indicator addresses the potential change in function for alteration of these geomorphic features and sensitive ecosystems. How measured? Qualitatively measure disruption of hydrologic processes.

Ecosystem Services - This indicator addresses the provisioning, supporting, regulating, and cultural ecosystem services provided by watersheds and water resources. How measured? Combo above measures.”

This analysis was applied to all alternatives and used in the development and application of the Land Management Plan components found in the Aquatic Ecosystems section of the Plan.

These Plan components are be applied in an integrated manner along with Plan components for Sustainable Recreation, Eligible and Suitable Wild and Scenic Rivers, and others as appropriate. In signing the Record of Decision, the decision maker determines that these Plan components are adequate to protect these rivers’ free-flowing character and outstandingly remarkable values.

Commenters are encouraged to review the FEIS and Land Management Plan components to understand the development and application of the components with an understanding that all Plan components serve to address the specific resource values identified and to compliment other resource components.

Concern Statement: Wild and Scenic Rivers 3

These concern statements express the sentiment that the Forest Service should not consider any more, or should limit the amount of, recommended Wild and Scenic Rivers due to impacts of designation on economic activities such as logging and mining, as well as potentially restricting the ability to perform ecological restoration work within and adjacent to recommended W&SR corridors.

Letter #	Comment #
93	3
164	3
573	8
873	35
3110	42,43

Response to comment

The Planning Rule at 36 CFR 219.7(c)(2)(vii) requires the identification of the eligibility of rivers for inclusion in the National Wild and Scenic Rivers System, unless a systematic inventory has been previously completed and documented, with no changed circumstances to warrant additional review.

Forest Service Handbook 1909.12, Chapter 80 describes the process for identifying and evaluating potential additions to the National Wild and Scenic Rivers System pursuant to the Wild and Scenic Rivers Act, and in accordance with the Planning Rule. Chapter 80 provides guidance on the determination of eligibility, suitability, and recommendation for designation of wild and scenic rivers.

The Nez Perce-Clearwater determined there was no previous inventory as per the Planning Rule, and therefore followed the guidance of FSH 1909.12, Chapter 80, to evaluate potential wild and scenic rivers. Specifically, sections 82 – Evaluating River Eligibility, 83 – Evaluating River Suitability, and 84 – Interim Management of Eligible or Suitable Rivers provide the most pertinent direction for the evaluation. This evaluation is documented in the FEIS section 3.6.2 Suitable Wild and Scenic Rivers, and FEIS Appendix F – Wild and Scenic River Suitability Report.

Through the eligibility evaluation process, approximately 1460 rivers were reviewed. Twenty rivers were determined not to be free-flowing and dropped from further consideration, and all but 89 were determined as not possessing at least one outstandingly remarkable river-related value (ORV) and were also dropped from further consideration. The remaining 89 rivers were identified as possessing at least one ORV and given a preliminary eligible W&SR determination and preliminary classification (see Tables 6 and 8 of FEIS Appendix F). Subsequently, it was determined that Glover Creek did not meet the criteria to be eligible and was dropped (See FEIS). Following the river suitability evaluation process, another 50 rivers were dropped from further consideration. Therefore, 38 rivers were brought forward for inclusion in alternatives and analyzed as documented in the FEIS, Chapter 3.6.2.

The evaluation as documented in the FEIS included a No Action alternative, four alternatives with varying combinations of suitable rivers, and an alternative with no rivers identified as eligible or suitable. The following table from the FEIS, 3.6.2 gives a brief comparison of the alternatives. Alternative X has no eligible or suitable rivers, therefore is not listed.

Table 7. Eligible and Suitable Wild and Scenic Rivers indicator for comparison across Alternatives.

Indicator	Alternative				
	No Action	W	Y	Z	<u>Preferred</u>
Number of suitable or eligible wild and scenic rivers segments	29	12	14	37	11 suitable 1 eligible
Total miles	574.4	232.7	346.1	519.3	237.6
Total acres	183,808	74,464	110,752	166,176	76,032

Any eligible or suitable river would be identified and managed consistent with Management Area 2 direction as well as Land Management Plan components intended to meet the interim protection measures in FSH 1909.12, Chapter 84.3. Most of the eligible and suitable rivers are already located in lands identified as Management Area 2. It is anticipated that only 100 acres per year would receive treatments that involve commercial harvest on MA 2 lands. Some portions of some of the eligible and suitable rivers are in or adjacent to Management Area 3. Therefore, conversion of these segments from MA3 to MA2 would have a minor effect on potential management treatments that may occur within those river corridors. This conversion ranges from a high of 26,648 acres in the no action alternative down to 3,990 acres in the preferred alternative; less than 0.1 percent of the Forest land base.

Regarding the effects on forest lands associated with eligible and suitable wild and scenic rivers, the FEIS, 3.2.1 Suitable Wild and Scenic Rivers section states, “For suitable wild river corridors, cutting of trees and other vegetation is not allowed within the corridor except when needed to maintain a primitive recreation experience, to protect users or to protect outstandingly remarkable values. Prescribed fire and wildfires managed for resource benefit may be used to restore or maintain habitat for threatened, endangered or sensitive species or to restore the natural range of variation. For suitable scenic and recreational river corridors. A range of vegetation management and timber harvest is allowed within the

corridor if these practices are designed to protect users, or protect, restore, or enhance the river environment and its outstandingly remarkable values.”

This section goes on to say, “Eligible and suitable wild and scenic river corridors are mainly located in Management Area 2 and would be managed under the vegetation management restrictions associated with such designations. Within these areas, desired conditions for vegetation would be obtained primarily through natural disturbance processes. Scenic and recreational river corridors across the action alternatives would have the same level of ability to achieve desired vegetation conditions using vegetation treatments. Scenic and recreation river corridors have Land Management Plan direction that allow restoration activities to occur if the ecological and social characteristics that provide the basis for scenic and recreational recommendation are maintained and protected. Anticipated vegetation treatment activities would largely be associated with the restoration of highly departed vegetation conditions or in response to disturbance events which have compromised the integrity of management objectives. There may be other treatments occurring to achieve restoration objectives outlined in the plan components. The most likely treatment would be prescribed burning (planned ignition), in some cases followed by limited planting of conifer seedlings. Objectives would include restoration of desired forest structure and compositions, and to restore desired landscape patterns.” And “Future wild and scenic river designation areas could be anticipated. Determination of suitability for wild and scenic river designation would likely result in reduced flexibility and options for vegetation management to achieve desired conditions.”

The FEIS, 3.8.1 states’ “Under all alternatives, the Nez Perce-Clearwater will continue to provide the full suite of economic benefits which currently contribute to economic sustainability, as described in the Affected Environment section. Over the life of the plan, no consequential adverse impacts are expected to the economic conditions of the primary analysis area or to any of the key industries that the Nez Perce-Clearwater currently supports.” “All alternatives are estimated to produce more jobs and income over current estimated levels, with Alternative X contributing the most income and jobs.” And “Relative to current conditions, all alternatives show a significant increase in the contributions from timber programs.”

It has been determined that suitability for wild and scenic river designation would likely result in reduced flexibility and options for vegetation management. However, the Preferred Alternative identifies less than 2% of the Forest’s land base as an eligible or suitable wild and scenic river. Given the small area that would potentially be determined as eligible or suitable, and the management constraints already in place for these acres in the Land Management Plan components applicable to Management Area 2, regardless of designation, the concern that such designation would significantly impact the ability to perform restorative work or would have significant economic impacts may hold true within the designated river corridor and immediately adjacent area, but not necessarily the larger landscape.

Concern Statement: Wild and Scenic Rivers 4

The comments included in this concern statement express concern over the thoroughness of the analysis of river suitability for designation as wild and scenic rivers. This is summarized by the statement “It is evident, both by the lack of analysis of effects and the various contradictions, that the DEIS fails to provide a comprehensive and robust comparison of alternatives and consideration of wild and scenic suitability determinations and management direction.”

Letter #	Comment #
974	18,36
1052	32,51

Response to comment

The Wild and Scenic Rivers Act, 5(d) (1) states: “In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic and recreational river areas, and all river basin and project plan reports submitted to the Congress shall consider and discuss any such potentials. The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved.”

The Planning Rule at 219.7(c)(2)(vi) directs the agency to “Identify the eligibility of rivers for inclusion to the National Wild and Scenic Rivers system, unless a systematic inventory has been previously completed and documented and there are no changed circumstances that warrant additional review.”

Additionally, 219.10(b)(1)(v) states that the Plan must include plan components, to provide for; “Protection of designated wild and scenic rivers as well as management of rivers found eligible or determined suitable for the National Wild and Scenic River system to protect the values that provide the basis for their suitability for inclusion in the system.”

Forest Service Handbook 1909.12, Chapter 80 provides guidance for identifying and evaluating potential additions to the National Wild and Scenic River System on NFS lands.

Section 80.1 cites the authority given in the Wild and Scenic Rivers Act of October 2, 1968, section 5(d)(1); paraphrasing that authority that Federal agencies are to identify and evaluate additional potential rivers for inclusion in the system during Agency planning.

Section 80.2 states; “The objective of chapter 80 is to provide guidance on the determination of eligibility, suitability, and recommendation for designation of wild and scenic rivers for legislatively mandated or Forest Service-identified study rivers. The chapter also describes interim protection measures applied to eligible and suitable rivers and the process to submit a recommendation for designation of a wild and scenic river.”

The FEIS Chapter 3.6.2 contains analysis of eligible and suitable wild and scenic rivers supported by the information in FEIS Appendix F and comments received through public participation and collaboration. The Land Management Plan includes components addressing all resource values found on the Forest as well as the Forest’s ability to contribute to economic and social sustainability of local communities and forest visitors. Many of these Plan components have direct and indirect applicability to the rivers and streams on the Forest regardless of eligible and suitable determinations.

The FEIS Chapters 3.2.7 and 3.2.8 provide analysis of effects from management actions to the water, aquatic and fisheries resources through comparison of alternatives. This analysis indicates that selection of the Preferred Alternative and through of the applicable Land Management Plan components these water-based resources will be preserved through the life of the Plan.

The Appendix to the Record of Decision regarding Wild and Scenic River Suitability provides the rationale for determination of suitability for each of the 88 rivers included in the analysis documented in the FEIS and Appendix F.

In consideration of the above-mentioned analysis and as explained in the ROD, the decision serves to strike a balance of resource management to provide for ecological, economic and social sustainability for the Forest resources and surrounding communities.

Concern Statement: Wild and Scenic Rivers 5 (One comment in letter number 974)

This concern statement contends that Alternative W does not have a reasonable basis. There is not a legitimate collaborative voice on this issue, and there is no consensus agreement from any group regarding this matter. Therefore, they state, “Stating Alternative W is based on a collaborative approach is arbitrary and capricious.”

Response to comment

Forest Service Handbook 1909.12, Chapter – Zero Code provides the definition of collaboration or a collaborative process as, “A structured manner in which a collection of people with diverse interests share knowledge, ideas, and resources, while working together in an inclusive and cooperative manner toward a common purpose. Collaboration, in the context of the land management planning regulation at 36 CFR part 219 and this Handbook, falls within the full spectrum of public engagement described in the Council on Environmental Quality’s publication of October 2007: Collaboration in NEPA— A Handbook for NEPA Practitioners (36 CFR 219.19).”

FSH 1909.12, Chapter 40, at 43.1 provides guidance for collaboration. It states, “The responsible official shall engage the public . . . early and throughout the planning process as required by this part, using collaborative processes where feasible and appropriate. (36 CFR 219.4(a)).”

It goes on to state, “In a collaborative process (see sec. 41, ex. 01), the public works together to explore resolutions to one or more issues.” And “The Responsible Official may consider the common ground agreements and recommendations of collaborators but is not obligated to accept the recommendations in making a decision.”

AS explained in the FEIS, Chapter 1, the Nez Perce-Clearwater began public participation activities in 2012 and facilitated numerous public and interagency meetings to bring together information for the Nez Perce-Clearwater to consider in preparing the assessment, developing the proposed action, and developing alternatives to the proposed action. The FEIS, section 1.7 states, “Collaboration with groups terming themselves as such has also provided the Nez Perce-Clearwater with information that is used by the Nez Perce-Clearwater the same as other comments. The Nez Perce-Clearwater attends their meetings at their invite and does not give any decision-making authority to these collaborative groups. However, groups of people with diverse thoughts and needs working to solve problems working towards consensus on issues is taken very seriously and input of this sort is highly valued by the Forest Service, whether it comes from an organized collaborative or from elsewhere. The interdisciplinary team has meet with the following collaborative groups since 2012:

- Land Management Plan Collaborative 2012-2014, U.S. Forest Service convened
- Clearwater Basin Collaborative (CBC) 2014-current, at their invitation
- Efficiency in Public Collaborative (EPC) 2019-current, at their invitation”

The State of Idaho has also been involved with Land Management Planning since 2012. Various state agencies have been present at public meetings, met with the interdisciplinary team, provided information and data, and assisted in the development of plan components.

Numerous public meetings and meetings with the identified collaborative groups occurred from the beginning, and throughout the planning process. Through this process many voices were heard with a variety of perspectives, opinions, recommendations, issues, and concerns. On some issues, some collaborative groups could reach consensus, on other issues consensus was not achieved. In any case, nothing, by definition or inference, suggests that there must be, or was, any consensus agreement from

any collaborative group regarding identification of eligible or suitable rivers. Alternative W was developed in response to the many comments shared during this process, not intending to reflect any consensus agreement, specific proposal, or alternative brought forward by any collaborative group.

Concern Statement: Wild and Scenic Rivers 6 (One comment in letter number 3110)

This concern statement contends that mine tailing along the South Fork of the Clearwater river should not be considered as part of the cultural ORV; that they are, in fact, remnants of the impacts that have occurred in the river that, in part, render it unsuitable as a W&SR; that they “create conflict between the protection of other river values, threatened and endangered species, and the Clean Water Act.” Therefore, they should not be afforded any protections beyond those provided through the Historic Preservation Act.

Response to comment

FSH 1909.12, Chapter 10 – The Assessments, 13.23, provides guidance for the identification of social, cultural, and economic conditions affected by management of the Nez Perce-Clearwater. It states, in part, “the Interdisciplinary Team may consider conditions such as: 2a - Activities and traditions that connect people to the plan area such as recreation, education, and interpretation activities and opportunities.” And 3b - “Historical legacies and cultural connections between the plan area and communities.”

FSH 1909.12, Chapter 20 – Land Management Plan, 23.22, directs the ID Team to take in account “1.b.(2) Opportunities for the plan area to contribute to cultural conditions such as traditions, history, art, and traditional resource uses.” And 3.b. “Management of cultural resources or interpretation of these resources to foster certain educational and cultural activities.”

FSH 1909.12, Chapter 80 – Wild and Scenic Rivers provides direction on identifying and evaluating potential eligible and suitable wild and scenic rivers. Section 82.73a - Criteria for Establishing Outstandingly Remarkable Values States, “6. Historic and Cultural Values. The river, or area within the river corridor, contains important evidence of historic or pre-historic occupation or use by humans. 6.a. History. Sites or features are associated with a significant event, an important person, or a cultural activity of the past that is now rare or unique in the region. A historic site or feature, in most cases, is 50 years old or older.”

The FEIS, section 3.4.1 – Cultural Resources, addresses how the proposed plan “attempts to move cultural resource management constructs more firmly into the enhancement arena by crafting desired conditions and indicators meant to improve the condition classification of the Nez Perce-Clearwater’s historic properties” and how the proposed plan “facilitates the protection and enhancement of historic properties . . .”

The FEIS, section 3.4.1 identifies seven elements of integrity that were established as Measurement Indicators for protection and enhancement of historic properties. One indicator is Setting. “Setting is the physical environment of a historic property. Setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space.”

It goes on to say, “The discovery of gold near present-day Pierce in 1860, and a year later at Elk City and Florence, ushered in a wave of settlement and land use that transformed the Nez Perce-Clearwater’s natural and political landscape.” “Today, thousands of historic mining features can be found throughout central Idaho and embody an historic theme replete with ecological, economic, political and social implications.”

The FEIS lists the broad historic themes which have transpired across the Nez Perce-Clearwater and the associated cultural resource site types typical of each. The Historic Theme of Mining includes site and feature types of; Townsites, placer mines, load mines, ditches, mills, building, structures, dam, cemeteries, etc.

The FEIS, Appendix F documents the eligibility and suitability study for wild and scenic rivers on the Nez Perce-Clearwater. Included is identification of Outstandingly Remarkable Values for 89 rivers, including the South Fork Clearwater River. It states, “The South Fork Clearwater River’s mining history is its ORV for cultural resources. The river features an outstanding collection of mining sites and features, along with the townsite of New Golden its surround history.”

The FEIS, 3.4.1 recognizes that suitability of wild and scenic stream courses generally has a positive effect on cultural resources. The analysis, findings and conclusions apply to the South Fork Clearwater as well the other rivers considered for suitability. as It states:

“Wild and Scenic River Suitability

A reasonably foreseeable outgrowth of wild and scenic river suitability is wild and scenic river designation. Designation of wild and scenic stream courses has a neutral effect on cultural resources. Fuel reduction meant to benefit historic properties can be more difficult around historic properties having an outstanding remarkable value in wild portions of wild and scenic stream corridors. However, designated streams possessing an outstanding remarkable value related to historic and cultural values offer additional protection to historic properties beyond that offered by the National Historic Preservation Act.”

“Suitable Wild and Scenic Rivers

Suitability of wild and scenic stream courses generally has a positive effect on cultural resources. Fuel reduction around historic properties having an outstanding remarkable value in suitable wild and scenic stream corridors is possible. Additionally, designated streams possessing an outstanding remarkable value related to historic and cultural values offer additional protection to historic properties beyond that offered by the National Historic Preservation Act.”

“Sustainable Recreation - Including Developed and Dispersed Recreation

Developed and dispersed recreation sites often occur in common with locations on the landscape that also attracted historic human use. The existence of archaeological sites at these locations poses a potential effect to historic properties if unmitigated recreation use continues at these sites. These recreation sites do, however, offer opportunities for interpretation and public education concerning Forest history and other issues associated with historic property management. Plan component FW-GDL-CR-02 is meant to resolve ongoing effects located at both developed and dispersed recreation sites.”

The Land management Plan includes several components addressing cultural resources and includes:

“FW-DC-CR-01. Historic properties with high National Register integrity are available for present and future generations. These well-maintained properties connect communities with ancient places having a deep history, as well as sites associated with the recent past. Archaeological and historical research contributes to knowledge about history and provides a valuable perspective on past climate and environment. Traditional cultural properties and other culturally significant areas identified by tribes and local communities provide tangible links to historically rooted beliefs, customs, and practices.

The FEIS supports that consideration has been given to the cultural and historic values associated with past mining on the South Fork Clearwater River. It is apparent that an assemblage of mining related

evidence and features, rather than a single structure or site, collectively provides for education, interpretation and recreation related to these features and the setting they provide. Analysis indicates that the South Fork Clearwater provides an outstanding collection of mining-related cultural resources. As such some of these resources warrant protection for their informational, educational and cultural value. It is also clear that designation as a wild and scenic river would provide added protections to these resources. However, there are numerous mining-related artifacts across the Forest, and extensive laws, regulation and policy in place to manage and preserve these cultural resources. The questions become what, where, and why specific artifacts and cultural resources warrant the incremental permanent increase in protection through designation as a wild and scenic river, in consideration of the other Land Management Plan components that serve to protect them and considering the other goals and objectives of the Plan.

It is less clear as to which features, the location of the features, or how many features are appropriate to retain and/or warrant some other action to preserve the setting associated with past mining along the South Fork Clearwater River. The disposition of the mining tailing along the South Fork Clearwater River has been a long-standing topic of dispute. Until such time as a site-specific decision is made, leaving the mine tails in place would be the least environmentally impactful and would continue to support the historical nature of the area. Such a decision would require a site-specific analysis that is beyond the scope of this Land Management Plan revision.

Wildlife

Concern 1: Management Area 1: Wilderness, Wild, and Scenic Rivers and National Historic Landmark Areas (letter number 877, comment 735)

The Forest Service should ensure that Management Area 1 is managed to support ungulate populations, including elk.

Response to comment

Management Area 1 includes areas of Designated Wilderness, Designated Wild and Scenic Rivers, the Lolo Trail National Historic Landmark. Wilderness is primarily managed for wilderness values, but within that management framework there is some flexibility in regards to habitat types and conditions so long as the tools used to achieve those conditions need Wilderness Act criteria and as long as the condition maintained also meets Wilderness Act requirements for naturalistic appearance and conditions.

The Revised Forest Plan does have a management goal (MA1-GL-WILD-03) to promote cooperation between Idaho Department of Fish and Game to manage fish and wildlife resources within this management area.

In addition, all subdivisions within Management Area 1 are managed with natural conditions and values as primary goals. This would generally result in areas that remain suitable for ungulate populations.

Many of the factors that could damage the area's suitability as ungulate habitat (such as motorized use, high impact recreation, new facility construction, etc.) would be prohibited or constrained in this management scenario such the area would remain suitable ungulate habitat, even if that were not specifically enunciated in the plan.

Conclusion: The Revised Forest Plan does not specifically manage for elk in Management Area 1. This is partly due to the laws and regulations surrounding Wilderness, Wild and Scenic Rivers, and the National

Historic Trail designation. However the plan does manage these areas for naturalness, which is generally beneficial for elk.

Concern 2: Terrestrial Ecosystems-Forestlands

The Forest Plan should include components that protect or restore the habitat and populations of listed, at-risk, or species of conservation concern.

Response to comment

The plan includes numerous species-specific components in addition to components that apply to wildlife in general, including:

FW-DC-WL-01. The Nez Perce-Clearwater provides habitat conditions for federally listed threatened, endangered, and candidate plant and animal species that contribute to their recovery to the point at which listing is no longer appropriate. Habitat used by federally listed species provides conditions to meet their life history needs.

FW-DC-WL-02. Ecological conditions on the Nez Perce-Clearwater contribute sustainable habitat to maintain species of conservation concern. Habitat is resilient and adaptable to stressors and likely future environments.

FW-DC-WL-03. The arrangement and distribution of vegetation patches is consistent with the natural range of variation and varies widely in size, shape, and structure to provide connectivity for native wildlife.

The Plan is compliant in providing for the diversity and abundance of wildlife under Section 219.9 of the planning rule.

Concern 4: Terrestrial Ecosystems-Snags (letter number 717, comment 204)

The Forest Service should retain all snags for wildlife benefit unless a snag poses a risk to human life or safety. These snags should be felled and left on-site, where appropriate, to provide coarse woody debris.

Response to comment

Snags are an important component of wildlife habitat and will be retained according to management area direction as follows:

MA3-DC-FOR-11. Snags are present across Nez Perce-Clearwater lands, contributing to diversity of structure and habitat. Snags are unevenly distributed and dynamic over time with highest densities occurring in burned areas and those infested by insects. The lowest densities of snags occur along roads and in developed sites or other areas where the concern for human safety is elevated. A range of decay classes is represented.

FW-GDL-FIRE-03. To maximize firefighter safety and ensure escape routes are available for firefighters and the public in the event of a wildfire, snags should not be retained when working within close proximity to the wildland urban interface/intermix, administrative sites, permitted infrastructure, or near roads that serve as fire fighter or public escape routes.

Concern 1: Wildlife

The Forest Service should provide more detailed analysis for ESA-listed species, species of conservation concern, birds, and invertebrates, including the beneficial effect wilderness has on wildlife by alternative and wildlife movement data.

Letter #	Comment #
577	15
805	54.58
877	299, 381
947	2
1054	11
1060	53, 120, 122, 124, 133
12883	3
17500	11

Response to comment

Commentors desire to have detailed analysis for at-risk species, birds and invertebrates, and include the beneficial effect wilderness has on wildlife and wildlife movement.

The National Environmental Policy Act requires Federal agencies to assess the environmental effects of proposed major Federal actions prior to making decisions. Furthermore NEPA requires Federal agencies to prepare a detailed statement on: (1) the environmental impact of the proposed action; (2) any adverse effects that cannot be avoided; (3) alternatives to the proposed action; (4) the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity; and (5) any irreversible and irretrievable commitments of resources that would be involved in the proposed action. 42 U.S.C. 4332(2)(C).

Consistent with the requirements of the National Environmental Policy Act (NEPA), the final EIS provides an in depth and detailed analysis of the effects of the proposed action and alternatives on at risk species including federally listed species, species of conservation concern. Other wildlife species were analyzed through a coarse filter ecosystem analysis. The FEIS discloses the beneficial and detrimental effects of potential management actions as well as plan components that would help to avoid or mitigate those potential effects including the effects of management of wilderness and recommended wilderness. The FEIS includes a species-specific analysis of the effects of the plan on each at risk species including each federally listed species, each species of conservation concern, and for some species of social or economic interest such as game species. These include detailed analysis of each at risk species within sections 3.2.9 Diversity and Abundance of Wildlife of the FEIS under the headings Species of Conservation concern, and Threatened, Endangered, Proposed, and Candidate Species heading. Effects to at risk plan species were analyzed in section 3.2.2 and effects to and at-risk aquatic species were analyzed in section 3.2.8.

The analysis for wildlife used a coarse filter-fine filter approach to analyze effects. Each wildlife species known to occur within the plan area, including birds, were identified, and evaluated for coarse filter ecosystem requirements. The analysis included a brief description of their habitat, and each species was grouped into habitat categories or groups based on the description of their habitat use preferences or key ecological requirements and is included in appendix C Wildlife. The project record also includes a

spreadsheet that identifies key ecological attributes, identification of key threats, broad potential vegetation types used, habitat types used, food habits, and whether the species is known to use snags or downed wood. The FEIS then analyzed the effects of the proposed action and alternatives on the habitat categories or groups including the effects on key ecological attributes of species within that group. Essentially, every species of wildlife known to occur within the plan area including some invertebrates of conservation interest were analyzed, either through coarse filter or species-specific analysis. Pollinators were also evaluated within the 3.2.2 in the at-risk plants section and under section 3.2.9 under the heading resource habitats including effects on species dependent upon nectar resources important to pollinators. The effects, both beneficial and detrimental, were evaluated and disclosed for the proposed action and alternatives including for wilderness and recommended wilderness for coarse filter ecosystem analysis and for species specific analysis for at risk species. The analysis for at risk species was improved and expanded between the draft EIS and the final EIS.

Concern 2: Wildlife

The Forest Service should define the parameters for models and define viability at the population level.

Letter #	Comment #
674	11
805	27, 51, 57
877	303, 304, 308-312, 379,468
1041	5
1060	121
1065	5, 66

Response to comment

The Forest Service defines the parameters for models in the wildlife section of the FEIS. The spatial scale is the plan area of the Nez Perce-Clearwater. However, in some cases, the evaluation looks at the broader landscape when evaluating cumulative effects, connectivity, and wide-ranging species. In most cases, the temporal scale of analysis included the life of the Land Management Plan. Some habitat analyses are evaluated over a longer timeframe. the analysis used modeling for 120-years through SIMPPLLE and 120- and 150-years in PRISM. However, the farther out predictions are made the more uncertain they are. Most reporting from SIMPPLLE and PRISM modeling is for 50 year periods to limit uncertainty. The analysis recognizes that effects can last over longer time periods.

Wildlife analyses relied on quantitative and spatial outputs from multiple modeling exercises, using geographic information systems and other tools. Such models were used to evaluate:

- proportions of unique habitat types affected by permanent human developments, such as roads and other infrastructure
- amounts and types of habitat for species, such as lynx and wolverine
- important areas for wildlife habitat connectivity
- predicted changes in climate patterns and potential impacts to wildlife and habitat.

Concern 3: Wildlife

The Forest Service should address various forms of motorized and nonmotorized recreation that would affect wildlife that are not discussed adequately in the Draft EIS. Other effects, such as those from roads, disease, climate change, fire, and timber harvest, are incomplete and should also be considered.

Letter #	Comment #
321	4
563	8, 9
569	2
805	7, 65, 66
872	1
877	380
1054	8
1060	132, 134
17594	1

Response to comment

The FEIS addressed effects of motorized and nonmotorized recreation on wildlife; particularly for wolverine, grizzly bear and lynx. Effects from road, disease, climate change, fire and timber harvest are also examined further in the FEIS in Chapter Three.

It is acknowledged in the analysis that increased road densities, motorized, and nonmotorized recreation (overall anthropogenic disturbance) have a variety of impacts on wildlife including avoidance and decreased survival rates.

Disease is addressed in particular for bighorn sheep. Climate change is discussed throughout the analysis including increased fire return intervals. Effects from timber harvest is varied among species and habitat types and discussed in further detail in Chapter Three of the EIS.

Concern 1: Wildlife-Habitat

The Forest Service should include an analysis of invertebrates in the Draft EIS and the benefit of large woody debris on wildlife habitat.

Letter #	Comment #
968	4
1060	45

Response to comment

Additional analysis for invertebrates has been added to section 3.2.9. “Abundance and Diversity of Wildlife” of the FEIS. As described in this section of the analysis, 41 terrestrial invertebrates and 23 aquatic invertebrates were evaluated for potential includes as species of conservation concern.

The wildlife analysis of the FEIS recognizes woody debris as a component of ecosystem structure (section 3.2.9), as a key ecological characteristic of aquatic and riparian habitats and as a mediator of insect community diversity (section 3.2.8). In section 3.2.8 of the analysis (“Key Ecological Attributes of Forested Habitats”) contains a separate subsection for “snags and downed wood,” which describes the

benefits of large woody debris for wildlife and fish habitat. Table 155 shows the number of species dependent upon snags or downed wood, or both, by habitat grouping. Guidelines MA2 and MA3-GDL-FOR-01 provide direction for retention of downed coarse woody material in management areas 2 and 3 to provide habitat structure for various terrestrial wildlife. Desired conditions FW-DC-SOIL-02, FW-DC-WTR-04, FW-GDL-WTR-01, FW-DC-RMZ-01, and FW-DC-WL-04 also direct providing woody debris for fish and wildlife habitat forest-wide.

The FEIS does include an analysis of invertebrates and accounts for the benefit of large woody debris on wildlife habitat.

Concern 2: Wildlife-Habitat

The Forest Service should update the desired condition for wildlife habitat to include wildlife adaptations to human disturbance. The cumulative effects of activities occurring outside of the National Forests' boundaries should include impacts on wildlife habitat. The Forest Service should also analyze the effects of management on winter wildlife habitat.

Letter #	Comment #
307	32
529	6
938	34
1060	44, 49
1076	5

Response to comment

Desired conditions in the revised forest plan reflect adaptations to human disturbance, including habitats that are adaptable to stressors and likely future environments, efforts to reduce human-wildlife conflicts such as with grizzly bears at recreation sites, and ensuring habitat connectivity.

In general, the analysis area for wildlife includes all lands managed by the Nez Perce-Clearwater; however, for the purposes of this document it may include segments outside National Forest System boundaries. In some cases, National Forest System lands may provide all, or a high percentage, of the habitat for a given species; however, in most instances, wildlife generally move from area to area without regard for boundaries. Cumulative effects analyses generally include lands within other ownerships immediately adjacent to the Nez Perce-Clearwater, although for some wide-ranging species the analysis area may have been larger and included an evaluation of connectivity between larger areas of habitat.

Concern 3: Wildlife-Habitat

The Forest Service should include the positive effects of fire on wildlife habitat and the minimal loss of timber. The adverse effects of clearcutting on wildlife habitat should also be more fully discussed, along with the impact of trails on wildlife habitat outside of trail boundaries.

Letter #	Comment #
62	3
436	8
1050	4
1054	2
13498	2

Response to comment

The positive effects of fire are discussed in Chapter Three of the FEIS under wildland fire management. Fire can increase forage for some wildlife species. The FEIS states the following:

“It is a key ecological driver in many ecosystems, facilitating nutrient cycling and promoting the growth of grasses and forbs over woody species. Periodic fire maintains a number of major grasslands, shrub steppe, and savanna ecosystems (Maczko and Hidinger 2008).

The land management plan includes a desired condition that expresses the full range of fire management activities, including both prescribed fire and natural wildfire, are recognized and used by Nez Perce-Clearwater administrators as an integral part of achieving ecosystem sustainability, including interrelated ecological, economic, and social components, such as improved ecosystem resilience and wildlife habitat, protection of property, other values at risk, and public safety (FW-DC-FIRE-02).

Prescribed fire is a tool to emulate natural processes and manipulate forested vegetation. It is a management tool often preferred in roadless areas. As with timber harvest, prescribed fire can open existing forest canopies and allow for an increase in herbaceous forage and understory shrub production. All Action Alternatives propose similar levels of prescribed fire, ranging between 6,450 to 8,330 average annual acres, depending on alternative. There is a high degree of variation, spatially and temporally, in the amount and location of wildfire, therefore calculating the amount of transitory forage created by wildfire is difficult to predict.”

Concern 1: Connectivity of Habitats

The Forest Service should develop species-specific connectivity plan components, use new migration data, and consider adjacent lands. It should pay attention to the importance of grizzly bears, wilderness areas, and river systems when developing an analysis for habitat connectivity.

This broad concern statement can be broken down into 8 unique comments.

- A) The plan should protect or address wildlife migration routes or wildlife corridors.
- B) The plan should incorporate connectivity for at risk species especially species affected by roads including grizzly bears and wolverines.
- C) Connectivity of rivers for fish and wildlife in the plan should include most suitable rivers especially those that have the largest contributions to watershed basins.
- D) The DEIS Errs in describing connectivity because it includes natural factors that species evolved with.
- E) Forest plan and monitoring should anticipate new information on connectivity and best practices.

F) The plan should provide direction to provide wildlife crossings across highways when they are reconstructed or expanded.

G) The plan should provide corridors to connect protected areas like wilderness or national parks.

H) The language in FW-GDL-WL-01 should be strengthened and clarified to allow for windthrow.

Letter #	Comment #
307	84
516	1
563	1
572	4
575	3
577	12, 18
663	17
877	375
1050	10
1115	1
17349	21
17262	3
17673	17, 38

Response to comment

The 2012 planning rule requires forest plans to include plan components to provide for ecosystem integrity including connectivity as outlined in section 219.8 Sustainability of the planning rule. Connectivity is defined in the planning rule as “Ecological conditions that exist at several spatial and temporal scales that provide landscape linkages that permit the exchange of flow, sediments, and nutrients; the daily and seasonal movements of animals within home ranges; the dispersal and genetic interchange between populations; and the long distance range shifts of species, such as in response to climate change.” Additionally, Section 219.8 includes specific direction to provide ecological connectivity in riparian areas, and section 219.10 Multiple Uses requires consideration of integrated resource management including habitat and habitat connectivity (219.10 (a)(1)).

The plan contains several plan components to provide connectivity to meet the requirements of the 2012 planning rule. These include land allocations in the preferred alternative, suitability plan components, coarse filter ecosystem components, and fine filter, species specific plan components. Land allocations such as wilderness management, Idaho Roadless Rule management, recommended wilderness allocation and management, designated wild and scenic rivers management, suitable and eligible wild and scenic rivers allocation and management, and Research Natural Area allocation and management all contribute to connectivity. Suitability plan components associated with these guide management on these land management

FW-DC-WL-06. The grizzly bear Bitterroot Recovery Zone provides the ecological conditions to support recolonization of grizzly bears. Land Management Plan land use allocations provide connectivity to allow secure passage from occupied habitat to the Bitterroot Recovery Zone.

FW-DC-WL-09. Wide-ranging species are free to move across and between habitats, allowing for dispersal, migration, genetic interaction, and species recruitment.

MA2-DC-RWILD-03. Recommended wilderness areas facilitate the connectivity and movement of wildlife species across the Nez Perce-Clearwater by remaining large areas with little human activity.

MA2-DC-IRA-03. Roadless areas contribute habitats for wide ranging species and connectivity for movement of wildlife. These areas also provide foraging, security, denning, and nesting habitat for wildlife.

FW-STD-WL-01. Canada lynx habitat shall be managed in accordance with the Northern Rockies Lynx Management Direction (U.S. Department of Agriculture 2007b) and Record of Decision (U.S. Department of Agriculture 2007a).

The Northern Rockies Lynx Direction Provides the following plan components related to connectivity:

Objective 30 ALL O1 Maintain or restore lynx habitat connectivity in and between LAUs, and in linkage areas.

Standard ALL S1 New or expanded permanent development and vegetation management projects must maintain habitat connectivity in an LAU and/or linkage area.

Objective HU O2 Manage recreational activities to maintain lynx habitat and connectivity.

Objective HU O4 Provide for lynx habitat needs and connectivity when developing new or expanding existing developed recreation sites or ski areas.

Objective HU O6 Reduce adverse highway effects on lynx by working cooperatively with other agencies to provide for lynx movement and habitat connectivity, and to reduce the potential of lynx mortality.

Guideline HU G7 New permanent roads should not be built on ridge-tops and saddles, or in areas identified as important for lynx habitat connectivity. New permanent roads and trails should be situated away from forested stringers.

FW-DC-WL-05. Bighorn sheep habitat reflects its historic distribution and connectivity and is comprised of native, high protein grass and forbs near rugged escape cover.

FW-DC-WL-06. The grizzly bear Bitterroot Recovery Zone provides the ecological conditions to support recolonization of grizzly bears. Land Management Plan land use allocations provide connectivity to allow secure passage from occupied habitat to the Bitterroot Recovery Zone.

FW-DC-WTR-02. Spatial connectivity exists within or between watersheds. Lateral, longitudinal, and drainage network connections include floodplains, wetlands, upslope areas, headwater tributaries, and intact habitat refugia. These network connections provide chemically and physically unobstructed routes to areas critical for fulfilling life history requirements of aquatic, riparian-associated, and many upland species of plants and animals.

FW-OBJ-WTR-04. Reconnect 10 to 20 miles of habitat in streams every 5 years where passage barriers created by roads or culverts are limiting the distribution of fish or other aquatic species of concern.

FW-OBJ-RMZ-01. Improve 300 to 700 acres of riparian habitat every 5 years, through improvements that are intended to meet desired conditions for riparian management zones, such as road obliteration, riparian planting, hardwood restoration, post assisted log structures, beaver dam analogs, and reconnecting floodplains by removing road prisms or berms.

FW-STD-CWN-03. In the Conservation Watershed Network and subwatersheds with Endangered Species Act critical habitat or listed aquatic species, hydroelectric and other surface water development authorizations shall include requirements for instream flows and habitat conditions that maintain or restore native fish and other desired aquatic species populations, riparian dependent resources, favorable channel conditions, and aquatic connectivity.

FW-STD-ARLND-01. When authorizing new lands special uses, or reauthorizing existing uses, include conditions to avoid adverse effects to fish, water, and riparian resources. If adverse effects are unavoidable to Endangered Species Act listed fish, species of conservation concern, impaired water bodies, or stream habitat conditions, authorizations shall require actions that result in the re-establishment, restoration, mitigation, or improvement of conditions and ecological processes to ensure that projects that degrade conditions also include measures to improve conditions to the extent practicable. These processes include in-stream flow regimes, physical and biological connectivity, water quality, and integrity and complexity of riparian and aquatic habitat.

FW-DC-WL-03. The arrangement and distribution of vegetation patches is consistent with the natural range of variation and varies widely in size, shape, and structure to provide connectivity for native wildlife.

FW-GL-WL-02. The Nez Perce-Clearwater cooperates with highway managers, state agencies, tribes, and landowners to implement wildlife and aquatic organism crossings that reduce encounters and contribute to public safety.

Concern 1: Wildlife-Filter, Ecosystem Components, and Ecological Conditions (letter number 577, comments 1-5)

The Forest Service must include an analysis of species of conservation concern, using fine- scale components that are not adequately addressed through coarse scale vegetation components.

Response to comment

At issue is whether plan components sufficiently provide for the ecological conditions necessary for the persistence of species of conservation concern, or if additional “fine filters” are necessary for individual species or groups of species that may not be provided through coarse filter plan components.

As described in the wildlife analysis (section 3.2.9), at-risk species are addressed through a coarse- and fine-filter approach consistent with the direction in FSH 1909.12 sections 23.11 and 23.13. The directives state “The plan components developed for ecosystem integrity and ecosystem diversity (sec. 23.11) are expected to provide the ecosystem (coarse-filter) approach to maintaining the persistence of native species within the plan area, including the at-risk species identified during the assessment... When the evaluation reveals that plan components for ecosystem integrity and ecosystem diversity or other plan components would not provide the ecological conditions necessary for one or more at-risk species, the responsible official shall develop additional species-specific plan components for those individual species (fine filter)” (FSH 1909.12 23.13).

Between the draft and final EIS, the wildlife analysis has been revised to have more robust analysis of coarse filter ecosystem plan components and to evaluate how the plan would provide for the diversity and abundance of wildlife. Appendix C of the FEIS (Wildlife Species and Habitat Summary) provides a crosswalk of at-risk species, threats to their habitat, key ecosystem characteristics of habitats, and how coarse- and fine-filter plan components provide for those habitats and address threats to at-risk species.

Concern 1: Wildlife-Focal Species

Because the identification of focal species is required by law, the Forest Service should adopt the species list provided and should implement a monitoring strategy. The Forest Service should retain focal species (management indicator species), include elk as a focal species, and incorporate raw data.

Letter #	Comment #
307	78, 80
577	6-9
805	5
12883	15
17349	6

Response to comment

Focal species were selected on the basis of their functional role in ecosystems according to 36 CFR 219.9. Focal species for the Nez Perce-Clearwater are Western Pearlshell Mussel, Ponderosa Pine Xeric Habitat Ecotone, and Elk.

Appendix three of the Land Management Plan includes monitoring information. The monitoring plan includes questions to evaluate the status of focal species as a means to assess the ecological conditions required under 36 CFR 219.9.

Monitoring focal species provides meaningful information regarding the effectiveness of the plan in maintaining or restoring the ecological conditions to maintain the diversity of plant and animal communities in the plan area.

Concern 1: Wildlife-Connectivity of Habitat

The Forest Service should develop species-specific connectivity plan components, use new migration data, and consider adjacent lands. It should pay attention to the importance of grizzly bears, wilderness areas, and river systems when developing an analysis for habitat connectivity.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	84	577	12, 18	1115	1
516	1	663	17	17349	21
563	1	877	375	17462	3
572	4	1050	10	17673	17, 38
575	3				

Response to comment

There are several plan components that address connectivity for grizzly bear and wildlife in general including the following:

FW-DC-WL-09. Wide-ranging species are free to move across and between habitats, allowing for dispersal, migration, genetic interaction, and species recruitment.

MA2-GDL-WL-05. To maintain large areas of unfragmented habitat for wide-ranging species, such as elk and grizzly bear, new motorized trails open to the public should not be authorized in Idaho Roadless Areas unless there are adjacent areas of 5,000 acres without open motorized system routes. This guideline does not apply to:

- Community Protection Zones (CPZs) as defined by the Idaho Roadless Rule.
- Areas with existing motorized access that are currently less than 5,000 acres.
- Existing trails that are relocated or reconstructed to mitigate negative impacts to ecological resources.

FW-GL-TE-01. The Nez Perce-Clearwater works with federal, state, tribal, and private land managers towards an all-lands approach through management and cooperation, including efforts to mitigate threats or stressors, provide for wildlife and fish habitat connectivity, and to provide social, economic, and ecological conditions that contribute to mutual objectives.

FW-DC-WTR-02. Spatial connectivity exists within or between watersheds. Lateral, longitudinal, and drainage network connections include floodplains, wetlands, upslope areas, headwater tributaries, and intact habitat refugia. These network connections provide chemically and physically unobstructed routes to areas critical for fulfilling life history requirements of aquatic, riparian-associated, and many upland species of plants and animals.

FW-OBJ-WTR-02. Enhance or restore 50 to 100 miles of stream habitat within naturally unconfined channels every five years to maintain or restore connectivity, structure, composition, and function of habitat for fisheries and other aquatic species in streams with legacy effects that caused channels to become straightened or incised, impaired beaver habitat, or diminished floodplain capacity. Activities include, but are not limited to, berm removal, large woody debris placement, streamside road decommissioning, riparian planting, beaver dam analogs, and process-based restoration and floodplain restoration.

FW-DC-WL-03. The arrangement and distribution of vegetation patches is consistent with the natural range of variation and varies widely in size, shape, and structure to provide connectivity for native wildlife.

FW-DC-WL-05. Bighorn sheep habitat reflects its historic distribution and connectivity and is comprised of native, high protein grass and forbs near rugged escape cover.

MA2-DC-RWILD-03. Recommended wilderness areas facilitate the connectivity and movement of wildlife species across the Nez Perce-Clearwater by remaining large areas with little human activity.

MA2-DC-IRA-03. Roadless areas contribute habitats for wide ranging species and connectivity for movement of wildlife. These areas also provide foraging, security, denning, and nesting habitat for wildlife.

Additionally, in the analysis in Chapter Three, adjacent lands were considered where appropriate for other species such as grizzly bear. Connectivity was examined particularly for grizzly bear, lynx, and elk.

Concern 2: Wildlife-Connectivity of Habitat

The Forest Service should develop standards and guidelines to improve connectivity and should work with managers of adjacent lands. The range of alternatives should include a scenario where road density is reduced to support the maximum level of habitat connectivity.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
436	7	669	2	1054	3
525	3	717	54, 55, 62	16859	2
529	31, 32	877	377	17509	15
563	2	938	3, 62	17673	25
657	1	962	11		

Response to comment

Commenters questioned whether the Land Management Plan (LMP) components sufficiently provide for spatial connectivity, including through working across management boundaries. The 2012 Planning Rule requires that the plan must include components, such as standards or guidelines, to maintain or restore connectivity (36 CFR 219.9).

The Land Management Plan (LMP) directs management activities within the plan area of the Nez Perce-Clearwater National Forests. However, the importance of an “all-lands approach” in providing for habitat connectivity is recognized in several plan components of the revised LMP. For example, Chapter 2 ‘Physical and Biological Ecosystems’ begins with goals for across the landscape. Goal FW-GL-TE-01 guides that “The Nez Perce-Clearwater works with federal, state, tribal, and private land managers towards an all-lands approach through management and cooperation, including efforts to mitigate threats or stressors, provide for wildlife and fish habitat connectivity, and to provide social, economic, and ecological conditions that contribute to mutual objectives.” Other plan components that direct trending toward improving connectivity include FW-DC-WTR-02, FW-DC-ARINF-01, FW-STD-ARINF-07, FW-STD-ARLND-01, FW-STD-ARLND-03, FW-DC-WL-03, FW-DC-WL-05, FW-DC-WL-06, MA2-DC-RWILD-03, and MA2-DC-IRA-03. The importance of connectivity is additionally recognized throughout the ‘Management Approaches’ (Appendix 4) of the revised LMP. For example, the approach for land status and ownership identifies this as a criterion to be considered when evaluating lands for acquisition: “lands important for wildlife connectivity and big game winter range” (Appendix 4, revised LMP). The revised LMP therefore provides for species distribution and will maintain or restore connectivity.

The alternatives presented in the FEIS provide for differing levels of motorized use through the recreation opportunity spectrum and suitability plan components. Alternative W proposes over four times the Recommended Wilderness Area acreage as the current situation, without motorized or mechanized access. However, as further described in Section 1 in the FEIS, no threshold for minimum or maximum densities of routes is prescribed. Designated routes and areas for motorized use are addressed in travel planning. While the LMP sets the stage for travel planning, the plan is not travel planning and becoming too specific may limit the range of possible solutions during travel planning. The action alternatives use suitability to describe motorized access. Action alternatives focus on desired conditions for access—desiring roads in the correct places to provide for a valid multiple use and providing motorized access while preventing harm to ecological resources, including fish and wildlife, remaining silent on the site-specific route density needed to accomplish this desired condition.

Concern 3: Wildlife-Connectivity of Habitat

The Forest Service should bolster the impact analysis with best available science information for activities affecting connectivity, including roads, clearcutting, timber harvest, climate change, factors reducing gene flow, and fragmentation.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	129, 149	577	11	1050	20
492	2	625	1	1054	2, 12
518	1	805	25	4767	6
529	33, 34	877	376	5742	1
563	3, 10	947	1	17374	2
566	3				

Response to comment

Commenters requested the FEIS include additional analysis related to activities that affect habitat connectivity. The 2012 Planning Rule requires that the plan must include components, such as standards or guidelines, to maintain or restore connectivity (36 CFR 219.9).

The wildlife analysis of the FEIS recognizes connectivity as one of the key ecosystem characteristics that is an indicator of ecological integrity. As described in section 3.2.9, models were used to evaluate important areas for wildlife habitat connectivity, proportions of unique habitat types affected by permanent human developments, such as roads and other infrastructure, and predicted changes in climate patterns. For example, the SIMPPLLE model was used to project future vegetation changes to fisher habitat over the next 50 years as a result of managing towards desired conditions, as well as future climate conditions. The SIMPPLLE model takes into account disturbance factors that have occurred in the past, including timber treatments, and concurrently simulates natural disturbances like fire, insects, and disease. Modeling analyses have been bolstered considerably in the FEIS compared to DEIS. In addition to modeling, the analysis also contains numerous sections of more qualitative evaluation of plan components on connectivity under different alternatives, informed by best available science (e.g., section 3.2.9 of the FEIS on Key Ecological Attributes of Forested Habitats).

Concern 1: Wildlife-Pollinators

The Forest Service should include a pollinator section in the Draft EIS that includes standards and guidelines for connected pollinator habitats.

Letter #	Comment #
577	20
805	50
877	550, 552

Response to comment

The FEIS contains a section on pollinators. The Plan emphasizes the importance of pollinators by including a desired condition that promotes plant communities that are comprised of a diverse mix of native grass, forb, shrub and tree species which provide forage for pollinator species (FW-DC-TE-03). The wildlife section of the FEIS provides an evaluation of the effects of the plan on pollinator resources. Additionally, Monarch are address in Chapter 3 of the FEIS.

Concern 2: Wildlife-Pollinators

The Forest Service should quantify impacts on native pollinators and take a hard look under NEPA on how nonnative species would affect rare endemic communities. Additionally, the Forest Service should define what it means by desirable nonnative pollinators.

Letter #	Comment #
307	128
805	50
877	551, 553, 555
1060	73, 74

Response to comment

Pollinators are briefly analyzed in Chapter Three of the FEIS along with Monarch Butterfly in particular. Non-native species impacts to endemic communities are analyzed in Chapter Three of the FEIS. The FEIS analysis does not distinguish between nonnative pollinators and native pollinators.

Effects from nonnative species to rare plants are analyzed in Chapter Three of the FEIS in addition to a dedicated section titled “Current Invasive Plant Infestations.”

Concern 1: Threatened and Endangered Species – Wolverine

The Forest Service should consider the minimum territory size for a viable population and should restore linkages and connectivity on lands on and next to the National Forests.

Letter #	Comment #
529	21
877	382, 384

Response to comment

The FEIS considered maternal, primary, and female dispersal habitat as broken out in Table 230. The LMP contains many plan components emphasizing habitat connectivity for all wildlife including wolverine:

FW-DC-WL-09. Wide-ranging species are free to move across and between habitats, allowing for dispersal, migration, genetic interaction, and species recruitment.

MA2-GDL-WL-05. To maintain large areas of unfragmented habitat for wide-ranging species, such as elk and grizzly bear, new motorized trails open to the public should not be authorized in Idaho Roadless Areas unless there are adjacent areas of 5,000 acres without open motorized system routes. This guideline does not apply to:

- Community Protection Zones (CPZs) as defined by the Idaho Roadless Rule.
- Areas with existing motorized access that are currently less than 5,000 acres.
- Existing trails that are relocated or reconstructed to mitigate negative impacts to ecological resources.

FW-GL-TE-01. The Nez Perce-Clearwater works with federal, state, tribal, and private land managers towards an all-lands approach through management and cooperation, including efforts to mitigate threats

or stressors, provide for wildlife and fish habitat connectivity, and to provide social, economic, and ecological conditions that contribute to mutual objectives.

FW-DC-WTR-02. Spatial connectivity exists within or between watersheds. Lateral, longitudinal, and drainage network connections include floodplains, wetlands, upslope areas, headwater tributaries, and intact habitat refugia. These network connections provide chemically and physically unobstructed routes to areas critical for fulfilling life history requirements of aquatic, riparian-associated, and many upland species of plants and animals.

FW-DC-WL-03. The arrangement and distribution of vegetation patches is consistent with the natural range of variation and varies widely in size, shape, and structure to provide connectivity for native wildlife.

MA2-DC-RWILD-03. Recommended wilderness areas facilitate the connectivity and movement of wildlife species across the Nez Perce-Clearwater by remaining large areas with little human activity.

MA2-DC-IRA-03. Roadless areas contribute habitats for wide ranging species and connectivity for movement of wildlife. These areas also provide foraging, security, denning, and nesting habitat for wildlife.

Concern 2: Threatened and Endangered Species – Wolverine

The Forest Service should develop species-specific plan components to mitigate impacts on wolverine. Objectives from the State of Idaho for the conservation of wolverines should be included.

Letter #	Comment #
717	149, 151
805	73
877	383, 385
17673	41

Response to comment

The Idaho Department of Fish and Game established wolverine priority conservation areas as a framework for managing wolverines in the state of Idaho. The areas across the state with wolverine habitat were categorized as Tier I, Tier II, or Tier III as a means to prioritize conservation work for wolverines. Nearly all the lands of the Nez Perce-Clearwater were identified as either Tier II moderate or Tier III low.

The LMP contains several plan components that benefit wolverine including:

FW-DC-WL-09. Wide-ranging species are free to move across and between habitats, allowing for dispersal, migration, genetic interaction, and species recruitment.

MA2-GDL-WL-05. To maintain large areas of unfragmented habitat for wide-ranging species, such as elk and grizzly bear, new motorized trails open to the public should not be authorized in Idaho Roadless Areas unless there are adjacent areas of 5,000 acres without open motorized system routes. This guideline does not apply to:

- Community Protection Zones (CPZs) as defined by the Idaho Roadless Rule.
- Areas with existing motorized access that are currently less than 5,000 acres.

- Existing trails that are relocated or reconstructed to mitigate negative impacts to ecological resources.

FW-GL-TE-01. The Nez Perce-Clearwater works with federal, state, tribal, and private land managers towards an all-lands approach through management and cooperation, including efforts to mitigate threats or stressors, provide for wildlife and fish habitat connectivity, and to provide social, economic, and ecological conditions that contribute to mutual objectives.

FW-DC-WTR-02. Spatial connectivity exists within or between watersheds. Lateral, longitudinal, and drainage network connections include floodplains, wetlands, upslope areas, headwater tributaries, and intact habitat refugia. These network connections provide chemically and physically unobstructed routes to areas critical for fulfilling life history requirements of aquatic, riparian-associated, and many upland species of plants and animals.

FW-DC-WL-03. The arrangement and distribution of vegetation patches is consistent with the natural range of variation and varies widely in size, shape, and structure to provide connectivity for native wildlife.

MA2-DC-RWILD-03. Recommended wilderness areas facilitate the connectivity and movement of wildlife species across the Nez Perce-Clearwater by remaining large areas with little human activity.

MA2-DC-IRA-03. Roadless areas contribute habitats for wide ranging species and connectivity for movement of wildlife. These areas also provide foraging, security, denning, and nesting habitat for wildlife.

Concern 3: Threatened and Endangered Species – Wolverine

The Forest Service should expand the analysis of the effects of motorized use and associated roads and trails on wolverine habitat. Studies that analyze recreation, including over-snow vehicle impacts, need to be included to support management decisions. The effects of climate change should also be included.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
321	2	563	7	805	71
397	1	587	32	877	386-391
423	3, 4	682	3	968	13
529	22-24	717	148, 150	17673	42-44

Response to comment

The FEIS used the best available science and cited several studies on impacts to wolverine from winter recreation and motorized and nonmotorized recreation. Figure 89 shows a detailed snowmobile user selection that could impact wolverine habitat. Road-related mortality is currently not an issue and there is no information to indicate that it will increase in the future.

Climate change was the only primary threat the USFWS identified for the wolverine DPS. The FEIS used a compilation of climate change effects published for the Northern Region Adaptation Partnership (Halofsky et al. 2018b, a) that summarizes climate change projections by subregions. Downscaled climate models were used to predict the effects of a changing climate. Future climate uncertainty and anticipated variability is associated with scale. Potential effects of future changes in snow cover and persistence are uncertain or variable due to geographic location, atmospheric circulation patterns, such as the Pacific Decadal Oscillation, and elevation.

Concern 1: Wildlife Other than At-Risk Species

The Forest Service should analyze the impacts on other wildlife species, including beavers, doves and pigeons, and amphibians. It should also discuss how management of elk habitat can affect other species.

Letter #	Comment #
307	81
672	2
805	77
1050	9

Response to comment

Commenters sought additional analysis to evaluate the sufficiency of plan components to provide for the persistence of specific wildlife species, and also suggested opportunities for more coordinated management related to elk.

The FEIS considers ecological integrity at multiple scales and explains the rationale for the analysis area used for wildlife habitat diversity as well as individual species. Appendix C of the FEIS has been revised to include a new table (Table 2) showing how individual species were assigned to habitat groupings and subgroupings to facilitate coarse filter ecosystem analysis. Beavers, mourning and Eurasian collared doves, rock pigeon, and several species of amphibians are included in Table 2 of Appendix C. For example, mourning doves are associated with the “Ecotone, forest edge or habitat combinations” habitat grouping. This crosswalks with the analysis in the FEIS for ecotone, forest edge, or forest mosaic habitat. Beavers are associated with riparian habitat that is analyzed in section 3.2.9. This same process is applied for Eurasian collared doves, rock pigeon, and different amphibian species. Rather than analyzing the effects of the plan on individual wildlife species, the analysis evaluates the effects of the plan and alternatives on these habitat groupings or subgroupings consistent with the coarse-filter approach in § 219.9 of the 2012 planning rule.

The effects of Plan direction in the Multiple Uses Wildlife section are analyzed on at-risk species. For example, the analysis for Canada lynx states: “The objectives for elk nutrition are nested within the vegetation plan components, except that they direct a proportion of treatments to areas that would produce higher nutritional responses. Sites with higher nutrition potential are those that are more mesic and have better quality soils. Some of these treatments could occur within lynx habitats and would reduce lynx use for approximately 30 to 40 years. These treatments would be required to abide by the Northern Rockies Lynx Management Direction, which restricts the amount of lynx habitat that could be treated within a lynx analysis unit to ensure they protect lynx habitat” (section 3.2.9). The analysis for wolverine states “Plan direction in the multiple uses’ wildlife section would have negligible effects on wolverines and would benefit wolverine prey” (section 3.2.9).

Commenters also requested inclusion of goals that emphasize coordination between the Forest and other agencies to provide habitat conditions for elk and other big game. Appendix 4 of the Land Management Plan (LMP) describes some of the possible actions and potential management approaches and strategies the Nez Perce-Clearwater National Forests might undertake toward achieving the desired conditions described in the LMP. It is also intended to help clarify how the planned outcomes (i.e., objectives, desired conditions) in the plan might be achieved. A step in the potential management strategy for elk includes “Describe hunter harvest and hunter opportunity objectives for the landscape, as developed with Idaho Department of Fish and Game and Nez Perce Tribe, and how the current landscape condition meets or does not meet those objectives.”

Concern 2: Wildlife Other than At-Risk Species

The Forest Service should include how wilderness areas affect wildlife species and the contribution of natural processes to maintain habitat. The impact of roads and wolves on other wildlife species should also be discussed.

Letter #	Comment #
436	6
549	4
3110	58
17688	3

Response to comment

Several comments questioned if Land Management Plan (LMP) components adequately provide for wildlife species in the plan area that are commonly enjoyed and used by the public.

The 2012 Planning Rule requires that plan components must provide for multiple uses and ecosystem services within Agency authority and inherent capability of the plan area as described in Section 219.10 of the Planning Rule.

A suite of plan components provide or contribute to habitat conditions for wildlife commonly enjoyed and used by the public. As identified in the wildlife analysis for ecosystem plan components (section 3.2.9 of the FEIS), FW-DC-WLMU-04 is a desired condition emphasizing the role natural processes have in maintaining or improving the mosaic habitats needed for many game species. FW-GDL-WLMU-03 is a guideline designed to reduce disturbance during critical time periods of the lifecycle of big game species. Winter range restoration is not discouraged within the plan and FW-DC-WLMU-03 would encourage consideration of winter habitat management for ungulates. Additional emphasis on winter range has been added via FW-DC-WLMU-07, which guides that “Motorized access does not preclude use of high-quality nutritional resources or winter ranges.”

The analysis also included the potential impacts to different habitat types, at-risk species, and multiple use species from land allocations, such as recommended wilderness areas, across alternatives using a threat-based framework (Section 3.2.9 of the FEIS). For example, Section 3.2.9 of the FEIS analyzes the effects of land allocations on habitat connectivity across alternatives. Additional analysis has been added to the FEIS (Section 3.2.9) regarding how natural processes and land management (including wilderness areas) affect fisher habitat. Spatial overlays of the amount of land use allocations were overlaid on fisher, grizzly bear, and wolverine habitat to evaluate those effects to those species.

Gray wolves are analyzed in a subsection of “Wildlife for Multiple Uses” (3.2.9 of the FEIS) As acknowledged in this section, “wolves, cougars, and black bears are not emphasized in the plan specifically. The populations of wolves and cougars are dependent upon healthy ungulate populations, which are provided for in the plan.” The impacts of wolves on other wildlife species are described in the FEIS; however, the analysis also recognizes that population objectives are not within the authority of the Forest Service.

Plan components and alternatives were analyzed in the FEIS for whether they provide for habitat conditions for species commonly enjoyed and used by the public (section ‘Multiple Uses Wildlife’).

Concern 1: Wildlife Other than At-Risk Species - Elk

The Forest Service should address factors that influence forage quality and availability. Nutritional requirements for elk in habitat management areas also need to be considered.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
805	87, 90, 92, 125	873	34	1060	139
587	9, 34	877	93, 465, 466, 471-476, 478	17349	8, 10, 12
717	167	938	51	17673	11
805	28	1050	1	17688	5, 16, 22-25, 42, 44-47,

Response to comment

The FEIS focuses heavily upon elk nutrition quality in Chapter 3. The importance of high-quality nutritional resources is increasingly thought to be important to elk population performance. Higher amounts of high quality dietary digestible energy during the summer has been correlated to faster calf growth, better winter survival, increased calf production, earlier breeding phenology, and better calf survival. Lukacs et al. (Lukacs et al. 2018) studied elk population trends in 101 elk management units from 7 states in the western United States. They tested the effects of predator richness, forage productivity, and precipitation on elk population performance. Forage productivity on summer and winter ranges had the strongest effect on elk recruitment relative to other factors. There is increasing evidence from detailed studies of maternal nutrition that summer forage conditions may be more important than winter conditions in some settings. The Clearwater Basin Collaborative’s elk project has initiated a long-term monitoring study which includes animal fitness and nutrition.

The elk nutrition model was run through the SIMPPLLE model to predict the changes in the amount of area that has high nutrition forage under the plan components and alternatives. This allowed the national forest to understand the relationship between the desired conditions and elk vital rates and will become a valuable tool when managing elk habitats.

The following plan components address elk nutrition:

FW-DC-WLMU-06. Habitat conditions maintain or improve elk habitat use and provide nutritional resources sufficient to support productive elk populations. The amount and distribution of early seral nutritional resources are consistent with the desired conditions in the Forestlands and Meadows, Grasslands, and Shrublands sections. Elk habitat quality is not degraded by invasive plant species.

FW-DC-WLMU-07. Elk habitat is distributed throughout the planning area to support elk populations. Motorized access does not preclude use of high-quality nutritional resources or winter ranges.

Concern 2: Wildlife Other than At-Risk Species - Elk

The Forest Service should address many concerns for habitat management, including those relating to winter range and population trends. Plan components with quantifiable standards need to be implemented, and coordination with state agencies and tribes should occur. Management should be aligned with the 2012 Planning Rule.

Letter #	Comment #	Letter #	Comment #
307	65, 89, 155-159	1050	2, 3
805	24	1060	135, 136, 140
873	33	17688	15, 40, 51
877	94, 467, 469, 470		

Response to comment

Winter range and population trends are addressed in Chapter Three. For elk management it is being found that summer range is more important to survival rates than winter range; though winter range is still important.

The plan component has several quantifiable standards regarding elk:

FW-DC-WLMU-06. Habitat conditions maintain or improve elk habitat use and provide nutritional resources sufficient to support productive elk populations. The amount and distribution of early seral nutritional resources are consistent with the desired conditions in the Forestlands and Meadows, Grasslands, and Shrublands sections. Elk habitat quality is not degraded by invasive plant species.

FW-DC-WLMU-07. Elk habitat is distributed throughout the planning area to support elk populations. Motorized access does not preclude use of high-quality nutritional resources or winter ranges.

MA1-DC-WLMU-01. Elk habitats in Management Area 1 provide nutritional resources primarily through natural processes and are consistent with the natural range of variation. Vegetation is composed of native plants.

MA2-DC-WLMU-01. Ten to twenty percent of Management Area 2 is in a condition that provides moderate or high nutritional quality forage for elk. Areas with moderate or high-quality forage are distributed across the management area.

MA2-DC-WLMU-02. Areas at least 5,000 acres in size exist without motorized access open to the public to maintain habitat use by elk.

MA3-DC-WLMU-01. Ten to twenty percent of Management Area 3 is in a condition that provides moderate or high-quality nutritional forage for Elk. Areas with moderate or high-quality forage are distributed across the management area, with a portion of the moderate or high-quality nutritional forage occurring greater than 0.5 miles from open motorized routes.

MA1-OBJ-WLMU-01. Treat 500 acres of invasive weeds in elk habitat every 5 years.

MA2-OBJ-WLMU-01. In Management Area 2, 10,000 to 15,000 acres are improved every five years through vegetative treatments and wildland fire to improve nutritional forage value for elk. Natural ignitions are used to improve nutritional forage when and where appropriate to contribute to these acres.

MA3-OBJ-WLMU-01. Improve habitat use for elk on 19,000 acres in Management Area 3 with moderate or high potential nutritional resources within 15 years. Treatments are preferentially focused on areas more than one half mile from roads open motorized system routes.

FW-GDL-WLMU-01. When closing routes to motorized use, to ensure benefits to wildlife habitat are realized, include measures to sufficiently exclude motorized use on closed routes.

FW-GDL-WLMU-02. New fencing installation or reconstruction should be designed to reduce barriers to wildlife movement, except when fencing is for the purpose of restricting wildlife movement.

FW-GDL-WLMU-03. In order to reduce disturbance to wintering big game, management activities should be scheduled to minimize disturbance in big game winter range between December 1st and March 15th.

MA2-GDL-WLMU-01. To increase available habitat for elk, vegetation management projects designed to improve elk habitat should increase available summer forage in areas of moderate or high nutrition potential.

MA3-GDL-WLMU-01. Treatments designed to improve elk habitat should focus on one or more of the habitat covariates likely to improve predicted cow elk body fat condition.

The Forest Service is coordinating closely with state and tribal agencies on wildlife management including elk. The LMP is aligned with the 2012 planning rule.

Concern 3: Wildlife Other than At-Risk Species - Elk

The Forest Service should expand the analysis of impacts on elk from motorized use, roads, hunting, logging, pesticides, recreation, and wolves.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
307	86, 88, 91,	938	49, 50-53	1115	21
436	5	1050	11, 18	17349	17
549	11	1054	7	17473	4
677	1	1060	137, 138	17688	17-19, 25, 39, 43
717	165, 166	1067	4	17871	3
877	477, 479	1100	1		

Response to comment

The FEIS has an expanded analysis of impacts on elk from roads and motorized vehicles which contains an overview of over 30 studies. It also addresses impacts from recreation, hunting, wolves, and vegetation management (including logging). The LMP contains several plan components for elk management:

FW-DC-WLMU-06. Habitat conditions maintain or improve elk habitat use and provide nutritional resources sufficient to support productive elk populations. The amount and distribution of early seral nutritional resources are consistent with the desired conditions in the Forestlands and Meadows, Grasslands, and Shrublands sections. Elk habitat quality is not degraded by invasive plant species.

FW-DC-WLMU-07. Elk habitat is distributed throughout the planning area to support elk populations. Motorized access does not preclude use of high-quality nutritional resources or winter ranges.

MA1-DC-WLMU-01. Elk habitats in Management Area 1 provide nutritional resources primarily through natural processes and are consistent with the natural range of variation. Vegetation is composed of native plants.

MA2-DC-WLMU-01. Ten to twenty percent of Management Area 2 is in a condition that provides moderate or high nutritional quality forage for elk. Areas with moderate or high-quality forage are distributed across the management area.

MA2-DC-WLMU-02. Areas at least 5,000 acres in size exist without motorized access open to the public to maintain habitat use by elk.

MA3-DC-WLMU-01. Ten to twenty percent of Management Area 3 is in a condition that provides moderate or high-quality nutritional forage for Elk. Areas with moderate or high-quality forage are distributed across the management area, with a portion of the moderate or high-quality nutritional forage occurring greater than 0.5 miles from open motorized routes.

MA1-OBJ-WLMU-01. Treat 500 acres of invasive weeds in elk habitat every 5 years.

MA2-OBJ-WLMU-01. In Management Area 2, 10,000 to 15,000 acres are improved every five years through vegetative treatments and wildland fire to improve nutritional forage value for elk. Natural ignitions are used to improve nutritional forage when and where appropriate to contribute to these acres.

MA3-OBJ-WLMU-01. Improve habitat use for elk on 19,000 acres in Management Area 3 with moderate or high potential nutritional resources within 15 years. Treatments are preferentially focused on areas more than one half mile from roads open motorized system routes.

FW-GDL-WLMU-01. When closing routes to motorized use, to ensure benefits to wildlife habitat are realized, include measures to sufficiently exclude motorized use on closed routes.

FW-GDL-WLMU-02. New fencing installation or reconstruction should be designed to reduce barriers to wildlife movement, except when fencing is for the purpose of restricting wildlife movement.

FW-GDL-WLMU-03. In order to reduce disturbance to wintering big game, management activities should be scheduled to minimize disturbance in big game winter range between December 1st and March 15th.

MA2-GDL-WLMU-01. To increase available habitat for elk, vegetation management projects designed to improve elk habitat should increase available summer forage in areas of moderate or high nutrition potential.

MA3-GDL-WLMU-01. Treatments designed to improve elk habitat should focus on one or more of the habitat covariates likely to improve predicted cow elk body fat condition.

Concern 1: Wildlife Other than At-Risk Species – Mountain Goat

Due to population declines for mountain goats, the Forest Service should expand its analysis to include effects from over-snow vehicles, forage availability, and habitat connectivity.

Letter #	Comment #
307	154
717	168, 169, 178
17688	28, 30-33, 49

Response to comment

Most mountain goat habitats are inaccessible to anthropogenic threats and are protected in many ways by restrictions in wilderness, recommended wilderness, or roadless areas. FW-DC-WLMU-05 and FW-DC-WL-03 would help to increase connectivity for mountain goats. Lack of connectivity from current populations to unoccupied suitable habitats is suspected to have caused mountain goat habitats to remain

unoccupied and is thought to be caused by fire suppression, which creates conditions unfavorable to mountain goat travel at high elevations. Connectivity between mountain goat populations and suitable habitats potentially prevents mountain goat distribution from increasing in areas formally occupied by mountain goats. FW-DC-GS-05 describes desired vegetation conditions in subalpine areas, including mountain goat habitat, and would direct management towards improved forage conditions for mountain goats.

In the Preferred Alternative, the Mallard Larkin and Hoodoo areas were identified as recommended wilderness with modified boundaries as compared to the No Action Alternative. These modified boundaries were a compromise between the desires of motorized winter recreationalists and providing protections for mountain goats. They excluded areas popular with recreational users from recommended wilderness so that use could be suitable for motorized winter recreation. However, areas of concentrated use by mountain goats were included in recommended wilderness and would not be suitable for summer nor winter motorized uses. This strikes a balance in providing for both the desires of winter recreational users and the protection of mountain goat populations. These recommended wilderness areas contain two of the three largest herds in the plan area. The other large herd is located in designated wilderness areas and is also protected from winter recreation disturbances. The Preferred Alternative does not include the Bighorn Weitas area nor the Moose Mountain wilderness area, which contains small herds of mountain goats. Additionally, winter motorized recreation in recommended areas were found not suitable so these measures would protect mountain goats in the plan area from disturbance.

Snowmobile use was modeled and suggested low amounts of overlap between snowmobile use and known occupied mountain goat habitat.

Concern 2: Wildlife Other than At-Risk Species – Mountain Goat

Mountain goat occurrences in wilderness areas are second only to occurrences in roadless areas. The Forest Service should acknowledge the importance of these areas for mountain goats and associated activities, such as hunting.

Letter #	Comment #
1115	2
17688	35

Response to comment

The importance of wilderness areas and roadless areas is addressed in Chapter Three as is the status of mountain goat as a sought after big game animal.

Concern 3: Wildlife Other than At-Risk Species – Mountain Goat

The use of over-snow vehicles in mountain goat habitat is highly controversial; accordingly, the Forest Service needs to expand the analysis of this use as it relates to mountain goats.

Letter #	Comment #	Letter #	Comment #	Letter #	Comment #
320	1	682	2	1008	1
321	3	717	170-177, 179-181	1054	5
421	5	764	10	3110	59
529	25, 27, 28	805	41	16863	1
587	33	903	1	17349	4
662	1	938	54, 67	17688	29, 34, 50, 54

Response to comment

To understand snowmobile use in the plan area, landscape characteristics selected by snowmobilers were modeled spatially to evaluate the overlap of mountain goat habitats and other wildlife habitats with modeled snowmobile preferences (Olson et al. 2017). Modeling was conducted by Lucretia Olson and used parameters similar to those she used in Olson et al. (2017). The model was validated by user data and Forest Service recreation staff who have expert knowledge of the use in the plan area. The snowmobile model is a function of terrain, access, canopy cover, and snow depth, which are features that may contribute to the ease of which snowmobilers can use an area. It creates a probability surface, at which values closer to one would be preferred for snowmobiling while those closest to zero would not be preferred. It does not necessarily predict where snowmobile use is occurring or the number of snowmobilers using an area because use also depends upon whether the areas are open administratively, have available access, or other factors. Rather, it predicts where snowmobiling might be desirable or easier to the average snowmobile user. The model appeared to represent well where most snowmobile use is occurring and performed better in the Clearwater side of the national forest than on the Nez Perce side.

Model results suggest low amounts of overlap between snowmobile use and known mountain goat population areas. This makes sense because most mountain goat habitat is too steep for comfortable snowmobile use. However, some areas predicted to have high probability values in the snowmobile model are in proximity and adjacent to known mountain goat herds, particularly the herd on Blacklead Mountain, which may leave them susceptible to access by highly skilled snowmobilers. Highly skilled snowmobilers can access steeper terrain and more rugged conditions that average snowmobilers. The model did not perform well at predicting use by highly skilled snowmobilers because it shows areas known to be used by advanced snowmobile users as not preferred by typical snowmobilers. The model only predicts snowmobiler preferences and does not predict snow bike use, which may have different use patterns than snowmobiles.

Concern 1: Wildlife Other than At-Risk Species - Moose

The Forest Service should not eliminate the winter management area for moose but rather should update it to ensure winter protection of stands. This is because studies have shown that older forest canopies and stands with yew are important for wintering moose.

Letter #	Comment #
307	66, 82
17688	27, 48

Response to comment

The FEIS states that FW-GDL-WLMU-03 restricts disturbing activities on winter ranges and will protect these species during this challenging time. The FEIS and LMP acknowledges the importance of yew for winter habitat for moose.

FW-DC-WLMU-03. Pacific yew plant communities and timbered areas with mature yew-wood thickets provide moose winter habitat.

Concern 1: Wildlife Other than At-Risk Species – White-Tailed Deer

The Forest Service should address the cumulative effects on the species from activities on adjacent lands. The effects of timber harvest activities on this species should also be analyzed because forest succession may be responsible for declining populations in several game units.

Letter #	Comment #
412	1, 2
17688	36, 38
17879	3

Response to comment

Effects to white-tailed deer and other game species were analyzed in Chapter Three. Table 300 contains a comparison of the effects to white-tailed deer among the alternatives. The FEIS cites the assessment in 2014 that detailed winter and summer habitats. Whitetail deer would benefit from a variety of stand size classes and a mosaic pattern of disturbance offering hiding and foraging cover. Whitetail deer populations are generally healthy in most of the Nez Perce-Clearwater but may have declined in Game Management Units 16A, 17, 19, and 20 due to forest succession.

Concern 1: Wildlife Other than At-Risk Species – Black Bear

The Forest Service should not restrict black bear hunting in the National Forests. Additionally, it should consult with biologists and the Idaho Department of Fish and Game's Black Bear Management Plan (1999-2010).

Letter #	Comment #
938	55
17349	28

Response to comment

A goal of the plan is that the Nez Perce-Clearwater provides habitat conditions to meet Idaho Department of Fish and Game management plan objectives. Similarly, it is a desired condition that habitat supports opportunities for hunting, fishing, trapping, gathering, observing, photography, subsistence, cultural interactions, and the exercise of treaty reserved rights, as in FW-DC-WLMU-01. Language in FW-DC-WLMU-01 indicating a desire that “wildlife is distributed in habitats within their respective seasonal ranges” suggests desired conditions have a wide distribution of these species in the plan area but is not to be construed to mean that all wildlife occurs forestwide at all seasons of the year. Since wildlife species use a variety of habitats, FW-DC-WLMU-02 is a desired condition that habitats in each potential vegetation type function within a desired range of variation to contribute to multiple use wildlife needs.

Concern 2: Wildlife Other than At-Risk Species – Black Bear (letter number 1092, comment 4)

The Forest Service should prohibit black bear hunting in the Great Burn Area. Additionally, it should require appropriate food storage on the National Forests and should eliminate bear baiting.

Response to comment

The State of Idaho manages bear populations including hunt units, tags, and hunting methods. Forest visitors are provided bear safety information at many recreation sites not only for black bear but also grizzly bear: FW-DC-WL-08. Within occupied grizzly bear habitat, developed recreation sites, administrative sites, and dispersed recreation sites where garbage disposal services are provided, facilities are equipped with necessary infrastructure so that food, garbage, and other attractants can be made inaccessible to grizzly bears to reduce the potential of human-bear conflict.

Concern 1: Wildlife Other than At-Risk Species – Waterfowl, Upland Game, Wildlife Watching, Migratory Birds

The Forest Service should expand its analysis to include the pileated woodpecker, the black-backed woodpecker, and the goshawk. Mammalian species that should also be analyzed are the marten, beaver, and bat. It also should provide population trends for management indicator species.

Letter #	Comment #
307	152
805	26
877	502-510, 512-516, 518-531, 549
1054	25

Response to comment

Commenters sought additional analysis to evaluate the sufficiency of plan components to provide for the persistence of specific wildlife species.

Implementation of the 1982 Planning Rule relied on management indicator species as surrogates assumed to reflect the effects of management on their populations as well as the populations of a broader suite of unmeasured species. The 2012 Planning Rule did not perpetuate the use of management indicator species in planning but instead adopted the use and monitoring of focal species. Focal species are a small subset of species whose status permits inference of the integrity of the larger ecological system to which it belongs. Monitoring of focal species provides meaningful information regarding the effectiveness of the plan in maintaining or restoring ecological conditions to maintain the diversity of plant and animal communities in the plan area. Monitoring of focal species is linked to the requirement of § 219.9 of the 2012 planning rule, which describes the coarse-filter approach for providing diversity and integrity of plant and animal communities and persistence of native species in the plan area. Focal species monitoring is not intended to provide information about the persistence of any individual species. The rule does not require managing habitat conditions for focal species, nor does it confer a separate conservation requirement for these species simply because they were selected as focal species (see the preamble to the 2012 rule at 77 FR 68, pp. 21222-21223). There is no requirement under the 2012 Planning Rule to provide population trends for management indicator species. The Responsible Official has discretion to choose a select set of ecological conditions to be monitored for ecosystems and at-risk species (FSH 1909.12, chapter 30, section 32.13b).

The FEIS considers ecological integrity at multiple scales and explains the rationale for the analysis area used for wildlife habitat diversity as well as individual species. Appendix C of the FEIS has been revised to include a new table (Table 2) showing how individual species were assigned to habitat groupings and subgroupings to facilitate coarse filter ecosystem analysis. Pileated woodpecker, black-backed woodpecker, American Marten, Pacific Marten, and goshawk are all associated with the “Forested habitats” grouping. This crosswalks with the analysis of Forested habitats in the FEIS. Likewise, several species of bats are associated with substrate habitats, which is summarized in Table 29. Beavers are associated with riparian habitat that is analyzed in the FEIS. The habitat grouping approach for the analysis is consistent with the coarse-filter approach of the 2012 planning rule.

Beavers and bats also have additional “fine filter” plan components with specific conservation strategies for the needs of these species. The positive benefits of beavers in aquatic habitats were recognized in the draft LMP and EIS within the desired conditions for aquatic systems (FW-DC-WTR-09). Following public comment, an additional plan component has been added specific to beaver: “FW-GL-WTR-03. The Nez Perce-Clearwater works with partners to improve aquatic habitat, increase resiliency, and enhance ecological integrity by improving habitat for beaver where appropriate.” Plan components for bats include FW-GDL-CAVE-02, FW-DC-CAVE-04, FW-STD-CAVE-02, FW-GDL-WL-02.

Rather than analyzing the effects of the plan on individual wildlife species, the analysis evaluates the effects of the plan and alternatives on these habitat groupings or subgroupings consistent with the coarse-filter approach in § 219.9 of the 2012 planning rule. There is no requirement under the 2012 Planning Rule to provide population trends for management indicator species.

Concern 2: Wildlife Other than At-Risk Species – Waterfowl, Upland Game, Wildlife Watching, Migratory Birds

For areas identified as crucial to big game wildlife movement, including winter range, the Forest Service should include road density standards to limit human disturbance and facilitate movement.

Response to comment

While there are no road density limits, habitat connectivity including migration corridors is addressed by several plan components:

FW-DC-WLMU-02. At the forest scale, habitat for wild ungulates provides conditions to meet life history requirements year-round. Vegetation in these habitats is primarily composed of native plants.

FW-DC-WLMU-06. Habitat conditions maintain or improve elk habitat use and provide nutritional resources sufficient to support productive elk populations. The amount and distribution of early seral nutritional resources are consistent with the desired conditions in the Forestlands and Meadows, Grasslands, and Shrublands sections. Elk habitat quality is not degraded by invasive plant species.

FW-DC-WLMU-07. Elk habitat is distributed throughout the planning area to support elk populations. Motorized access does not preclude use of high-quality nutritional resources or winter ranges.

Concern 1: Wildlife Other than At-Risk Species - Hunting

The Forest Service should implement a separate management area plan for all big game species in the winter. Additionally, the adverse impacts of big game carts on wildlife should be reexamined.

Letter #	Comment #
109	6
307	83
3110	62

Response to comment

It is indicated from studies that summer forage quality and availability is more crucial than winter range; however winter range is still important. It is not implementable to have a management area plan depending on seasons. The desired conditions, goals, standards and guidelines in the LMP address wildlife needs in winter. For example, the availability of Pacific Yew for moose during winter.

Big game cart use is addressed in the wilderness analysis in the FEIS. It is not allowed in wilderness areas and the use elsewhere would have little effect on the wildlife, as most hunters have additional options that can allow removal of game carcasses. Big game carts outside of wilderness areas would have less impact on wildlife than motorized vehicles such as ATVs.

Concern 2: Wildlife Other than At-Risk Species - Hunting

The Forest Service should include Executive Order 13443 on Facilitation of Hunting Heritage and Wildlife Conservation (2007) and the John D. Dingell, Jr., Conservation, Management, & Recreation Act (2019). The Federal Lands Hunting, Fishing & Shooting Sports Roundtable Memorandum of Understanding should provide for the continuation of these activities as a valid and vital component of the recreation spectrum.

Letter #	Comment #
8307	153
1050	12, 13

Response to comment

Comments requested the Forest Plan should provide for the continuation of hunting and wildlife conservation activities, particularly related to hunting and angling access, pursuant to Sections 219.9 and 219.10 of the 2012 Planning Rule.

As acknowledged in the ‘Relevant Laws, Regulations, and Policy’ section of the wildlife analysis of the FEIS “Many other laws, regulations, executive orders, and policies not described below also guide the management of this resource.” The list of laws, regulations, and policy is not intended to be exhaustive.

Plan components under the ‘Multiple Uses Wildlife’ section of the revised Land Management Plan (LMP) are designed to provide or contribute to habitat conditions for wildlife, fish, and plants commonly enjoyed and used by the public for hunting, fishing, trapping, gathering, observing, subsistence, and other activities. Goal FW-GL-WLMU-01 identifies the importance of collaboration with relevant wildlife-managers: “The forest cooperates with the Nez Perce Tribe and Idaho Department of Fish and Game to provide habitat conditions that contribute to wildlife populations at levels meeting Idaho Department of Fish and Game species management plan objectives.” Goal FW-GL-WLMU-02 similarly identifies the importance of collaboration with fisheries managers. Desired condition FW-DC-ES-01 emphasizes a variety of human uses including ecosystem services to area residents and visitors, which includes hunting, trapping and fishing. The economic contribution of hunting, particularly elk, is identified in several locations within the wildlife analysis of the FEIS. As summarized in Section 3.2.9 of the FEIS, “The

current Forest Plans are generally consistent with Idaho Department of Fish and Game’s management plans and will serve to increase populations of many species of interest to the public for hunting. The current Forest Plans conserve habitat for a broad variety of wildlife, generally consistent with the Idaho Statewide Wildlife Action Plan, which emphasizes the conservation of habitats as a primary goal for conserving species.”

A multitude of desired conditions, objectives, and guidelines facilitate ecological sustainability, a diversity of plant and animal communities, and contribute to social and economic sustainability, consistent with Sections 219.9 and 219.10 of the 2012 Planning Rule.

Concern 3: Wildlife Other than At-Risk Species - Hunting (letter numbers 52, comment 6)

The Forest Service should limit hunting until native grass and brush cover increases.

Response to comment

The overarching issue raised is whether plan components adequately provide for the diversity and integrity of plant and animal communities and persistence of native species in the plan area, particularly given multiple uses of hunting and livestock grazing.

Hunting and associated practices on National Forest System Lands are generally subject to State fish and wildlife laws and regulations (FSH 2643.1). The Idaho Department of Fish and Game regulates hunting and hunting practices on the Nez Perce-Clearwater National Forest. The Forest Service has the responsibility to prevent damage to resources occurring on National Forest System lands (FSH 2641). Desired condition FW-DC-GRZ-01 directly addresses the issue of capacity of the land to produce sustained forage for multiple uses. Several other plan components address forage (e.g., FW-DC-TE-03, MA2-DC-WLMU-01, MA3-DC-WLMU-01, MA2-OBJ-WLMU-01, MA2-GDL-WLMU-01), invasive plants (e.g., FW-DC-GS-02, FW-DC-GS-03, FW-DC-INV-01, FW-OBJ-INV-01, FW-GDL-INV-01), and livestock grazing (e.g., FW-OBJ-GRZ-01, FW-GDL-GRZ-01, FW-GDL-GRZ-03).

Plan components collectively provide for integrated social, economic, and ecological sustainability and ecosystem integrity and diversity, while providing for ecosystem services and multiple uses.

Concern 1: At-Risk Wildlife Threatened and Endangered Species and Species of Conservation Concern

The Forest Service should develop standards and guidelines or other protections to limit activities that would affect at-risk wildlife species habitat to reduce human conflicts and habitat fragmentation.

Letter #	Comment #
805	45, 56
877	344, 346, 347, 349-351, 353, 354, 356, 358, 419,517
1110	2

Response to comment

Commenters expressed concern that the Land Management Plan (LMP) has insufficient plan components to provide for the persistence of at-risk species, particularly related to connectivity and human conflicts. The 2012 Planning Rule requires that the plan must include components, such as standards or guidelines, to maintain or restore connectivity (36 CFR 219. 9).

Many plan components in the revised LMP, including both standards and guidelines, direct management toward maintaining or restoring habitat connectivity. For example, Chapter 2 ‘Physical and Biological Ecosystems’ of the revised LMP begins with goals for across the landscape. Goal FW-GL-TE-01 guides that “The Nez Perce-Clearwater works with federal, state, tribal, and private land managers towards an all-lands approach through management and cooperation, including efforts to mitigate threats or stressors, provide for wildlife and fish habitat connectivity, and to provide social, economic, and ecological conditions that contribute to mutual objectives.” Other plan components that direct trending toward improving connectivity include FW-DC-WTR-02, FW-DC-ARINF-01, FW-STD-ARINF-07, FW-STD-ARLND-01, FW-STD-ARLND-03, FW-DC-TE-04, FW-DC-WL-03, FW-DC-WL-05, FW-DC-WL-06, MA2-DC-RWILD-03, and MA2-DC-IRA-03. The importance of connectivity is additionally recognized throughout the ‘Management Approaches’ (Appendix 4) of the revised LMP. For example, the approach for land status and ownership identifies this as a criterion to be considered when evaluating lands for acquisition: “lands important for wildlife connectivity and big game winter range” (Appendix 4, revised LMP).

The revised LMP also includes plan components intended to help reduce human-wildlife conflict, particularly with grizzly bears (FW-DC-WL-07, FW-DC-WL-08).

Concern 2: At-Risk Wildlife Threatened and Endangered Species and Species of Conservation Concern

The Forest Service should better describe the impacts of motorized use and vegetation management on at-risk wildlife species.

Letter #	Comment #	Letter #	Comment #
307	72, 73, 79	1110	1
764	8, 9	12883	14
805	55	17297	6
877	343, 348, 352, 355, 357	17349	5

Response to comment

These comments raised several different issues:

- Focal species: the public had difficulty determining what the focal species were for the revised Land Management Plan (LMP), pursuant to 36 CFR 219.12(a)(5).
- Coarse-filter/fine-filter approach for at-risk species: commenters felt the LMP has insufficient fine filter components to provide for the persistence of at-risk in the plan area, particularly Harlequin Ducks, Mountain Goats, Fisher, and Wolverines.
- Regional Forester Sensitive Species (RFSS): commenters expressed concern that the DEIS did not have sufficient analysis of RFSS, pursuant to Forest Service Manual 2670.5 and FSM 2670.22.
- Analysis of environmental consequences from plan direction for recreation and timber: commenters expressed concern that the DEIS did not adequately analyze the effects of plan direction related to motorized uses and vegetation management.

For the issue of focal species, the Monitoring Program of the LMP (Appendix 3) has been revised to include a separate section for focal species (Section 1.3). There are three focal species: western pearlshell mussel, ponderosa pine, and elk. These focal species are identified in the “indicators” column within

Tables 1-30 in Appendix 3. The monitoring program includes one or more monitoring questions addressing the status of each of the focal species as a means to assess the ecological conditions required under 36 CFR 219.9.

For the issue of coarse-filter/fine-filter approach for at-risk species, the wildlife analysis has been revised in the FEIS to have more robust analysis of coarse filter ecosystem plan components and to evaluate how the plan would provide for the diversity and abundance of wildlife. Appendix C of the FEIS (Wildlife Species and Habitat Summary) provides a crosswalk of at-risk species, threats to their habitat, key ecosystem characteristics of habitats, and how coarse- and fine-filter plan components provide for those habitats and address threats to at-risk species. There were also changes to species-specific plan components including for bighorn sheep related to pack goats, the fisher plan component, the plan components for multiple use wildlife including elk, and the addition of plan components designed to contribute to grizzly bear recovery.

For the issue of RFSS, these species are analyzed according to habitat groupings consistent with the coarse-filter approach in § 219.9 of the 2012 planning rule. Evaluation of how the coarse filter would provide for the diversity and abundance of wildlife is found in the “Abundance and Diversity of Wildlife” section of the FEIS (3.2.9). Appendix C of the FEIS has been revised to include two new tables (Table 2 and Table 19) that help show how the wildlife analysis was performed, including for RFSS. Table 2 shows how individual species were assigned to habitat groupings and subgroupings to facilitate coarse filter ecosystem analysis. Table 19 has also been added to Appendix C to show the effects determinations for RFSS, based on analysis in the “Abundance and Diversity of Wildlife” section of the FEIS. RFSS that have been carried forward as species of conservation concern (harlequin duck, bighorn sheep, and mountain quail) have been analyzed both individually and within the context of habitat groupings.

For the issue of analysis of environmental consequences from plan direction, the FEIS analyzes the effects of plan components under different alternatives, including those related to motorized suitability and vegetation management. Evaluation of Land Management Plan outcomes on wildlife habitat relies heavily on spatial modeling. In the FEIS, more rigorous spatial overlays have been added to the wildlife analysis to better evaluate the effects of plan direction on habitat. The effects of motorized suitability and vegetation management vary widely by species and by habitat type. An example summary of the analysis for aquatic, wetland, water, and riparian habitats is: “The preferred alternative strikes a balance in the amounts of recommended wilderness, summer Recreation Opportunity Spectrum and motorized suitability, winter Recreation Opportunity Spectrum and motorized suitability, eligible and suitable wild and scenic rivers, and timber suitability. The preferred alternative takes a relatively rapid pace towards achieving desired vegetation conditions. However, the pace is within the modeled range of disturbance the land experienced from natural disturbances during warmer-drier periods in the SIMPPLLE model and so should be within the natural range of variability” (section 3.2.9). The FEIS analyzes how the plan would influence or guide the development of future motorized uses and timber suitability, and what these impacts would be on wildlife. For threatened and endangered species, the associated Biological Assessment (BA) also provides a robust analysis of the effects of these activities likely to occur under the land management plan (see section “Vegetation Management and the Road Network” of the BA, along with the “Vegetation and Timber Management” and “Developed and Dispersed Recreation” section of the analysis for each species within the BA).

Concern 2: Threatened and Endangered Species

The Forest Service should develop a crosswalk between the Forest Plan and species recovery plans and new directions provided in the Draft EIS. The Forest Service should use the best available scientific information provided in these comments to develop habitat models and identify high priority habitats.

Letter #	Comment #
780	1
877	445
1065	38, 40

Response to comment

Several commenters asked about species listed under the Endangered Species Act (both fish and wildlife), their associated Recovery Plans, status of these species relative to management under the existing Land Management Plan (LMP), and how that has informed the revised LMP.

Per the planning regulations at 36 CFR 219.9(b), land management plans must “provide the ecological conditions necessary to contribute to the recovery of federally listed threatened and endangered species”.

Per the Endangered Species Act, Federal agencies are required to ensure that any action authorized, funded, or carried out is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of designated critical habitat (ESA, section 7(a)(2)).

The forest service’s role in ESA recovery is primarily one of managing habitat. The Land Management Plan underwent consultation with the regulatory agencies and any future ground disturbing activities authorized that are consistent with the Land Management Plan could not occur without further site-specific analysis, section 7 consultation, and project decision documents.

Analysis in the final EIS and biological assessment demonstrates how plan components are designed to support these species and their critical habitat. The biological assessment released with the draft record of decision and biological opinion provided by the National Marine Fisheries Service and the Fish and Wildlife service satisfy the procedural requirements under section 7 of the Endangered Species Act.

The Plan recognizes the responsibility to provide adequate habitat protections and levels of restoration to support species recovery. Additional analysis was added for ESA-listed fish status and potential effects of the revised plan. Graphs of spring-summer Chinook salmon redd count trends and wild steelhead returns, of ESA listed fish trends summarized by the Idaho Department of Fish and Game or other agencies, were included to provide context of species trends within the Nez Perce-Clearwater. The “status and distribution” section on bull trout was also expanded in the FEIS. Although the Forest Service does not manage fish species or populations, this information provides a baseline of current trends at this time. The Forest Service manages critical habitat for threatened and endangered species. Endangered Species Act Recovery plans are specifically referenced in the Forest Plan in Section 1.1 and 2.2 Aquatic Ecosystems, and relevant information from recovery plans and BASI were included in discussions of ESA listed fishes. As suggested by commenters, Table 6 of the FEIS has been considerably revised to provide a more comprehensive crosswalk between PACFISH/INFISH standards and guidelines versus the aquatic ecosystem plan components under the revised LMP.

In terms of habitat models for wildlife, a description of modeling methods is described in the FEIS in ‘Methodology’. Additional descriptions of models or model parameters were included in the FEIS in the evaluation of individual species when appropriate (see summary in section “Use of models, maps, and data”). A thorough description of models used to understand and evaluate habitat for fishers are found within the Species of Conservation Concern in the fisher analysis. The 2014 Assessment in 5.0 Threatened, Endangered, and Candidate Species provides the modeling parameters for lynx habitat used

in the analysis. Wolverine habitat models are discussed in section 3.2.9 of the FEIS. Additional information about the modeling parameters is described in publications cited in the FEIS.

The Nez Perce-Clearwater has complied with the requirement of 36 CFR 219.9 by including plan components that provide the necessary habitat conditions to contribute to the recovery of threatened and endangered fish and wildlife, supported by the fisheries and wildlife analysis in the FEIS.

References Cited