

United States
Department of
Agriculture

Forest Service

Pacific
Northwest
Region

1990



Appendices – Volume II

Final Environmental Impact Statement

Land and Resource
Management Plan

Wallowa-Whitman National Forest



ACRONYMS AND ABBREVIATIONS USED IN THIS DOCUMENT

Those listed with an asterisk are further explained in the Glossary

AC - Acres	MR - Management Requirement
AMP - Allotment Management Plan *	MRVD - Thousand Recreation Visitor Days
AMS - Analysis of the Management Situation *	MS - Management Strategy(ies)
ASQ - Allowable Sale Quantity *	MWFUD - Thousand Wildlife/Fish User Day
ATV - All Terrain Vehicle *	NA - No Action
AU - Animal Unit *	NAS - National Activity Structure
AUM - Animal Unit Month *	NC - No Change
BAP - Benzo (A) Pyrene	NDF - Nondeclining Flow *
BCR - Benefit Cost Ratio	NEPA - National Environmental Policy Act
BF - Board Foot *	NFMA - National Forest Management Act
BIA - Bureau of Indian Affairs	NFMAS - National Fire Management Analysis System
BLM - Bureau of Land Management *	NPB - Net Public Benefits
BMP - Best Management Practice *	NRA - National Recreation Area (HCNRA)
BTU - British Thermal Unit *	NRT - National Recreation Trail *
CCC - Civilian Conservation Corps	O&M - Operation and Maintenance
CEQ - Council on Environmental Quality *	OBERS - Office of Business Economics - Economic Research Service
CFL - Commercial Forest Land *	ODFW - Oregon Department of Fish and Wildlife
CFR - Code of Federal Regulations *	ONRC - Oregon Natural Resources Council
CI - Capital Investment	ORV - Off Road Vehicle
CMAI - Culmination of Mean Annual Increment *	PAOT - Persons At One Time
CMP - Comprehensive Management Plan (HCNRA)	P&M - Protection and Management Funds
CRITFC - Columbia River Inter-tribal Fish Commission	PILOT - Payment in Lieu of Taxes
DBH - Diameter at Breast Height *	PL - Public Law
DEIS - Draft EIS *	PNV - Present Net Value
DEP - Departure *	PNW - Pacific Northwest
EA - Environmental Assessment *	POM - Polycyclic Organic Matter
EHF - Earned Harvest Factor	PVB - Present Value of Benefits
EIS - Environmental Impact Statement *	PVC - Present Value of Costs
EO - Executive Order	R-6 - Region 6
EPA - Environmental Protection Agency *	RARE II - Roadless Area Review and Evaluation *
FEIS - Final EIS *	RIM - Recreation Information Management *
FERC - Federal Energy Regulatory Commission	RNA - Research Natural Area *
FIL - Fire Intensity Level *	ROD - Record of Decision
FORPLAN *	ROS - Recreation Opportunity Spectrum *
FPFO - Forestry Program for Oregon	RPA - Forest and Rangeland Renewable Resources Planning Act of 1974 *
FRES - Forest Range Environmental Study *	RVD - Recreation Visitor Day *
FS - Forest Service	SAF - Society of American Foresters
FSH - Forest Service Handbook	S&G - Standards and Guidelines
FSM - Forest Service Manual	SCORP - Statewide Comprehensive Outdoor Recreation Plan
FVB - Future Value of Benefits	SHCI - Smolt Habitat Capability Index
FVC - Future Value of Costs	SHPO - State Historical Preservation Officer (Office)
FY - Fiscal Year	SIC - Standard Industrial Classification
GIS - Geographic Information System	SMA - Special Management Area
GNP - Gross National Product	SMU - Streamside Management Unit *
HCNRA - Hells Canyon National Recreation Area	SPM - Semiprimitive, Motorized
HCRS - Heritage Conservation and Recreation Service	SPNM - Semiprimitive, Nonmotorized
HEI - Habitat Effectiveness Index	T&E - Threatened and Endangered *
ICO's - Issues, concerns, and Opportunities	TRI - Total Resource Inventory *
I&DC - Insect and Disease Control	TSI - Timber Stand Improvement *
ID - Interdisciplinary	TSPIRS - Timber Sale Program Information Reporting System
IPM - Integrated Pest Management *	TSPQ - Timber Sale Program Quantity *
IMPLAN *	TSP - Total Suspended Particulates *
INTEGER *	USGS - United States Geological Survey
K-V Act - Knutson-Vandenberg Act *	US - United States
KV - Kilovolt	USDA - United States Department of Agriculture
LRMP - Land and Resource Management Plan	USDI - United States Department of Interior
LTSY - Long Term Sustained Yield *	VAC - Visual Absorption Capacity *
MA - Management Area	VMS - Visual Management System
MAUM - Thousand Animal Unit Month	VCO - Visual Quality Objective *
MBF - Thousand Board Feet	WFUD - Wildlife and Fish User Day *
MCF - Thousand Cubic Feet	WRC - Water Resources Council
MIH - Management Information Handbook	WRS - Wilderness Recreation Spectrum *
MIS - Management Indicator Species	
MMS - Million Dollars	
MMBF - Million Board Feet	
MMCF - Million Cubic Feet	
MOU - Memorandum of Understanding	

PUBLIC COMMENTS AND FOREST SERVICE RESPONSES

TABLE OF CONTENTS

	Page	
I	INTRODUCTION	I-1
	Purpose	I-1
	How Comments Were Obtained	I-1
	Release of Documents	I-1
	Meetings	I-1
	Publicity by Others	I-2
	Information About Those Who Commented	I-2
	Where Respondents Live	I-2
	Who Responded	I-2
	Form of Responses	I-3
	Number of Comments by Resource Area	I-3
	Explanation of How Comments Were Used	I-3
	Comments and Responses	II-1
II.	LIST OF THOSE WHO COMMENTED	II-1
	Agencies, Public Officials, and Indian Tribal Governments	II-2
	Organizations	II-3
	Individuals	II-6

III SUMMARY OF COMMENTS AND RESPONSES

Code	Chapter	Page
25	- Recreation	See Code Number at bottom of page
26	- Trails	
38	- Hells Canyon National Recreation Area	
60	- Wild and Scenic Rivers	
80	- Cultural Resources	
90	- Special Interest Areas	
100	- Wilderness	
200	- Roadless Areas	
300	- Old Growth	
400	- Wildlife in General	
405	- Diversity	
407	- Snags	
420	- Management Requirements	
440	- Fish Habitat	
450	- Riparian Habitat	
460	- Threatened and Endangered Species	
500	- Livestock Grazing	
650	- Research Natural Areas	
700	- Timber Resource in General	
701	- Timber Harvest Levels	
702	- Reforestation	
703	- Sustained Timber Yields	
704	- Departure from Nondeclining Flow	
705	- Below Cost Timber Sales	
706	- Species Mix	
708	- Suitability of Land for Timber Production	
718	- Timber Management Effects	
750	- Fuelwood	
800	- Water and Soil	
830	- Air Quality	
900	- Land Status and Special Uses	
930	- Energy	
940	- Minerals	
1000	- Transportation System in General	
1110	- Fire	
1120	- Pesticide Use	
1200	- Social and Economic Considerations	
1230	- Forest Service Budget	
1275	- Treaty Rights	
1300	- Multiple Use and Miscellaneous	
1400	- Monitoring	

IV. LETTERS FROM GOVERNMENTAL AGENCIES, PUBLIC OFFICIALS, INDIAN TRIBAL GOVERNMENTS

BAKER COUNTY COURT	71
BAKER COUNTY COURT	70
BAKER SCHOOL DISTRICT 5J	89
CIRCUIT COURT OF OREGON	70
CITY OF BAKER	86
CITY OF BAKER	84
CITY OF GREENHORN	82
CITY OF HAINES OREGON	81
CITY OF JOSEPH	81
CITY OF LA GRANDE	78
CITY OF LA GRANDE	79
CITY OF PENDLETON	80
CONFEDERATED TRIBES UMATILLA INDIAN RES	91
CONFEDERATED TRIBES UMATILLA INDIAN RES	91
ENTERPRISE PUBLIC SCHOOLS	87
HOUSE OF REPRESENTATIVES, FRENCH, RAY	23
IDAHO FISH AND GAME	69
IMBLER PUBLIC SCHOOLS	88
NEZ PERCE TRIBAL EXECUTIVE COMMITTEE	104
NEZ PERCE TRIBE	103
OREGON STATE SENATE, THORNE, MIKE	24
OREGON STATE SENATE, TIMMS, EUGENE D.	25
STATE OF OREGON, ATIYEH, VITOR, GOVERNOR	26
DEPARTMENT OF ENERGY	41
DEPARTMENT OF ENVIRONMENTAL QUALITY	44
DEPARTMENT OF GEOLOGY AND MINERAL INDUSTRIES	40
DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT	48
DEPARTMENT OF TRANSPORTATION	37
DEPARTMENT OF TRANSPORTATION, PARKS AND RECREATION DIVISION	36
DIVISION OF STATE LANDS	41
ECONOMIC DEVELOPMENT DEPARTMENT	60
EMPLOYMENT DIVISION, DEPARTMENT OF HUMAN RESOURCES	65
INTERGOVERNMENTAL RELATIONS DIVISION OF THE EXECUTIVE DEPARTMENT	
OFFICE OF ECONOMIC ANALYSIS	58
OFFICE OF STATE FORESTER	49
OREGON DEPT OF AGRICULTURE	39
OREGON DEPT OF FISH AND WILDLIFE	30
WATER RESOURCES DEPARTMENT	38
STATE OF OREGON, GOLDSCHMIDT, NEIL, GOVERNOR	
UNION COUNTY COURT, CALDWELL, MIKE, COMMISSIONER	74
UNION COUNTY COURT, LESTER, MARIE, COMMISSIONER	76
UNION COUNTY ROAD DEPARTMENT	73
UNITED STATES DEPARTMENT OF THE INTERIOR	20

APPENDIX N

US DEPARTMENT OF FISH AND WILDLIFE	20
US DEPARTMENT OF THE AIR FORCE	2
US DEPARTMENT OF TRANSPORTATION	3
US DEPT COMMERCE NAT MARINE FISHERIES	4
US DEPT HEALTH & HUMAN SERVICES	3
US DEPT OF ENERGY	22
US DEPT OF THE INTERIOR BUREAU OF MINES	23
US ENVIRONMENTAL PROTECTION AGENCY, BURD, ROBERT S., DIRECTOR WATER DIV.	6
US ENVIRONMENTAL PROTECTION AGENCY, LEE, RONALD A., CHIEF	6
WALLOWA COUNTY COURT	72
WALLOWA COUNTY ROAD DEPARTMENT	73
WALLOWA PUBLIC SCHOOLS	88

APPENDIX N

PUBLIC COMMENTS AND FOREST SERVICE RESPONSES

I. INTRODUCTION

Purpose

The purpose of this appendix is to display the substantive comments to the draft Forest Plan and the accompanying environmental documents, and to show the Forest Service response to the comments. Included in this appendix are (1) background information on how comments were obtained; (2) information about those who commented; (3) explanation of how comments were used, (4) Comments and responses; (5) letters from government agencies and elected officials, and 6) a list of those who commented

Background Information on How Comments Were Obtained

Release of the DEIS Documents

A Notice of Availability of the Wallowa-Whitman Draft Environmental Impact Statement (DEIS) and Proposed Forest Plan was published in the Federal Register, Vol. 51, No 60, on March 28, 1986. The documents were filed with the Environmental Protection Agency and mailed to individuals, groups and organizations on March 15, 1986. Six hundred document sets were distributed. The 120-day comment period ended July 15, 1986. During that time, approximately 600 more sets of documents were given to interested parties who were not included in the original mailing.

A Supplement to the DEIS was issued in August, 1988 and distributed to those who received copies of the DEIS. Others who responded to the DEIS were personally notified of the availability of the Supplement and were provided with one upon request. A 90-day period was provided for review and response to the Supplement. Some 443 people responded, 238 of whom had not commented on the original documents.

Throughout the planning process, news releases played an important role in informing the public of meetings, the availability of documents, and raising the awareness that Forest Planning was occurring.

Meetings

The first of five public meetings took place May 20 in Halfway, Oregon. Subsequent meetings were held in Baker, La Grande, Unity, and Enterprise. A total of about 150 people attended these meetings.

Planning team members and the Forest Supervisor were invited to speak on the proposed Forest Plan by 28 community groups and organizations. These information sessions reached about 330 local residents.

A number of people stopped by or called Forest offices to offer comment or gain understanding about the plan.

Publicity by
Others

Prior to issuance of the draft documents, as well as after, several interest groups issued brochures, held meetings, or otherwise attempted to stimulate public interest in the planning process and to generate responses that were sympathetic to their organization's concerns. Several were very successful. These groups included the Powder River Sportsman's Club, Oregon Natural Resources Council, Committee for a Stable Community, and Friends of Lake Fork. In addition, the Governor of Oregon was deeply involved in the planning process and this participation also resulted in public responses to the draft documents.

Information About Those Who Commented

Where Respondents
Live

We received more than 3,400 letters and forms from over 6,500 people (many had multiple signatures). Eighty-five percent of the respondents were residents of northeastern Oregon. Nearly 5,600 individuals from Wallowa, Union and Baker counties (population total of 50,000) signed letters, petitions or other documents regarding the proposed Forest Plan. A breakdown of where the respondents live follows:

Location	Number of Respondents
Northeast Oregon	*5,583
Other Oregon	736
Washington	53
Idaho	28
All other states	155
*includes 3,050 names from petitions	

Who Responded

Ninety-three percent of the responses came from individuals. The next highest percentage, 5 percent, were responses sent in by organizations. The major categories are as follows:

Category	Number of Responses
Federal agencies	6
State agencies	15
County agencies	6
City governments	5
State elected officials	2
Organizations	

	Academic	6
	Professional	2
	Conservationists	23
	Civic	12
	Business	60
	Timber	32
	Associations	13
	Riding/hiking	1
	Hunting	8
	Indian tribes	2
	Individuals	3,164
Form of Response		
	Private response form	1,382 or 35%
	Letters	1,171 or 29%
	Form letters	1,092 or 27%
	FS response form	45 or 01%
	Other (oral, legal brief, etc)	300 or 08%
Number of Comments by Resource Area (Does not include many late comments which were also considered but not coded)	County receipts	1,777
	Economic considerations	487
	Firewood	344
	Fish Habitat/Riparian	215
	Hells Canyon NRA	210
	Livestock grazing	207
	Local economy/employment	2,096
	Old growth	243
	Recreation	552
	Road closures/mgmt.	1,900
	Roadless areas	2,290
	Roadless Area, Lake Fork	116
	Soil/Water	207
	Timber harvest effects	201
	Timber harvest levels	4,381
	Timber resource	779
	Timber species mix	239
	Wilderness, Hells Canyon	1,632
	Wilderness, other	891
	Wildlife habitat/T&E Sp.	720
	Misc.	2,558
		<u>22,045</u>

Explanation of How Comments Were Used

In accordance with 40 CFR 1503.4, Response to Communities, we have assessed comments collectively and individually and have responded by a variety of means including

1. Modifying the alternatives, including the proposed action.
2. Developing new alternatives
3. Modifying and supplementing the analysis
4. Adding information.
5. Making factual corrections
6. Making format changes
7. Explaining why comments did not result in changes
8. Agreeing or disagreeing with comments.
9. Simply acknowledging a comment.

Comments and Responses

As expected with the large number of comments received, many were similar. We have, therefore, chosen to respond to what we believe to be representative comments. Although some reviewers may not find their exact comment, we are confident they can find one that represents their point of view. We believe all substantive comments which were pertinent to the Forest Plan and received during the comment period have been addressed. Late comments were considered, but are not necessarily addressed in this Appendix.

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

II. LISTS OF THOSE WHO COMMENTED

Agencies, Public Officials, and Indian Tribal Governments

(Letters from this group may be found in part IV of this volume.)

We have elected to include representative nonsubstantive comments to show the variety of viewpoints held by reviewers--especially when several people expressed the same thought.

III. SUMMARY OF COMMENTS AND RESPONSES

RECREATION Code 25

COMMENT NO. 1 POPULATION IS ESSENTIALLY IRRELEVANT TO THE PLAN'S RECREATIONAL USE ESTIMATES SINCE THE AREA ATTRACTS CAMPERS AND SKIERS FROM THREE STATES THE KEY TO UNDERSTANDING AREA TOURISM IS IN EXAMINING REPEAT VISITS RATHER THAN FOCUSING ON THE STATE'S POPULATION BASE. LIKEWISE, THE NUMBER OF REPEAT VISITS IS A FUNCTION OF THE QUALITY OF THE EXPERIENCE. KNOWING THAT A MOUNTAIN CAN BE CLIMBED BY A NONTECHNICAL WALK-UP, OR BEING ABLE TO VIEW A BALD EAGLE, WILL HAVE MORE TO DO WITH WHETHER THE RECREATION ESTIMATES ARE REASONABLE THAN ANY CHANGE IN POPULATIONS.

FOREST SERVICE RESPONSE

We believe that Oregon state population will continue to have a strong effect on recreation use. Residents of Idaho, Washington, and California are also significant users as evidenced in Forest recreational statistics. Repeat usage is included in those figures.

COMMENT NO. 2: RECREATION OPPORTUNITIES FAR EXCEED RECREATIONAL USE, BOTH PRESENT AND FUTURE ON THE WALLOWA-WHITMAN NATIONAL FOREST. THIS SITUATION IS NOT LIKELY TO VARY SIGNIFICANTLY AMONG ALTERNATIVES, AS STATED ON PAGE IV-11 OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT. WHETHER THE ANNUAL TIMBER HARVEST IS 123 MMBF (ALTERNATIVE H) OR 179 MMBF (ALTERNATIVE B-DEP), RECREATIONAL CAPACITY WILL OVERWHELMINGLY EXCEED USE, BOTH PRESENT AND FUTURE.

FOREST SERVICE RESPONSE.

This is true of overall opportunities, but opportunities for nonwilderness primitive and semiprimitive experiences vary significantly among alternatives. Also, in the future, primitive and semiprimitive areas, in aggregate, will be at capacity. Our analysis indicates that only areas which provide roaded recreational opportunity will have surplus capacity.

COMMENT NO. 3: THE TREATMENT OF RECREATION IN THIS PLANNING PROBLEM HAS BEEN POORLY ORGANIZED AND PRESENTED IN A MANNER THAT IS A REAL CHALLENGE TO THE SERIOUS REVIEWER. INCONSISTENT INCLUSION OF NRA DATA WITHOUT IDENTIFICATION AS SUCH, PIECEMEAL DISPLAY OF USE, CAPACITY, SUPPLY AND DEMAND DATA PLUS REPEATED ATTEMPTS TO USE ROS CLASSES IN THE ANALYSIS PROCESS HAVE CREATED A MESS.

FOREST SERVICE RESPONSE.

As a part of the Forest, the NRA is included in all recreation and wilderness data.

One of the key issues identified in the planning process is "recreation diversity". The Recreation Opportunity Spectrum is the best framework we know of for expressing recreation diversity.

COMMENT NO. 4: THE QUESTION OF RECREATION DIVERSITY HAS NOT BEEN FORTHRIGHTLY ADDRESSED IN YOUR PLANNING PROCESS THE USE OF ROS CLASSES SHOULD BE DISPENSED WITH SINCE THESE VAGUE, EXTENSIVE LAND CLASSIFICATIONS HAVE NO REAL RELATIONSHIP TO LEGALLY DEFINED LIMITED USE AREAS OR TO FOREST SERVICE FISCAL PROCEDURES SUCH AS BUDGET LINE ITEMS FOR SPECIFIC TYPES OF RECREATION OR WILDERNESS USE MANAGEMENT. WE EXPECT THE FOREST SERVICE TO ABANDON ATTEMPTS TO APPLY ROS IN THE NEAR FUTURE AND IT IS UNFORTUNATE THIS IMPRACTICAL CONCEPT HAS BEEN MUDDLED UP IN THESE PLANS WHICH ARE PRESENTLY BEING FORMULATED.

FOREST SERVICE RESPONSE.

We know of no indication that ROS will be abandoned, and we believe it to be an adequate method of expressing recreation diversity

COMMENT NO. 5. THE FOREST NEEDS TO TAKE A FORTHRIGHT, ANALYTICAL LOOK AT EXISTING AND POTENTIAL RECREATION OPPORTUNITIES THE AREAS OF WILDERNESS AND NRA WHERE USES ARE CLEARLY DEFINED NEED TO BE DISPLAYED AS TO CURRENT USE, PROJECTED USE TRENDS, ESTIMATED TOTAL DEMAND, AND CAPACITY THESE CONSIDERATIONS ARE THEN CONSTANTS IN THE FOREST RECREATION RESOURCE EQUATION WHEREIN THE REMAINING UNDESIGNATED AREAS CAN BE ASSESSED FOR RECREATION OPPORTUNITIES AND THE NATURE OR RESIDUAL DEMANDS IDENTIFIED SO THAT A BALANCED PROGRAM CAN BE PROVIDED IN THE PLAN AS WE VIEW THE SITUATION OF OPPORTUNITIES FOR RECREATION ON THE WALLOWA-WHITMAN IT IS VERY CLEAR THAT NOT ONLY WILDERNESS, BUT OTHER OPPORTUNITIES FOR UNDEVELOPED, LIMITED USE RECREATION ARE PROVIDED BY CLEARLY DEFINED LAND ALLOCATIONS THAT ARE NONDISCRETIONARY FOR FOREST SERVICE PLANNERS AND MANAGERS *AS PLAINLY AS WE CAN EXPRESS IT; YOU ALREADY ARE OBLIGATED TO PROVIDE THESE LOW DENSITY USES TO SUCH A GREAT EXTENT THAT THE FOREST IS BY DEFINITION OVERBALANCED IN THIS REGARD*

FOREST SERVICE RESPONSE:

NFMA direction is that we plan for the Forest as a whole Our analysis of recreation supply and demand indicates a continuing surplus of roaded recreation and future shortages of primitive and semiprimitive opportunities. This does not support a contention of overbalance toward low density uses

COMMENT NO. 6: ALL REMAINING UNDESIGNATED AREAS WHERE RECREATION OPPORTUNITIES EXIST SHOULD BE PLANNED TO PROVIDE HIGH DENSITY DEVELOPED AND MEDIUM DENSITY ACCESSIBLE FORMS OF DISPERSED RECREATION. CONSIDERING THE DEMOGRAPHICS OF AN AGING RECREATION USER CLIENTELE AND THE OBVIOUS DEMAND TREND TOWARD THE END OF THIS NEXT PLAN PERIOD, TO DO OTHERWISE WOULD BE UNRESPONSIVE TO PUBLIC NEEDS EVEN IN THE UNLIKELY SCENARIO THAT EVENTUALLY YOU DEVELOPED ALL OF THE FOREST OUTSIDE THE BOUNDARIES OF THE NRA AND EXISTING WILDERNESS AREAS, THERE WOULD REMAIN AN OVERBALANCE OF LOW DENSITY RECREATION USE CATERING TO A VERY EXCLUSIVE CLIENTELE.

W-W PLANNERS NEED TO REFOCUS TO EMPHASIZE RECREATION OPPORTUNITIES WHICH WILL PROVIDE THE GREATEST BENEFITS FOR THE GREATEST NUMBER OF RECREATIONISTS IN THE LONG RUN - AND CEASE TO EQUATE THE HIGHEST AMENITY VALUES WITH NONUSE

FOREST SERVICE RESPONSE

Even though the population in older age brackets will grow the fastest in the next few decades, population in the under-40 age group (in terms of actual numbers) will grow too. Our projections show that "low density" (primitive and semiprimitive) recreation opportunities will be used to near or above capacity while roaded opportunities will substantially exceed demand in the foreseeable future. Developed sites will be close to capacity, but providing additional developed site capacity requires substantial public or private investment in facilities, not major commitments of land. Not all of the NRA is devoted to low density recreation. It presently has 14 percent of the Forest's developed site capacity and will have 18 percent of that capacity after construction called for in the Plan is completed.

COMMENT NO. 7. ALTERNATIVE B WOULD PROVIDE HIGHER THAN RECENT LEVELS (AND THE SAME LEVELS AS THE FOREST SERVICE'S PREFERRED ALTERNATIVE C) FOR DEVELOPED RECREATIONAL USE AND NONWILDERNESS DISPERSED RECREATIONAL USE. FROM A TOURISM STANDPOINT, BETTER ROAD ACCESS TO RECREATIONAL AREAS WOULD ENCOURAGE THE EXPANSION OF TOURISM FACILITIES AND OPPORTUNITIES.

FOREST SERVICE RESPONSE:

Developed use (EIS Table S-1) is the same in *all* alternatives, because it depends on investment rather than land allocation, that is, there is no shortage of land for recreation facility development. There is also a huge surplus of roaded recreation opportunities. All alternatives include improved roads to important recreation attractions, particularly in the Hells Canyon NRA.

COMMENT NO. 8. SOME RECENT STUDIES INDICATE THAT BY 1990, 30 PERCENT WILL BE SENIOR CITIZENS (60 AND OLDER). NATIONWIDE RECREATION EQUIPMENT MANUFACTURERS ARE PRODUCING FAMILY ORIENTED EQUIPMENT. ALL STATES, COUNTIES, AND COMMUNITIES ARE ADVERTISING AND PROMOTING FAMILY VACATIONS AND RECREATION OUTINGS. TO ACCOMMODATE THESE GROUPS OF PEOPLE WILL REQUIRE ACCESS ROADS WHICH CAN BE NEGOTIATED WITH FAMILY TYPE VEHICLES.

FOREST SERVICE RESPONSE:

All alternatives include a significant increase in roaded recreation opportunities and all project a surplus of such opportunities in the future. Even though the percentage of older citizens will increase in the future, the number of younger citizens will also increase. We project increased demand for, and a shortage of, unroaded recreation opportunities.

COMMENT NO. 9. YOU MUST BUILD A PLAN THAT PROVIDES FOR THE MAXIMUM OF PRIMITIVE RECREATION FIRST, THEN FILLS IN WITH LOGGING WHERE IT DOESN'T INTERFERE WITH RECREATION. RECREATIONAL USE IS COMPATIBLE WITH MOST PROPER USES OF THE FOREST, WITH LOGGING AND MINING THE NOTABLE EXCEPTIONS. BY EMPHASIZING RECREATION, YOU PRESERVE THE ABILITY TO CHANGE LATER TO OTHER USE -- YOU DESTROY NOTHING. BY EMPHASIZING LOGGING, YOU START BY DESTROYING THE OTHER VALUES -- WATERSHED PROTECTION, MOST FORMS OF RECREATION, STREAM PROTECTION, SALMON AND STEEL-HEAD BREEDING, AND MANY OTHER USES.

FOREST SERVICE RESPONSE

Recreation, and more specifically primitive recreation, is only one of many needs that compete for the limited resources of the Forest. No need can be completely satisfied, but we have tried to achieve the best possible mix of outputs.

Many people enjoy and even prefer roaded recreation. Presently, 65 percent of all use on the Forest occurs in roaded areas.

COMMENT NO. 10. I BELIEVE THAT WHAT LITTLE BIT OF WILD COUNTRY WE HAVE LEFT HERE IN EASTERN OREGON SHOULD BE SAVED AND PROTECTED FOR THE USE, I E , EDUCATION, SPIRITUAL RENEWAL AND RECREATION, OF THE CITIZENS OF THIS WORLD, OUR AMERICA, AND OUR OREGON FOR NOW AND THE FUTURE. I BELIEVE THAT THE URBAN PEOPLE OF AMERICA OF PORTLAND, SEATTLE, LOS ANGELES, AND OTHER GREAT CITIES WILL NEED EVER MORE THE WILD PLACES LIKE EASTERN OREGON TO COME TO FOR A BREAK FROM THEIR HURRIED LIVES. BECAUSE OF THIS, I BELIEVE THAT THE ECONOMIC FUTURE OF OREGON IN GENERAL AND EASTERN OREGON IN PARTICULAR WILL BE IN THE ROLE OF CUSTODIAN OF OUR WILD LAND AND AS HOST AND GUIDE FOR THE TIRED URBAN PEOPLE THAT WILL COME HERE FOR REST.

FOREST SERVICE RESPONSE

We feel that the Forest Plan achieves a reasonable measure of protection of such lands through Management Areas 4, 6, 7, 8, 9, 10, 12, and 15. These designations cover about 40 percent of the Forest.

COMMENT NO. 11. FROM A TOURISM STANDPOINT, THE ECONOMIC IMPACT OF ALTERNATIVE C COULD BE VERY DRAMATIC AND HAVE A DETRIMENTAL EFFECT ON THE AREA'S ECONOMY. IT DOES NOT TAKE INTO CONSIDERATION A STUDY PREPARED FOR THE TOURISM DIVISION BY AN OUTSIDE CONSULTANT THAT STUDY DETAILS THE LACK OF DESTINATION FACILITIES IN NORTHEAST OREGON. ALTERNATIVE C COMPOUNDS THIS SITUATION BY FURTHER RESTRICTING THIS NEEDED TYPE OF DEVELOPMENT FOR EXPANSION OF RECREATION/TOURISM.

IT ALSO DOES NOT ALLOW FOR EXPANSION OF THE WALLOWA LAKE BASIN PROJECT, WHICH INVOLVES FUTURE DEVELOPMENT OF RECREATIONAL FACILITIES, HOUSING, ATTRACTIONS AND DESTINATION PROPERTIES.

FOREST SERVICE RESPONSE.

All alternatives, including C, include a plentiful supply of land for recreation facility development. Public and private capital for development is what is limiting. We feel, in general, that there is so much developable private land in northeastern Oregon, that in most cases intensive recreation development should be on private land, with the National Forest providing the attractive natural features and attendant access routes, to complement the intensive development.

Development at Wallowa Lake is limited by terrain and existing wilderness boundaries. The Plan imposes no significant additional limitation.

COMMENT NO. 12. IN ORDER TO CONTINUE TO MEET THE EXPECTATIONS OF THE AREA'S RESIDENTS, VISITORS, AND TOURIST-RELATED ECONOMIC INTERESTS, THE FOREST MUST

STABILIZE ITS RECREATIONAL OFFERINGS AND CONTINUE TO MAINTAIN AND IMPROVE, WHERE APPROPRIATE, ITS RECREATION FACILITIES. NO OTHER PUBLIC AGENCY CAN EFFECTIVELY MOVE IN TO FILL THE FUTURE DEMANDS

FOREST SERVICE RESPONSE

All alternatives provide for improvement of road and trail access for recreation, particularly in Hells Canyon, expansion of developed recreation facilities in Hells Canyon, and continued maintenance of existing facilities across the Forest. We anticipate that our ability to provide increased facilities will be limited by the federal budget.

COMMENT NO. 13: PREDICTIONS FOR FUTURE RECREATION USE ARE BASED ON STATE POPULATION GROWTH. MUCH RECREATION GROWS FASTER THAN POPULATION PREDICTIONS OF FUTURE USE WOULD BE BETTER GROUNDED BASED ON HISTORIC TRENDS IN THE WALLOWA-WHITMAN.

FOREST SERVICE RESPONSE:

We feel that historical trends reflect a period of rapid increases in leisure time and disposable income and great advances in recreation technology. We anticipate a less rapid change in the future, so recreation use increases should more closely parallel population increases.

COMMENT NO. 14: YOUR INCREASED EMPHASIS ON RECREATION AND TOURISM IS ADMIRABLE. WE BELIEVE THAT IT WILL GROW AND BE MORE IMPORTANT TO NORTHEASTERN OREGON, HOWEVER, THERE APPEARS TO A DIFFERENCE IN WHAT YOU CONSIDER RECREATION AND WHAT THE GENERAL PUBLIC THAT WE TALK TO WOULD LIKE TO SEE. THEY WANT IMPROVED CAMPGROUNDS, THE ROAD TO JOSEPH PAVED...NOT TALKED ABOUT, ACTUALLY PAVED. THEY WANT SOME MORE QUALITY CAMP SITES AT PHILLIPS LAKE AND OTHER KEY CAMPING AREAS WHERE THEY CAN DRIVE TO AND USE THE RECREATIONAL EQUIPMENT THAT THEY HAVE

TODAY'S TOURIST IS HIGHLY MOBILE AND NEEDS GOOD ACCESS AND GOOD FACILITIES. IN OUR ESTIMATION, THIS MOVEMENT WILL ONLY GROW AS WE ALL AGE, THE EASE WITH WHICH WE ALL RECREATE BECOMES MORE IMPORTANT. LOOK AT THE MOTOR HOMES AND CAMP TRAILERS THAT YOU SEE EVERY DAY. CAMP SITES ARE IN GREAT DEMAND. IT ALL COSTS MONEY AND THE PEOPLE WE TALK TO ARE WILLING TO PAY FOR IT, ESPECIALLY IF THE JOB IS DONE RIGHT. WE ARE NOT TOO SURE THAT THE HELLS CANYON NATIONAL RECREATION AREA AND THE EAGLE CAP WILDERNESS AREA SERVE MANY OF THESE RECREATORS. FURTHER REMOVALS OF VAST AREAS OF GROUND CERTAINLY WILL NOT HELP THE TOURISTS THAT WE HAVE IN MIND

FOREST SERVICE RESPONSE

All Forest Plan alternatives provide land for the intensive recreation development described, plus improvement of access roads and expansion of facilities. The land that varies from roaded to unroaded management among the various alternatives is not where we would choose to place facilities, in any event. Capital to finance development, not developable land, is the limiting factor.

COMMENT NO. 15: WINTER RECREATION. I AM UNABLE TO FIND ANY REFERENCE TO WINTER RECREATION MANAGEMENT. THE FOREST PLAN SHOULD SPECIFICALLY ADDRESS PLANS FOR

ACCOMMODATING WINTER RECREATION DEMAND (E G , CROSS COUNTRY SKI TRAILS AND FACILITIES) AND FOR SEPARATING MOTORIZED AND NONMOTORIZED WINTER USES OF THE FOREST

FOREST SERVICE RESPONSE

We have added direction to the Plan on this subject.

COMMENT NO. 16 WITH THE COMMUNITY STABILITY ALTERNATIVE, RECREATION WILL BE OPEN TO ALL WITH BETTER ROAD MAINTENANCE AND THE WILDLIFE WILL REMAIN STRONG THROUGH NEW FORAGE

FOREST SERVICE RESPONSE

We don't see that the CSA guarantees better road maintenance than any other alternative -- only more roads. We agree that wildlife would probably have sufficient forage on summer ranges with the CSA and most other alternatives

COMMENT NO. 17 I DON'T HAVE TIME TO WALK THROUGH THE WILDERNESS, BUT I SURE ENJOY TAKING A DRIVE THROUGH THE WOODS OR GOING TO GET MY FIREWOOD YOU NEED TO ALLOW FOR ROADED RECREATION

FOREST SERVICE RESPONSE

All alternatives provide increased roaded recreation opportunities that are well in excess of demand for the foreseeable future.

COMMENT NO. 18 START PROMOTING MORE RECREATIONAL USE OF THE DISPERSED ROAD-ED AREAS - SHOW THE PUBLIC THAT A MANAGED FOREST CAN BE A FUN FOREST

FOREST SERVICE RESPONSE.

Total use of dispersed roaded areas greatly exceeds use of unroaded areas today and we expect it to do so in the future. We feel, and most people seem to agree, that the Forest should provide a variety of recreation opportunities, from "paved to primitive." The issue is "how much of each." We provide information about many kinds of recreation opportunities in the National Forest

COMMENT NO. 19 WHY NOT TAKE A WEEK-END AND GO TO THE POPULAR RECREATION SPOTS LIKE PHILLIPS LAKE, THE SNAKE RIVER AREA AND COUNT THE PEOPLE ENJOYING THEMSELVES, THEN GO TO THE WILDERNESS AREAS AND COUNT THE PEOPLE, THEN TELL ME WHAT WE NEED MORE OF.

FOREST SERVICE RESPONSE

Phillips Lake, by design and definition, is intended to accommodate intense use. Wilderness, by definition, is not.

All Forest Plan alternatives provide for significant increases in developed recreation. The field is also wide open for private sector development on the plentiful private land in, and adjacent to, the Forest.

COMMENT NO. 20 PLEASE CREATE SOME WAY FOR THESE TOURISTS TO LEAVE MONEY IN THE COMMUNITY, LIKE A RESORT OR SOMETHING.

FOREST SERVICE RESPONSE

Resort development is primarily a job for private interests and private capital. We will cooperate by providing an attractive National Forest for those resort visitors to drive for pleasure, hunt, fish, hike, and ride in, and in some instances it will be possible to develop resorts on the Forest when in the public interest. The Anthony Lakes development is an example.

COMMENT NO. 21 THE TOURISTS THAT TRAVEL THROUGH HERE DON'T ACTUALLY SPEND THAT MUCH MONEY HERE. MOST OF THE PEOPLE THAT COME THROUGH ARE IN R-V'S AND ARE ON THEIR WAY TO CAMP AT THE WALLOWA LAKE. THESE PEOPLE ARE ALREADY EQUIPPED AND DON'T HAVE TO BUY THAT MUCH ON THEIR WAY THROUGH. PLEASE PUT MORE IMPORTANCE ON FUNDING FOR IMPROVING THE RECREATION AREAS WE HAVE SUCH AS HAT POINT AND DUG BAR. THESE ARE BOTH BEAUTIFUL AREAS THAT SHOULD BE DEVELOPED.

FOREST SERVICE RESPONSE

All Forest Plan alternatives provide for improvement of roads for recreation, including the Dug Bar and Hat Point roads, and improved recreation facilities.

COMMENT NO. 22 METHODS TO ESTIMATE VALUES OF RECREATION ARE FLAWED AND RESULT IN A SERIOUS UNDERVALUATION OF RECREATION. THIS UNDERVALUATION BECOMES OF PARTICULAR CONCERN IN THOSE AREAS OF THE FOREST WHERE IRREPLACEABLE DISPERSED RECREATIONAL OPPORTUNITIES MAY BE TRADED FOR LOW VALUE TIMBER RESOURCES. FOR EXAMPLE, WILLINGNESS TO PAY ESTIMATES OF CAMPING ARE \$9 A VISITOR DAY AND ANADROMOUS FISHING AT \$52 A DAY. THE PLAN CURRENTLY VALUES CAMPING AT \$6 A DAY AND ANADROMOUS FISHING AT \$33 A DAY.

FOREST SERVICE RESPONSE.

The values shown in the document for the various forms of recreation do reflect willingness-to-pay values. They correspond with those promulgated by the Pacific Northwest Regional Office in its letter of April 27, 1984 to the Forest Supervisors and are shown in Appendix B of the EIS. They are the 1985 RPA program values. The number of anadromous fish produced on the Wallowa-Whitman is quite small -- so small in fact that no anadromous sport fishing activity was attributed to them. The anadromous fishing that does occur on the Forest (and downstream of the Forest) occurs overwhelmingly in response to the efforts of the fish hatcheries, the Forest does not take credit for it.

The commenter considers the values to be low. Certainly, reasonable estimates of value can be generated on either side of the values we have used. We recognize that the figures are arguable, but we must use the figures generated in the analyses for the 1985 Program, unless we have evidence supporting a different value.

As shown in the EIS, very little difference is anticipated in total recreation use among the alternatives

The FORPLAN model used to help develop Forest alternatives did not include recreation values and hence could not trade off recreation for timber or vice versa. The complexity involved with adequately modeling recreation with all its geographic specificity and subcategories was beyond the limits of the model in the case of the Wallowa-Whitman. The tradeoffs were made during the land allocation process in response to the various issues driving the process

COMMENT NO. 23: RECREATION USE FORECAST (APPENDIX, PAGE B-52) - THE FOREST USES THE 1980 OBERS BEA REGIONAL POPULATION PROJECTIONS TO FORECAST FUTURE RECREATION DEMAND, ESTIMATING THE DEMAND FOR RECREATIONAL USE FROM A PROJECTED POPULATION GROWTH RATE OF 1.9% PER ANNUM. THIS SOURCE IS OUTDATED AND MAY PROVIDE AN OVERLY OPTIMISTIC GROWTH RATE. THE WALLOWA-WHITMAN SHOULD REVISE ITS ANALYSIS OF RECREATION BENEFITS USING THE STATE ECONOMIST'S CURRENT POPULATION GROWTH PROJECTION

FOREST SERVICE RESPONSE

The population projections used were those contained in the 1980 OBERS series for the State of Oregon. They are contained in Volume 1, Methodology, Concepts and State Data, BEA Regional Projections prepared by the U. S. Department of Commerce. Published in July 1981, they supplanted the preceding 1972 series.

There were numerous other population projections available at the time the planning documents were being drafted. The OBERS series was used because they provided a single set of projections encompassing both the near and the far term and because they are widely used by federal land management agencies. Using a single series ensures a certain consistency in the projections which is not possible when two or more population projections sets are used. Likewise, there is a benefit to be gained in using the same projections as those used by other federal agencies.

The OBERS series used contained the following decade-respective projections for the State of Oregon.

1980's	1.8%
1990's	1.5%
2000's	1.2%
2010's	0.9%
2020's	0.6%

Whether they prove accurate in the long-term remains to be seen. It is important to clarify for the reviewer that the population projections were used only to project future recreation use on the Forest. They figure in the analysis in no other way. No alternative would have been reranked in terms of economic efficiency, no timber harvest levels would have changed had another professionally-acceptable series of populations projections been used.

COMMENT NO. 24. IT'S INTERESTING TO NOTE THAT THE FOREST SERVICE MAINTAINS THAT LOST JOBS WILL BE REPLACED BY THE CREATION OF NEW JOBS THROUGH RECREATION. IF YOU WILL CHECK THE FIGURES, YOU WILL FIND THAT RECREATIONAL VISITORS ARE DOWN SIGNIFICANTLY THIS YEAR. VISITORS TO OUR COUNTY ARE FREQUENTLY LEFT FRUSTRATED

AND ANGRY AT NOT BEING ABLE TO ACCESS THE WILDERNESS--THEY HAVE TRAVELED HUNDREDS AND EVEN THOUSANDS OF MILES TO VIEW HELLS CANYON FROM HAT POINT, ONLY TO FIND THAT YOU CAN'T GET THERE FROM HERE

FOREST SERVICE RESPONSE:

All Forest Plan alternatives provide for improved road access to places like Hat Point, Dug Bar, and Pittsburg Landing. Access within wilderness will continue to be by trail or cross-country, as directed by the Wilderness Act. Recreation use of the Forest in 1986 was 1,642,000 visitor days, compared to "current use" shown in the Plan of 1,511,000 visitor days, which was the average use for 1980-84. We acknowledge that recreation use does vary significantly on a year-to-year basis, but there is an upward trend

COMMENT NO. 25. PAST PREDICTIONS THAT WILDERNESS ADDITIONS AND THE HELLS CANYON NATIONAL RECREATION AREA WOULD GENERATE NEW RECREATION-ORIENTED EMPLOYMENT HAVE NOT BEEN FULFILLED THEREFORE, TO MAXIMIZE NET PUBLIC BENEFITS, THE WALLOWA-WHITMAN'S PREFERRED ALTERNATIVE SHOULD INCREASE THE ECONOMIC VITALITY OF THESE THREE COUNTIES BY ENCOURAGING TIMBER MANAGEMENT AND WOOD PRODUCTS MANUFACTURING.

FOREST SERVICE RESPONSE.

Both the Hells Canyon NRA and the 1984 wilderness additions are recent enough that the effects of their designation on tourism have not been felt. Most of the improved access and facilities planned for Hells Canyon are scheduled for development in the next 10 to 20 years. When they are completed, and as the area becomes better known, some changes should be evident.

COMMENT NO. 26. I ENJOY TAKING MY CAMPER TO A DEVELOPED SITE AND SPENDING THE WEEKEND JUST FISHING AND RELAXING. WE NEED MORE OF THESE FACILITIES THOUGH YOU ARE REALLY LIMITED AS TO WHERE YOU CAN GO--UNLESS YOU LIKE TO JUST GO INTO THE WOODS AND CAMP.

THE FEW DEVELOPED CAMPSITES THAT WE DO HAVE ARE USUALLY QUITE CROWDED, AND ON HOLIDAYS IT'S NEARLY IMPOSSIBLE TO GET A SPOT

FOREST SERVICE RESPONSE:

Crowding is certainly a problem on busy weekends at the highly developed sites, like Union Creek and Anthony Lakes, but many other campgrounds are underutilized

COMMENT NO. 27. THE LUCRATIVE RV ECONOMY IS VIRTUALLY UNTAPPED. AREAS SUCH AS PHILLIPS LAKE, ANTHONY LAKES, AND MT HOWARD ARE EXCEPTIONALLY POPULAR (OFTEN TRUE WITH STATE PARKS SUCH AS WALLOWA LAKE AND CATHERINE CREEK) BECAUSE THEY HAVE EASY ACCESS (PAVED ROAD) AND RV FACILITIES. OTHER AREAS THAT ARE ALREADY DEVELOPED AND ARE NEAR WATER OR OFFER OUTSTANDING VIEWS WOULD INCREASE HIGH SPENDING VISITOR DAYS DRAMATICALLY. EXAMPLES ARE HAT POINT, BUCKHORN SPRINGS, LOWER CRACKER CREEK, FISH LAKE.

**RECOMMENDATION: RECREATION
DEVELOPED CAMPING AREAS (SELECT ONES) GIVEN UPGRADE**

FOREST SERVICE RESPONSE.

The shortage of federal funds will not permit development of "modern" facilities, such as trailer parks and comfort stations with hot water and showers. We encourage development of such facilities with private funds on private land.

COMMENT NO. 28 WE CAN'T AFFORD TO HAVE SO MUCH OF THE FOREST LOCKED UP FOR WILDERNESS. WHAT WE NEED ARE MORE DEVELOPED RECREATIONAL AREAS. MAYBE THEN WE COULD DRAW SOME OUTSIDE MONEY FROM TOURISTS AND CAMPER'S. INSTEAD OF DISCOURAGING PEOPLE FROM ENJOYING OUR WILDERNESS, WE SHOULD PROMOTE THE IDEA, AND LET PEOPLE SPEND THEIR MONEY IN OUR LOCAL COMMUNITIES.

FOREST SERVICE RESPONSE:

There is plenty of land suitable for development on public and private land outside of wilderness. Funds for development, not land, are what are in short supply.

COMMENT NO. 29 PLANNED DEVELOPMENT OF CAMPSITES APPEARS TO BE CONCENTRATED IN THE HELLS CANYON NATIONAL RECREATION AREA. WE ARE CONCERNED THAT OTHER RECREATION SITES IN THE FOREST BE GIVEN EQUAL CONSIDERATION FOR DEVELOPMENT AND IMPROVEMENT AS NEEDED.

FOREST SERVICE RESPONSE:

Little or no expansion of facilities is planned outside of the National Recreation Area. There will be some upgrading of sites, such as has recently occurred at Anthony Lakes. Existing developed recreation capacity is adequate for existing and projected use. However, a change in this situation could result in increased development.

COMMENT NO. 30: WE NEED MORE DEVELOPED RECREATION SPOTS. THE ONE PLACE THAT IS DEVELOPED IS PHILLIPS LAKE. IT'S SO CROWDED THAT YOU CAN'T EVER GET A PLACE TO CAMP THERE, AND IT'S TOO FAR FROM WALLOWA COUNTY TO REALLY TAKE ADVANTAGE OF. HOW ABOUT DESIGNATED MONEY TO FUND A NICE CAMPGROUND AT DUG BAR, OR LET SOME SPECIAL USE PERMITS SO COMMERCIAL DEVELOPERS WOULD BE ABLE TO BUILD A BUSINESS THERE?

FOREST SERVICE RESPONSE:

The Comprehensive Management Plan calls for a rustic campground at Dug Bar. We are open to the idea of commercial operation. Some campground improvements are also planned for the upper Imnaha River area and Pittsburg Landing.

COMMENT NO. 31. MY FAMILY AND I GO TO THE SNAKE RIVER 10 OR MORE TIMES A YEAR, AND HAVE TO STAY ON THE IDAHO SIDE AND FISH OUT OF OUR BOAT, BECAUSE OREGON DOES NOT HAVE ANY FACILITIES ON OUR SIDE, PLUS THE FACT WE ONLY HAVE TO PAY \$3.00 PER NIGHT WITH FULL HOOK-UP, SOMETHING IS WRONG WHEN WE HAVE TO GO TO IDAHO TO HAVE DECENT CAMPING GROUNDS!

FOREST SERVICE RESPONSE

The developable land on the Oregon side of Hells Canyon Reservoir is outside the National Forest. Both Baker County and private developers are considering some development there.

COMMENT NO. 32 THE APPARENT PLANNED NEGLECT OF THE LOSTINE RIVER ROAD AND CAMPGROUNDS SITUATION IS BECOMING EVER MORE ACUTE. IT SHOULD BE OBVIOUS TO ANY INTERESTED OBSERVER THAT ACTION SHOULD BE TAKEN TO MAKE THAT AREA BETTER MAINTAINED FOR PUBLIC USE.

FOREST SERVICE RESPONSE:

This reflects five or more years of reduced recreation budgets. We feel we have done well to accomplish what we have with the dollars that have been available.

COMMENT NO. 33: THE COMMUNITY STABILITY ALTERNATIVE MEANS MORE DEVELOPED RECREATION FOR THOSE OF US WHO ARE UNABLE (SUCH AS THOSE OF US WITH SMALL CHILDREN) TO HIKE INTO THE WILDERNESS. AT PRESENT, THERE ARE FEW AREAS AVAILABLE FOR US IN THIS CATEGORY. EVEN ANTHONY LAKES (ONE OF MY FAVORITE CAMPING SPOTS AS A SMALL CHILD), IS BEING FIXED SO THAT ONLY THE YOUNG CAN ENJOY THE AREAS WHERE WE FORMERLY CAMPED!

FOREST SERVICE RESPONSE.

To have more developed recreation requires more dollars for development. The CSA doesn't assure that--only Congress can. Our view is that, during the life of the Forest Plan, funds for recreation development are going to be quite limited. Wilderness and developed recreation are not in competition on this Forest. There is far more developable land outside of wilderness than we can afford to develop.

While the camping area close to Anthony Lakes, which was resulting in erosion and siltation of the lakes, has been closed, a new, attractive campground has been provided to replace it.

COMMENT NO. 34 WE WILL HAVE TO HAVE FUNDING TO DEVELOP OTHER SCENIC AREAS AND HAVE DEVELOPERS PUT IN "DESTINATION RESORTS" IF WE ARE REALLY GOING TO DEPEND ON TOURISM AS A STABLE PART OF OUR ECONOMY.

FOREST SERVICE RESPONSE

We agree. Although we feel that resort facilities should generally be developed on private land with private funds, we are willing to cooperate with local government and developers to provide complementing facilities and recreation (trails, picnic grounds, boating sites, an attractive environment for recreation) on National Forest land.

COMMENT NO. 35 WE NEED MORE DEVELOPED RECREATION. IT'S GETTING SO I CAN'T EVEN FIND A SPOT TO CAMP ANYMORE. WE HAVE ENOUGH WILDERNESS AND PRIMITIVE AREA ALREADY.

FOREST SERVICE RESPONSE

We have some campgrounds that receive little use.

Wilderness and developed recreation are not in competition on this Forest. There is far more developable land outside wilderness than we can afford to develop. Dollars for development are what are in short supply.

COMMENT NO. 36 THERE ARE MANY OPPORTUNITIES TO DEVELOP RECREATION FACILITIES ON THE NATIONAL FOREST OTHER THAN THOSE DIRECTLY CONNECTED WITH THE WILDERNESS AREAS. SEVERAL RENOWNED SITES, SUCH AS HAT POINT AND DUG BAR ARE AMONG THE MANY THAT SHOULD BE IMPROVED SO THAT A LARGER PERCENTAGE OF OUR POPULATION COULD ENJOY THEM. I HAVE HAD MANY INQUIRIES AS TO WHERE VISITORS CAN CAMP, AND THEY ARE TERRIBLY DISAPPOINTED WHEN I TELL THEM THERE IS ONLY ONE SMALL CAMPGROUND IN OUR VICINITY (HURRICANE CREEK). THIS CAMPGROUND IS USUALLY FULL AFTER HURRICANE CREEK, THE NEXT CLOSEST TO JOSEPH IS LICK CREEK - A FULL 28 MILES WE NEED MORE DEVELOPED RECREATION SPOTS IN OUR AREA

FOREST SERVICE RESPONSE

The Comprehensive Management Plan for the National Recreation Area calls for recreation development at Hat Point, Dug Bar, and the Upper Imnaha. However, none of these places are close to Joseph. No new development is planned as close to Joseph as Hurricane Creek, in fact, there is little National Forest land as close to Joseph as Hurricane Creek.

COMMENT NO. 37: I HAVE TOURED THE WETMORE AND YELLOW PINE CAMPGROUNDS ON THE UNITY DISTRICT WITH THE RANGER AND DISCUSSED THE IMPORTANCE OF THE BIG PONDEROSA PINES TO THOSE CAMPGROUNDS. AT THIS POINT, I DO NOT KNOW IF THERE ARE FURTHER PLANS TO LOG THE BIG TREES FOR "SAFETY REASONS." HOW DOES THE FOREST PLAN PROPOSE TO MANAGE THESE CAMPGROUNDS AND OTHERS LIKE THEM? I THINK IT IS IMPOSSIBLE FOR THE FOREST SERVICE TO PROTECT THE PUBLIC FROM TREES FALLING. A 5 INCH DIAMETER TREE COULD KILL SOMEBODY AS EASILY AS 30 INCH DIAMETER TREE. I BELIEVE PEOPLE CHOOSE THE BIG TREE CAMPGROUNDS FOR THEIR BEAUTY AND ARE WILLING TO RISK A TREE FALLING. REMOVING ONE OR TWO ESPECIALLY HAZARDOUS TREES IN A CAMPGROUND IS FINE, BUT THIS SHOULD BE DONE WITH EXTREME CARE. I THINK THE FOREST SERVICE IS EXCEEDING THEIR RESPONSIBILITY TO THE PUBLIC'S SAFETY. I SEE TOO MANY TREES REMOVED AT ALMOST EVERY CAMPGROUND I VISIT. A RECENT TRIP TO LAKE FORK CAMPGROUND CORRESPONDED WITH THIS YEAR'S HARVEST OF HAZARD TREES THERE EVERY YEAR MORE AND MORE TREES ARE REMOVED. I DO NOT BELIEVE THE TREES ARE DETERIORATING ALL AT ONCE. INSTEAD, I AM SEEING A FOREST-WIDE POLICY OF CALLING MOST TREES OVER A CERTAIN SIZE A "HAZARD." YOU ARE TAKING AWAY THE VERY REASON MANY PEOPLE CAMP IN THOSE AREAS.

FOREST SERVICE RESPONSE:

Our evaluation of trees to determine whether they are hazardous is based on a methodology developed by researchers at the Pacific Southwest Forest and Range Experiment Station and modified for the Pacific Northwest by professional pathologists at our Regional Office. Developed sites are inspected annually and trees are evaluated as to their potential for failure and the likelihood of their falling into an occupied area if they do fail. Trees that are judged as having a high risk of causing damage or injury are removed. The alternative is to restrict use of the site or facility that is at risk.

Not all hazardous trees are large trees. Small trees that are defective and likely to fail and cause injury or damage are removed, too

Failure to deal with hazardous trees can have fatal consequences. There have been several instances of persons being killed or seriously injured by trees that failed in recreation sites with sizeable damage awards as a result.

COMMENT NO. 38: I DON'T LIKE TO BE CHARGED TO USE BOAT RAMPS AND DAY USE FEES

FOREST SERVICE RESPONSE:

Many people who don't use boat ramps or day use sites resent having their tax dollars used for building and maintaining such facilities.

Presently, we have no authority to charge for such facilities. Legislation has been proposed to Congress that would give us that authority, based on the point-of-view that those who use public recreation facilities should pay some of the cost of providing them.

COMMENT NO. 39: I WOULD LIKE TO HAVE THE FOREST OPENED UP, OR MADE AVAILABLE, SO MORE OF OUR OLDER CITIZENS COULD ENJOY SOME OF IT, ALONG WITH THE YOUNGER GENERATION

FOREST SERVICE RESPONSE.

Our analysis shows that the Forest has, and will have in the future, a plentiful supply of road-accessible recreation.

COMMENT NO. 40 ALL HOT SPRING SITES OUGHT TO BE PROTECTED WITH BUFFER AREAS AS THESE SITES ARE OR WILL BECOME POPULAR FOR RECREATION

FOREST SERVICE RESPONSE:

Although the Forest includes few hot springs, and none which are currently important for recreation, the standards and guidelines for riparian zones provide for protection of these resources.

COMMENT NO. 41. WE NEED MORE DEVELOPED RECREATION. I CAN'T EVEN FIND A CAMPING SPOT OR A PLACE TO PUT MY BOAT IN THE WATER AT PHILLIPS. WE ALREADY HAVE ENOUGH WILDERNESS AND PRIMITIVE RECREATION

FOREST SERVICE RESPONSE:

There are times when the more popular recreation sites are fully occupied, although we don't know of any times when there is not a place to put a boat in at Phillips Reservoir. We have requested funds for more developed recreation facilities, but such funds are difficult to obtain.

COMMENT NO. 42. THE EIS PRESENTS FOUR MANAGEMENT AREAS DEALING WITH TIMBER HARVESTING (AREAS 1, 2, 3, AND 18), BUT ONLY ONE INVOLVING BACKCOUNTRY. GRRC [GRANDE RONDE RESOURCE COUNCIL] BELIEVES A SECOND BACKCOUNTRY AREA SHOULD

BE INCORPORATED INTO THE DOCUMENT, THE EXISTING BACKCOUNTRY ALLOCATION WOULD ALLOW OFF-ROAD VEHICLES INTO THE AREA -- WE WOULD LIKE TO SEE A MANAGEMENT AREA PROHIBITING ORV'S FROM BACKCOUNTRY AREAS.

FOREST SERVICE RESPONSE

Area 6 provides for areas to be either open or closed to off-road vehicles. The Forest Travel Management Plan will designate which will be closed. Presently, many of the lands proposed for Area 6 designation are closed to ORV use. We do not feel that separate areas are necessary or desirable.

COMMENT NO. 43 I WANT LESS PRIMITIVE OR WILDERNESS RECREATION AND MORE DEVELOPED RECREATION OPPORTUNITY.

FOREST SERVICE RESPONSE

An increase in developed recreation opportunity can only come about with an increase in funding for these developments. To date, our funding requests have not been met.

COMMENT NO. 44 WHAT REASONING LEADS TO THE CONCLUSION THAT THE PEOPLE WHO OWN THE NATIONAL FORESTS PREFER SUB-ALPINE AND ALPINE TERRAIN RATHER THAN LUSH FOREST SETTINGS FOR THEIR OUTDOOR EXPERIENCES?

FOREST SERVICE RESPONSE

There is no such reasoning or conclusion. Far more recreation opportunities are provided at lower elevations on the Forest than at higher elevations. The fact that many of the remaining unroaded lands on the Forest are at higher elevations is an existing situation. The Plan is aimed at meeting many resource needs within a limited land and resource base.

COMMENT NO. 45. RECOMMENDATION BACKCOUNTRY

1. ALL HARVEST LOOPHOLES BE REMOVED FROM AREA
2. ALL PRESENT BACKCOUNTRY REMAIN OR GIVEN WILDERNESS STUDY
3. 20% OF PREVIOUS TIMBER MANAGED LANDS BE ALLOCATED TO BACKCOUNTRY

FOREST SERVICE RESPONSE

Your comment was considered in developing the Final Plan.

COMMENT NO. 46 ALTERNATIVE C ALLOWS FOR SO-CALLED BACK COUNTRY SURROUNDING THE WILDERNESS AREAS. THESE ARE THINLY VEILED PSEUDO-WILDERNESS AREAS.

FOREST SERVICE RESPONSE.

Management Area 6 is intended to partially meet the demand for semiprimitive recreation opportunities. The areas which were selected for inclusion in Management Area 6 have, in our opinion, greater value for semiprimitive recreation than for other uses.

COMMENT NO. 47. INCREASING THE TIMBER RESERVE FOR RECREATION IS UNNECESSARY THERE ARE ALREADY MILLIONS OF ACRES RESERVED FOR THE BACK-PACKERS I WOULD VENTURE TO SAY THAT LESS THAN 5% OF THE USE IS FROM BACK-PACKERS AND YET A LARGE PORTION OF THE NATIONAL FOREST IS PRESERVED FOR THAT TYPE OF USE. IN ADDITION, SINCE THESE AREAS ARE SO LARGE IT IS NOT NECESSARY TO HAVE ANY TYPE OF BUFFER ZONE BETWEEN THEM AND THE AREA OF FOREST UTILIZED FOR FULL TIMBER YIELD A BUFFER ZONE DOES NOTHING MORE THAN INCREASE THE EXISTING PROTECTED AREA WHICH THE PEOPLE IN EASTERN OREGON CANNOT AFFORD.

FOREST SERVICE RESPONSE:

Primitive and semiprimitive recreation, which includes a variety of uses in wilderness and other roadless areas, makes up about 30% of the total recreation use on the Forest Many people share your opinion that too much land is retained for that kind of use in the Plan.

COMMENT NO. 48: I AM COMPELLED TO ADD A FEW WORDS ABOUT WILDERNESS AND ROADLESS AREAS. I HATE TO SEE THEM OPENED TO ROADS WHEN WE HAVE FAR TOO MANY ROADS ALREADY

FOREST SERVICE RESPONSE

Many shared this opinion

COMMENT NO. 49 ALL QUALITY PRIMITIVE HUNTING OPPORTUNITIES FOUND IN THE FOREST SHOULD BE PROTECTED FROM INCREASED LOGGING AND ROAD BUILDING

FOREST SERVICE RESPONSE:

An opinion shared by others

COMMENT NO. 50: FURTHER, IT MAY SEEM HARD FOR SOME TO FATHOM IN AS-YET SPARSELY POPULATED EASTERN OREGON, BUT ONE OF OUR MOST PRESSING FUTURE NEEDS WILL BE FOR ADEQUATE HIGH-QUALITY PRIMITIVE RECREATION LANDS SUCH LANDS ARE ONE OF OUR FASTEST-DISAPPEARING NATURAL RESOURCES

FOREST SERVICE RESPONSE:

We believe that our analysis of present and future supply and demand for various kinds of recreation experiences bears this out. Land allocations in the Plan are aimed at satisfying this and many other resource needs Management plans for wilderness are aimed at keeping wildernesses "high quality primitive recreation lands."

COMMENT NO. 51. THE EXISTING BACKCOUNTRY ALLOCATION SHOULD BE APPLIED TO UNLOGGED OR LIGHTLY LOGGED AREAS WITH UNIMPROVED ROADS IN EXISTENCE, SUCH AS THE EAGLE CREEK CANYON NEAR EAGLE FORKS, UPPER GROUSE CREEK, THE NON-NRA PORTION OF SHEEP DIVIDE, AND CHICKEN CREEK AREAS

FOREST SERVICE RESPONSE.

This was considered in selecting the Final Plan.

COMMENT NO. 52: THE ELKHORN BACK COUNTRY PROPOSAL MUST NOT JEOPARDIZE A CENTURY OF EXPERIENCE AND OPPORTUNITY FOR MINING--AND INVESTMENTS IN MINING THE NATIONAL FOREST CANNOT JUSTIFY THE SELFISH HATE FOR THE MINER BY THE COALITION, AS A NATIONAL POLICY BY ALLOCATING ANY SPACE TO THAT HATE

FOREST SERVICE RESPONSE.

Area 6 places no limitation on mineral exploration or development, although the existing access level may make these activities more difficult

COMMENT NO. 53: THE BACKCOUNTRY DESIGNATION SHOULD BE CHANGED TO A MORE PROTECTIVE DESIGNATION EITHER WILDERNESS OR BY ADDING RESTRICTIONS THAT DISALLOW LOGGING, ROADS, R.V. USE, OR ANY TIMBER MANAGEMENT. THOSE FEW AREAS DESIGNATED AS BACKCOUNTRY ARE TOO SMALL AND UNDER-PROTECTED.

FOREST SERVICE RESPONSE:

We believe that these areas provide a needed recreation opportunity not available in wilderness or in developed areas.

COMMENT NO. 54: THE ATTITUDE THAT USERS WHO DO NOT HAVE THE OPPORTUNITY TO BACKPACK CAN SIMPLY CHANGE HABITS AND LEARN TO DRIVE THEIR CARS THROUGH FORMER ROADLESS AREAS DENIES THE FACT THAT PEOPLE WANT ROADLESS AND WILDERNESS AREAS. SAYING THAT PEOPLE WILL SIMPLY ADAPT OVER A PERIOD OF 50 YEARS TO FINDING RECREATIONAL OUTLETS IN CLEARCUTS (PLAN 3-4) BELIES A BASIC RESISTANCE TO MODIFYING WHAT IS PERCEIVED BY THE WWNF AS THE PRIMARY REASON FOR EXISTENCE OF THE FOREST -- TO PROVIDE TIMBER AND RANGE

FOREST SERVICE RESPONSE:

The shortfall described is in semiprimitive motorized recreation; i.e., motorcycling or four-wheel driving in areas accessed only by trails and primitive roads. We believe that the shortfall in this category can be made up by providing similar opportunities in roaded areas.

We do not intend to imply that backpackers can or will do the same. However, the shortage of semiprimitive nonmotorized opportunities outside of wilderness can be more than satisfied by a surplus of similar opportunities in wilderness.

Wording of this section has been changed to more clearly express these thoughts

COMMENT NO. 55: ALTHOUGH THERE IS ALWAYS A VARIETY OF TYPES OF RECREATION SOUGHT ON THE FOREST, IT IS NOT LEGITIMATE TO CLAIM A NEED TO ROAD MORE ACRES TO PROVIDE ACCESS TO PHYSICALLY DISABLED PERSONS (PLAN 2-6) PEOPLE DO NOT GET A WILDERNESS EXPERIENCE DRIVING TO A LOCATION, AND THE WWNF ABOVE ALL FORESTS IN THE REGION, HAS ENOUGH ROADS TO SATISFY ALL VEHICLE-BASED RECREATION

FOREST SERVICE RESPONSE

The statement is paraphrasing a prevailing view in the public, not the view of Forest managers

COMMENT NO. 56. I SEE LITTLE NEED FOR MANAGEMENT AREA 6 WITH ALL THE WILDERNESS AVAILABLE. THE ONLY AREA WHERE I RECOMMEND MANAGEMENT AREA 6 IS THE HIGH COUNTRY IN THE ELKHORN MOUNTAINS.

FOREST SERVICE RESPONSE:

Many share this opinion.

COMMENT NO. 57. WE BELIEVE THERE HAS TO BE A LIMIT TO THE AMOUNT OF RECREATION AREA AND THIS PART OF THE STATE HAS ABOUT REACHED MORE THAN THE LIMIT SO FEW PEOPLE SEEM TO USE THESE "WILDERNESS" AREAS IT SEEMS LIKE A GREAT AMOUNT OF WASTE

FOREST SERVICE RESPONSE

Our analysis shows that recreation opportunities at the primitive end of the scale will be used to near capacity in the future.

COMMENT NO. 58 THE FOREST SHOULD BE OPEN TO ALL THE PEOPLE, NOT JUST A FEW. THERE'S ALREADY PLENTY OF PRIMITIVE AREAS WE NEED ROADS FOR BETTER RECREATION

FOREST SERVICE RESPONSE:

The Plan does not create new primitive or semiprimitive areas It retains these opportunities on those portions of the Forest where the cost of doing so is relatively low.

COMMENT NO. 59 DISPERSED RECREATIONAL OPPORTUNITIES OUTSIDE OF WILDERNESS AREAS ARE DECLINING THROUGHOUT THE FOREST, ESPECIALLY THOSE DEFINED AS "PRIMITIVE" AND "SEMIPRIMITIVE." THIS REPRESENTS AN EROSION OF RECREATIONAL DIVERSITY OF WHICH THE USFS IS A PRIME SUPPLIER.

FOREST SERVICE RESPONSE.

The Plan provides, in our opinion, a balanced mix of recreational opportunities, including primitive and semiprimitive

COMMENT NO. 60: THE PLAN DOESN'T SHOW THE VALUE OF SEMIPRIMITIVE RECREATION VISITOR DAY.

FOREST SERVICE RESPONSE:

These values are displayed in Appendix B to the EIS.

COMMENT NO. 61 INADEQUATE CONSIDERATION FOR NONWILDERNESS-PRIMITIVE RECREATION --TABLE IV-3A OF THE DEIS STATES THE PREFERRED ALTERNATIVE WILL PROVIDE ONLY 7,000 RECREATION VISITOR DAYS FOR NONWILDERNESS-PRIMITIVE RECREATION AFTER 40 YEARS. THE SAME TABLE STATES THE DEMAND FOR NONWILDERNESS PRIMITIVE RECREATION IN 40 YEARS TO BE 11,000 VISITOR DAYS IF MORE ACCURATE PROJECTIONS ARE USED FOR THE INCREASE FOR DISPERSED RECREATION DEMAND, THE DISPARITY WOULD BE MUCH GREATER. NO ADEQUATE DISCUSSION IS PROVIDED EXPLAINING WHAT IMPACTS (ECONOMIC AND/OR ENVIRONMENTAL) WILL OCCUR AS THE RESULT OF THIS SHORTFALL

FOREST SERVICE RESPONSE:

The supply of nonwilderness primitive recreation remains the same throughout the planning period. There is no practicable way to increase that supply. Projected demand is based on present use and projected population increases.

Some would argue that a more meaningful comparison of supply and demand can be made by comparing total supply and demand for primitive recreation, both within and outside of wilderness.

COMMENT NO. 62: JUST "LEAVE ALONE" MOST OF THE WELL USED DISPERSED CAMPSITES FOR CONTINUED FUTURE USE SEEMS LIKE A SMALL BUT IMPORTANT MULTIPLE USE

FOREST SERVICE RESPONSE:

It is not practical to protect every campsite as some are hardly recognizable. We do recognize and usually preserve those minimum-development hunter camps that are long-established through repeated use. But sometimes the insects and disease do not cooperate and trees need to be salvaged to such a degree that the camps are affected more than their occasional occupants desire.

COMMENT NO. 63 HORSES AND MULES SHOULD BE STRICTLY LIMITED TO SMALL PRIVATE PARTIES AND COMPLETELY BANNED IN ROADLESS AND WILDERNESS AREAS. EXCEPTIONS SHOULD BE MADE FOR HANDICAPPED AND ELDERLY AS WELL AS FOR FOREST SERVICE USE

FOREST SERVICE RESPONSE:

This approach wouldn't fulfill the objective of providing a wide range of recreation opportunities, nor do we believe it is necessary. We recognize that there are many wilderness users who would prefer that horse use be more restricted.

COMMENT NO. 64 SOMETHING THAT BOTHERS ME IS LACK OF TIME FOR RECREATION AS A WORKING PEON MY AVAILABLE RECREATION TIME IS HIGHLY LIMITED. WHAT RECREATION TIME IS AVAILABLE HAS TO BE STRUCTURED TO THE NEEDS OF THE PARTICULAR TRIP. FOR THIS REASON IT IS IMPROVIDENT TO PLAN ON SLOW MOVING RECREATION TIME AS A PEON I HAVE NOT THE TIME, OR INCOME, NOR EQUIPMENT TO PROVIDE MYSELF AN EXTENDED LEISURELY TRIP. I FAIL TO UNDERSTAND OR PERCEIVE A FOREST SERVICE PLAN WHICH

RESTRICTS PUBLIC ACCESS TO PUBLIC LANDS, OPEN TO THE PUBLIC. I FEEL IT IS RESTRICTIVE IN THAT I CANNOT DRIVE TO MY CHOICE OF ANY AREA OF PUBLIC ACCESS, DO MY RECREATION FROM MY VEHICLE, AND RETURN TO MY HOME. NO MUSS, NO FUSS, NO STRAIN. ACCESS TO THE FOREST IN THIS SENSE IS TOO RESTRICTED

FOREST SERVICE RESPONSE:

While many persons prefer a recreation setting that is road-accessible, many others do not. Making all areas road accessible removes freedom-of-choice. The Plan provides "no strain" recreation opportunities far in excess of expected demand for the foreseeable future.

COMMENT NO. 65. THE ASSUMPTIONS CATEGORIZE WILDERNESS AND MULTIPLE-USE AREAS AS BOTH HAVING RECREATION/TOURISM VALUE. HOWEVER, THE PREFERRED ALTERNATIVE INCLUDES EXPANSION OF WILDERNESS AT THE COST OF MULTIPLE-USE ACREAGE. THE MANAGER OF THE WALLOWA COUNTY CHAMBER OF COMMERCE, WHO ALSO SITS ON THE STATE TOURISM COUNCIL, SAYS THAT NATIONAL FOREST SERVICE DATA (PAGE 111 - 158) OF THE DRAFT ENVIRONMENTAL STATEMENT REFLECTS 1,766,515 ACRES OF NON-WILDERNESS LAND. CURRENT RECREATION USE IN THIS CATEGORY IS 1,389,000 VISITORS. WILDERNESS LAND, COMPRISING 582,000 ACRES, IS BEING USED FOR RECREATION BY 122,000 VISITORS. ON THE BASIS OF THESE COMPARISONS, MULTIPLE-USE ACREAGE HAS A MUCH STRONGER VISITOR-TO-ACRE RATIO.

FOREST SERVICE RESPONSE:

The preferred alternative provides for no expansion of wilderness. Roaded acres not only have more use at present, but also have a higher capacity for use because they are generally the less fragile lands, because they have major investments in roads and facilities that increase their capacity, and because the social setting provided in such areas allows a higher user density. We feel that the future value of the Forest for recreation is maximized by its having a variety of recreation opportunities and settings "from paved to primitive."

COMMENT NO. 66: THE DEIS WOULD WIPE OUT MOST LOWER ELEVATION PRIMITIVE RECREATION. ONE OF THE GREAT SHORTAGES ON THE FOREST IS QUALITY, LOW ELEVATION, DISPERSED RECREATION, AND BACKCOUNTRY. THERE ARE FEW CONVENIENT MEADOWS OR STREAMS THAT FAMILIES CAN HIKE, PICNIC, OR CAMP IN THE SPRING, EARLY SUMMER, LATE FALL.

FOREST SERVICE RESPONSE:

Most of the low elevation primitive recreation on the Forest is found in the Hells Canyon NRA. This is retained in its primitive state under the Plan.

COMMENT NO. 67. RECOMMENDATION: RECREATION

2. MORE TRAIL MAINTENANCE
3. NO MORE OVERBUILT TRAILS - SUCH AS COMMON IN EAGLE CAP, ELKHORNS
4. MORE DISPERSED RECREATION

FOREST SERVICE RESPONSE:

- Trail maintenance depends on budget levels, but it is our intent to maintain the trail system to a standard that protects the trails from erosion and keeps them safe to use

- Trail standard is based on the planned kind and amount of use. Sometimes trails that seem "overbuilt" to a user are built the way they are to accommodate a more demanding use - ORV's or horses
- The plan provides for more dispersed recreation opportunity than will be used for the foreseeable future

COMMENT NO. 68 ALTERNATIVE C RESULTS IN FORCING OTHER FOREST USERS INTO SMALLER SPACES DUE TO ROAD CLOSURES AND BACKCOUNTRY DESIGNATIONS.

FOREST SERVICE RESPONSE.

Those who like road closures and backcountry designations see increased roading as doing the same thing to them. Alternative C is aimed at achieving a balance.

COMMENT NO. 69 WHILE I DON'T EXPECT THAT THE SLATE CAN BE WIPED CLEAN AND FOREST MANAGEMENT CAN GET A FRESH START IN THIS AREA, THE PREFERRED ALTERNATIVE DOES NOT ACKNOWLEDGE THAT THE HEAVIEST FOREST USERS ARE THE PEOPLE WHO LIVE HERE. WHILE WE DO HAVE OUTSTANDING SCENIC VIEWS, CLOSER INSPECTION SHOWS COWS NEXT TO CAMPGROUNDS AND LOGGING DAMAGE FROM THE TURN OF THE CENTURY IN OUR PRESENT WILDERNESS AND ROADLESS AREAS. THIS IS NOT PRIME WILDERNESS AND NO ONE WILL TRAVEL FROM ACROSS THE STATE TO EXPERIENCE IT. A SACRIFICE IN THE TIMBER CUT WILL NOT GAIN US RECREATION DOLLARS.

FOREST SERVICE RESPONSE:

Much of the use on the Forest is by persons from outside northeastern Oregon. We believe that all users, local and otherwise, will enjoy and benefit from having a plentiful and varied supply of recreation opportunities to choose from.

COMMENT NO. 70 THE DRAFT EIS DID NOT RECOGNIZE THE VALUE OF ANY OF THE EXISTING AND HISTORICAL RECREATIONAL CORRIDOR-ACCESS AREAS BY EXCLUDING ALL OR MOST OF THEM FROM TIMBER HARVEST. MAPS WILL BE ENCLOSED IDENTIFYING THESE IMPORTANT RECREATION AREAS THAT NEED TO BE PROTECTED IN THEIR NATURAL STATE.

FOREST SERVICE RESPONSE:

No maps were received. The value of the corridors was recognized, but not to the extent of excluding them from harvest.

COMMENT NO. 71 DISPERSED RECREATION ALONE ACCOUNTS FOR 1,144,300 RVD'S PRESENTLY WHICH EQUATES TO 1060 JOBS. BY YEAR 2030 THIS IS PROJECTED TO INCREASE 77% AND WILL BE EQUIVALENT TO 1,870 JOBS. WILL THE MASSIVE SHIFT IN ROS SPECTRUM AFFECT THESE NUMBERS? RECREATION PRODUCES NEARLY AS MANY JOBS AS TIMBER, PRODUCES MORE ECONOMIC BENEFIT, AND LEADS TO COMMUNITY STABILITY, YET IT IS GIVEN LITTLE WEIGHT IN REACHING A BALANCE.

FOREST SERVICE RESPONSE

Analysis in the Plan shows that, despite the shift in acreage in various ROS categories, capacity will exist that is sufficient to satisfy demand in most categories.

COMMENT NO. 72 YOUR PLAN CALLS FOR AN INCREDIBLE OVERSUPPLY OF RECREATION AS STATED IN TABLE III-13, SUMMARY OF PROJECTED SUPPLY AND ANTICIPATED DEMAND YOU COULD HAVE DONE A MUCH BETTER JOB OF MATCHING THE SUPPLY TO THE ANTICIPATED DEMAND IT IS OBVIOUS THAT VERY LITTLE ATTEMPT WAS MADE TO EVEN TRY TO MATCH THE SUPPLY OF TIMBER WITH ANTICIPATED DEMAND YOU HAVE FOREGONE TIMBER HARVEST IN ORDER TO OVERSUPPLY THE ANTICIPATED RECREATION DEMAND, IN ONE INSTANCE AS HIGH AS 7.85 TO 1. SURELY THERE IS A BETTER MIX OF OUTPUTS THAN THE ONE YOU CHOSE

FOREST SERVICE RESPONSE

Only roaded recreation has a significant oversupply and that oversupply is due to the amount of roaded lands. No timber harvest is foregone to provide it. Other recreation opportunities (primitive and semiprimitive) are close to projected demand. There is little difference in recreation use among the alternatives.

COMMENT NO. 73. THE COMMUNITY STABILITY ALTERNATIVE PROVIDES RECREATION BY CREATING BETTER ROAD SYSTEMS

FOREST SERVICE RESPONSE:

Fourteen respondents made this comment. Roaded recreation is in plentiful supply, in excess of projected demand, in all plan alternatives.

COMMENT NO. 74 THERE SHOULD BE MORE ALTERNATIVES BENEFITING OTHER MULTIPLE USES SUCH AS FISH AND WILDLIFE AND RECREATION.

FOREST SERVICE RESPONSE:

While there are an unlimited number of management alternatives which could be considered, we believe those that we have developed constitute a reasonable range of alternatives.

COMMENT NO. 75 ANOTHER OMISSION FROM THE DEIS (WHICH THE PACIFIC NORTHWEST REGIONAL OFFICE ALSO STATES SHOULD BE INCLUDED) IS THAT TABLE II-3B OF THE DEIS SHOULD DISCUSS THE QUALITATIVE EFFECTS OF THE ALTERNATIVES ON THE QUALITY OF UNROADED DISPERSED RECREATION. ANY DEIS REVISION SHOULD ALSO INCLUDE SUCH A TABLE.

FOREST SERVICE RESPONSE:

We feel that this subject is adequately discussed in Chapter IV and Appendix C of the EIS.

COMMENT NO. 76: MORE CHALLENGING HUNTING OPPORTUNITIES CAN ALSO BE ACHIEVED THROUGH ROAD CLOSURES, LIMITING THE NUMBERS OF HUNTERS, AND RESTRICTING THE HARVEST TO CERTAIN TYPES OF GAME (EXAMPLE - BULLS WITH THREE OR MORE ANTLER

POINTS). TO WHAT DEGREE WOULD INCREASED USE OF THESE OTHER METHODS OF REGULATION REDUCE OR ELIMINATE THE NEED TO LIMIT TIMBER PRODUCTION?

FOREST SERVICE RESPONSE:

The implementation of any or all of these example regulations would decrease, somewhat, the need to limit timber production. How much this would be, we don't know. The research being undertaken on the Starkey Experimental Forest and Range may help answer these questions. The Forest Service is not responsible for regulating hunter numbers or game harvest, but we do cooperate with the State on road and area closures. Due to the apparent requirement of deer and elk for certain amounts of thermal cover, there may always be a need for some level of restriction on timber production in critical game habitat areas such as winter range.

COMMENT NO. 77: AN IDEAL SOLUTION TO THIS DILEMMA WOULD BE TO PUT INTO PLACE THE RECOMMENDATION OF JACK WARD THOMAS, CHIEF OF THE FOREST SERVICE RESEARCH STATION IN LA GRANDE. IF THE FOREST SERVICE WERE TO CHARGE A HUNTING FEE WITHIN THE WALLOWA-WHITMAN NATIONAL FOREST, YOU WOULD BE ABLE TO GENERATE MUCH MORE INCOME FOR THE OPERATION OF THE SERVICE BY LEAVING ALL OF THE AVAILABLE FORAGE FOR WILDLIFE USE. I'M SURE THAT A \$5.00 PER HUNTER FEE WOULD GENERATE SUBSTANTIALLY HIGHER REVENUES TO THE SERVICE THAN WHAT THE PRESENT GRAZING PROGRAM PROVIDES.

FOREST SERVICE RESPONSE:

The regulation and means for requiring entry fees is not presently available to the Forest and was not a consideration in the Plan. It may become a consideration during the life of this Plan.

COMMENT NO. 78: HUNTING SHOULD BE ALLOWED TO INCREASE ONLY AS THE HERDS INCREASE IN RESPONSE TO PROPER MANAGEMENT.

FOREST SERVICE RESPONSE:

The State Fish and Wildlife Organizations are responsible for managing fish and wildlife populations and their harvest. The Forest Service has little to do with increasing or decreasing hunter numbers.

COMMENT NO. 79: HUNTING DEMAND IS INCREASING YEARLY, YET THE PLAN PROPOSES A DECREASE IN ELK AND DEER POPULATIONS. HABITAT FOR THESE GAME ANIMALS HAS BEEN GIVEN SECONDARY CONSIDERATION TO INTENSIVE TIMBER MANAGEMENT. MORE STRINGENT RESTRICTIONS SHOULD BE PLACED ON DEVELOPMENTS WITHIN DEER AND ELK HABITAT AND A MANAGEMENT AREA SHOULD BE DESIGNED SPECIFICALLY FOR HABITAT FOR THESE ANIMALS. QUALITY PRIMITIVE HUNTING OPPORTUNITIES SHOULD BE MAINTAINED, NOT DECREASED.

FOREST SERVICE RESPONSE:

The Plan provides habitat for nearly the objective population levels of deer and elk established by the Oregon Fish and Wildlife Commission in December, 1981. Many considerations went into the setting of those objectives including forage and habitat conditions, both on and off National Forest land. Many people share your opinion about primitive hunting opportunities.

COMMENT NO. 80: WE ARE OVERCROWDED WITH HUNTERS NOW. AS YOU KNOW, THE GAME COMMISSION IS STARTING LIMITED ENTRY IN MANY ELK HUNTING UNITS THE DEER POPULATION IS WAY DOWN; THE SEASON HAS BEEN CLOSED FOR TWO YEARS IN PARTS OF UNION AND BAKER COUNTIES. THERE IS ONLY ONE WAY FOR THE NUMBER OF HUNTERS TO GO, AND THAT IS DOWN

FOREST SERVICE RESPONSE

We agree that significant decreases in success rates for deer and elk hunting, or rapid changes in the recreation opportunities available to hunters, could cause the numbers of hunters to decline. However, given the wildlife populations projected in the Plan, and continued efforts at improving hunting opportunities through area closures and reduced road density, we do not expect such a decline to occur.

COMMENT NO. 81 QUALITY PRIMITIVE HUNTING OPPORTUNITIES SHOULD NOT BE DECREASED.

FOREST SERVICE RESPONSE:

In order to maintain a flow of wood products to local mills approximating historical levels, it was necessary to plan to enter several previously unroaded areas. This will be partially offset by direction to decrease open road densities Forest-wide in Areas 1, 3, and 18 and through the use of road and area closures.

COMMENT NO. 82. CONCERN THAT MARKET VALUE FOR ELK HUNTING MAY BE LOW IN PLAN.

FOREST SERVICE RESPONSE

The values shown in the document for the various forms of recreation reflect willingness-to-pay values. They correspond with those promulgated by the Pacific Northwest Regional Office in its letter of April 27, 1984 to the Forest Supervisors and are shown in Appendix B of the EIS. They are the 1985 RPA program values

Reasonable estimates of value can be generated on either side of the values we have posted. We recognize that the figures are arguable, but we must use the figures generated in the analyses for the 1985 program unless we have good reason supporting the use of different numbers

COMMENT NO. 83: I PERSONALLY CHOOSE TO HUNT ELK IN ROADLESS AREAS, SIMPLY BECAUSE I ENJOY THE BEAUTY OF AN UNMANAGED FOREST, THE SOLITUDE IT PROVIDES, AND THE CHALLENGE OF A PRIMITIVE HUNTING EXPERIENCE.

FOREST SERVICE RESPONSE:

Under the plan, many of these areas will be left for hunting or other forms of nonmotorized recreation. Portions of the Hells Canyon NRA, Eagle Cap, Monument Rock, or North Fork John Day Wildernesses or Lake Fork Area contain many areas of unmanaged forest where access is restricted to foot or horseback. In total, nearly 40 percent of the National Forest (900,000 acres) would be available for primitive or semiprimitive types of recreation.

COMMENT NO. 84: WE BELIEVE THAT OPPORTUNITIES FOR ORV USE SHOULD BE GUARANTEED HOWEVER, WE FIRMLY MAINTAIN THAT ORV USE IS INCOMPATIBLE WITH MOST ALL OTHER USES OF THE NATIONAL FOREST AS SUCH, THEIR USE SHOULD BE STRICTLY REGULATED AND CONFINED TO AREAS, ADEQUATE IN SIZE, WHERE THEY WILL BE SUFFICIENTLY SEPARATED FROM OTHER FOREST USES, ESPECIALLY RECREATION AND WILDLIFE, IN SUCH A MANNER THAT THE VALUE OF OTHER RESOURCES WILL NOT BE DIMINISHED. SPECIFICALLY, ORV USAGE AREAS SHOULD BE DESIGNATED SO THAT NOISE WILL NOT CARRY INTO OTHER RECREATION AND IMPORTANT WILDLIFE AREAS. THE PRESENT PLANNING STAGE IS THE BEST TIME TO AVOID FUTURE CONFLICTS.

FOREST SERVICE RESPONSE:

The intensity of ORV use on the Forest is quite low and we expect it to remain quite low for some time. This being the case, we see little need for the rigid, structured strategy that you recommend. The plan provides for ORV restrictions in important wildlife habitat areas. The Forest Travel Plan restricts use in other areas where there are, or are likely to be, resource conflicts.

COMMENT NO. 85 WE BELIEVE THAT A TRAIL AUTHORIZED FOR CYCLE USE SHOULD BE OF SUCH STANDARD THAT USE OF A CYCLE DOES NOT LEAVE A GROOVE IN THE TRAIL. THUS WE ADVOCATE KEEPING ALL WHEELED VEHICLES OFF TRAILS THAT MAY BE DAMAGED OR DISFIGURED BY THEIR USE. ALL TRAILS THAT ARE OFF LIMITS TO CYCLES SHOULD ALSO BE OFF LIMITS TO MOUNTAIN BIKES WE BELIEVE THAT MOUNTAIN BIKES SHOULD BE TREATED AS ANY ORV WOULD BE THE MAZAMAS ALSO FIRMLY BELIEVE THAT NO TRAIL THAT LEADS TO A WILDERNESS AREA SHOULD BE OPEN TO ORV USE.

FOREST SERVICE RESPONSE:

Most trails leading to wilderness are closed to ORV use, unless the portion outside of wilderness provides a significant riding experience in its own right

We generally restrict motorcycle use on trails that may be damaged by such use

We regard bicycles as having less physical and social impact than motorcycles, so they are generally allowed on nonwilderness trails.

COMMENT NO. 86: MOST RECREATIONISTS WILL NOT DRIVE FOR HOURS TO COME TO THE WALLOWA-WHITMAN, IF THEY ARE ONLY TO BE MET WITH A STREAM OF OFFENSIVE MOTORBIKES ON THEIR FAVORITE HIKING TRAILS

FOREST SERVICE RESPONSE:

We can practically guarantee that they can travel their favorite hiking trails without meeting a "stream of offensive motorbikes " Even on trails open to motorcycles, use is light

COMMENT NO. 87: THE FOREST SHOULD ALSO BE CLOSED TO ALL VEHICLES EXCEPT ON DESIGNATED AND MAINTAINED ROADS

FOREST SERVICE RESPONSE

We do not feel that this meets an objective of providing a broad spectrum of recreation opportunities

COMMENT NO. 88: THE PLAN SHOULD ALSO DISCUSS IN MORE DETAIL HOW CONFLICTS BETWEEN MOTORIZED AND NON-MOTORIZED RECREATIONISTS WILL BE RESOLVED FURTHERMORE, THE EIS SHOULD INCLUDE SPECIFIC INFORMATION AS TO HOW ORV-DESIGNATED AREAS WILL BE AFFECTED IN TERMS OF DETERIORATION OF NATIVE PLANT COMMUNITIES, WILDLIFE HABITAT, AND ENVIRONMENTALLY SENSITIVE AREAS.

FOREST SERVICE RESPONSE:

The annual Forest Travel Plan provides the primary tool for dealing with such user conflicts. Additional direction has been added to the standards and guidelines to address the possible conflict between ORV's and threatened and endangered species

COMMENT NO. 89: THERE SHOULD BE NO USE OF ORV'S ANYWHERE IN RIPARIAN ZONES. THE DRAFT PLAN IS UNCLEAR ON THIS POINT. THE USE OF ATV'S IN STREAMBEDS IS PARTICULARLY DESTRUCTIVE AND SHOULD BE SPECIFICALLY PROHIBITED ON THE FOREST.

FOREST SERVICE RESPONSE:

This is addressed in the watershed standards and guidelines in the Plan

COMMENT NO. 90: RECREATIONAL VEHICLES SHOULD BE LIMITED TO SMALL AREAS AND ONLY TO ROADS. OFF-ROAD VEHICLES SHOULD BE LIMITED TO VERY SMALL AREAS THAT HAVE ALREADY BEEN LOGGED AS THEY ARE DESTRUCTIVE TO THE ENVIRONMENT. EFFECTIVE MUFFLERS SHOULD BE MANDATORY. RV'S AND PRIMITIVE AREAS ARE NOT COMPATIBLE. SNOWMOBILES SHOULD NOT BE ALLOWED NEAR DOWNHILL OR CROSSCOUNTRY SKI AREAS BECAUSE ONE MACHINE CAN RUIN THE AESTHETIC RECREATIONAL ASPECTS OF HUNDREDS OF SKIERS OR HIKERS

FOREST SERVICE RESPONSE:

Mufflers/spark arrestors are required on all ORV's. This doesn't guarantee that there will be no violations. The Forest Travel Plan excludes ORV's from alpine and nordic ski areas and other areas of intense recreation use or where there is serious potential for conflict with other resource values

COMMENT NO. 91. I USE THE NATIONAL FORESTS OF OUR AREA FOR RECREATIONAL USE, OFF-ROAD MOTORCYCLE, AND THINK THAT THERE ARE ALREADY TOO MANY WILDERNESS AND RESTRICTED AREAS.

FOREST SERVICE RESPONSE:

The Plan adds no wilderness

COMMENT NO. 92: I AM CONCERNED WITH THE LACK OF FOREST THAT IS AVAILABLE FOR OFF-ROAD MOTORIZED RECREATION

FOREST SERVICE RESPONSE:

Off-road motorized recreation is caught in a squeeze between wilderness designations and roading of areas for timber harvest and other purposes that require roads. We recognize that there will be a distinct shortage of semiprimitive motorized recreation in the future. We think that some of the shortage can be satisfied by providing some additional ORV opportunities in roaded areas.

COMMENT NO. 93: WHEN THE FOREST WAS CLOSED TO CAMPING THIS PAST FIRE SEASON, I FOUND OUT THAT THERE IS A GREAT NEED FOR MORE DESIGNATED CAMPGROUNDS. THERE ARE NONE IN THE AREA WE WERE CAMPING IN, AND WE HAD TO PULL OUR SELF-CONTAINED TRAILERS OUT EVEN THOUGH THE CAMPING AREA WAS FIRE SAFE.

FOREST SERVICE RESPONSE:

In general, our current campgrounds are not heavily used, and in many portions of the Forest, it is difficult to justify more construction.

COMMENT NO. 94: I DO NOT SUPPORT SEASONAL ROAD CLOSURES; EXCEPT ON A VERY LIMITED BASIS FOR A SPECIFIC SHORT-TERM LOCAL PROBLEM. I FEEL THERE IS ADEQUATE WILDERNESS AND UNDEVELOPED AREAS FOR THOSE WHO FEEL ROADS AND ACCESS ARE A DETRIMENT TO A SATISFYING HUNTING EXPERIENCE.

FOREST SERVICE RESPONSE:

Many share your view.

COMMENT NO. 95: WE REQUEST THAT THE FOLLOWING ROUTES BE DESIGNATED AS SENSITIVITY LEVEL ONE AS SHOWN IN APPENDIX K. ROAD 7710 FROM COUNTY ROAD 413 TO ROAD 77. ROAD 7755. ROAD 7740. ROAD 7715. ROAD 77 FROM STATE HIGHWAY 86 TO THE EDGE OF PINE DISTRICT. COUNTY ROAD 413 FROM THE CARSON BRIDGE TO CORNUCOPIA.

FOREST SERVICE RESPONSE:

This request was carefully considered in arriving at a final plan.

COMMENT NO. 96: OF VISUAL SENSITIVITY IN LOGGING OPERATIONS WHICH LINE THE ROADS AND TRAILS INTO THE WILDERNESS AREAS, SUCH AS ALONG CHINA SPRINGS ROAD TO MCBRIDE AND ON TO SUMMIT POINT, DUCK & FISH LAKES ROADS, ETC., TOURIST VIEWS NEED TO BE PROTECTED. THERE ARE SO FEW PLACES I CAN TAKE FRIENDS FROM OUT OF STATE TO SHOW THEM WHAT THE FOREST USED TO LOOK LIKE WHEN I FIRST CAME HERE.

FOREST SERVICE RESPONSE:

We agree. Unfortunately nature sometimes does not cooperate as in the case of tree blow-down and fires.

**TRAILS
Code 26**

COMMENT NO. 1: MANY TRAILS IN THE FORESTS OF THE REGION HAVE BEEN ABANDONED OR ARE IN A NON-MAINTAINED STATE. WE BELIEVE STRONGLY IN DISPERSED RECREATION AND ARE SUPPORTIVE OF THE RETURN TO USE OF AS MANY OF THE OLD TRAILS AS IS PRACTICAL IN ORDER TO TAKE THE PRESSURE OFF THE MORE HEAVILY USED AND POPULAR AREAS. WE BELIEVE THAT ESTABLISHED HORSE CAMPS SHOULD BE SEPARATED FROM HIKER CAMPS. WE FEEL STRONGLY THAT THESE TWO USES ARE NOT COMPATIBLE.

FOREST SERVICE RESPONSE

Trails. We agree that trails which serve management objectives, should be maintained. This includes some trails in roaded areas. However, where trails serve no real purpose and would receive little use if they were maintained, we believe they should be abandoned. We feel that resurrection of these trails would be a waste of public funds.

Camps. We agree that horse and hiker camps should be separated. This is a basic planning guideline in areas where we plan and designate camp locations.

COMMENT NO. 2: DON'T PERMIT LOGGING AND OTHER ACTIVITIES TO DESTROY THE TRAILS AND TRAILHEADS. KEEP THEM IN THEIR NATURAL CONDITION.

FOREST SERVICE RESPONSE:

Many others share your views. Some of the trails and trailheads are currently located in highly productive timberland with high standing volumes. There becomes the decision of tradeoffs between retaining the aesthetic values of the present trailhead and foregoing the timber values; moving the trailhead, or retaining the trailhead in an area where the effects of timber harvest are noticeable. All of these situations will occur with implementation of the Plan. This is discussed in Chapter IV of the FEIS.

COMMENT NO. 3: PAGE III-30, 55, PAGE IV-12 - THREE NATIONAL RECREATION TRAILS (NRTS) ARE MENTIONED IN THE DEIS. THE NPS HAS RECORDS OF THREE (NEE-ME-POO, ELKHORN CREST, AND HIGH WALLOWA) IN OREGON AND ANOTHER (SNAKE RIVER) IN IDAHO. IMPACTS TO THE HIGH WALLOWA NRT SHOULD BE DISCUSSED.

FOREST SERVICE RESPONSE:

The Elkhorn Crest, High Wallowa, and Snake River Trails are all National Recreation Trails. The Nee-Me-Poo Trail is a National Recreation Trail and is also a part of a larger trail system designated by Congress as a National Historic Trail. The Forest also includes a 16-mile segment of the Oregon Trail, a National Historic Trail. No adverse impacts to the High Wallowa Trail are expected in any alternative. The text of the EIS has been corrected.

COMMENT NO. 4: ALL TRAILS AND TRAILHEADS MUST BE RETAINED IN THEIR NATURAL CONDITIONS. I AM TIRED OF RETURNING TO MY FAVORITE TRAILS ONLY TO FIND THAT I HAVE TO SIFT AND BROIL MY WAY THROUGH A CLEARCUT MESS TO THE TRUNCATED REMNANT. I WANT TO

SEE A COMPLETE WWNF TRAILS INVENTORY AND AN ACCOUNTING FOR THE IMPACTS TO EACH TRAIL RESULTING FROM THE PLAN

FOREST SERVICE RESPONSE.

Additional information on the effects of the alternatives on trails has been added to the Environmental Impact Statement

COMMENT NO. 5. THE DEIS WOULD OBLITERATE MANY TRAILHEADS. SUCH ACTIONS ARE IRRESPONSIBLE MANY TRAILHEADS AND EARLY SECTIONS OF TRAIL ARE THE MOST SCENIC AND IRREPLACEABLE NICHES IN THE FOREST. THE LOWER BEAR CREEK (ABOVE WALLOWA) TRAIL, LOWER TWIN LAKES TRAIL (ELKHORNS), LITTLE CRACKER JEEP TRAIL, KILLAMACUE TRAIL ARE ALL ABSOLUTELY GORGEOUS TO RIP INTO THOSE AREAS WOULD BE CRIMINAL

FOREST SERVICE RESPONSE

Thank you for your comment Many people shared these concerns.

Also see response to Comment No. 2

COMMENT NO. 6: ALSO, ALL TRAILS SHOULD REMAIN OPEN TO PEOPLE AND DOGS. SOME SHOULD BE OPEN TO MOTORCYCLES AND HORSES

FOREST SERVICE RESPONSE:

The plan provides a balance between permitted uses. Responsible dogs and dog owners are welcome on all trails

COMMENT NO. 7 TRAILS - SOME OF MY FAVORITE TRAILS ARE IN JEOPARDY, THE TWIN LAKES AND DUTCH FLATS TRAILS IN THE ELKHORNS, THE CATHERINE CREEK TRAIL IN THE WALLOWAS I WOULD LIKE THEM TO BE PRESERVED, AS WELL AS ALL EXISTING TRAILS ON THE FOREST

FOREST SERVICE RESPONSE

Thank you for your comment. Also see response to Comment No 2

COMMENT NO. 8. YOUR PLAN WILL ELIMINATE AN ENORMOUS MILEAGE OF HIKING TRAILS AT A TIME WHEN THE TRAILS ARE VERY CROWDED, AND BEING GROUND TO DUST BY OVERUSE BY PACKSTOCK

FOREST SERVICE RESPONSE

Thank you for your comment Many responses voiced similar concerns.

COMMENT NO. 9: THE DRAFT DOCUMENTS DO NOT ADEQUATELY CONSIDER THE GROWING IMPORTANCE OF MAINTAINING A HIGH QUALITY HIKING TRAIL SYSTEM ON THE FOREST. FAR TOO MANY LANDS, ESPECIALLY IN THE MORE SENSITIVE UPPER ELEVATION AREAS, ARE PROPOSED FOR USE BY MOTORBIKES AND OTHER ORV'S THERE IS A GREAT RESOURCE USE

CONFLICT BETWEEN MOTORIZED AND NON-MOTORIZED TRAIL USE, AND ORV'S SHOULD NOT BE ALLOWED ON ESTABLISHED HIKING TRAILS OR IN AREAS WITH SENSITIVE HABITATS - SUCH AS MEADOWS, LAKES, BOGS, RIPARIAN AREAS, ETC

FOREST SERVICE RESPONSE:

Of the 1,750 miles of trail on the Forest, about 915 miles are in wilderness and therefore closed yearlong to motorized use. Of the mileage that is outside of wilderness, under the current travel plan, about 420 miles are closed yearlong to motorized use and 140 miles are closed seasonally, leaving about 270 miles that are open yearlong, or about 15 percent of the system. We feel that this is evidence of a strong commitment to a hiking trail system. Our monitoring indicates that on trails that are open, use is so light that encounters between hikers and motorcycles are unusual. Effects on sensitive areas adjacent to trails are monitored and are a factor in deciding whether use should be restricted.

COMMENT NO. 10: ALREADY OVERCROWDED BACKPACKING TRAILS WOULD BE FURTHER OVEREXTENDED BY ELIMINATING THE KILLAMACUE, TWIN LAKES, AND DUTCH FLAT TRAILS IN THE ELKHORNS AND THE CATHERINE CREEK AND BEAR CREEK TRAILS IN THE WALLOWA MOUNTAINS. THE SOLITUDE AND BEAUTY GOD'S CREATION, THE WILDERNESS, WOULD BECOME LESS AVAILABLE AS PEOPLE REQUIRE MORE DUE TO AN INCREASINGLY FRUSTRATING SOCIETY.

FOREST SERVICE RESPONSE

Additional information on these and other trails has been added to the FEIS

COMMENT NO. 11: TRAILS - REVISE LOGGING PLANS SO TRAILS ARE NOT OBLITERATED. AS SALES TAKE PLACE, REPLACE TRAILS THRU CUT UNITS - THEY WILL SOON GROW BACK & THE TRAIL WILL BE THERE. I KNOW YOU CANNOT GET FUNDS TO BUILD NEW ONES - SO PRESERVE THESE! DON'T SHORTEN TRAILS - IMPROVE TRAILHEAD PARKING. TAKE THE PRESSURE OFF THE MORE WELL-KNOWN SPOTS

FOREST SERVICE RESPONSE:

Statements have been added to the Plan to the effect that trails that serve a continuing purpose and are likely to be used will be retained in areas subject to road construction and logging.

COMMENT NO. 12: PAGE 2-3, 2-6 - THE PLRMP DOES NOT MENTION THE PRESENCE OF THE NATIONAL RECREATION TRAILS (NRT), NEITHER EXISTING NOR PROPOSED. GREATER RECOGNITION OF NRT, AS WELL AS OTHER TRAILS AND TRAIL USE, SHOULD BE GIVEN IN THE PLAN

FOREST SERVICE RESPONSE:

Discussion of National Recreation Trails is covered under the section titled "Transportation." In general, discussion of trails has been broadened in the plan. Also see response to Comment No. 3

COMMENT NO. 13: WHERE POSSIBLE, EFFORTS SHOULD BE MADE TO IMPROVE PUBLIC ACCESS TO FOREST TRAILHEADS

FOREST SERVICE RESPONSE

Improvement of trailheads and access to them is a continuing part of the Forest program.

COMMENT NO. 14: IN AREAS TO BE LOGGED WHERE A ROAD IS PLANNED TO OBLITERATE A TRAIL, I WOULD ADVOCATE FOR DOING MORE TO RELOCATE TRAILS AND TRAILHEADS RATHER THAN JUST RUNNING THEM OUT OF THE END OF A ROAD IN A CLEARCUT

FOREST SERVICE RESPONSE:

This will be a part of detailed planning for areas where trails and trailheads are affected by logging and road construction.

**HELLS CANYON NATIONAL RECREATION AREA
Code 38**

COMMENT NO. 1: YOU SHOULD TAKE A LOOK AT THE HELLS CANYON RECREATION AREA AGAIN AS THE ACT PROVIDES FOR. INSECTS AND DISEASE ARE CURRENTLY TAKING A HEAVY TOLL ON THE RENEWABLE TIMBER RESOURCE OF THIS AREA. I CONSTANTLY HEAR COMPLAINT ABOUT THE LACK OF ACCESS OR THE POOR CONDITIONS OF THE ROADS IN THE HCNRA. PERHAPS YOU SHOULD CONSIDER MORE SALES TO GET THE ACCESS PEOPLE WANT AND FIX UP THE EXISTING ROADS

FOREST SERVICE RESPONSE:

The Comprehensive Management Plan for the National Recreation Area calls for timber harvesting in Management Area 11 Road improvements are scheduled and some are currently being designed or constructed

COMMENT NO. 2 THE HELLS CANYON NATIONAL RECREATION AREA WAS DESIGNATED BY CONGRESS AND SET ASIDE PRIMARILY FOR RECREATIONAL PURPOSES. WE SUPPORT THE ORIGINAL NRA ACT AND REQUEST THE NRA BE MANAGED TO MEET CONGRESS' ORIGINAL INTENT

FOREST SERVICE RESPONSE.

The legislation also provides for other purposes. We intend to implement the Comprehensive Management Plan, which, we feel, meets Congress's original intent.

COMMENT NO. 3. HELLS CANYON NATIONAL RECREATION AREA, PLEASE MANAGE THE HCNRA AS PART OF THE TEN YEAR WWNF FOREST PLAN PLEASE REFER TO THE CROWELL LETTER AND ADJUST THE ALLOWABLE CUT ON THE NRA. WE NEED MORE TIMBER FROM THE NRA, NOT LESS. THE ALLOWABLE CUT IS PUTTING AN ECONOMIC HARDSHIP ON WALLOWA COUNTY

FOREST SERVICE RESPONSE:

The NRA will be managed as part of the Wallowa-Whitman and is included in determining the allowable harvest level for the entire Forest administrative area The level of timber contributed from the NRA is based on the current Comprehensive Management Plan

COMMENT NO. 4: PLEASE FIX THE ROAD TO HAT POINT AND DUG BAR. IF WE HAVE TO LIVE WITH THE NRA, THE LEAST THE USFS COULD DO IS FIX THE ACCESS SO THE TOURISTS CAN GET THERE. WE ALSO NEED A DESTINATION RESORT AT HAT POINT TO GIVE THE TOURIST'S SOMETHING TO DO

FOREST SERVICE RESPONSE.

Improvement of the roads is directed by the Comprehensive Management Plan. Surveys are scheduled for 1987 Reconstruction will be completed as funds are appropriated for this purpose

COMMENT NO. 5 SENATOR PACKWOOD'S BILL FOR HCNRA ADDITIONAL WILDERNESS SHOULD APPEAR IN THE DEIS.

FOREST SERVICE RESPONSE

We disagree

COMMENT NO. 6 HCNRA SHOULD BE RESPECTED FOR WHAT CONGRESS INTENDED--A RESERVE PRIMARILY FOR RECREATION WITH ONLY SMALL SCALE OCCASIONAL TIMBER REMOVAL OF SELECTED TREES

FOREST SERVICE RESPONSE

We feel that the Comprehensive Management Plan is consistent with Congressional intent That is the plan we are following.

COMMENT NO. 7 I HAVE BEEN A LANDOWNER AND HOMEOWNER RESIDENT OF THE HCNRA FOR OVER TEN YEARS, AND HAVE BEEN CONTINUALLY SHOCKED AND DISAPPOINTED AT THE APPARENT FAVORITISM TOWARDS TIMBER/GRAZING AND OTHER COMMERCIAL INTERESTS, THE PEOPLE WHO STAND TO MAKE MONEY FROM CONSUMPTION OF PUBLIC RESOURCES.

FOREST SERVICE RESPONSE

We are allowing the commercial use provided for in the Comprehensive Management Plan, which, we believe, is consistent with the intent of the legislation that established the National Recreation Area.

COMMENT NO. 8 YOU ALSO NEED TO TAKE A REAL CLOSE LOOK AT THE INTENT OF THE MULTIPLE USE FACETS OF THE HELLS CANYON NATIONAL RECREATION AREA YOU CAN MAKE THE DECISION TO KEEP OUR ECONOMY MORE STABLE BY LISTENING TO THE WORKING PEOPLE THAT LIVE IN YOUR AREA, AND AMEND THE PLAN AS ASSISTANT SECRETARY OF AGRICULTURE CROWELL INSTRUCTED IN HIS LETTER OF AMENDMENTS TO THE NRA PLAN DATED MAY 2, 1984 (ATTACHED)

FOREST SERVICE RESPONSE

The May 2, 1984 decision on appeals, signed by then Assistant Secretary of Agriculture John B. Crowell, Jr., stated that "The plan shall be revised or amended whenever (1) the Forest Supervisor determines that conditions or demands of the public in the area covered by the plan have changed significantly or (2) when any Forest Plan or Forest Plans adopted for the Wallowa-Whitman, Nez Perce, or Payette National Forests sets a timber harvest level or any other output level which alone or in combination with the Forest Plan for one or more of those Forests might have a significantly adverse effect on the economy of Wallowa County or Baker County in Oregon or Adams County, Idaho County, or Nez Perce County in Idaho. If revision or amendment occurs because of the second of the above-described conditions, every reasonable effort will be made to eliminate or mitigate the significantly adverse effect on the economy of the affected county or counties by revising or amending the Comprehensive Management Plan."

We believe it is clear the intent is to consider revision after the three Forest Plans have been adopted and when it has been determined that the plans have resulted in significantly adverse effects on the economy

COMMENT NO. 9 WE HAVE COMMERCIAL BOATS RUNNING THE SNAKE RIVER CANYON BUT WE CAN'T HAVE A RIM ROAD SO EVERYONE CAN ENJOY THE CANYON ESPECIALLY OUR SENIOR CITIZENS. WHY SHOULD A VERY SMALL SELECT GROUP HAVE ALL OF THIS PART OF THE COUNTRY TO THEMSELVES?

FOREST SERVICE RESPONSE.

The Rim Road was considered in preparation of the Comprehensive Management Plan, but is not a part of the final plan. Commercial jet boat operation on the Snake was also considered, and made a part of the final plan.

COMMENT NO. 10 THE HCNRA NEEDS TO BE REEVALUATED ACCORDING TO THE ECONOMIC DIRECTION IN THE COMPREHENSIVE PLAN. THE HCNRA IS NOT BEING MANAGED THE WAY IT SHOULD BE. THERE IS NO REASON TO LOG ONLY 7 MM BD FT PER YEAR WHEN PRIOR TO THE ACT, ABOUT 17MM BD. FT. WAS TAKEN OFF THE AREA, AND THE AREA HAS THE ABILITY TO SUSTAIN ABOUT 26MM BD FT. ON AN ANNUAL BASIS.

FOREST SERVICE RESPONSE.

There were a variety of alternatives considered for the NRA. The one selected provided 7-9 MMBF. The annual timber harvest contribution from the NRA was recalculated in development of the Forest Plan and was determined to be about 6 MMBF for the first decade.

COMMENT NO. 11: YOU SHOULD ALSO NOTE THAT CURRENT HCNRA PLANNED HARVESTS ARE ONLY 37.6% OF HISTORICAL LEVELS AND THAT NONE OF THE HCNRA IS BEING MANAGED PRIMARILY FOR TIMBER. IN A LETTER, DATED AUGUST 13, 1982, TO SECRETARY JOHN CROWELL, JR., SENATOR HATFIELD STATED THAT HIS CONCERN WITH THE PLAN AS IT WAS ULTIMATELY ADOPTED WAS THAT IT DID NOT SUFFICIENTLY ADDRESS CONGRESSIONAL INTENT FOR CONTINUING TIMBER HARVEST AT OR NEAR HISTORICAL LEVELS.

FOREST SERVICE RESPONSE.

Mr. Crowell, as Assistant Secretary, subsequently released the Comprehensive Management Plan to be implemented.

COMMENT NO. 12 THE DRAFT PLAN STATES (PAGES 4-79) THAT IS AN ACCEPTABLE SELECTIVE HARVEST SYSTEM FOR USE IN THE NRA IS A SHELTERWOOD HARVEST SYSTEM. A SHELTERWOOD IS NOT A SELECTIVE HARVEST SYSTEM, AND IS NOT APPROPRIATE FOR THE NRA.

FOREST SERVICE RESPONSE.

In his decision of April 27, 1984, Assistant Secretary Crowell directed that shelterwood cutting be added as a permitted silvicultural treatment.

COMMENT NO. 13: MANAGEMENT DIRECTIONS FOR AREA #9 (NRA DISPERSED RECREATION AND NATIVE VEGETATION), IF THEY ARE TO TRULY "ENHANCE NATIVE VEGETATION" AS THE GOAL STATEMENT SUGGESTS, SHOULD PROHIBIT ALL LIVESTOCK GRAZING. SUCH LIVESTOCK USE CAN HAVE ONLY NEGATIVE EFFECTS ON NATIVE VEGETATION AND WILL DIRECTLY CONFLICT WITH THE GOAL OF THIS AREA. LIVESTOCK GRAZING IS HARMFUL TO NATIVE PLANT COMMUNITIES IN NUMEROUS WAYS, AND IT IS NEVER "CONSISTENT WITH NATIVE VEGETATION PRODUCTION OBJECTIVES." FURTHERMORE, YOUR INTENT TO "AVOID" "FURTHER INTRODUCTION" OF NON-NATIVE PLANTS (NOXIOUS WEEDS AND OTHERS) WILL BE EXTREMELY DIFFICULT IF YOU ALLOW CONTINUED LIVESTOCK GRAZING OF THE AREA.

FOREST SERVICE RESPONSE.

We feel that livestock grazing, as specified in the Comprehensive Management Plan, is consistent with maintenance of native plant communities.

COMMENT NO. 14: HELLS CANYON NRA ADOPTION IN YOUR PLAN MUST NOT ASSUME THAT THE COALITION SHOULD WIN AND THAT YOU WILL NOT GIVE THE PUBLIC THE RECREATIONAL SCENIC ROUTE, UNOBTRUSIVE RIM ROAD ACCESS THERE.

FOREST SERVICE RESPONSE:

The Rim Road will undoubtedly be considered in future planning efforts.

COMMENT NO. 15: I THINK THE AMOUNT OF WILDERNESS IN THE HELLS CANYON RECREATION AREA SHOULD BE REDUCED

FOREST SERVICE RESPONSE.

Many people voiced similar opinion

COMMENT NO. 16: WE NEED TO HAVE FUNDS TO IMPROVE THE CAMP SITES, AND BOAT RAMPS, ALONG WITH THE ROADS TO HAT POINT AND DUG BAR. WE NEED TO PROVIDE SOMETHING FOR OUR TOURISTS TO LOOK AT AND PARTICIPATE IN BESIDES WALLOWA LAKE IF WE ARE REALLY GOING TO BE ABLE TO COUNT ON THE TOURIST TRADE TO HELP WITH OUR DEPRESSED ECONOMY

FOREST SERVICE RESPONSE

The road and recreational improvement called for in the Comprehensive Management Plan, including those mentioned, will be completed as funds are appropriated for them

COMMENT NO. 17: WILDERNESS ACREAGE IN THE HCNRA SHOULD STAY AT THE PRESENT LEVEL.

FOREST SERVICE RESPONSE

Many people expressed a similar opinion.

COMMENT NO. 18: THE HELLS CANYON NATIONAL RECREATION AREA PROVIDES MILES OF PARK AREA THAT COULD BE ACCESSIBLE TO MANY PEOPLE WHO WOULD PREFER IMPROVED RECREATION AREAS, WITH SWIMMING POOLS, SPAS, SAUNAS, CAMPER HOOKUPS, PAVED ROADS, AND ALL THE CONVENIENCES OF CITY LIFE NEXT TO THE RIVER WHERE THEY CAN ALSO ENJOY CATCHING A FEW FISH, BOATING, WATER SKIING, AND ENJOY THE SCENERY AND RELAXATION OF AN OUTDOORS EXPERIENCE. IN FACT, THIS IS WHAT MANY FOLKS FROM THE CITY ENVISION AS A WILDERNESS EXPERIENCE, AND THESE PEOPLE ARE WILLING TO PAY FOR IT TOO. THIS IS WHERE THE COMMUNITIES ARE GOING TO MAKE MONEY ON RECREATION. THIS IS WHERE THE REAL MONEY IS. THERE IS MONEY IN SELLING BOATS, WATER SKIS, MOTOR HOMES, TENTS, PICKUPS, --- BUT VERY LITTLE MONEY MADE BY THE SALE OF A TANK OF GAS OR A COUPLE LOAVES OF BREAD. MAKING MONEY FROM HUNTERS IS ANOTHER FALLACY. THE HUNTERS DO NOT BUY THEIR GUNS OUT HERE

FOREST SERVICE RESPONSE.

The Comprehensive Management Plan calls for some improved roads and recreation sites, but at a more modest scale and level than described

COMMENT NO. 19: I WANT THE ROAD TO HAT POINT TO BE IMPROVED SO WE CAN PULL CAMP TRAILERS UP THERE. I WANT AN IMPROVED RECREATION SITE (WATER, FLUSH TOILETS) AT HAT POINT.

FOREST SERVICE RESPONSE:

The Comprehensive Management Plan provides for the Hat Point Road to be reconstructed, generally on present alignment and grade, to a single lane, gravel surface standard. The grades will somewhat limit camp trailer use. The plan calls for a new rustic (vault toilets, table, fire rings) campground at Hat Point

COMMENT NO. 20: I WANT THE SAME FACILITY AT DUG BAR AS AT PHILLIPS LAKE

FOREST SERVICE RESPONSE:

The Comprehensive Management Plan calls for development of a rustic (vault toilet, tables, fire rings) at Dug Bar. Development of more elaborate facilities was considered, but rejected during the planning process.

COMMENT NO. 21. HELLS CANYON NATIONAL RECREATION AREA (HCNRA) - (APPENDIX, PAGE B-107) THE DEPARTMENT OF FORESTRY BELIEVES THE WALLOWA-WHITMAN MAY HAVE BIASED ITS MODEL AGAINST TIMBER MANAGEMENT IN THE HCNRA BY ASSIGNING LOG HAUL AND ROAD MAINTENANCE COSTS TO STANDS WITHIN THE AREA WHICH ARE HIGHER THAN IDENTICAL STANDS WITH IDENTICAL HAUL DISTANCES OUTSIDE THE NRA. NO SATISFACTORY JUSTIFICATION IS GIVEN FOR THIS DECISION. IF FOREST-WIDE AVERAGE COSTS ARE NOT ADEQUATE FOR THE HCNRA, THEY ARE VERY LIKELY NOT ADEQUATE ELSEWHERE. IF THIS IS TRUE, AREA-SPECIFIC COSTS SHOULD BE DEVELOPED FOR THE ENTIRE FOREST

FOREST SERVICE RESPONSE:

On the average, the NRA has significantly higher log haul costs than the remainder of the Forest

COMMENT NO. 22: (DEIS, PAGE II-14) - IN LIGHT OF THE ASSISTANT SECRETARY'S APRIL 27, 1984 DECISION ON THE MANAGEMENT PLAN, WE BELIEVE IT IS ESSENTIAL THAT THE WALLOWA-WHITMAN DEIS SPECIFICALLY STATE WHAT LEVEL OF ADVERSE ECONOMIC EFFECTS RESULTING FROM THE FOREST PLAN WILL TRIGGER AN NRA PLAN REVISION THE OREGONIAN WHO LIVES IN BAKER AND WALLOWA COUNTIES DESERVES TO KNOW HOW MUCH UNEMPLOYMENT, LOSS OF PERSONAL INCOME AND COUNTY PAYMENT REDUCTIONS THEY WILL HAVE TO ENDURE BEFORE THE COMPREHENSIVE MANAGEMENT PLAN IS AMENDED.

FOREST SERVICE RESPONSE

Once the three Forest Plans for the five-county area have been implemented, we will be in a position to determine the effects on the local economies. At this time, we do not know what will be considered significant. We do not want to indicate that the NRA plan may be automatically revised to provide more timber. Changing the plan for this nationally significant area for the benefit of local economies would not be a simple task.

COMMENT NO. 23: IS IT A REALISTIC MANAGEMENT OBJECTIVE NOT TO SALVAGE DAMAGED AND DISEASED TIMBER IN THE HELLS CANYON RECREATION AREA?

FOREST SERVICE RESPONSE:

Yes, in those management areas where other values have been determined to be more important than the potentially salvageable timber or where costs of salvage operations are prohibitive

COMMENT NO. 24: THE FOREST SERVICE HAS LIMITED THE "PLANNING AREA" TO EXCLUDE THE ACRES WITHIN THE HELLS CANYON NATIONAL RECREATION AREA.

THE WALLOWA-WHITMAN PLAN WILL HAVE A SIGNIFICANT ADVERSE EFFECT ON THE ECONOMIES OF BAKER AND WALLOWA COUNTIES BECAUSE OF THE REDUCTION IN SAWTIMBER VOLUME. IT MAKES NO SENSE TO ADOPT A FOREST PLAN THAT MUST BE IMMEDIATELY REVISED TO INCORPORATE A REVIEW OF THE HELLS CANYON PLAN.

*RECOMMENDATION. LAND ALLOCATIONS AND MANAGEMENT DECISIONS IN THE HELLS CANYON COMPREHENSIVE MANAGEMENT PLAN SHOULD BE REASSESSED NOW TO COMPLY WITH THE SECRETARY'S DECISION ON THE HELLS CANYON APPEAL. THIS WILL AVOID THE NEED TO REVISE THE WALLOWA-WHITMAN FINAL PLAN IMMEDIATELY AFTER IT IS COMPLETED.

FOREST SERVICE RESPONSE

We disagree with the assumption that the plan will have to be immediately revised. See responses to other comments in this section on this subject.

COMMENT NO. 25: CHIEF OF THE FOREST SERVICE, MAX PETERSON, IN A LETTER TO CONGRESSMAN DENNY SMITH AGREED " THAT THE TIMBER ALLOCATION, INCLUDING THOSE FOR MORE INTENSIVE TIMBER MANAGEMENT AREAS FOR SUITABLE NRA FORESTED ACRES, WILL BE REEVALUATED DURING THE DEVELOPMENT OF THE WALLOWA-WHITMAN FOREST PLAN " IN ADDITION, THE FORMER ASSISTANT SECRETARY CROWELL DIRECTED THE FOREST SERVICE TO REVISE OR AMEND THE NRA MANAGEMENT PLAN "WHEN ANY FOREST PLAN OR FOREST PLAN ADOPTED FOR THE WALLOWA-WHITMAN, NEZ PERCE, OR PAYETTE NATIONAL FORESTS SET A TIMBER HARVEST LEVEL OR ANY OTHER OUTPUT LEVEL WHICH ALONE OR IN COORDINATION WITH THE FOREST PLAN OR ONE OR MORE OF THOSE FORESTS MIGHT HAVE A SIGNIFICANTLY ADVERSE EFFECT ON THE ECONOMY OF WALLOWA OR BAKER COUNTY IN OREGON..."

SOLUTION: THE DECISION NOT TO ALLOW PUBLIC REVIEW OF THE NRA MANAGEMENT PLAN AT THIS TIME WAS A DISCRETIONARY DECISION MADE BY THE FOREST SUPERVISOR. AS DIRECTED AND AGREED TO, THE FOREST SERVICE SHOULD REEVALUATE THE TIMBER MANAGEMENT AREA IN THE HELLS CANYON FINAL EIS HARVESTING TIMBER IN THE NRA WILL MAINTAIN THE HEALTH OF THE FOREST AND PROVIDE AN ADDITIONAL 5-6 MILLION BOARD FEET TO LOCAL TIMBER DEPENDENT COMMUNITIES THE COMMUNITY STABILITY ALTERNATIVE SUPPORTS REEVALUATION OF THE HELLS CANYON NATIONAL RECREATION AREA WITH THE INTENT OF INCREASING THE ALLOWABLE SALE QUANTITY

FOREST SERVICE RESPONSE.

The timber harvest level was calculated for the Forest as a whole, including the HCNRA, in each of the Forest Plan alternatives NRA contribution varied from approximately 5 to 9 MMBF In addition, we computed the harvest level for all suitable lands in the NRA (ignoring the current land allocation) and found that this could provide an additional 9 MMBF. (See DEIS, page II-13)

COMMENT NO. 26: IN HELLS CANYON, JET BOATS SHOULD NOT BE PERMITTED ABOVE JOHNSON BAR I AM DISMAYED THAT THE FOREST SERVICE MADE THIS COMPROMISE AND OUTRAGED THAT THE WILDEST SECTION OF THE RIVER HAS BEEN INVADED BY LOUD, NOISY JET BOATERS

FOREST SERVICE RESPONSE:

The original decision in preparation of the Comprehensive Management Plan called for limitations on powerboating The decision was changed upon appeal to the Chief and the Secretary of Agriculture.

**WILD AND SCENIC RIVERS
Code 60**

Potential Wild and Scenic rivers were given considerable discussion in the DEIS and three streams on the Forest were recommended by the Forest Service for inclusion in the National Rivers System. This generated many comments from the public as well as governmental agencies. The issue was rendered moot by the signing by the President of the Omnibus Oregon Wild and Scenic Rivers Act of 1988. We have, therefore, not included many public comments on the subject, since they were made in 1986 without knowledge of the action the U. S. Congress would take in 1988.

COMMENT NO. 1: THE LOSTINE, THE NORTH POWDER RIVER, GRANDE RONDE RIVER, EAGLE CREEK, JOSEPH CREEK, NORTH FORK JOHN DAY (A BEAUTIFUL STREAM) SHOULD ALL BE PROTECTED BY THE "SCENIC RIVERS" DESIGNATION. THEY ALL HAVE ALL UNIQUE QUALITIES WHICH WILL BE ENJOYED BY GENERATIONS TO COME. THEY ARE ALSO IMPORTANT FOR A VIABLE ECOLOGY.

FOREST SERVICE RESPONSE

Congress agreed with the need for protection. On October 28, 1988, the President signed the Omnibus Oregon Wild and Scenic Rivers Act of 1988. (P L 100-557) which included these streams as well as the Imnaha, South Fork Imnaha, and Minam.

COMMENT NO. 2 BASED ON THE INFORMATION PROVIDED IN THE DEIS, THE DEPARTMENT OF FORESTRY CANNOT SUPPORT INCLUSION OF ADDITIONAL STREAMS LOCATED OUTSIDE WILDERNESS AREAS INTO THE WILD AND SCENIC RIVER SYSTEM. WE SUPPORT CONTINUATION OF THE EXISTING MANAGEMENT AREAS WHICH HAVE SUCCESSFULLY PRESERVED THE CHARACTER OF THESE STREAMS (OSFD)

FOREST SERVICE RESPONSE.

P L 100-557 (10/28/88) designated nine streams on the Wallowa-Whitman.

COMMENT NO. 3 PAGE 2-10 - THE FLRMP STATES THAT "UNDER THIS PLAN THE NONWILDERNESS PORTIONS OF THE NORTH FORK JOHN DAY AND THE GRANDE RONDE RIVERS (LOWER GRANDE RONDE) ARE RECOMMENDED FOR INCLUSION IN THE NATIONAL RIVERS SYSTEM." YET IN MANAGEMENT AREA 7, P 4-73, AND IN THE DEIS, PAGE II-39, ALTERNATIVE C (PROPOSED ACTION), THE LOSTINE IS ALSO SHOWN TO BE RECOMMENDED FOR INCLUSION IN THE NATIONAL RIVERS SYSTEM. THIS ISSUE NEEDS CLARIFICATION.

FOREST SERVICE RESPONSE:

Yes, the sentence cited on page 2-10 should also have included the Lostine. The sentence has been corrected in the final plan.

COMMENT NO. 4: THE CONFEDERATED TRIBES SUPPORTS ALL PROPOSED WILD, SCENIC AND RECREATIONAL RIVERS FOR THE REASONING OF PROTECTING RIPARIAN AND FISHERIES HABITAT AND PROMOTING A DIVERSITY OF ECONOMY.

FOREST SERVICE RESPONSE.

For perhaps these reasons, Congress agreed.

COMMENT NO. 5 YOUR OFFICE CLASSIFIED THE CREEK IN THE REACH FROM JOSEPH CREEK RANCH TO THE FOREST BOUNDARY AS ELIGIBLE FOR WILD RIVER STATUS. SIMILARLY THE REACH FROM CROW CREEK BRIDGE TO JOSEPH RANCH WAS FOUND TO BE ELIGIBLE FOR RECREATIONAL STATUS.

THE CANYON AND RIPARIAN WETLAND WERE PROPOSED FOR WILDERNESS OVER FOUR YEARS AGO, BUT DID NOT SURVIVE THE LEGISLATIVE HURDLES TO MAKE IT WILDERNESS STATUS. IT WOULD SEEM THAT YOUR OFFICE WOULD RECOGNIZE THE SIGNIFICANT CONSTITUENCY THAT EXISTS NOW FOR THIS BEAUTIFUL CANYON.

THE AAC GOES ON RECORD OF SUPPORTING THE FORMAL DESIGNATION OF THIS CANYON FOR WILD RIVER AND RECREATIONAL RIVER RESPECTIVELY.

FOREST SERVICE RESPONSE:

P L 100-557 designated that portion downstream from the Joseph Creek Ranch as wild river. The portion upstream was considered but not included in the National Rivers System.

COMMENT NO. 6. THE FOREST SHOULD ALSO DEVELOP A COMPLETE SET OF MANAGEMENT PRESCRIPTIONS FOR WILD & SCENIC RIVERS. EACH LEVEL OF RIVER CLASSIFICATION DESERVES A SEPARATE MANAGEMENT PRESCRIPTION.

FOREST SERVICE RESPONSE

The Wild and Scenic Rivers Act provides separate direction for each level of classification. It also requires that individual plans be developed for each river.

COMMENT NO. 7 WILD RIVERS SHOULD BE GIVEN A VISUAL QUALITY OBJECTIVE OF PRESERVATION, A RECREATIONAL OPPORTUNITY SPECTRUM OF PRIMITIVE, AND GRAZING SHOULD BE PROHIBITED (MANAGEMENT INTENSITY A). SCENIC RIVERS SHOULD BE GIVEN A VISUAL QUALITY OBJECTIVE OF RETENTION, A RECREATIONAL OPPORTUNITY SPECTRUM OF SEMI-PRIMITIVE NON-MOTORIZED (EXCLUDING ESTABLISHED ROADS WITHIN THE CORRIDOR), AND GRAZING AT LEVEL C. RECREATIONAL RIVERS SHOULD BE GIVEN A VISUAL QUALITY OBJECTIVE OF RETENTION IN THE FOREGROUND AND PARTIAL-RETENTION FOR MIDDLE DISTANCE, A RECREATIONAL OPPORTUNITY SPECTRUM OF ROADED NATURAL, AND GRAZING AT LEVEL C.

FOREST SERVICE RESPONSE

Thank you for your recommendations, which will be carefully considered during the development of the river plans which is beginning.

COMMENT NO. 8: THE FOREST SHOULD CONDUCT STUDIES IN SUFFICIENT DETAIL TO MAKE A DECISION REGARDING THE RIVER AND ITS MANAGEMENT AND RECORD THAT DECISION. THE DECISION SHOULD BE FOR A SPECIFIC TYPE OF MANAGEMENT, NOT TO RECOMMEND ADDITIONAL STUDY OR FUTURE STUDY (EXCEPT IN SPECIAL CIRCUMSTANCES). WHILE THE ELIGIBILITY/SUITABILITY STUDY RESULTS ARE A CONSTANT IN EACH ALTERNATIVE

CONSIDERED, THE POSSIBLE MANAGEMENT ACTIONS WITH RESPECT TO A SPECIFIC RIVER SHOULD NOT BE LIMITED. STUDIES RESULTING IN ELIGIBILITY OR SUITABILITY SHOULD BE VIEWED ONLY AS NECESSITATING THE CONSIDERATION OF VARIOUS ALTERNATIVE USES OF THE LAND AND WATER FOR THOSE RIVERS AND RELATED LAND RESOURCES. THE NPS HAS ALSO PROVIDED A CHART WHICH SETS FORTH A RECOMMENDED PROCEDURE OF CONDUCTING RIVER EVALUATIONS THAT MAY RESULT IN DESIGNATION AS A COMPONENT OF THE NATIONAL WILD AND SCENIC RIVER SYSTEM OR ELIMINATION FROM THE NRI OR ANY OTHER MANAGEMENT DESIGNATION IMPOSED BY A FEDERAL LAND MANAGEMENT AGENCY.

FOREST SERVICE RESPONSE:

We appreciate the use of the chart and other information provided by the National Park Service. We will use it in our evaluation of the Wallowa River for which the Forest Service was given the study responsibility.

COMMENT NO. 9: AN ISSUE THAT NEEDS TO BE ADDRESSED IN THE FOREST PLANNING PROCESS IS THE SUBJECT OF A MANAGEMENT PLAN FOR IMPLEMENTING THE NEW OREGON WILD & SCENIC RIVERS LEGISLATION RECENTLY PASSED BY CONGRESS. IT WOULD SEEM TO MAKE SENSE TO INCLUDE THAT MANAGEMENT PLAN AS PART OF THE OVERALL FOREST PLANNING PROCESS. THERE ARE SEGMENTS OF SEVERAL RIVERS ON THE FOREST THAT WILL NOW BECOME A PART OF THE FEDERAL WILD & SCENIC RIVERS INVENTORY, ONCE THE PRESIDENT SIGNS THE LEGISLATION. THE BIGGEST RESPONSIBILITY THAT THE FOREST SERVICE WILL HAVE WILL BE MONITORING OF ACTIVITIES WITHIN THE BOUNDARY OF THE WILD & SCENIC RIVER. IT WOULD BE HELPFUL TO OUTLINE YOUR PLANS WITHIN THE FINAL EIS ON THE FOREST PLAN.

FOREST SERVICE RESPONSE:

The Omnibus Oregon Wild and Scenic Rivers Act of 1988 (P L. 100-557) provides three years to complete the studies. Considering the number of rivers designated on the Wallowa-Whitman, it may take the full amount of time. We do not believe it necessary to delay the Forest Plan, pending completion of the studies. In the meantime, the stream corridors will be protected.

COMMENT NO. 10: THE SUPPLEMENT FAILS TO INCORPORATE THE WILD AND SCENIC RIVERS ACT RECENTLY ENACTED BY CONGRESS. SINCE ALL THE CATEGORIES EXCEPT "WILD" ALLOW TIMBER HARVESTING, THE PLAN MUST INCORPORATE THIS ADDITIONAL TIMBER VOLUME.

FOREST SERVICE RESPONSE:

We have taken the approach in modeling that harvest will occur in recreational and scenic portions, where other land management direction does not prohibit such activity.

**CULTURAL RESOURCES
Code 80**

COMMENT NO. 1: OUR PRIMARY CONCERN IS THAT BOTH THE PLAN AND EIS DO NOT INDICATE HOW CULTURAL RESOURCES ARE INTEGRATED WITH OTHER RESOURCES AND MANAGEMENT ACTIVITIES BOTH DOCUMENTS INDICATE THE FOREST WILL MANAGE CULTURAL RESOURCES, REGARDLESS OF THE ALTERNATIVE SELECTED, THROUGH THE APPLICATION OF MULTIPLE USE STANDARDS AND GUIDELINES WE FEEL THIS APPEALS TO LEGAL AND PROFESSIONAL "CRM" RHETORIC RATHER THAN WITH THE CONSEQUENCES OF THE FOREST'S MANAGEMENT PROGRAM. WE BELIEVE THIS SITUATION NEEDS TO BE CLARIFIED DURING THE PUBLIC PLANNING PROCESS.

FOREST SERVICE RESPONSE:

Cultural resources management (CRM) is an integral part of the National Environmental Protection Act (NEPA). In addition, the USDA - Forest Service, along with all federal agencies, is charged with inventorying all land holdings and protecting all sites eligible for the National Register of Historic Places (NRHP) under the National Historic Preservation Act (NHPA) of 1966 as amended in 1980. The inventory of National Forest lands is conducted on a project by project basis. Each project with a potential for ground disturbing activity requires consultation with the appropriate State Historic Preservation Officer (SHPO). To receive project concurrence from SHPO, a report is submitted documenting the cultural resource inventory and protection measures for each site eligible for the NRHP. The USDA - Forest Service consults with SHPO for all activities. This consultation process is regulated under several Memorandums of Agreement between the USDA - Forest Service, SHPO, and the National Advisory Council.

COMMENT NO. 2: THERE IS VERY LITTLE DISCUSSION ON CULTURAL RESOURCES SUCH AS CULTURAL AREAS AS JOSEPH CANYON, THE BOURNE, GRANITE AND CAMP CARSON MINING AREAS, AND THE OREGON TRAIL WOULD RECEIVE NO PROTECTION FROM LOGGING WE FEEL THAT ESTABLISHING A CULTURAL RESOURCE MANAGEMENT AREA WOULD PROTECT THESE AND OTHER RESOURCES FOR FUTURE GENERATIONS.

FOREST SERVICE RESPONSE

The National Historic Preservation Act (NHPA) of 1966 as amended in 1980 charges the USDA - Forest Service with inventorying all land holdings and protecting all sites eligible for the National Register of Historic Places (NRHP). No federal activity will impact the townships of Bourne or Granite as they are private property. Any sites eligible for the NRHP on adjacent federal lands are protected from logging and all ground disturbing activities under the Act as well as the Oregon Trail, the proposed Camp Carson Mining District, and cultural sites in Joseph Canyon. The Forest's Cultural Resource Management Area is directed by the Region 6 Cultural Resource Management Standards and Guidelines and several Congressional laws, acts, and executive orders. The Wallowa-Whitman National Forest has pioneered Programmatic Memorandums of Agreement between the USDA - Forest Service, the State Historic Preservation Officer, and the National Advisory Council for several types of sites including historic water transportation ditches, historic railway systems, and prehistoric sites.

COMMENT NO. 3. IN THE EIS, THE AFFECTED ENVIRONMENT MIGHT HAVE INCLUDED A MORE COMPLETE DISCUSSION OF ACRES COVERED AND CULTURAL SITES FOUND PER YEAR PER

PROJECT(S) ETC., TO PROVIDE A MORE COMPLETE ASSESSMENT OF CULTURAL RESOURCE MANAGEMENT ON THE FOREST. THIS SITUATION SHOULD HAVE BEEN MORE FULLY DISCUSSED IN THE ENVIRONMENTAL EFFECTS SECTION RATHER THAN SIMPLY APPEALING TO FEDERAL LAWS AND REGULATIONS WE APPRECIATE THE FOREST'S ATTEMPT AT QUANTIFYING EFFECTS BY PERCENT PER ALTERNATIVE, BUT WOULD HAVE APPRECIATED MORE COMPREHENSIVE DISCUSSION BY EACH ALTERNATIVE, ESPECIALLY AS IT PERTAINS TO THE HELLS CANYON NRA FINALLY, WE QUESTION IF THE EFFECTS (IMPACTS) OF CULTURAL RESOURCES ON OTHER RESOURCES AND ACTIVITIES, ESPECIALLY TIMBER MANAGEMENT, ARE AS MINIMAL AS SUGGESTED

FOREST SERVICE RESPONSE.

The number of acres inventoried for cultural resources and the number of sites recorded on the Forest is updated and published each year in Forest Facts and in reports to Congress. The Forest Plan is not the appropriate place to discuss the number of sites located project by project. Those figures are available on a project by project basis in the EA or EIS Cultural Resources Management has a minimal effect on restricting other activities of multiple use management. The number of acres protected by cultural resource values is far fewer than those excluded for other resources (i.e., shelterwood for wildlife). Protecting cultural resource values is easily accommodated on the Forest with insignificant alternatives to other management prescriptions

COMMENT NO. 4 AS A SUGGESTION I WOULD LIKE TO SEE THE OREGON TRAIL SHOWN ON FUTURE MAPS OF THE FOREST LANDS. THIS WOULD MAKE THE PUBLIC AWARE OF THE RESOURCE AS THEY USE THESE LANDS AND ALSO MAKE THE TIMBER INTERESTS AWARE OF THEIR EXISTENCE AS THEY PLAN THEIR OPERATIONS IN THE VICINITY.

FOREST SERVICE RESPONSE.

We agree with your suggestion and we intend to show the trail on future maps We are also assisting the National Park Service (USDI) in evaluating the Marcus Whitman Trail

COMMENT NO. 5 OTHER SITES OF AN ARCHAEOLOGICAL NATURE SHOULD BE BROUGHT TO THE ATTENTION OF TIMBER HARVESTERS BUT SHOULD NOT BE GENERALLY PUBLISHED FOR PUBLIC USE. MY PAST EXPERIENCE HAS SHOWN A GREAT DISREGARD BY THE TIMBER INDUSTRY TO PROTECT SUCH SITES PARTICULARLY ON PRIVATE LANDS. GRAVES ARE CONSTANTLY BEING DESTROYED AND IT IS VERY ANNOYING TO DESCENDENTS OF THOSE FAMILIES WHO ON OCCASION RETURN TO THE SITE

FOREST SERVICE RESPONSE.

Contractors who are awarded contracts are provided with maps identifying archaeologically sensitive areas and are directed in contract clauses to report any unidentified sites encountered during the project The maps are not available to the general public Site location information concerning archaeological sites is exempt from the Freedom of Information Act The USDA Forest Service has no right to dictate protection measures for sites on private property Oregon law does protect grave sites on state land as well as private property The USDA Forest Service protects grave sites based on federal laws, acts, and executive orders

COMMENT NO. 6. THE TRAIL MARKING PROGRAM IS STILL UNDER STUDY AND WHILE PLANS ARE PROGRESSING ON THE BLUE MOUNTAIN SEGMENT THERE ARE OTHER AREAS THAT

NEED TO BE MARKED AS WELL ON NATIONAL FOREST LANDS. THE WHITMAN TRAIL NEEDS SOME RECOGNITION AND MARKING ALTHOUGH IT IS NOT AS WELL KNOWN AND DEFINED AS THE OREGON TRAIL. FURTHER STUDY SHOULD BE DONE ON THIS ASPECT.

FOREST SERVICE RESPONSE.

The USDA - Forest Service is assisting the National Park Service in evaluating the Whitman Trail. A management plan will be developed at the conclusion of the current study.

COMMENT NO. 7: I DO NOT AGREE THAT HARVESTING TIMBER IS MORE HARMFUL TO CULTURAL RESOURCES THAN RECREATION ACTIVITIES.

FOREST SERVICE RESPONSE.

Because of the relatively large area affected by timber harvest each year, and the ground disturbing activities involved, we believe timber harvest has greater potential for damage than recreation activities. We recognize that there are exceptions. Our intent is to prevent or mitigate the effects of any management or recreational activities on cultural resources.

SPECIAL INTEREST AREAS
Code 90

COMMENT NO. 1: THE WALLOWA-WHITMAN NATIONAL FOREST HAS NOT IDENTIFIED ANY SPECIAL INTEREST AREAS IN ANY PLAN ALTERNATIVES. GIVEN THE DIVERSITY OF BOTANICAL, CULTURAL, AND GEOLOGICAL RESOURCES THAT ARE PRESENT ON BOTANICAL, CULTURAL, AND GEOLOGICAL RESOURCES THAT ARE PRESENT ON THE FOREST IT SEEMS THE SPECIAL INTEREST AREA DESIGNATION WOULD BE APPROPRIATE FOR SEVERAL SITES THAT ARE IN NEED OF SPECIAL MANAGEMENT CONSIDERATIONS THE NATURE CONSERVANCY WOULD BE HAPPY TO WORK WITH THE FOREST IN IDENTIFYING SITES THAT MAY BENEFIT FROM SUCH DESIGNATION

FOREST SERVICE RESPONSE

We are recommending 18 new research natural areas, several of which are quite large. No other special interest areas were suggested by the public, nor were any recommended by Forest Service personnel. However, if the Nature Conservancy has some special areas in mind, they could be considered for special interest status at a later time.

COMMENT NO. 2: MT. EMILY IS NOT IDENTIFIED AS A POTENTIAL NATIONAL NATURAL LANDMARK. BOTH THE NAME AND THE MOUNTAIN ARE OF UPMOST IMPORTANCE TO LA GRANDE AND THE GRANDE RONDE VALLEY. HER USE AS A MASTHEAD AND LOGO IS WIDESPREAD AND HER FEATURES ARE DEAR TO MOST RESIDENTS.

FOREST SERVICE RESPONSE

We are not anticipating any management activities which will significantly alter the features of Mt. Emily. We do not believe it is necessary to identify it as a National Natural Landmark to protect it.

COMMENT NO. 3: LANDMARK AREAS AND SPECIAL AREAS OF INTEREST SUCH AS MT. EMILY AND THE OREGON TRAIL ROUTE SHOULD ALSO BE PROTECTED UNDER WILDERNESS OR SIMILARLY STRICT PROTECTION. "VIEWSHED" AREAS SHOULD BE EXPANDED AND SHOULD NOT BE LOGGED.

FOREST SERVICE RESPONSE:

The Oregon Trail, within the National Forest, is protected by the provisions of a recently completed management plan. See previous comment regarding Mt. Emily.

**WILDERNESS
Code 100**

COMMENT NO. 1: WILDERNESS RECREATIONAL SUPPLY, BOTH EXISTING AND FUTURE, WILL FAR EXCEED USE FOR THE FOUR WILDERNESS AREAS ON THE WALLOWA-WHITMAN WHAT WE HAVE IS A GREATLY UNDERUTILIZED "UNDEVELOPED RECREATION" RESOURCE THAT IS BY ACT OF CONGRESS PERMANENTLY PRESERVED FOR THIS AND OTHER PURPOSES WHY THEN ARE FOREST SERVICE PLANNERS SACRIFICING ECONOMIC STABILITY AND, LITERALLY, THE WAY OF LIFE OF NORTHEAST OREGON'S SMALL TOWNS AND RURAL COMMUNITIES? AREA 6 ELIMINATES 111,000 ACRES FROM THE TIMBERLANDS BASE OSTENSIBLY FOR THE PURPOSE OF IMPROVING BACKCOUNTRY RECREATION THE AREA SHORTCHANGES THE HIGH DEMAND TIMBER RESOURCE TO IMPROVE AN UNDERUTILIZED RECREATION RESOURCE. I FIND THIS AREA TOTALLY INDEFENSIBLE

WALLOWA-WHITMAN NATIONAL FOREST ALREADY HAS MORE WILDERNESS AREA THAN ANY OTHER FOREST IN OREGON. WE DEFINITELY DO NOT NEED ANY MORE NONPRODUCTIVE AREA IN OUR FOREST. WILDERNESS AREAS ARE A VERY BAD WASTE OF NATURAL RESOURCES, CATERING TO A VERY SMALL GROUP OF PEOPLE WHO ACTUALLY DERIVE SOME USE OF THEM

FOREST SERVICE RESPONSE.

Projections show that unroaded area (including wilderness) use will equal or exceed capacity in the future

Most areas proposed for Area 6 have low timber-growing potential. These are the areas that provide opportunity for unroaded motorized use, which is prohibited in wilderness.

The Wallowa-Whitman has a large amount of wilderness, largely because it has a large amount of land suitable for wilderness designation Your opinion about the value of wilderness is shared by many, but does not, in our judgement, reflect the opinion of the public at large.

COMMENT NO. 2. I BELIEVE THAT THE GROUP ADVOCATING MORE WILDERNESS AREA IS IN THE MINORITY, WHILE PROBABLY MORE VOCAL THAN THE MAJORITY

FOREST SERVICE RESPONSE.

Of those who responded to the Draft Forest Plan documents, those opposed to more wilderness were more "vocal"

COMMENT NO. 3: WITH THE WILDERNESS BILL OF 1984, WE GAVE UP 900,000 ACRES TO WILDERNESS WITH THE PROMISE THAT UNROADED AREAS COULD BE LOGGED TO MAKE UP THE LOSS IN THE NORTH FORK JOHN DAY AREA, WE LOST FOUR YEARS WOOD SUPPLY (DEAD LODGEPOLE) IN THE TOWER MOUNTAIN AREA, 60 MILES FROM OUR PLANT. TO REPLACE THIS WOOD, WE MUST NOW HARVEST 85 MILES FROM THE PLANT, AT A SEVERE FREIGHT PENALTY

FOREST SERVICE RESPONSE.

We are not familiar with promises that may have been made. It is certainly true that tradeoffs for wilderness or other resource decisions often affect some people or firms more than others

COMMENT NO. 4 I LIVE IN EASTERN OREGON, BECAUSE OF THE WILDLANDS THAT EXIST HERE WITHIN CLOSE PROXIMITY TO MY HOME IT IS VERY IMPORTANT TO ME THAT THE FOREST REMAIN AS RICH AS EVER IN ITS OFFERINGS OF BIG TREES, CLEAR WATERS, FISH AND WILDLIFE, AND SOLITUDE

FOREST SERVICE RESPONSE

Many local people share your feelings We are confident that the offerings you value will be available for the foreseeable future

COMMENT NO. 5 OUR PARTICULAR INTEREST IS IN PRESERVING WHAT IS LEFT OF THE RECREATIONAL QUALITIES IN BEAR CREEK CANYON OUR DAUGHTER'S GREAT- GRANDPARENTS OWN PROPERTY ON THE EDGE OF THE WALLOWA-WHITMAN NATIONAL FOREST AND HAVE FOR OVER 40 YEARS. IN THE LAST 15 YEARS WE HAVE SEEN THE CANYON SUFFER FROM EXTENSIVE ROAD BUILDING AND LOGGING. DECREASES IN DEER AND ELK POPULATIONS, AND LOSS OF WATER QUALITY AND QUANTITY HAVE FOLLOWED. THE ONLY HOPE WE HAVE FOR PRESERVING WHAT IS LEFT OF THE CANYON IS THROUGH BACKCOUNTRY WILDERNESS DESIGNATION EXCLUDING ALL LOGGING FROM BEAR CREEK CANYON, INCLUDING THE ELIMINATION OF CATASTROPHIC SALVAGES OF ANY TYPE (#6).

AS A BOY I REMEMBER RUFFED AND BLUE GROUSE POPULATIONS WE SHALL NEVER SEE AGAIN, DUE TO PUBLIC AND PRIVATE OVER-HARVESTING OF OLD-GROWTH PONDEROSA PINE DURING THE PAST TEN YEARS SIGHTINGS OF GREAT GREY OWLS IN WHAT IS LEFT OF THE OLD GROWTH TIMBER UP BEAR CREEK CANYON HAVE BEEN TOTALLY IGNORED IN ANY OF THE FOREST SERVICE ALTERNATIVES MILLIONS OF DOLLARS HAVE BEEN SPENT IN REINTRODUCING BIGHORN SHEEP TO THE CANYON THE CANYON HAS HISTORICALLY BEEN A PRIME STEELHEAD AND SALMON SPAWNING GROUND WHICH FEEDS THE WALLOWA AND GRANDE RONDE RIVER SYSTEMS. WE FEEL THAT FOR ALL THESE REASONS BEAR CREEK CANYON, IN PARTICULAR, DESERVES WILDERNESS PROTECTION. LOGGING IN BEAR CREEK IS UNECONOMICAL FOR A NUMBER OF REASONS. THE HELICOPTER LOGGING WEST OF BOUNDARY CAMPGROUND HAS NEVER REGENERATED SEEDLINGS WERE PLANTED BEHIND EVERY STUMP WITH LESS THAN A 5% SURVIVAL RATE REQUIREMENTS OF THE 1976 FOREST MANAGEMENT ACT (FMA), BY LAW, HAVE NOT BEEN MET IN THIS INSTANCE THE TRAILHEAD AT THE TOP OF WATER CANYON RIDGE HAS BEEN DESTROYED AND IS IMPOSSIBLE FOR PUBLIC RECREATIONAL USAGE. FOR ALL THESE REASONS, IT SEEMS OBVIOUS THAT THE ONLY POSSIBLE ALTERNATIVE FOR BEAR CREEK CANYON IS WILDERNESS DESIGNATION THE VALUE OF BEAR CREEK IS AN INCREASINGLY VALUABLE RESOURCE FOR RECREATION, WATER QUALITY, AND WATER QUANTITY. IN THE LAST FIVE YEARS WE HAVE SEEN THREE OF THE CABINS IN THE AREA LOSE WATER TWO MONTHS EARLIER THAN PRIOR TO THE HELICOPTER LOGGING OPERATION THE AMOUNT OF PUBLIC USAGE OF TRAILHEADS INCREASES EVERY YEAR, AND WILL CONTINUE TO BECOME A VITAL ECONOMIC RESOURCE TO WALLOWA COUNTY IF THE CANYON CAN BE PRESERVED. WE SINCERELY HOPE THAT YOU WILL CONSIDER OUR INPUT AND INCLUDE BEAR CREEK CANYON IN WILDERNESS PROTECTION FOR THE ENJOYMENT OF GENERATIONS TO COME.

FOREST SERVICE RESPONSE

Your input has been carefully considered To date, nearly all of the timber harvesting that has occurred in the canyon has been on private land More than two thirds of the 17 mile length of Bear Creek that is within the National Forest lies within the Eagle Cap Wilderness Under the Forest Service proposal, the remainder of the Canyon will be in Management Area 6 and Management Area 3. Timber harvest will occur within the vicinity of Bear Creek only in the lower 3 5 miles of the canyon We believe the standards and guidelines for watershed and riparian

habitat management will prevent serious damage to the stream. We encourage you to contact the Eagle Cap District Ranger and participate in the project level planning for the Bear Creek area

COMMENT NO. 6 WHICHEVER MANAGEMENT PLAN IS CHOSEN, CERTAIN AREAS ARE IN NEED OF SPECIAL ATTENTION. ONE OF THESE AREAS IS THE ELKHORN RIDGE AREA WEST OF BAKER. I DISAGREE WITH THE ASSESSMENT THAT THE ECOSYSTEMS IN THE ELKHORN RIDGE AREA ARE ALREADY REPRESENTED IN OTHER WILDERNESS AREAS. ELKHORN RIDGE IS HIGHER THAN OTHER AREAS WITH THE SAME PRECIPITATION AND DRIER THAN OTHER AREAS OF SIMILAR ALTITUDE, AND THEREFORE REPRESENTS A UNIQUE AREA. THE UNROADED SECTIONS CONTAIN LITTLE TIMBER OR PROVEN MINERAL RESOURCES, AND I BELIEVE THE BEST USE OF THE ELKHORN RIDGE AREA IS FOR PRIMITIVE AND UNCONFINED RECREATION. ELKHORN RIDGE SHOULD BE PROTECTED AS WILDERNESS.

FOREST SERVICE RESPONSE

The portion of the Elkhorns that is not in the North Fork John Day Wilderness is mostly in Area 6, which should provide protection of the values you have described.

COMMENT NO. 7: IN OVER-USED AND ABUSED AREAS, CONSIDER LIMITING TO DAY-USE-ONLY WHEN PRACTICAL. ESTABLISH METHODS TO MONITOR AND DETERMINE WHEN AN AREA IS REACHING OR HAS REACHED UNACCEPTABLE CHANGE. CURTAIL OR DISPERSE USE AS NECESSARY TO MEET GOALS.

FOREST SERVICE RESPONSE:

Management Area 4 and the Wilderness Management Plans provide for monitoring and action where limits of acceptable change are approached.

COMMENT NO. 8: THERE IS TOO MUCH WILDERNESS AREA NOW TO MAINTAIN PROPERLY.

FOREST SERVICE RESPONSE.

Meeting management standards within available budgets is a challenge in all resource allocations. Wilderness is no exception.

COMMENT NO. 9: ANY INCREASE IN THE LAND THAT IS SET APART AND PRESERVED FOR OUR CHILDREN GIVES AN EVEN GREATER APPEAL TO LIVING HERE.

FOREST SERVICE RESPONSE

Many responses to the draft Planning documents mentioned concern for preserving land in a natural state for future generations.

COMMENT NO. 10: THE PEOPLE WHO ARE IN SUPPORT OF MORE WILDERNESS ARE IN A MINORITY AS WELL AS BEING OUT OF THE AREA. THEY PAY NO TAXES, DO NOTHING TO SUPPORT THE LOCAL COMMUNITY, BUT EXPECT THE LOCAL PEOPLE TO SUPPORT A CONCEPT OF UTOPIA TO COME AND VISIT AT THEIR WILL.

FOREST SERVICE RESPONSE

We are unsure that people nationwide who support increasing wilderness are in a minority. Regardless, all U S citizens have equal rights to speak on this matter of how federal lands are managed. Because of the way our planning process is structured, the interests of local people are well represented.

COMMENT NO. 11: MOST OF THE PEOPLE OF THE COUNTRY DO NOT HAVE THE TIME TO PACK INTO THE WILDERNESS BUT WOULD LIKE TO SEE SOME OF OUR FORESTS, SO ACCESS ON ROADS INSTEAD OF MORE WILDERNESS IS THE BETTER WAY TO SERVE THE PUBLIC INTEREST

FOREST SERVICE RESPONSE

Enough people have the time that we project use loads which will equal capacity of the wilderness we have on the Forest. In contrast, there is now more than enough roaded area to meet projected recreation demand.

COMMENT NO. 12: I DON'T BELIEVE IN WILDERNESS AREAS FOR THE SIMPLE REASON, WHO CAN ENJOY THEM BUT THE RICH WHO CAN RENT HORSES OR OWN THEM OR HIRE A GUIDE TO GET BACK INTO THEM

FOREST SERVICE RESPONSE:

Many wilderness users are backpackers without high income.

COMMENT NO. 13: I WANT THE FOREST SERVICE TO BETTER MANAGE WHAT WILDERNESS THEY ALREADY HAVE BEFORE TAKING ANY MORE LAND OUT OF PRODUCTION.

FOREST SERVICE RESPONSE:

We are not proposing that more area on the Wallowa-Whitman be added to the wilderness system.

**COMMENT NO. 14. RECOMMENDATION
WILDERNESS STUDY**

- 1 ELKHORNS
- 2 UPPER GRANDE RONDE
3. LAKEFORK
- 4 ALL BACKCOUNTRY CONTIGUOUS TO EAGLE CAP

FOREST SERVICE RESPONSE

All of these areas were considered by Congress in the 1984 Wilderness Act. We are not reconsidering them for wilderness at this time.

COMMENT NO. 15: CREATING MORE WILDERNESS IS ACTUALLY MORE HARMFUL THAN BENEFICIAL TO MANY SPECIES OF WILDLIFE. SOUND MANAGEMENT CREATES A HEALTHY FOREST THAT IS NOT OVERCROWDED WITH DEAD AND DOWN TREES AND IS NOT SUSCEPTIBLE TO UNCONTROLLABLE FOREST FIRES. CAREFUL HARVESTING PROVIDES AN UNEVEN-AGE STAND.

AND GETS RID OF DISEASED AND DAMAGED TREES TO IMPROVE THE QUALITY OF THE FOREST WHILE PRESERVING A HABITAT THAT IS IDEAL FOR WILDLIFE. THE FOREST SERVICE SHOULD REALIZE BEFORE IT IS TOO LATE THAT WE ALREADY HAVE ENOUGH WILDERNESS.

FOREST SERVICE RESPONSE.

The effects of wilderness on wildlife can be positive, negative, or neutral, depending on the wildlife species. Regardless, the purpose of wilderness is to provide areas where the wilderness character, as defined by the Wilderness Act, is retained. The fact that some wildlife species may be favored by timber management practices is not important in most wilderness decisions.

COMMENT NO. 16: PLEASE CONTINUE YOUR FIGHT TO PRESERVE WHAT WILDERNESS WE HAVE LEFT. IT'S YOUR JOB AND THERE ARE MANY OF US WHO APPRECIATE THE EFFORTS YOU PUT FORTH ON BEHALF OF ALL THE PEOPLE--PRESENT AND FUTURE.

FOREST SERVICE RESPONSE

We consider effective management of areas designated by Congress as Wilderness to be an important responsibility.

COMMENT NO. 17. IT HAS BEEN SHOWN, ALTHOUGH OUR CONGRESSIONAL LEADERS WOULD NOT CONSIDER IT, THAT BAKER COUNTY IS CURRENTLY LOSING THREE MILLION DOLLARS ANNUALLY AS A RESULT OF THE WILDERNESS BILL. WHEN WE FIRST ASSUMED OFFICE, WE HAD A POPULATION OF 16,250. IT IS NOW 15,600. THIS INDICATES A LOSS OF 650, BUT WHAT ABOUT THE NATURAL INCREASE OF THE POPULATION? WE'VE LOST IT TOO.

FOREST SERVICE RESPONSE

The employment situation in the past six or seven years has been due to poor market for forest products, not a shortage of raw material. The '84 Act has, so far, not affected raw material supply.

COMMENT NO. 18 WE HAVE PLENTY OF WILDERNESS AND I DON'T BELIEVE THAT IT IS USED AS MUCH AS SAID. I KNOW BECAUSE I AM IN IT A LOT MYSELF.

FOREST SERVICE RESPONSE

Use and capacity data in the plan pretty well support an observation that there is plenty of wilderness now. It also indicates that there will be a future shortage.

COMMENT NO. 19. IF YOU ADD MORE WILDERNESS THAN WE ALREADY HAVE, THE ROADS THAT WE COULD DRIVE OR SNOWMOBILE ON WILL BECOME MORE AND MORE CROWDED, THUS MAKING IT LESS ENJOYABLE FOR EVERYONE. WE SHOULD LEAVE THE WILDERNESS WHERE IT IS NOW.

FOREST SERVICE RESPONSE:

Data in the Plan indicates that there is plenty of roaded area to meet future demand for roaded recreation.

COMMENT NO. 20 THERE IS VERY LITTLE OF THE LAND IN THE W/W NATIONAL FOREST THAT WOULD QUALIFY AS "WILDERNESS", BEYOND THE LANDS PRESENTLY ALLOCATED. BUFFER ZONES FOR THESE AREAS PRESENTLY EXIST AND ARE ADEQUATE FOR THE PURPOSE

FOREST SERVICE RESPONSE:

While many will agree with you, other comments in this section show that there is a wide variety of opinion on the subject

COMMENT NO. 21: THE COMMON COUNCIL OF THE CITY OF HAINES WISHES TO GO ON RECORD AS OPPOSING THE PLAN TO INCREASE THE WILDERNESS AREA IN THE WALLOWA-WHITMAN NATIONAL FOREST AT THEIR REGULAR MEETING HELD TUESDAY JULY 8, 1986, THE COUNCIL VOTED IN FAVOR OF A MOTION TO WRITE THIS LETTER STATING THEIR OBJECTION TO EXPANDING THE PRESENT AREA ALREADY TAKEN AWAY FROM USE BY THE GENERAL PUBLIC

THE MAJORITY OF THE COUNCIL MEMBERS PREFER TO HAVE THE FOREST LANDS MANAGED BY THE MULTIPLE USE CONCEPT AS PRACTICED BY THE GOVERNMENT IN THE PAST.

FOREST SERVICE RESPONSE

The Forest Plan proposes no increase in Wilderness.

COMMENT NO. 22: THIS FOREST HAS PRACTICALLY THE ONLY SIZEABLE WILDERNESS IN OREGON. TO ME IT IS A SPECIAL CONSIDERATION IN ANY FUTURE PLANNING TO PROTECT THIS MOST VALUABLE AND TOTALLY IRREPLACEABLE RESOURCE

FOREST SERVICE RESPONSE:

We agree that protection of this resource is an important responsibility

COMMENT NO. 23 THE WILDERNESS AREA IS ALREADY OVERCROWDED WITH HIKERS, BACK-PACKERS, AND HORSE PARTIES.

FOREST SERVICE RESPONSE:

Use and capacity data indicate that while there are some places and times where overcrowding occurs, there are many opportunities for solitude. However, projected future demand for wilderness recreation is near capacity, as is projected future demand for most resources.

COMMENT NO. 24 THE WALLOWA-WHITMAN WILDERNESS AREAS NEED CAREFUL AND CAUTIOUS MANAGEMENT PLANS, CALLING FOR AS LITTLE DISTURBANCE AS POSSIBLE OF THE EXISTING FRAGILE BALANCES. THROUGH PROTECTIVE MANAGEMENT, THESE AREAS CAN BE PRESERVED FOR FUTURE GENERATIONS, WITH RECREATION AND ENJOYMENT AS ITS CHIEF SOURCE OF INCOME. I IMPLOR YOU TO PUT ASIDE COMMERCIAL CONSIDERATIONS IN YOUR PLANNING AND LOOK REALISTICALLY AT THE PRESERVATION OF NATURE AS THE MOST IMPORTANT ASPECT OF MAN'S SURVIVAL ON THIS PLANET

FOREST SERVICE RESPONSE

Our highest priority in wilderness management is protection of the wilderness resource

COMMENT NO. 25. YOU MUST REALIZE YOUR CONCERN FOR THE COALITION ONLY FEEDS THE ANNUAL BITTER UNSTABILIZING PRESSURE OF "ALL THE WILDERNESS WE CAN GET IS ONLY HALF ENOUGH." WE URGE YOU NOT TO FEED THAT CONSUMING FIRE IN YOUR MANAGEMENT PLAN.

FOREST SERVICE RESPONSE:

We are not proposing more wilderness

COMMENT NO. 26 STATEMENTS IN TABLE 4-4 OF THE PLAN FOR "WATER" UNDER THE COLUMN HEADING OF "PHYSICAL/BIOLOGICAL SETTING OBJECTIVES" VIOLATE THE ANTIDegradation POLICY STATED IN OAR 340-41-026. FOR HIGH QUALITY WATERS SUCH AS THOSE IDENTIFIED BY THE DEIS FOR WILDERNESS AND SEMIPRIMITIVE WILDERNESS STREAMS, THERE CAN BE NO TEMPORARY DEGRADATION OF THESE WATERS THAT DEGRADES THE VALUE OF THE BENEFICIAL USES OF THOSE SAME WATERS. AS STATED IN THE RULES FOR SUCH HIGH QUALITY WATERS, DEGRADATION MAY ONLY BE ALLOWED AFTER CAREFUL CONSIDERATION BY THE OREGON ENVIRONMENTAL QUALITY COMMISSION, THE DIRECTOR OF THE DEQ OR HIS DES DESIGNEE.

FOREST SERVICE RESPONSE:

An example of the kind of temporary degradation we are thinking of is that which occurs when a backpacker wades across a stream, leaving a little dust from his or her boots. We do not believe this would degrade the value of the beneficial uses of the waters.

COMMENT NO. 27 THE MANAGEMENT PLAN FOR THE HELLS CANYON WILDERNESS LACKS INFORMATION ON EXISTING CONDITION OF WATER QUALITY. IT ALSO LACKS MANAGEMENT AREAS AND A MONITORING PLAN FOR THE WILDERNESS. WE RECOMMEND DISCUSSION OF THESE TOPICS SIMILAR IN SUBSTANCE AND FORMAT TO THAT DISPLAYED FOR THE EAGLE CAP MANAGEMENT PLAN

FOREST SERVICE RESPONSE:

These have been added to the Final Plan.

COMMENT NO. 28. MANAGEMENT 4--WILDERNESS IT IS A SHAME YOU DIDN'T INCLUDE SOME AREAS IN THE PREFERRED ALTERNATIVE. THE PUBLIC ACCEPTANCE WOULD HAVE BEEN OVERWHELMING. THE DUNNS BLUFF AREA IS LIKE SLOBOVIA AND SHOULD BE INCLUDED AS A WILDERNESS IN THE FINAL PLAN. MAPS OF OUR PROPOSAL FOR THIS AND OTHER AREAS WILL BE FOLLOWING.

PEOPLE ARE DRIVING-ROADING AND DAMAGING THIS AREA EXTENSIVELY. YOU SHOULD REMEMBER THE PROBLEMS ON THE ELKHORN CREST TRAIL WHERE SIMILAR MANAGEMENT COULDN'T BE ENFORCED BY THE FOREST SERVICE ON MOTOR BIKE DAMAGE. THE FOREST SERVICE WELCOMED WILDERNESS DESIGNATION TO STOP THIS ACTIVITY. YOU HAVE DOZENS OF MARGINAL AREAS AROUND ALL WILDERNESS RECEIVING EXTENSIVE DAMAGE THAT

SHOULD BE WILDERNESS TO STOP THIS RAPE OF OUR FRAGILE SOILS AND UNNECESSARY WATERSHED SEDIMENTATIONS

FOREST SERVICE RESPONSE:

if such damage is resulting from improper vehicle use, it should be curtailed whether or not the damaged area lies within wilderness.

There was low support for wilderness study for the Dunns Bluff area

COMMENT NO. 29: WILDLIFE MANAGEMENT WILL EMPHASIZE PRESERVATION OF SPECIES INDIGENOUS AT THE TIME OF WILDERNESS DESIGNATION (PLAN 4-64). WHICH SPECIES THAT WERE RECENTLY EXTIRPATED ARE NOW EXCLUDED FROM THE ECOSYSTEM? IS THIS PROVISION DESIGNED TO DISALLOW WOLVES AND GRIZZLY BEARS AND TO LEAVE OPEN THE DOOR FOR MORE MOUNTAIN SHEEP?

FOREST SERVICE RESPONSE.

No. The intent is to preclude introduction of additional nonnative species. Extirpated species may be reintroduced, provided they do not endanger significant resources outside wilderness "

COMMENT NO. 30: I BELIEVE ALTERNATIVE D IS A GOOD ALTERNATIVE FOR A NORTHEAST OREGON FOREST, ESPECIALLY ONE WITH SUCH A LARGE AMOUNT OF WILDERNESS ON OR NEAR THE FOREST

FOREST SERVICE RESPONSE:

Many other people agree with this rationale for Alternative D as well as Alternative B.

COMMENT NO. 31: THE FOREST PLAN IS CORRECT IN NOT PROPOSING MORE WILDERNESS. THE WILDERNESS ACT HAS ALREADY BEEN BADLY ABUSED TO PROTECT FISHERIES, WILDLIFE HABITAT, AND OTHER FAVORITE PLACES

FOREST SERVICE RESPONSE

There are others who share your views

COMMENT NO. 32: THE ROADLESS AREAS OF ALTERNATIVE E OR F DO NOT HAVE TO BE DESIGNATED AS WILDERNESS AREAS UNLESS THEY BORDER ALREADY EXISTING WILDERNESS AREAS. EXCLUDING A BORDERING ROADLESS AREA FROM WILDERNESS DESIGNATION BECAUSE CERTAIN ECOSYSTEMS ARE FOUND MORE ABUNDANTLY IN A NEIGHBORING ROADLESS AREA ARE NOT DESIGNATED WILDERNESS, THE POTENTIAL FOR DEVELOPMENT IS ALWAYS PRESENT AS IS THE CASE WITH BOULDER PARK AND LITTLE EAGLE MEADOWS. I FEEL STRONGLY ON PROTECTING THE CORE OF EXISTING WILDERNESS AREAS BY ADDING ADDITIONAL ACREAGE. FOR EXAMPLE, THE TWIN MOUNTAIN ROADLESS AREA WOULD BE AN EXCELLENT ADDITION TO THE NORTH FORK JOHN DAY WILDERNESS AREA

FOREST SERVICE RESPONSE:

By normally including 5,000 acres or more, wildernesses are large enough to not require additional lands to protect the core. We believe an area should be recommended for wilderness based on its inherent wilderness characteristics.

COMMENT NO. 33: THE FOREST SERVICE MADE THE STAY UNPLEASANT BY SENDING OUT WILDERNESS GUARDS TO HARASS THE PUBLIC AND MAKE IT LESS THAN A WILDERNESS EXPERIENCE.

FOREST SERVICE RESPONSE:

Wilderness Rangers (guards) are there to protect the wilderness resource. Those contacted by Wilderness Rangers, including some who have violated rules and regulations aimed at protecting the wilderness, may consider the contact harassment.

COMMENT NO. 34: I SUPPORT THE "COMMUNITY STABILITY ALTERNATIVE". I FEEL THAT IT WILL NOT JEOPARDIZE ANY OF THE MUCH NEEDED AND WANTED WILDERNESS, AS IT IS PRESENTLY CONSTITUTED.

FOREST SERVICE RESPONSE:

We agree that the "CSA" will not have a significant effect on wilderness. Neither will any of the other alternatives.

COMMENT NO. 35: I FEEL A WILDERNESS AREA IS A COMPLETE WASTE.

FOREST SERVICE RESPONSE:

Although some will agree with you, the Wilderness Act of 1964 reveals why Congress felt that wilderness is necessary.

COMMENT NO. 36: I AGREE WE NEED SOME WILDERNESS AREAS BUT FEEL WE HAVE MORE THAN ENOUGH TO PLEASE EVERYONE. WHAT ABOUT OUR SENIOR CITIZENS THAT ARE ABLE TO RIDE THROUGH, BUT UNABLE TO HIKE THROUGH THESE AREAS. SHOULD THEY BE DENIED THE RIGHT TO ENJOY THESE AREAS BECAUSE THEY MAY BE INFIRM, I THINK NOT!

FOREST SERVICE RESPONSE:

We recognize, and presume that Congress recognized, that some persons, due to age or physical limitations, would not be able to visit the interior of larger wildernesses. Horses provide a means of experiencing the wilderness for some of those who are unable to walk long distances.

COMMENT NO. 37: WILDERNESS AREAS ARE A MISTAKE AS CURRENTLY LEGISLATED. RIGHT NOW WITH INSECT INFECTION OR TREE DISEASE, DISASTER IS JUST A PENDING EVENT.

FOREST SERVICE RESPONSE.

There are few documented instances of tree insect or disease epidemics starting in wilderness and spreading outward

COMMENT NO. 38: PLEASE REVIEW STATISTICS REGARDING THE MAN-DAYS USAGE IN DEVELOPED SITES AND WILDERNESS AND COMPARE THEM WITH THE AMOUNT OF ACRES DESIGNATED TO EACH.

FOREST SERVICE RESPONSE.

We have.

Wilderness is intended to provide opportunities for solitude and unconfined recreation in a natural setting. If the intensity of use allowed in a developed recreation area were to occur in wilderness, it would cease to be wilderness.

COMMENT NO. 39: CONSTRUCTION VARIANCES SHOULD BE ALLOWED FROM WILDERNESS STATUS FOR THE ENHANCEMENT OF SPRINGS, SMALL CATCHMENT BASINS, AND SWAMPS, TO SUPPLY LARGER ANIMALS AND BIRDS A MORE RELIABLE YEAR-AROUND WATER SUPPLY.

FOREST SERVICE RESPONSE:

Interference with natural processes, such as those suggested, are contrary to the intent of the Wilderness Act.

COMMENT NO. 40 IT SEEMS TO ME THAT THERE ARE CURRENTLY ENOUGH LANDS SET ASIDE FOR WILDERNESS AND THAT SOUND MULTIPLE USE OF THE BALANCE OF THE LAND WOULD BE A GOOD DECISION

FOREST SERVICE RESPONSE.

None of the Plan alternatives propose significant additional wilderness

COMMENT NO. 41: THE USABLE TIMBER SHOULD BE SALVAGED AND USED, THEN PUT INTO A WILDERNESS OR WHATEVER

FOREST SERVICE RESPONSE:

Extensive logging makes an area unsuitable for wilderness designation

COMMENT NO. 42 AS A LONG TIME RESIDENT OF WALLOWA COUNTY I HAVE OBSERVED THAT USE OF THE RESOURCES BY ALL IS PREFERABLE TO ADDITIONAL LOCK-UP IN WILDERNESS WE HAVE A LARGE AREA ALREADY IN WILDERNESS THE PEOPLE WHO USE THESE AREAS BRING THEIR OWN SUPPLIES, SPEND THEIR TIME IN THE REMOTE AREAS, AND LEAVE WILDERNESS DOES LITTLE FOR THE LOCAL ECONOMY.

FOREST SERVICE RESPONSE:

About half of the use of the Eagle Cap Wilderness is by people from local communities

COMMENT NO. 43 I THINK IT IS GENERALLY RECOGNIZED THAT THE UNITED STATES POPULATION IS GETTING OLDER AND IF YOUR PROJECTIONS OF FUTURE RECREATION GROWTH ARE CORRECT, I THINK YOU CAN SAFELY ASSUME THAT THESE INCREASES WILL OCCUR IN THE OLDER MEMBERS OF OUR SOCIETY. THIS SEGMENT WILL RELY MORE HEAVILY ON A ROADED FOREST AND MORE DEVELOPED-TYPE RECREATION FACILITIES. WILDERNESS OR PRIMITIVE RECREATION CATER TO THE YOUNG AND HEALTHY AND RETURNS MINIMAL ECONOMIC WELL BEING TO LOCAL COMMUNITIES.

FOREST SERVICE RESPONSE:

Projections show that even with the trends you describe, wilderness use will be near capacity while roaded recreation use will be well below capacity.

COMMENT NO. 44 REMEMBER, THERE IS NO MULTIPLE USE IN A WILDERNESS AREA.

FOREST SERVICE RESPONSE.

Wilderness, which may provide water, recreation, wildlife, and grazing is considered by the Forest Service to be within the framework of multiple use

COMMENT NO. 45 PRESENTLY THERE IS ROOM FOR ALL FOREST USERS ON THE WALLOWA-WHITMAN NATIONAL FOREST WITH THE NUMBER OF WILDERNESS ACRES FOR THOSE SEEKING THE SOLITUDE THAT THESE AREAS OFFER. YET IT IS ABUNDANTLY CLEAR THAT THOSE ACRES ARE NOT ENOUGH, AS EXEMPLIFIED BY THE PLANNED ELKHORN RAMBLE BEING PREPARED BY THE WILDERNESS ADVOCATES.

RATHER THAN A TREK THROUGH WILDERNESS TO PUBLICIZE THEIR EFFORTS AND ACHIEVEMENTS, THEY HAVE TARGETED THE ELKHORN MOUNTAINS AND CERTAINLY WILL USE THIS TREK EFFORT AS A "SHOW-ME" TYPE OF TRIP.

FOREST SERVICE RESPONSE:

We discourage large-group events in classified wilderness. (Part of the Elkhorns are in wilderness)

COMMENT NO. 46. ASIDE FROM THE LAKE BASIN, THE REST OF THE WILDERNESS IS HARDLY USED. A PERSON CAN SPEND SEVERAL DAYS ON THE IMNAHA OR MINAM RIVER AND NEVER SEE ANOTHER HUMAN. WHY SET ASIDE MORE LAND TO NOT GET USED?

FOREST SERVICE RESPONSE:

Being able to "spend several days and never see another human" is an experience that wilderness is supposed to provide (the Wilderness Act calls for "outstanding opportunities for solitude").

COMMENT NO. 47 I HAVE BEEN IN TOURIST ACCOMMODATIONS/SPORTING GOODS RETAIL BUSINESS AT WALLOWA LAKE FOR THE PAST 18 YEARS AND I CAN PROVE TO YOU FIRST-HAND THAT THE ADDITIONS IN WILDERNESS HAVE ACTUALLY HINDERED MY BUSINESS

THE MULTIPLE USE CONCEPT WITH SHELTERS FOR YEAR AROUND USE WITHIN THE ACTUAL WILDERNESS AREAS WOULD BENEFIT YOUNG AND OLD ALIKE. SUCH A CONCEPT, IF IT HAD BEEN UTILIZED ON MT HOOD, WOULD HAVE RECENTLY SAVED THE LIVES OF SEVERAL CHILDREN

FOREST SERVICE RESPONSE.

Shelters are contrary to the concept of wilderness. The Mt. Hood incident did not occur in wilderness

COMMENT NO. 48: I'M DISABLED AND I THINK IT IS UNFAIR TO NOT LET PEOPLE LIKE US SEE THE WILDERNESS. THERE COULD BE REGULATED ROADS PUT IN THE WILDERNESS AND THIS WOULD ALSO GIVE ACCESS TO FIRE OR EMERGENCY TIMBER HARVEST, LIKE FIRE DAMAGE OR BLOW DOWN. IT WOULD LET PEOPLE LIKE US GET ON SOME OF THESE ROADS AND SEE THE WILDERNESS, AND THE TIMBER IN THE WILDERNESS WOULDN'T GO TO WASTE

FOREST SERVICE RESPONSE:

As defined in the Wilderness Act, wilderness is a place without permanent improvements and where the imprint of man's work is substantially unnoticeable. If roads were constructed, the roaded portion would, in effect, no longer be wilderness

COMMENT NO. 49. WHY DO NONE OF THE ALTERNATIVES INCLUDE RECOMMENDATIONS FOR WILDERNESS OR ROADLESS AREAS THAT MEET WILDERNESS DEFINITIONS UNDER THE 1964 WILDERNESS ACT? THE PASSAGE OF THE 1984 OREGON WILDERNESS ACT DOES NOT PRECLUDE FURTHER WILDERNESS DESIGNATION IN OREGON. THE FOREST SERVICE HAS A RESPONSIBILITY TO DESIGNATE OR RECOMMEND LANDS FOR THE BEST USE, INCLUDING WILDERNESS.

FOREST SERVICE RESPONSE

You are correct that we are not precluded from considering more lands for wilderness, whether or not they were considered in the Oregon Wilderness Act of 1984. The Act states that for those lands considered by Congress, their review will "be an adequate consideration of the suitability of such lands for inclusion in the National Wilderness Preservation System and the Department of Agriculture shall not be required to review the wilderness options prior to the revision of plans . . ."

The Regional Forester has elected to review only those roadless areas which were not considered by Congress. On the Wallowa-Whitman, only the recently inventoried Dunns Bluff Roadless Area and the Homestead Further Planning Area are to be considered. The Bureau of Land Management, U. S. Department of Interior, is taking the lead in studying the Homestead area

COMMENT NO. 50: A VARIETY OF ARGUMENTS CAN BE OFFERED IN SUPPORT OF WILDERNESS, BUT THE MOST COMPELLING ARGUMENT REMAINS THAT THE LONG-TERM ECONOMIC

STABILITY OF OREGON IS IN WILDERNESS, IN THE TOURISM WILDERNESS PROMOTES AND SUSTAINS. LOGGING HAS HISTORICALLY CREATED ONLY SHORT-TERM ECONOMIC BENEFIT

FOREST SERVICE RESPONSE:

While the economic importance of wilderness will continue to grow, the timber related industries, we believe, will have greater economic influence for many years to come

COMMENT NO. 51: I THINK THE AMOUNT OF WILDERNESS IN HELLS CANYON SHOULD REMAIN THE SAME.

FOREST SERVICE RESPONSE.

Many respondents share your opinion.

COMMENT NO. 52: I THINK THE AMOUNT OF WILDERNESS IN HELLS CANYON SHOULD BE INCREASED.

FOREST SERVICE RESPONSE:

Many respondents agree.

COMMENT NO. 53. THE NEW MONUMENT WILDERNESS DOES NOT HAVE THE FINANCIAL BACKING TO PRESERVE ITS LIMITED WILDERNESS CHARACTER, SO WHY BOTHER? I DO NOT SEE VISITORS FLOCKING TO THE AREA, THERE IS NOT ENOUGH LAW ENFORCEMENT FUNDING TO KEEP THE LOCAL OFF-ROADERS OUT OF THE AREA, AND CONTINUED HEAVY GRAZING IS STILL RUINING THE SPRINGS AND RIPARIAN ZONES TO THE POINT THAT RECREATION IS A MISERABLE EXPERIENCE.

FOREST SERVICE RESPONSE.

Now that the area has been designated as part of the National Wilderness Preservation System, we must manage it as such whether or not the area attracts many visitors We expect conditions to improve during the next few years

COMMENT NO. 54: I THINK THAT THE ENVIRONMENTALISTS ARE RIGHT ABOUT NEEDING MORE WILD AREAS NEAR THE EAGLE CAP AREA BECAUSE A LOT OF THE TIME IN THE SUMMER AND HUNTING SEASON THERE ARE TOO MANY PEOPLE.

FOREST SERVICE RESPONSE:

Some areas are heavily used, but there are still many opportunities for solitude at all times of the year

COMMENT NO. 55. 3. EAGLE CAP WILDERNESS ADDITIONS - THE FINAL BOUNDARIES OF THE OREGON WILDERNESS BILL UNFORTUNATELY FAILED TO PROTECT SOME SPECTACULAR AREAS FROM TIMBER HARVESTING AND ROAD BUILDING. CATHERINE CREEK AND BEAR CREEK ARE NOT ONLY MAGNIFICENT IN APPEARANCE, THEY HARBOR IMPORTANT LOWER ELEVATION OLD GROWTH THAT ALSO PROTECTS SALMON AND STEELHEAD SPAWNING

AREAS. IT IS CRITICAL TO THE FUTURE OF WILD FISH IN THE GRANDE RONDE SYSTEM TO MAINTAIN AN INTACT (UNROADED AND NOT LOGGED) CATHERINE AND BEAR CREEK. I FEEL THESE TWO AREAS WERE A DEFINITE OVERSIGHT IN THE 1984 WILDERNESS BILL AND SHOULD NOW BE RECOMMENDED FOR WILDERNESS PROTECTION.

FOREST SERVICE RESPONSE:

Those portions of the Catherine Creek and Huckleberry (Bear Creek) Roadless Areas which Congress judged to have wilderness character were included in the Wilderness Act. We believe the fish habitat can be protected without a wilderness designation.

COMMENT NO. 56: I HOPE THE FOREST SERVICE CONTINUES THAT CONCERN FOR PROTECTING AND MAINTAINING OREGON'S WILDERNESS HERITAGE BY EXPANDING LANDS NOW PROTECTED IN THE EAGLE CAP AND SNAKE RIVER WILDERNESS AREAS

FOREST SERVICE RESPONSE:

Each time the Forest Plan is revised, the wilderness issue will be examined and the expansion of these two wildernesses will be considered.

COMMENT NO. 57: AS TIME GOES ON AND MORE PEOPLE ARE AROUND WITH TIME TO ENJOY HIKING AND HORSE PACKING, I CAN FORESEE MORE AND MORE USE OF OUR EXISTING WILDERNESS AREAS

CURRENTLY WE HAVE THE 220,000 ACRE EAGLE CAP WILDERNESS I WOULD LIKE TO SEE THE CONTIGUOUS BEAR CREEK, LAKE FORKS, SOUTH EAGLE CAP, CATHERINE CREEK, AND CASTLE RIDGE PRIMITIVE AREAS ADDED TO THE EXISTING WILDERNESS AREA I REALIZE THESE LOWER ELEVATIONS HOLD MUCH COMMERCIAL TIMBER. MY MAJOR CONTENTIONS FOR THIS ARE

1. ONCE THESE EXISTING PRIMITIVE AREAS ARE ROADED AND LOGGED, THEY ARE BASICALLY LOST AS WILDERNESS USE FOR HIKING, PACKING. A DECISION TO ROAD AND LOG IS FINAL
2. THE LOWER ELEVATIONS PROVIDE A FLAVOR AND THE SWEAT TO GET TO THE BARREN HIGH COUNTRY. I ENJOY WALKING THRU AN OLD-GROWTH FOREST AND SEEING THE SEVERAL LAYERS OF CANOPY TEEMING WITH LIFE. THESE LOWER ELEVATIONS PROVIDE EARLY AND LATE SEASON OUTINGS FOR MAN. THEY ALSO SUPPLY THE DEER AND ELK WITH WINTER AND EARLY SPRING HABITAT TO LIVE.

THE ABOVE TWO CONTENTIONS ARE ALSO APPLICABLE TO THE ELKHORN MOUNTAINS

FOREST SERVICE RESPONSE:

The Eagle Cap Wilderness now includes 346,000 acres With the Wilderness Acts of 1979 and 1984, many lower elevation areas were added. Congress attempted to avoid including areas of high timber producing potential and this resulted in some of the areas you suggest not being included But many lower elevation areas which are heavily timbered will remain, both within and outside wilderness.

COMMENT NO. 58 THE EAGLE CAP RANGER DISTRICT SHOULD BE STUDIED FOR POSSIBLE CLOSURE AND THE THREE RANGER DISTRICTS SHOULD HAVE THEIR RESPECTIVE PORTION OF THE EAGLE CAP WILDERNESS TO MANAGE AND PROVIDE LOCALIZED PUBLIC SERVICE HAVING ONE DISTRICT IN CHARGE HAS BEEN A DISASTER JUST LIKE THE FOREST SERVICE KNEW IT WOULD BE. THE OLD YEARS WHEN FIVE OR SIX DISTRICTS HAD SOME WILDERNESS WAS MUCH MORE SATISFACTORY, THE PUBLIC IS NOT RECEIVING THE SERVICE THEY DESERVE UNDER THE PRESENT WILDERNESS MANAGEMENT

FOREST SERVICE RESPONSE:

We have continuously monitored the performance of the Eagle Cap District. We feel that the wilderness is being managed in a more professional and consistent manner now than in the days when its management was by people whose main job was management of non-wilderness lands. This is in spite of significant budget reductions in recent years.

COMMENT NO. 59. THE WILDERNESS WE HAVE NOW IS NOT BEING USED. THE LAKE BASIN AREA OF THE FOREST MAY BE THE ONLY OVER-USED PORTION OF WILDERNESS.

FOREST SERVICE RESPONSE.

Data shows that, overall, wilderness use on the Forest is about 50% of capacity. However, it is projected to reach capacity in the future.

COMMENT NO. 60. WE ENDED UP IN THE W-W N.F., SPECIFICALLY THE EAGLE CAP WILDERNESS. I HAD NEVER SEEN ANYTHING LIKE THIS IN CONNECTICUT!!! PLEASE KEEP IT THE WAY IT WAS -- AS WILD AS POSSIBLE.

FOREST SERVICE RESPONSE:

We intend to.

COMMENT NO. 61. I AM AMAZED AT THE OVERCROWDING OF THE LAKES BASIN WHENEVER I GO BACKPACKING IN THE EAGLE CAP WILDERNESS. THIS OVER-USE CREATES DEGRADATION, AND NEEDS TO BE ADDRESSED BY PROVIDING A WIDE DIVERSITY OF AREAS FOR HIKING, HUNTING, AND BACKPACKING OPPORTUNITIES

FOREST SERVICE RESPONSE:

We recognize Lakes Basin as having above desirable use levels. The Wilderness Management Plan directs actions to reduce and distribute use and user impacts.

COMMENT NO. 62: WE OBJECT STRONGLY TO PREDATOR CONTROL FOR DOMESTIC LIVESTOCK PURPOSES IN ANY WILDERNESS AREA. WE RECOMMEND REMOVING DOMESTIC LIVESTOCK FROM WILDERNESS. THE EAGLE CAP IS A FRAGILE ENVIRONMENT AND ONLY NOW IS RECOVERING FROM PAST GRAZING ABUSE. RESTORATION EFFORTS ARE COMMENDED AS ARE THE FIRE MANAGEMENT PLANS.

FOREST SERVICE RESPONSE

Continuation of established grazing is specifically provided for in the Wilderness Act. Predator control is allowed in wilderness under very specific and limited conditions

COMMENT NO. 63: THREE YEARS AGO MY WIFE AND I ENJOYED A THREE DAY BACKPACK IN THE EAGLE CAP WILDERNESS WHILE THE SCENERY WAS AWESOME, THE NUMBER OF HORSES WAS VERY DISTRACTING AND DAMAGING TO THE LAND

FOREST SERVICE RESPONSE:

Horse use is limited in some areas (adjacent to lakes) and monitored in other places. However, we feel that in most places, horse use is compatible with wilderness values

COMMENT NO. 64: 1. MONUMENT ROCK WILDERNESS ADDITION -- I APPRECIATE THE RECOGNITION OF PART OF BULL RUN CANYON AS A BACKCOUNTRY AREA (MANAGEMENT AREA 6 WITH A CHANGE OF NO TIMBER HARVESTING). HOWEVER, THE ENTIRE ROADLESS PORTION SHOULD BE INCLUDED IN THIS CATEGORY THAT INCLUDES PAYTON GULCH, THE FACE OF BULL RUN MOUNTAIN AND SKULL CREEK DESIGNATION OF THE WHOLE ROADLESS AREA AS BACKCOUNTRY IS IN KEEPING WITH THE INTENT OF THE OREGON WILDERNESS BILL OF 1984. THE BILL'S LANGUAGE SPECIFICALLY INDICATED THAT WILDERNESS VALUES EXIST IN THE BULL RUN CANYON. THE EXCLUSION FOR MINING INTERESTS DOES NOT PRECLUDE THE FOREST SERVICE DESIGNATING THE ENTIRE AREA AS BACKCOUNTRY.

THE TRAIL THROUGH THE LOWER ROADLESS PORTION, NOW EXCLUDED FROM THE PROPOSED BACKCOUNTRY, IS ONE OF THE MOST BEAUTIFUL TRAIL SECTIONS OF THE ENTIRE MONUMENT ROCK WILDERNESS AND ADJACENT ROADLESS AREAS. IT WOULD BE SAD TO LOSE THIS EXCELLENT CHANCE TO INCLUDE BULL RUN AS BACKCOUNTRY. AT SOME POINT, THIS AREA COULD EASILY BE ADDED TO MONUMENT ROCK WILDERNESS, BUT ONLY IF THE WILDERNESS CHARACTER IS MAINTAINED.

FOREST SERVICE RESPONSE:

Your suggestion was carefully considered and the entire area was placed in Area 6 in Alternative E. In our judgement, the portion placed in Management Area 6 in the preferred alternative has the best "backcountry" characteristics with relatively few other resource tradeoffs

COMMENT NO. 65: ROADLESS AREAS. IN THREE DIFFERENT PLACES IN THE DOCUMENTS (PP. S-32, IV-5, III-68), IT IS STATED THAT ONLY ONE AREA (DUNN'S BLUFF) IS ELIGIBLE FOR WILDERNESS. THIS STATEMENT IS NOT ONLY UNTRUE (ALL ROADLESS AREAS ARE ELIGIBLE), BUT IT SEEMS A GOOD INDICATOR OF THE BIAS AGAINST THE VALUES OF ROADLESS AREAS AND WILDERNESS. THE DISCUSSION (APPENDIX B) OF ENVIRONMENTAL CONSEQUENCES OF DEVELOPING ROADLESS AREAS IS QUITE INADEQUATE. THERE IS NO AREA-SPECIFIC ANALYSIS, ONLY VAGUE GENERALITIES

WE FEEL THAT AN ADEQUATE ANALYSIS WOULD SHOW THAT THE ECOLOGICAL AND RECREATIONAL VALUES OF THE FOLLOWING AREAS REQUIRES THEIR MAINTENANCE IN A ROADLESS OR WILDERNESS CONDITION: ELKHORN RANGE, BEAR CREEK AND CATHERINE CREEK, LAKE FORK, UPPER GRANDE RONDE, GRANDE RONDE CANYON, SOUTH EAGLE CAP ADDITIONS, TOPE CREEK, MONUMENT ROCK ADDITIONS, CASTLE RIDGE, AND BEAVER CREEK

FOREST SERVICE RESPONSE:

The Oregon Wilderness Act makes it clear that we are not required to review the wilderness option for lands considered in the Act, prior to revision of Forest Plans. (See Chapter III of the FEIS.) Since we have chosen not to review them, Dunns Bluff is the only area available for consideration prior to plan revision. All of the areas you have mentioned have been considered for roadless recreation and several have been so recommended in the preferred alternative.

COMMENT NO. 66: WE CAN'T AFFORD TO HAVE SO MUCH OF THE FOREST LOCKED UP FOR WILDERNESS, JUST SO A FEW PEOPLE WHO MAKE A LOT OF NOISE CAN HIKE AND BACKPACK.

FOREST SERVICE RESPONSE:

Wilderness has been established by Congress. We are not recommending in this plan that more be established.

**ROADLESS AREAS
Code 200**

COMMENT NO. 1. NOTE IN THE DEIS SUMMARY ON PAGE S-12, THAT MANAGEMENT AREA 6 APPEARS HIGHLY SUSPECT. THIS AREA WILL OBVIOUSLY MAINTAIN SEMIPRIMITIVE AREAS IN MUCH OF THE FOREST, EXCLUDING TIMBER MANAGEMENT ON THOSE AREAS THAT ARE PRESENTLY MOSTLY UNDEVELOPED BUT OUTSIDE ESTABLISHED WILDERNESS ZONES IN EFFECT, YOU APPEAR TO BE CREATING ADMINISTRATIVE, RATHER THAN LEGISLATED, WILDERNESS TERRITORY. I ALSO SUSPECT THAT YOU ARE ATTEMPTING TO CREATE BUFFER ZONES AROUND EXISTING WILDERNESS I HAPPEN TO KNOW THAT SUCH BUFFER ZONES WERE SPECIFICALLY FORBIDDEN BY CONGRESS IN THE 1984 OREGON WILDERNESS ACT. THROUGH BIASED TACTICS SUCH AS THIS, YOU HAVE MANAGED TO EXCLUDE NEARLY ALL OF THE FOREST FROM MANAGEMENT FOR FULL TIMBER YIELD. I WOULD ASK THAT YOU RELEASE MORE NON-WILDERNESS ACRES FOR TIMBER MANAGEMENT AND, IN DOING SO, MAINTAIN HISTORICAL HARVEST LEVELS.

FOREST SERVICE RESPONSE:

We believe the designation of areas for roadless recreation provides for a legitimate recreation need. In such areas, users can find a backcountry experience without the restrictions of wilderness. They can, for example, use chainsaws for woodcutting and in many instances can use off-road vehicles such as trail bikes or other motor vehicles where primitive roads ("jeep trails") exist. Our analysis shows that this semiprimitive recreation opportunity is decreasing while other forms are increasing. We, therefore, believe it rational to display a range of alternatives for this sort of use. Placing the Area 6 lands in timber management areas would in theory result in increasing the preferred alternative harvest level by 5 MMBF per year if all of them were intensively managed for timber production (Area 1). Because of the elevational zones where much of the Area 6 lies and the tree species involved, it seems unlikely that this amount could be harvested without there first being a marked change in the economic climate. Also to be considered is that more than 70 percent of the Area 6 lands are nontimbered or do not contain lands suitable for timber production.

COMMENT NO. 2: I OPPOSE ANY PLAN THAT TARGETS THE REMAINING ROADLESS AREAS, EVEN WATERSHEDS, FOR HEAVY LOGGING. I FEEL THIS WILL RESULT IN LOSS OF DEER AND ELK HABITAT AND SUBSEQUENT DECLINE OF THEIR POPULATIONS, DECLINE IN WATER QUALITY AND NATIVE FISH POPULATION, DESTRUCTION OF MANY EXISTING TRAIL HEADS AND TRAILS, AND OF REDUCTION IN OLD GROWTH TO ONLY 4 PERCENT OF THE FOREST.

FOREST SERVICE RESPONSE:

Your view represents the opinion of many who participated in the planning process and responded to the Draft EIS. The amount of roadless area, and which roadless areas should remain roadless was a major issue used to evaluate Forest Plan alternatives.

COMMENT NO. 3: CERTAIN AREAS DESERVE SPECIFIC MENTION. THE LAKE FORK ROADLESS AREA IS ALSO A WATERSHED, AS IS THE BEAVER CREEK AREA. LOGGING IN THESE AREAS WOULD DEGRADE THE WATER SUPPLY THROUGH INCREASED EROSION AND RUNOFF.

FOREST SERVICE RESPONSE:

We are confident that some timber harvest can be carried out in these areas without significantly affecting the watershed values.

COMMENT NO. 4: JOSEPH CANYON IS ANOTHER AREA SIMILAR TO LAKE FORK THAT DESERVES SPECIAL CONSIDERATION BEFORE INTENSIVE MANAGEMENT OCCURS

FOREST SERVICE RESPONSE:

We agree. The steep sideslopes within the drainage are particularly sensitive due to their scenic values and fragile soils

COMMENT NO. 5. KEEP IN MIND THAT THE PRIMITIVE QUALITIES OF THE FOREST ARE VERY IMPORTANT. THE PRESSURE TO LOG AND OPEN ROADLESS AREAS SHOULD BE RESTRICTED FOR MANY REASONS

FOREST SERVICE RESPONSE

The primitive recreational qualities of the roadless areas are certainly important considerations

COMMENT NO. 6 WE HAVE THE OPPORTUNITY TO KEEP EVERY SQUARE MILE WE CAN ROADLESS AND UN CUT IN ORDER TO RETAIN THE MANY VALUES INHERENT ONLY IN AN ECOSYSTEM ALLOWED TO PROGRESS NATURALLY THROUGH TIME NATURAL ECOSYSTEMS DID VERY WELL WITHOUT OUR MANAGEMENT FOR MILLIONS OF YEARS! IF "MANAGEMENT" REFERS TO THE RELENTLESS INSULT OF CLEARCUTTING, THEN I CHALLENGE THE FOREST SERVICE TO DEVELOP TRULY LONG-RANGE PERSPECTIVES NOW, BEFORE IT HAS TAKEN AWAY THE NATURAL INTEGRITY OF ONE OF THE LAST GREAT FOREST ECOSYSTEMS ON EARTH. I CHALLENGE THE PRESENT FOREST SERVICE TO REGAIN THE RESPECT OF THE AMERICAN PEOPLE BY SHOWING US THAT YOUR GREATEST CONCERN IS FOR THE BIOLOGICAL INTEGRITY OF THESE NATURAL SYSTEMS I WANT THESE GREAT FORESTS TO BE A PROUD PART OF OREGON'S FUTURE, NOT IN A HUNDRED YEARS, BUT IN A THOUSAND

FOREST SERVICE RESPONSE

Maintaining the biological integrity as you describe would apparently require allowing fire to play a natural role and would not permit utilization of the wood resource, as within wilderness The wilderness question was addressed in 1984 by Congress and remaining roadless areas will be reconsidered for wilderness in future Forest Plans.

COMMENT NO. 7. I AM AT A LOSS AS TO WHY WE NEED MORE STREAM AND RIVER SET ASIDES, BACKCOUNTRY AREAS, AND ADDITIONS IN THE WILDERNESS ARE YOU PEOPLE NOT DOING A GOOD JOB IN TAKING CARE OF THESE AREAS? IT APPEARS TO ME THAT YOU AND I DON'T THINK WE NEED ANY MORE IF WE KEEP LOCKING IT UP, THE CANCER WILL ONLY GROW

FOREST SERVICE RESPONSE:

Yours is a view shared by many with strongly held antiwilderness feelings. In the preferred alternative, the Forest Service is proposing no additional wilderness and a reduction in "back-country."

COMMENT NO. 8 ALL OF THE "LEGALLY VIABLE" ALTERNATIVES SUBSTANTIALLY REDUCE (BY AT LEAST 57 PERCENT) ROADLESS ACREAGE OUTSIDE THE HELLS CANYON RECREATION AREA AND DESIGNATED WILDERNESS AREAS. THE "ISSUES, CONCERNS, AND OPPORTUNITIES" AS ASSOCIATED WITH ROADLESS AREAS WARRANT AN ANALYSIS OF AT LEAST ONE OR TWO "LEGALLY VIABLE" ALTERNATIVES THAT RETAIN MORE AREAS IN A ROADLESS CONDITION

FOREST SERVICE RESPONSE:

Alternatives E and F retain respectively, 100 percent and 61 percent of the roadless area acreage outside the NRA

COMMENT NO. 9 2. THE ELKHORN RANGE IS ONE OF THE MOST CLASSIC WILDERNESS APPEARING AREAS IN OREGON. TO PROTECT THIS POPULAR AREA, A NO-CUT BACKCOUNTRY BOUNDARY MUST TAKE IN ALL THE ROADLESS PORTION. THE PROPOSED ALLOCATION IN THE PREFERRED ALTERNATIVE LOOPS OUT MOST OF THE TIMBER THAT MAY HAVE ANY COMMERCIAL VALUE. THIS BOUNDARY WOULD ALLOW FOR TIMBER CUTTING THAT WOULD DESTROY THE INTEGRITY OF THE ELKHORNS AS A RECREATION AREA AND SERIOUSLY IMPACT WATERSHEDS AND WILDLIFE HABITAT.

I HAVE OFTEN HIKED IN THE ELKHORNS AND ONE OF ITS MAIN ATTRACTIONS IS HIKING THROUGH A TRANSITION OF ECOLOGICAL ZONES, FROM DENSE FORESTS OF BIG TREES ALL THE WAY UP TO THE ALPINE MEADOWS. THE TRAIL TO TWIN LAKES IS AN EXCELLENT EXAMPLE. THE FORESTED AREAS OF THE ELKHORNS MUST BE PROTECTED AS WILDERNESS.

FOREST SERVICE RESPONSE:

Much of the forested area will be retained in a roadless status in the preferred alternative. Prominent examples are the North Powder and Dutch Flat Creek drainages.

COMMENT NO. 10 4. UPPER GRANDE RONDE -- WHY WAS THE UPPER GRANDE RONDE RIVER ROADLESS AREA NOT EVEN IDENTIFIED IN THE DRAFT PLAN? THIS AREA WAS INCLUDED IN THE HOUSE VERSION OF THE OREGON WILDERNESS BILL AND IN THE FINAL BILL AS PART OF THE 100,000 ACRES DESIGNATED FOR SPECIAL FISHERIES EMPHASIS. YET IT WOULD APPEAR UNDER ALL ALTERNATIVES THAT THE FATE OF THIS AREA IS TO BE LOGGED. THE UPPER GRANDE RONDE IS DOTTED WITH MEADOWS THAT ARE IDEAL FOR ELK, AND A BLANKET OF TREES OF SMALL COMMERCIAL VALUE, BUT TREMENDOUS IMPORTANCE TO THE GRANDE RONDE FISHERY AND AS THERMAL AND HIDING COVER FOR BIG GAME. WATER QUALITY IS ONE OF THE UPPER GRANDE RONDE'S CHIEF RESOURCES AND SHOULD BE PROTECTED UNDER A NO-CUT, NO-ROAD MANAGEMENT AREA. A NO-CUT BACKCOUNTRY SEEMS APPROPRIATE, ESPECIALLY CONSIDERING THE UPPER GRANDE RONDE'S PROXIMITY TO THE POPULAR RECREATION AREA OF ANTHONY LAKES.

FOREST SERVICE RESPONSE:

We cannot agree that it is necessary to keep the Upper Grande Ronde area undeveloped in order to retain wildlife, fisheries, or watershed values. The reason the Upper Grande Ronde area was not identified as a roadless area in the DEIS which was distributed in March 1986, was because of plans to construct roads and harvest timber within the areas. The roads were to be completed prior to the Forest Plan and DEIS being issued for public review. Because of the unavailability of funds, the road construction did not materialize and the area remains roadless. It was included in the supplement to the DEIS which was distributed to the public for comment in 1988

COMMENT NO. 11: 7. OTHER ROADLESS AREAS - I HAVE FOLLOWED ELK ON MT EMILY, AS WELL AS SIMPLY TREASURED THE VIEW OF THE REMAINING VIRGIN COUNTRY OF MT EMILY FROM THE STREETS OF LA GRANDE. THIS AREA IS SMALL, BUT NEVERTHELESS CRITICAL FOR ELK, NON-GAME SPECIES, AND RECREATION AND SHOULD BE IN A NO-CUT BACKCOUNTRY ALLOCATION.

JOSEPH CANYON EMBODIES BEAUTIFUL STRINGERS OF TREES, A GOOD FISHERY, POPULAR RECREATION TRAILS, AND A WELL-KNOWN CULTURAL HERITAGE. THE NATURAL CHOICE FOR THIS AREA IS TO PRESERVE IT IN ITS PRESENT STATE FOR THE FUTURE -- NO-CUT BACKCOUNTRY .

FOREST SERVICE RESPONSE

The National Forest in the Mt. Emily area, as seen from La Grande, will be managed to retain the pleasing appearance of this important scenic backdrop. We believe the wildlife values can be retained while managing the area as shown in the preferred alternative.

A large portion of the Joseph Canyon area burned over in the 1986 fires; much of the timber was salvaged. The area remains roadless, however, and will remain essentially roadless throughout the life of the Forest Plan.

COMMENT NO. 12: MANAGEMENT AREA 6 MUST NOT ALLOW ANY TIMBER HARVESTING OR ROAD CONSTRUCTION IF IT IS A TRUE BACKCOUNTRY ALLOCATION

FOREST SERVICE RESPONSE:

There are many definitions of backcountry. Management Area 6 provides a reasonably undeveloped dispersed recreation opportunity while allowing road construction and timber harvest in the limited circumstances described.

COMMENT NO. 13 MY VISION OF THE FUTURE APPEARANCE OF THE WALLOWA-WHITMAN NATIONAL FOREST IS TO BE ABLE TO TRAVEL TO ANY PART OF THE FOREST AND SEE PLACES WHERE FOREST STANDS REMAIN IN AN "UNMANAGED CONDITION " I WANT TO BE ABLE TO LOOK DOWN FROM THE EAGLE CAPS ON THE PRISTINE CATHERINE CREEK AND BEAR CREEK, AND FROM THE ELKHORN PEAKS ACROSS THE ALPINE MEADOWS TO THE SURROUNDING VIRGIN FORESTS I WANT TO SEE HERDS OF ELK CROSSING A MEADOW ON A MISTY MORNING INTO A DEEP, DARK FOREST WHERE THERE ARE NO ROADS OR PEOPLE

FOREST SERVICE RESPONSE.

Although much of the Forest will retain a pristine, unmanaged appearance, timber harvest and roadbuilding activities will be visible from some points within the Eagle Cap Wilderness and from the Elkhorn peaks. The visions you describe will be possible from many places for the foreseeable future.

COMMENT NO. 14 THE ELKHORNS, AS PROPOSED BY THE ELKHORN STUDY COMMITTEE IN 1975 AND PREFERRED BY WELL OVER 1,000 SIGNATORS, SHOULD BE IMMEDIATELY CLASSIFIED AS A WILDERNESS STUDY AREA IN ACCORDANCE WITH THE 1975 BOUNDARIES.

FOREST SERVICE RESPONSE:

The Twin Mountain Roadless Area, which includes the Elkhorns, was considered by Congress in developing the 1984 Wilderness Act and a portion was placed in wilderness. The Forest Service has elected not to review such areas for wilderness in this planning effort, but intends to do so when the Plan is revised.

COMMENT NO. 15: OREGON TROUT RECOMMENDS A BACK COUNTRY, ROADLESS DESIGNATION FOR THE FOLLOWING ROADLESS AREAS: JOSEPH CREEK, UPPER GRANDE RONDE AND GRANDE RONDE CANYON, MT. EMILY, TOPE CREEK, HUCKLEBERRY MTN. AND WEST SLOPE ELKHORNS. THE MONUMENT ROCK, TWIN LAKES, AND LAKE FORK ROADLESS AREAS SHOULD ALSO RECEIVE A BACKCOUNTRY, ROADLESS DESIGNATION. OREGON TROUT BELIEVES THIS TYPE OF MANAGEMENT IS THE ONLY WAY TO INSURE HABITAT PROTECTION AND ENHANCEMENT. THE BENEFITS OF ROADLESS MANAGEMENT TO FISHERIES ARE CLEARLY SEEN IN THE MINAM RIVER AND WENAHA RIVER AREAS. THIS IS IN CONTRAST TO WHAT HAS HAPPENED TO THE UPPER GRANDE RONDE RIVER AREA WHERE SURFACE DISTURBING ACTIVITIES AND RIPARIAN DAMAGE HAVE REQUIRED EXTENSIVE AND EXPENSIVE REHABILITATION EFFORTS.

FOREST SERVICE RESPONSE

We respect your opinion that roadless designation is the only way to insure habitat protection. The disturbance in the Upper Grande Ronde was caused by placer mining many years ago at a time when the area was roadless.

COMMENT NO. 16: THESE TRACTS OF UNROADED FOREST, BEAVER CREEK, UPPER GRANDE RONDE, AND THE ELKHORN RANGE, ARE RICH IN NATURAL BEAUTY AND MINING HISTORY. THEY ARE ALSO OF A GRANITE BASE WHICH IS HIGHLY SUSCEPTIBLE TO EROSION FROM ROAD BUILDING. BESIDES LEAVING LONG-TERM SCARS ON THE LANDSCAPE, THE EROSION FROM ROADS AND TIMBER REMOVAL WOULD PROBABLY SILT UP ANADROMOUS STREAMS, CITY RESERVOIRS, AND FARMERS' IRRIGATION SYSTEMS.

FOREST SERVICE RESPONSE:

Road construction and other activities would have to be carried out in such manner as to avoid the problems you foresee. The standards and guidelines described in the Forest Plan are intended to prevent adverse impacts to water resources.

COMMENT NO. 17 THOSE LAST VESTIGES OF PRIMITIVE AMERICA SHOULD BE LEFT FOR PRESENT AND FUTURE AMERICANS AND FOREIGN VISITORS TO ENJOY BY HIKING OR HORSE PACKING

FOREST SERVICE RESPONSE.

An opinion with which many will agree Many such areas will remain with the preferred alternative

COMMENT NO. 18 5 IN ORDER TO PROTECT WILDLIFE HABITAT, ALL CURRENT ROADLESS AREAS SHOULD RECEIVE A "NO-CUT" BACKCOUNTRY ALLOCATION PROTECTED AREAS SHOULD INCLUDE: ELKHORN RANGE, BEAR CREEK AND CATHERINE CREEK WILDLANDS, LAKE FORKS WATERSHED, THE UPPER GRANDE RONDE RIVER, GRANDE RONDE RIVER CANYON, MT EMILY, JOSEPH CANYON, SOUTH EAGLE CAP WILDERNESS ADDITIONS, CRYSTAL CANYONS (TOPE CREEK), MONUMENT ROCK WILDERNESS ADDITION, CASTLE RIDGE, AND BEAVER CREEK

FOREST SERVICE RESPONSE

A large number of people suggested that these roadless areas be preserved in their entirety These sentiments were considered in determining the preferred alternative.

COMMENT NO. 19: WHEN IT IS FINALLY DECIDED WHICH RARE II LANDS WILL BE ENTERED, I WOULD LIKE TO SEE THEM ALL HANDLED LIKE FIVE POINTS CREEK IS HANDLED IN THE STANDARDS AND GUIDELINES.

FOREST SERVICE RESPONSE:

Closing all roads in each area, as with the Five Points Creek Drainage, would be a possibility. It would be administratively difficult, and would not be what we sense most of the public would want The prescribed maximum open road densities will keep the level of open roads quite low within these newly roaded areas, while providing access for mushroom and berry pickers and other dispersed recreation users

COMMENT NO. 20 IN PRINCIPLE, I FAVOR RETAINING THE FEW REMAINING ROADLESS AREAS LEFT AND FOREGOING THE PORTION OF THE TIMBER HARVEST THEY REPRESENT.

BUT I RECOGNIZE THE NEED FOR AN ORDERLY REDUCTION IN HARVEST LEVELS FOR THE ECONOMIC WELL BEING OF OUR LOCAL COMMUNITIES AND REQUEST THAT LAKE FORK AND MT EMILY & UPPER GRANDE RONDE ROADLESS AREAS BE MANAGED AS BACKCOUNTRY - PRIMITIVE RECREATION AREAS IN THEIR ENTIRETY. ALSO THE PORTIONS OF ROADLESS AREAS WHICH HAVE TRAILHEADS LEADING INTO THE EAGLE CAP AND ELKHORN AREAS ALSO SHOULD BE MANAGED FOR THE RECREATION RESOURCE THEY PROVIDE

FOREST SERVICE RESPONSE

Many others share your views Some of the trailheads are currently located in highly productive timberland with high standing volumes There becomes the decision of tradeoffs between retaining the aesthetic values of the present trailhead and foregoing the timber values, moving trailhead, or retaining the trailhead in an area where the effects of timber harvest are notice-

able All of these situations will occur with implementation of the Plan This is discussed in Chapter IV of the FEIS

COMMENT NO. 21: ROADLESS AREAS THE WILDERNESS SOCIETY BELIEVES SHOULD REMAIN UNDEVELOPED INCLUDE THE ELKHORN RANGE (CONTIGUOUS WITH THE NORTH FORK JOHN DAY WILDERNESS, PROVIDES DIVERSE RECREATIONAL OPPORTUNITIES); BEAR CREEK AND CATHERINE CREEK WILDLANDS AND OTHER AREAS CONTIGUOUS TO EAGLE CAP WILDERNESS (PRISTINE ANADROMOUS STREAMS AND LOW ELEVATION OLD-GROWTH TIMBER STANDS); LAKE FORK AREA (EXCEPTIONAL ELK HERDS AND LARGE OLD GROWTH TIMBER STANDS), UPPER GRANDE RONDE RIVER AREA (WATERSHED FOR THE GRANDE RONDE RIVER, KNOWN FOR QUALITY FISH HABITAT). OTHER ROADLESS AREAS WHICH ARE MORE VALUABLE UNDEVELOPED THAN DEVELOPED ARE: THE GRANDE RONDE RIVER CANYON, MT EMILY, JOSEPH CANYON, CRYSTAL CANYONS (TOPE AND MUD CREEKS), MONUMENT ROCK WILDERNESS ADDITIONS, CASTLE RIDGE AND BEAVER CREEK (LA GRANDE WATERSHED).

FOREST SERVICE RESPONSE

Your suggestions were carefully considered in arriving at a selected alternative All or portions of many of the areas you list will remain roadless as shown on the Alternative C map

COMMENT NO. 22. MANAGEMENT OF NON-WILDERNESS ROADLESS AREAS: MY INPUT AGAIN IS THAT ROADLESS AREAS SHOULD REMAIN UNDEVELOPED THERE ARE SO FEW LEFT AND AFTER ALL, IF THE USFS HAS DONE ITS JOB IT SHOULD BE ABLE TO OBTAIN TIMBER AND OTHER RESOURCES FROM THE ROADED AND CUT-OVER AREAS IN PERPETUITY. WHY CAN'T THIS BE DONE?

FOREST SERVICE RESPONSE.

This could be done, but at lower sustained yield levels The roadless areas have been a part of the timber base and have, therefore, contributed even though no harvest occurred on them

COMMENT NO. 23: THE FINAL PLAN'S APPROACH TO THE ROADLESS RECREATION ISSUE SHOULD RECOGNIZE TWO FACTS FIRST, THE DEIS NOTES THAT NONE OF THE ALTERNATIVES "CHANGE THE FOREST CHARACTER TO THE EXTENT THAT MARKED SHIFTS IN RECREATION ARE EXPECTED" (DEIS II-123). IN FACT, THE FOREST ANTICIPATES THAT SUCH EXTERNAL FACTORS AS THE GENERAL ECONOMIC CLIMATE AND DISTANCE FROM POPULATION CENTERS WILL HAVE "GREATER INFLUENCE THAN DO CHANGES IN THE CHARACTER OF THE FOREST THAT WILL RESULT FROM THE RANGE OF ALTERNATIVES" (DEIS IV-11). THE RATIONALE BEHIND THIS STATEMENT IS THE FACT THAT "MOST OF THE NON-WILDERNESS AREAS OF THE FOREST ARE ALREADY ROADED" (DEIS IV-11) SOME DISPERSED RECREATION USE IS EXPECTED TO SHIFT BETWEEN ROS CLASSES AS A RESULT OF ADDITIONAL ROADING AND TIMBER HARVEST ON THE FOREST, FROM SEMIPRIMITIVE MOTORIZED TO ROADED NATURAL, FOR INSTANCE (DEIS II-123) NEVERTHELESS, THESE CHANGES ARE NOT EXPECTED TO CHANGE TOTAL RECREATION USE (IBID). THE DEIS CONCLUDES THAT, OVERALL, THESE CHANGES WILL OCCUR GRADUALLY "OVER A SPAN OF DECADES" EVEN AS RECREATIONISTS' PERCEPTION OF THE FOREST'S RECREATION OPPORTUNITIES SLOWLY CHANGES IN RESPONSE TO THE CHANGING FEATURES OF THE LAND (IBID). IN OTHER WORDS, THE DEIS ANTICIPATES THAT EXISTING WILDERNESS AND ROADED NATURAL LANDS WILL SATISFY THE NEEDS OF THOSE PEOPLE WHO CURRENTLY RECREATE IN THE ROADLESS, NON-WILDERNESS LANDS ON THE FOREST, REGARDLESS WHICH ALTERNATIVE IS SELECTED.

FOREST SERVICE RESPONSE

The user shift from semiprimitive motorized to roaded involves motorized users whose main interest is in a riding opportunity. Some of those whose primary interest is in an unroaded recreation experience may shift to the remaining unroaded areas and wilderness. A surplus of roaded recreation opportunity will not substitute for a shortage of unroaded opportunity. In the FEIS, recreation numbers displayed are based on the assumption that little shift in recreational use across the ROS classes will occur

COMMENT NO. 24: THE SECOND PERTINENT CONSIDERATION IS THE FACT THAT, "BECAUSE OF THE EXTENSIVE AREAS WHICH CONTAIN NO OR LOW TIMBER VALUES, SIZEABLE PORTIONS OF THE ROADLESS AREAS WILL REMAIN UNDEVELOPED IN THE PREFERRED ALTERNATIVE AND SEVERAL OTHERS" (DEIS IV-22). THE PREFERRED ALTERNATIVE IS PROJECTED TO HAVE 358,700 ACRES OF UNDEVELOPED, NONWILDERNESS LANDS BY THE YEAR 2000 (DEIS-IV-22) BY COMPARISON, THE "HIGH-TIMBER" ALTERNATIVE B IS PROJECTED TO HAVE 331,700 ACRES, ONLY 8 PERCENT LESS (IBID)

THESE FACTS SUGGEST THAT THERE IS LITTLE RATIONAL JUSTIFICATION FOR TAKING PRODUCTIVE TIMBERLANDS OUT OF THE SUITABLE LAND BASE PRIMARILY TO MEET DISPERSED ROADLESS RECREATION OBJECTIVES, ESPECIALLY GIVEN THE PREFERRED ALTERNATIVE'S POTENTIALLY SEVERE ADVERSE IMPACT ON LOCAL COMMUNITIES. NORTHWEST PINE ASSOCIATION DOES NOT OPPOSE RECREATION ON THE NATIONAL FOREST OR MEASURES TO STRENGTHEN THE AREA'S RECREATION-BASED ECONOMY. WE RECOGNIZE THAT RECREATION IS AN IMPORTANT COMPONENT OF THE TRI-COUNTIES' ECONOMIC BASE, ALONG WITH AGRICULTURE AND TIMBER. HOWEVER, WE SERIOUSLY QUESTION THE WISDOM OF ANY ECONOMIC DEVELOPMENT PLAN BASED ON SUBSTITUTING LOW-PAYING SEASONAL RECREATION AND TOURISM JOBS FOR EXISTING HIGH-PAYING JOBS IN THE WOOD PRODUCTS INDUSTRY. GIVEN (1) THE IMPORTANCE OF NATIONAL FOREST TIMBER TO THE AREA'S ECONOMY; AND (2) THE MINIMAL SHIFTS IN RECREATION USE ANTICIPATED UNDER ANY ALTERNATIVE, WE SUGGEST THAT THE FINAL FOREST PLAN ALLOCATE NO TENTATIVELY SUITABLE FORESTLANDS TO MANAGEMENT FOR DISPERSED ROADLESS RECREATION. ROAD CLOSURES CAN BE USED TO PROVIDE MORE DIVERSE HUNTING EXPERIENCES WITHOUT NEEDLESS RESTRICTING OF TIMBER HARVEST OPPORTUNITIES.

FOREST SERVICE RESPONSE

A justification for keeping some of the roadless areas roadless and undeveloped is because many people desire that they remain so. This was one of the major issues considered in the environmental analysis, just as the major issues of local economy and timber harvest level were considered. The Forest Land and Resource Management Plan is not intended to be an "economic development plan." Our analysis indicates that the recreation opportunities provided by roadless areas will be less than demand in the near future.

COMMENT NO. 25: WITH THE RECENT DESIGNATION OF WILDERNESS, THE REGION SUPPORTS A VAST NUMBER OF ACRES FOR THE WILDERNESS AND PRIMITIVE EXPERIENCE AND AMENITIES. AS PART OF THE 1984 WILDERNESS LAW, IT WAS AGREED TO START UTILIZING THE ROADLESS AREAS UNDER MULTIPLE-USE VALUES AND POTENTIALS THAT CAN ADD TO THE VOLUMES AND NEEDS OF USERS. SUCH AREAS THAT OFFER MULTIPLE USES SHOULD BE RETURNED TO SUCH DESIGNATION AS SOON AS POSSIBLE. NO FURTHER AREAS SHOULD BE DESIGNATED OR RESTRICTED IN USAGE UNTIL SUCH TIMES AS ALL PUBLIC FOREST PLANS ARE COMPLETED IN THIS REGION TO BE ABLE TO ASSESS THE FULL NEEDS, RESOURCES, AND IMPACTS THEY WILL ALL HAVE ON THIS AREA.

FOREST SERVICE RESPONSE

Multiple-use includes a wide array of uses from wilderness to intensive resource utilization. Where the question of wilderness has been dealt with, there is still the possibility of a roadless recreation designation in lands which are suited. In accordance with the NEPA procedures, we have considered this designation, intensive timber management, and an array of management areas in between.

COMMENT NO. 26:

- HUCKLEBERRY R.A - CONTRARY TO THE DEIS'S CHARACTERIZATION, THIS AREA IS IMPORTANT AS AN ENTRANCE AND A BUFFER TO THE EAGLE CAP. IN ADDITION, THE AREA HAS OUTSTANDING SCENIC QUALITIES AND OFFERS IMPORTANT ANADROMOUS FISH HABITAT AND LOW ELEVATION OLD-GROWTH FOREST (BOTH OF WHICH ARE BECOMING INCREASINGLY SCARCE).
- JOSEPH CANYON R.A - ALTHOUGH THIS AREA IS TO PRESUMABLY REMAIN UNROADED, FURTHER LOGGING IS INADVISABLE DUE TO THE IMPACT ON ANADROMOUS FISH HABITAT, WILDLIFE HABITAT AND INCREASING RECREATIONAL USE.

FOREST SERVICE RESPONSE:

We cannot agree that a buffer is necessary. We have allocated the Huckleberry area to a combination of uses that will preserve many of the characteristics you recognize. The stands of lodgepole pine it contains are likely to become susceptible to the mountain pine beetle attack in the near future which will alter the area's character. The Joseph Canyon area suffered severe fire damage in 1986 and many damaged trees were removed. We believe this was accomplished without seriously affecting the fish habitat.

COMMENT NO. 27

- GRAND RONDE R.A - THIS VERY POPULAR AREA AND ANADROMOUS FISH HABITAT MOST DEFINITELY SHOULD NOT BE LOGGED. I WOULD BE VERY SURPRISED IF LOGGING OF THIS AREA WOULD RESULT IN A POSITIVE CASH FLOW.
- UPPER GRANDE RONDE. - I AM APPALLED THAT THIS LOVELY AREA AND HIGH QUALITY FISH HABITAT IS TO BE THOROUGHLY LOGGED.
- LAKE FORK AREA - DESERVES PROTECTIVE MANAGEMENT FOR THE WILDLIFE HABITAT AND LARGE STANDS OF OLD-GROWTH FOREST. IT SHOULD NOT BE SACRIFICED FOR THE SAKE OF UNJUSTIFIED "TEMPORARY" DEPARTURES FROM ALLOWABLE CUTTING.

FOREST SERVICE RESPONSE.

The Grande Ronde and the greater portion of the Lake Fork area are designated as Management Area 6, Roadless Recreation. We do not believe that the anadromous fish habitat will be significantly affected by the management activities that are contemplated in these areas or the Upper Grande Ronde.

COMMENT NO. 28.

- MT. EMILY - I STRONGLY OBJECT TO THE TOTAL OMISSION OF THE MT. EMILY AREA FROM NONDEVELOPMENT MANAGEMENT. THIS DECISION SHOULD BE REVERSED.

- EAGLE CAP ADDITIONS - THE FOLLOWING AREAS DESERVE NONDEVELOPMENT MANAGEMENT STATUS IN ORDER TO PROVIDE BUFFERING FOR THE EAGLE CAP WILDERNESS, PROTECTION OF ACCESS TRAILS TO THE WILDERNESS, AND PROTECTION OF LOW ELEVATION FORESTS AND WILDLIFE WHICH, DESPITE STATEMENTS IN APPENDIX C, ARE IN SHORT SUPPLY. UPPER CATHERINE CREEK, CASTLE RIDGE, BOULDER PARK, LITTLE EAGLE MEADOWS AND RESERVOIR

FOREST SERVICE RESPONSE

Portions of several of the areas you mention have been designated for roadless recreation Mt. Emily was not, but the important scenic values, as seen from the Grande Ronde Valley, will be protected.

COMMENT NO. 29

- TOPE CREEK R.A - MANAGEMENT OF THIS AREA AS STIPULATED UNDER AREA 3 WILL NOT YIELD THE OPTIMAL RESULTS FOR ALL WILDLIFE INCLUDING BIG GAME AND FISH. NONDEVELOPMENT MANAGEMENT IS TO BE PREFERRED

FOREST SERVICE RESPONSE.

Because of the ruggedness of the Tope Creek drainage, it is unlikely that roads will be constructed within it. When timber harvest occurs, helicopters and cable logging systems will probably be employed. This will be determined through project level planning

COMMENT NO. 30 I WOULD LIKE TO SEE LAND WHICH IS NOW ROADLESS MANAGED FOR PRIMITIVE RECREATION AS THE DEMAND FOR BACKCOUNTRY RECREATION INCREASES, THE DENSITY OF RECREATIONISTS IN EXISTING AREAS WILL ALSO INCREASE, THEREBY REDUCING THE VALUE OF THE EXPERIENCE MAKING PRESENTLY ROADLESS AREAS AVAILABLE INTO THE FUTURE FOR RECREATION WOULD NOT AFFECT MUCH SINCE MOST OF THE AREAS ARE MARGINAL FOR TIMBER PRODUCTS AND/OR ARE NOT COST EFFECTIVE TO HARVEST. IT WOULD BE WISER TO CONCENTRATE TIMBER PRODUCTION ON MORE SUITABLE SITES, KEEPING IN MIND THE NEEDS OF BIG GAME, CAVITY NESTERS, AND THE SPECIES DIRECTLY AFFECTED BY TIMBER PRACTICES

FOREST SERVICE RESPONSE

The thought processes you describe were a part of the analysis. However, the alternative which retained all of the roadless areas, Alternative E, was not selected

COMMENT NO. 31. WE BELIEVE THAT IT IS UNWISE TO FORECLOSE FUTURE OPTIONS SUCH AS ROADLESS DISPERSED RECREATION WHEN THE FOREST SERVICE ADMITS THAT THERE WILL BE A SHORTAGE OF THIS RESOURCE IN THE LONGER-TERM, WHILE ALSO ACKNOWLEDGING A SURPLUS OF ROADED RECREATION LAND DESIGNATED AS BACKCOUNTRY ALLOWS FUTURE GENERATIONS TO MAKE THEIR OWN CHOICES REGARDING JOBS IN TIMBER OR RECREATIONAL AMENITIES SUCH AS PRIMITIVE HUNTING OR HIKING

FOREST SERVICE RESPONSE

Nearly half of the roadless acres outside the Hells Canyon NRA will be retained essentially in a roadless status in the preferred alternative.

COMMENT NO. 32 BY DOING AWAY WITH THE "BUFFER ZONES" SURROUNDING EXISTING WILDERNESS AREAS AND REDUCING THE AREAS SET ASIDE FOR WILDLIFE PROTECTION, THE FOREST CAN PRODUCE A SUSTAINABLE HARVEST OF OVER 180 MILLION BOARD FEET ANNUALLY .

FOREST SERVICE RESPONSE.

We agree if the writer means to place all of the old growth, roadless recreation, and wildlife-timber allocations in Area 1 (Intensive Timber Management) and assuming all timber offerings would sell

COMMENT NO. 33. THE PUBLIC GENERALLY SEEMS TO BE OPPOSED TO MORE BONA-FIDE WILDERNESS, BUT YET WANTS THE WILDERNESS EXPERIENCE. THEY WANT IT TO BE EASILY ACCESSIBLE AND CONVENIENT. THEY WANT THE ROADS AND CAMPGROUNDS IN NATURAL, ORIGINAL WILD AREAS THIS COULD BE ACCOMPLISHED BY BUILDING ROADS, CAMPGROUNDS, AND OTHER AMENITIES UNDER STRICT REGULATIONS THAT WOULD MAINTAIN THE WILDERNESS ASPECT. MAYBE THESE COULD ALSO BE EXTENSIVELY MANAGED FOR HUNTING, FISHING, AND MAXIMUM PROTECTION OF OTHER WILDLIFE AND PLANTS

FOREST SERVICE RESPONSE

We agree that many people would like to have a more convenient wilderness experience.

COMMENT NO. 34 BUFFER ZONES (ALLOCATION 6) NEXT TO EXISTING WILDERNESS SHOULD BE INCREASED.

FOREST SERVICE RESPONSE

By limiting wildernesses to rather large areas, we do not believe it is necessary to provide buffers. However, many people share your opinion that the roadless recreation area (Management Area 6) should be increased

COMMENT NO. 35: BUFFER ZONES (ALLOCATION 6) NEXT TO EXISTING WILDERNESS SHOULD BE REDUCED

FOREST SERVICE RESPONSE

Many people perceived Management Area 6 to be a buffer zone and suggested that it be eliminated or reduced.

COMMENT NO. 36: THE OBVIOUS ANSWER TO ISSUE QUESTION 1 ON PAGE I-8 IS NONE. THAT IS, NO NONWILDERNESS ROADLESS AREAS SHOULD BE RETAINED IN AN UNDEVELOPED STATE FOR WHATEVER LIMITED OPPORTUNITIES THEY OFFER AND FOR FUTURE WILDERNESS CONSIDERATION. THE WALLOWA-WHITMAN IS ALREADY AS CLOSE TO BEING AN ANTI-COMMODITY RECREATION FOREST AS IT CAN POSSIBLY BECOME WITHOUT JURISDICTION BEING TRANSFERRED TO THE NATIONAL PARK SERVICE, U.S.D.I. IN ANY EVENT, SOME OF THE REMAINING ROADLESS AREAS WILL STAY ROADLESS THROUGH THE LIFE OF THIS PLAN, BUT ONLY DUE TO THE ABSENCE OF VALUES WHICH JUSTIFY ACCESS LANDS SUITABLE FOR ADDITION TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM SHOULD POSSESS UNIQUE NATURAL FEATURES OF NATIONAL SIGNIFICANCE.

FOREST SERVICE RESPONSE:

Your statement represents opinions of many respondents

COMMENT NO. 37 I WOULD HATE TO SEE LOGGING ANY CLOSER TO THE PRIMITIVE OR WILDERNESS AREAS. THE POSSIBILITY THAT THE FOREST SERVICE MAY LOG OVER SOME OF THE TRAILS INTO THAT AREA WOULD BE A CRIME. BECAUSE OF PRIVATE LAND CLOSURES, THE PUBLIC IS TURNING MORE AND MORE TO PUBLIC LANDS FOR FISHING AND HUNTING, SO THE CONTROLLERS OF THESE AREAS SHOULD BE DOING MORE, NOT LESS, FOR THESE PEOPLE. THE ORGANIZATIONS RECOMMENDING HOLDING THE ROADLESS AREAS AT PRESENT LEVELS WOULD FAR OUTNUMBER THE SAWMILLS THAT WANT TO CUT THE TIMBER

FOREST SERVICE RESPONSE:

See responses to Comments 20 and 34

COMMENT NO. 38 PLEASE RECONSIDER YOUR PLANS. ONCE THESE PRIMITIVE AREAS ARE ROADED AND LOGGED, THEY ARE LOST FOREVER TO THAT EVER-INCREASING SEGMENT OF THE PUBLIC WHICH ENJOYS EXPERIENCING THESE PRIMITIVE AREAS.

FOREST SERVICE RESPONSE:

This was a consideration in arriving at a decision. As shown in Table C-3 (FEIS Appendix), over 330,000 acres of roadless areas will remain undeveloped in the selected alternative

COMMENT NO. 39. I AM PARTICULARLY CONCERNED ABOUT THE DETRIMENTAL EFFECT ON THE BEAVER CREEK WATERSHED AND THE UPPER GRANDE RONDE RIVER I WOULD NOT FAVOR ANY FURTHER DESTRUCTION IN THESE AREAS AS THEY ARE NEEDED NOT ONLY FOR FISHERIES, BUT FOR BIG-GAME HABITAT

FOREST SERVICE RESPONSE.

We are confident that the timber in these areas can be managed in such a manner as to protect the fisheries and big game habitat.

COMMENT NO. 40. THE WNPS (WASHINGTON NATIVE PLANT SOCIETY) BELIEVES THAT TOO MUCH OF OUR ROADLESS LANDS HAVE BEEN DEVELOPED ALREADY AND THAT ALL INVENTORIED ROADLESS AREAS SHOULD REMAIN IN THAT CONDITION AND BE ALLOCATED TO MANAGEMENT IN A ROADLESS AND NONMOTORIZED STATE. OUTSTANDING HABITAT IS ALSO PRESENT FOR A WIDE VARIETY OF UNCOMMON AND EASILY DISPLACED WILDLIFE SPECIES. THESE AREAS ARE ALSO IMPORTANT FOR ROADLESS RECREATION, FOR THEIR EXCELLENT SCENIC VALUES, FOR MAINTENANCE OF WATER QUALITY, AND FOR MAINTAINING OPTIONS FOR FUTURE ADDITIONS TO THE WILDERNESS SYSTEM DEVELOPMENT OF THESE AREAS WILL LIKELY RESULT IN SERIOUS PROBLEMS WITH EROSION, LOWERING OF WATER QUALITY, AND TIMBER REGENERATION IN ADDITION, OUTSTANDING WILD ECOSYSTEMS WOULD BE LOST, INCLUDING CRITICAL HABITAT TO A HOST OF NATIVE PLANT AND ANIMAL SPECIES.

FOREST SERVICE RESPONSE.

Yours represents a view which many share. We believe some of the areas can be developed without the detrimental effects you foresee. See response to Comment 38.

COMMENT NO. 41: I URGE THAT THE SELECTED ALTERNATIVE INCLUDE PROTECTION FOR ALL EXISTING ROADLESS AREAS IN A "NO-CUT" BACKCOUNTRY ALLOCATION. THIS WILL HELP ENSURE THE MAINTENANCE OF LOW ELEVATION WILDLIFE HABITAT AND ECOLOGICAL DIVERSITY WHICH IS OF EXTREME IMPORTANCE IN ITSELF AS WELL AS TO THE CONTINUED DEVELOPMENT OF A STRONG RECREATION/TOURISM ECONOMY IN NORTHEASTERN OREGON. HIGH-PRIORITY ROADLESS AREAS WHICH MUST BE SO INCLUDED ARE:

- THE GRANDE RONDE RIVER CANYON -- ESPECIALLY NEEDED FOR CONSISTENCY WITH THE PROPOSED RECOMMENDATION FOR WILD AND SCENIC RIVER DESIGNATIONS
- JOSEPH CANYON
- ELKHORN RANGE
- BEAR CREEK / CATHERINE CREEK
- LAKE FORKS
- UPPER GRANDE RONDE ROADLESS AREA
- MOUNT EMILY
- BEAVER CREEK
- CASTLE RIDGE
- MONUMENT ROCK AND SOUTH EAGLE CAP WILDERNESS ADDITIONS
- CRYSTAL CANYONS (TOPE CREEK)

FOREST SERVICE RESPONSE

As shown in Table C-3, Appendix C, all or considerable portions of several of these areas are to remain undeveloped.

COMMENT NO. 42: I DO NOT BELIEVE ROADLESS AREAS, EXCEPT DESIGNATED WILDERNESS, NEED TO BE PERMANENT; BUT MAINTAINED FOR A PERIOD OF TEN OR MORE YEARS BEFORE BEING REDESIGNATED FOR HARVEST.

FOREST SERVICE RESPONSE:

Many people share your view that designated wilderness is sufficient to satisfy roadless needs.

COMMENT NO. 43: EVERY YEAR THERE ARE MORE AND MORE ROADS BEING PUT INTO ROADLESS AREAS. I SOMETIMES THINK THAT THIS IS REALLY WHAT YOU WANT. THE LONGER YOU PROCRASTINATE IN TAKING ACTION THE LESS THERE IS TO PROTECT. LOOK AT WHAT WE HAD WHEN WE TOOK IT FROM THE INDIANS AND LOOK AT IT NOW. YOU MUST DEVELOP A POLICY AND PROTECT WHAT WE HAVE.

FOREST SERVICE RESPONSE.

The question of how much of the nonwilderness roadless area should be retained is a question which this planning effort is intended to resolve.

COMMENT NO. 44: BACKCOUNTRY IS INDEED A BANKRUPT MANAGEMENT CONCEPT ALONG WITH BUFFERISM WE NOTED WITH INTEREST THE COMMENTARY ON PAGE 1 OF APPENDIX I REFERRING TO THE LOSTINE RIVER THAT "THIS SMALL RIVER CANYON'S PRIMARY SIGNIFICANCE IS AS AN IMPORTANT RECREATION AREA AND SERVES AS BUFFER AND ACCESS TO THE EAGLE CAP WILDERNESS." (EMPHASIS ADDED) ACCESS AND RECREATION ARE FINE, BUT BUFFERS ARE INAPPROPRIATE IN THIS CONTEXT OR ANY OTHER

FOREST SERVICE RESPONSE

We agree that the term buffer should not have been used, even in this instance

COMMENT NO. 45 THE ELK LIKE TO EAT GRASS IF YOU DON'T LOG AN AREA, THE BRUSH AND UNDERGROWTH GETS SO BAD THAT THE GRASS CANNOT GROW AND THE ELK WILL MOVE TO ANOTHER AREA WHERE THERE IS BETTER FEED. IF YOU DON'T LOG, THERE IS MORE PROTECTION BUT LESS FEED, SO YOU ARE DEFEATING YOUR PURPOSE.

FOREST SERVICE RESPONSE:

The purpose of retaining roadless areas is not necessarily to protect elk habitat. However, measures other than logging, such as prescribed burning, could be carried out to increase forage.

COMMENT NO. 46: PAGE 4-83, MANAGEMENT AREA 13 - THE HOMESTEAD WILDERNESS STUDY AREA (WSA) (OR-6-2), STILL BEING STUDIED FOR WILDERNESS, HAS BEEN INCREASED IN SIZE BY 600 ACRES OF SPLIT-ESTATE (FEDERAL SURFACE, NONFEDERAL SUBSURFACE) LAND CHANGES IN THE STUDY AREA WILL BE DISCUSSED IN A FORTHCOMING BLM SUPPLEMENTAL DRAFT EIS IN THE DRAFT EIS (APRIL 1985), BLM'S PREFERRED ALTERNATIVE WAS TO RECOMMEND THE WSA UNSUITABLE AS WILDERNESS

FOREST SERVICE RESPONSE

The supplement is now available.

COMMENT NO. 47: THE PLAN CREATES A NEW TYPE OF DE FACTO WILDERNESS, BACK COUNTRY EXPERIENCE ZONES, WHICH EFFECTIVELY CREATE BUFFER ZONES, TO ALREADY ESTABLISHED WILDERNESSES. SECTION 6 OF THE 1984 WILDERNESS ACT STRICTLY PROHIBITS THE CREATION OF SUCH ZONES

THE PLAN DOES NOT CONTAIN ANY EVIDENCE TO SUBSTANTIATE A NEED FOR MORE OF THIS TYPE OF MANAGEMENT IT IS THE POSITION OF THE EOMA (EASTERN OREGON MINING ASSOCIATION) THAT WITH 25 PERCENT OF THE WALLOWA-WHITMAN NATIONAL FOREST ALREADY CLASSIFIED FOR SINGLE USE, THERE IS NO NEED WHATSOEVER FOR ADDITIONAL LAND TO BE CLASSIFIED FOR RECREATIONAL USE ONLY

FOREST SERVICE RESPONSE

Under the roadless recreation management area, other uses (watershed, wildlife, grazing, minerals) than recreation would usually be available We agree that Section 6 of the Oregon Wilderness Act of 1984 makes it clear that Congress did not intend that the "designation of wilderness areas in the State of Oregon lead to the creation of protective perimeters or buffer zones around each wilderness area "

We did not propose buffer zones around wildernesses. In some alternatives, areas proposed for roadless recreation are adjacent to one or more of the four wildernesses on the Forest. This occurs because many of the remaining unroaded areas, which are most suitable for roadless recreation, lie at higher elevations where wilderness is also often found. The purpose of roadless recreation (Management Area 6) areas is not to "buffer" the wilderness, but to offer recreational opportunities in a semiprimitive setting that are not available in wilderness. Such use, we believe, is within the framework of the multiple-use act.

COMMENT NO. 48: ALTERNATIVE C PROVIDES FOR OVER 110,000 MORE ACRES OF UNDEVELOPED "BACKCOUNTRY"

THESE BUFFER ZONES CONTAIN MUCH MINERAL WEALTH THAT CITIZENS' TIME, MONEY, AND GREAT EFFORTS HAVE BEEN EXPENDED ON AND THAT COULD BECOME A LARGE POSITIVE FACTOR IN OUR LOCAL AND NATIONAL ECONOMIES IF KEPT AVAILABLE FOR EXTRACTION. HOWEVER, I SEE ALTERNATIVE C, WITH ITS BUFFER ZONES AROUND DESIGNATED WILDERNESS, AS A PLAN THAT WILL FOREVER KEEP THE VALUABLE MINERALS FROM BEING DUG UP AND USED TO BENEFIT THE PEOPLE.

FOREST SERVICE RESPONSE

Alternative C proposes slightly less roadless recreation lands than are in present plans. Mineral activities are not precluded.

COMMENT NO. 49: THE INADEQUACY OF ALTERNATIVE C IN ADDRESSING WILD FISH HABITAT IS QUITE CLEAR. THE DEGREE OF THIS FLAW IS SHOWN BY THE COMPLETE OMISSION OF FISHERIES IN AT LEAST TWO ROADLESS AREA DESCRIPTIONS IN THE PROPOSED PLAN. BEAR CREEK IN THE HUCKLEBERRY MOUNTAIN ROADLESS AREA AND BULLRUN CREEK IN THE MONUMENT ROCK ROADLESS AREA BOTH CONTAIN EXCELLENT NATIVE AND RESIDENT FISH POPULATIONS. YET, THEY ARE NOT EVEN MENTIONED.

FOREST SERVICE RESPONSE:

Many species of wildlife were not mentioned in the roadless area descriptions. We did attempt to make special note of those that were used by anadromous fish. In the case of Bear Creek, our failure to mention anadromous fish was an oversight.

COMMENT NO. 50. AS AN ELK HUNTER I'M VERY CONCERNED THAT ELK AND DEER HABITAT BE PROTECTED. I LIKE PRIMITIVE HUNTING EXPERIENCE, FEWER ROADS - MORE CLOSURES

FOREST SERVICE RESPONSE.

Many hunters apparently share your preference.

COMMENT NO. 51 THE ELKHORN RANGE AREA, WHERE I HAVE ALSO HIKEED, HAS OVER 100 MILES OF TRAILS FOR DISPERSED RECREATION WHICH REDUCE THE PRESSURE OF USE ON THE EAGLE CAP & WENAHA WILDERNESS. ALSO INCREASED PLANT COMMUNITIES ARE PRESENT. THIS AREA MUST BE PROTECTED FROM ROADING AND LOGGING - THE AREA DOESN'T SUPPORT SUITABLE COMMERCIAL TIMBER LAND. I HAVE BEEN IN THE AREA THE LAST TWO SUMMERS AND THE CLEARCUTS IN AREAS LIKE GORHAM BUTTE ARE BLIGHTS. YOU ARE

OBLITERATING ELK HABITAT THERMAL COVER AND EXISTING TRAILS FOR SHORT SIGHTED DEFICIT LOGGING

FOREST SERVICE RESPONSE

Most of the trailed area to which you refer is recommended for roadless recreation in the preferred alternative. The Gorham Butte area is recommended for intensive timber management, but is tempered by visual constraints to protect the view of the area as seen from the Baker-Haines-North Powder areas. We, too, are dissatisfied with the appearance of clearcuts that are currently noticeable from the valley. We do not agree that elk habitat is being adversely affected to any significant degree.

COMMENT NO. 52 I ALSO BELIEVE EAST EAGLE CREEK (FROM JACK CREEK TO EAGLE CAP WILDERNESS BOUNDARY), LAKE FORK AREA, AND MCCLAIN GULCH AREA (SE CORNER OF PINE RD) SHOULD BE PLACED IN AREA 6 BECAUSE OF THEIR DISPERSED RECREATION, WILDLIFE, ESTHETIC VALUES. ALL THESE AREAS HAVE EITHER LOW VALUE TIMBER OR HIGH HARVEST COSTS INVOLVED.

FOREST SERVICE RESPONSE.

In the selected alternative, most of the East Eagle Area to which you refer has been placed in Management Area 6. The McClain Gulch area has been placed in Management Area 3 rather than in Management Area 1 as shown in the DEIS

COMMENT NO. 53 THE DEPARTMENT (FISH AND WILDLIFE, OREGON) HAS A PROPOSAL FOR MANAGEMENT OF THE JOSEPH CREEK CANYON. THE TIMBER THERE IS INTERSPERSED IN STRINGER FASHION WITH BUNCHGRASS MEADOWS. ESSENTIAL WINTER COVER IS LIMITED, AND ANY REDUCTION IN COVER WOULD RESULT IN DIMINISHED CARRYING CAPACITY OF THE WINTER RANGE AND REDUCTION OF ELK SURVIVAL AND PRODUCTIVITY. THE HELICOPTER LOGGING THAT HAS BEEN PRACTICED IN RECENT YEARS IN THIS AREA USUALLY LEFT THE GROUND LITTERED WITH A SLASH THAT IMPEDES ANIMAL MOVEMENT WITHIN THE COVER AREAS. FURTHER, THE OPENING OF THE TREE CANOPY ALLOWS SNOWFALL TO BUILD UP ON THE GROUND RATHER THAN BEING INTERCEPTED BY THE TREE CANOPY. THE FORAGE IS THEN COVERED BY SNOW AND UNAVAILABLE FOR ELK USE. SURROUNDING ELK RANGES HAVE BEEN SO EXTENSIVELY LOGGED THAT THE ANIMALS NO LONGER USE THE AREAS. THE JOSEPH CREEK CANYON IS ALSO VALUABLE FOR GROUSE, TURKEYS, AND IS A POTENTIAL BIGHORN SHEEP REINTRODUCTION AREA. THE DEPARTMENT RECOMMENDS NO LOGGING WITHIN THE WINTER RANGES OF THE CANYON.

FOREST SERVICE RESPONSE:

Although we have placed these areas in Management Area 3, which permits timber harvest, it is unlikely there will be any timber sold there prior to the time the Forest Plan is revised. Little commercial timber remains there as a result of fires and salvage harvesting.

COMMENT NO. 54 MIDDLE FORK AND NORTH FORK CATHERINE CREEK ABOVE NORTH FORK CATHERINE CREEK CAMPGROUND - THIS AREA HAS HIGHLY EROSION SOILS, GOOD QUALITY BIG GAME HABITAT, AND AESTHETIC VALUE AS ACCESS TO THE EAGLE CAP WILDERNESS. THIS AREA SHOULD BE REALLOCATED TO MANAGEMENT AREA 6

FOREST SERVICE RESPONSE

We believe the timber in these areas can be managed without significant soil damage or serious effects on game habitat.

COMMENT NO. 55. WHEN I THINK THAT MY CHILDREN AND THEIR CHILDREN FROM NOW TO ETERNITY MIGHT BE CHEATED OUT OF SEEING THE UPPER GRANDE RONDE RIVER ROADLESS AREA IN EARLY SUMMER, I KNOW WE NEED A PLAN THAT TAKES MORE RESPONSIBILITY FOR THE PROTECTION OF THE ROADLESS AREAS. THE ELKHORN RANGE, BEAR CREEK, AND CATHERINE CREEK SHOULD NOT BE ROADED AND LOGGED

FOREST SERVICE RESPONSE:

While your descendants will not have the opportunity to see this particular area in a roadless state, there are many nearby areas on the Forest that are attractive and will remain roadless under this plan

COMMENT NO. 56: ALT. C ONLY PROTECTS A SMALL PORTION OF THE HIGH ELEVATION RA'S. THE CRITERIA FOR ESTABLISHING ACTUAL BOUNDARIES IS TIMBER HARVESTING INTERESTS (AS STATED BY THE WW FOREST PLANNING TEAM AT PUBLIC MEETINGS) RATHER THAN THE ACTUAL BACKCOUNTRY VALUES FOR SCENIC, RECREATION, WATERSHED, FISHERIES, WILDLIFE, AND ECOLOGICAL PURPOSES.

THE ELKHORN BOUNDARY, FOR EXAMPLE, ALLOCATES MOST LAND WITH PRODUCTIVE FOREST TO INTENSIVE TIMBER MANAGEMENT AND PROTECTS MAINLY ALPINE AREAS THAT WOULD NOT BE ROADED AND LOGGED ANYWAY. THE BACKCOUNTRY BOUNDARY ON MT. IRELAND IS NEARLY AT TIMBERLINE (7000-7500 FT.) AND LEAVES OUT TRAILS, DOWNIE LAKE, AND THE BEAUTIFUL AND ISOLATED ERIN MEADOWS AREA. THE PROPOSED BOUNDARY APPEARS AS AN AMOEBA WRAPPED AROUND THE EXISTING WILDERNESS, NONTIMBERED RIDGES, 1/8 TO 1/4 MILE WIDE, ARE IN BACKCOUNTRY AND THE TIMBERED DRAWS ARE ITM. SURELY, THERE MUST BE A BETTER WAY TO ALLOCATE LANDS

FOREST SERVICE RESPONSE.

There was an attempt in Alternative C to exclude high value timberland from the roadless recreation areas. However, the Management Area 6 boundary has been adjusted to include Downie Lake and Erin Meadows

There are many ways to allocate lands for management. You are correct that in the preferred alternative the lines around the Elkhorns are intended to avoid placing many important timber producing areas within Area 6. In other alternatives, this was not the case.

COMMENT NO. 57. MANY OF THE RA'S HAVE SIMILAR BOUNDARIES GENERALLY DRAWN ON NON-COMMERCIAL TIMBER LINES. THE FS SHOULD RE-EVALUATE THIS CRITERIA AND MAKE MORE MEANINGFUL BOUNDARIES FOR ALL ROADLESS AREAS. THE FS BACKCOUNTRY PROPOSALS LEAVE OUT PRODUCTIVE FOREST LANDS AND PRODUCTIVE AREAS FOR WATER, FISH, WILDLIFE, AND OTHER RESOURCES

FOREST SERVICE RESPONSE:

Many of the roadless areas exist because the timber there is of low commercial value. The boundaries often follow the point of demarcation between where timber harvest has occurred and where it has not.

COMMENT NO. 58 HAVE THE 84-85 AND 86 TIMBER SALES SOLD IN THE UPPER GRANDE RONDE EMPHASIZED ANADROMOUS FISH?

THE MONUMENT ROCK RA SHOULD BE ADDED TO THE EXISTING WILDERNESS OR DESIGNATED A NO CUT BACKCOUNTRY. THE OREGON WILDERNESS BILL WOULD HAVE DESIGNATED THE ENTIRE AREA WILDERNESS, HAD THERE NOT BEEN ACTIVE MINING INTERESTS ON THE NORTHERN TIP. PLEASE REFER TO 1984 OREGON WILDERNESS BILL REPORT LANGUAGE BACKCOUNTRY WOULD PROTECT THE HIGHLY VISIBLE FACE OF BULL RUN MOUNTAIN AND PAYTON GULCH AND QUALITY BIG GAME HABITAT.

FOREST SERVICE RESPONSE

Yes, any sales in the Upper Grande Ronde area will be designed to protect anadromous fish where such sales might affect those values. Most of the Monument Rock Roadless Area has been placed in Area 6 as you suggest.

COMMENT NO. 59. THE SQUAW RA SHOULD RECEIVE A BACKCOUNTRY OR STRONG ANADROMOUS FISH ALLOCATION TO PROTECT ANADROMOUS TRIBUTARIES TO THE NORTH FORK JOHN DAY AND GRANDE RONDE RIVERS.

FOREST SERVICE RESPONSE

We believe the fishery values will be adequately protected under management areas that permit timber harvest.

COMMENT NO. 60: PROTECTING THE ENTIRE CASTLE RIDGE RA AS BACKCOUNTRY WOULD MAINTAIN A PIECE OF LOWER ELEVATION FOREST AND THE HUNTING AND RECREATION OPPORTUNITIES ASSOCIATED WITH IT. PARTIAL DESIGNATION OF CASTLE RIDGE IS APPRECIATED WITH EXPANSION URGED.

FOREST SERVICE RESPONSE:

Your suggestion was considered and shown in that manner in two alternatives. In the preferred alternative, the area is a combination of "backcountry", Management Area 1, and old growth.

COMMENT NO. 61: WHY WAS THE CURRENTLY DESIGNATED MT EMILY BACKCOUNTRY CHANGED TO TIMBER MANAGEMENT IN THE DP?

FOREST SERVICE RESPONSE:

The timber producing potential of the area and the fact that there had been an increase in wilderness since the Grande Ronde Unit Plan was prepared were two important factors in this consideration.

COMMENT NO. 62: WE URGE THE UNIQUE WET AND DRY CANYON SYSTEM OF MT EMILY BE RETAINED AS A BACKCOUNTRY WILDLIFE HAVEN AND THE FACE OF MT EMILY BE DESIGNATED A NATURAL LANDMARK (MINIMAL CUTTING) OR BACKCOUNTRY. THE FACE OF MT FANNY SHOULD ALSO BE A NATURAL LANDMARK.

FOREST SERVICE RESPONSE:

The area is recommended for management under Area 3 (wildlife-timber). Those areas in sensitive landscapes, as is the face of Mt Emily, are to be managed to protect the visual quality. We have not nominated the faces of Mt Emily or Mt. Fanny for the National Registry of Natural Landmarks as we do not believe they meet the criteria of being "outstanding representative examples of the Nation's heritage" As discussed in the EIS, Chapter III, the only areas on the Forest considered by the National Park Service to have National Registry potential are the Hells Canyon - Seven Devils geomorphic province and the Wallowa Mountains .

COMMENT NO. 63 JOSEPH CANYON STILL RETAINS BACKCOUNTRY QUALITIES FOR CULTURAL , SCENIC, FISHERY, AND RECREATION RESOURCES AND SHOULD RECEIVE THAT PROTECTION .

FOREST SERVICE RESPONSE:

In the preferred alternative, protection of these values will be emphasized

COMMENT NO. 64: THE ROADLESS LANDS ON THE SOUTH SIDE OF THE WALLOWA MOUNTAINS PROVIDE VARIED SCENIC AND PRIMITIVE RECREATION VALUES, WITH LOW TIMBER VALUES.

FOREST SERVICE RESPONSE:

We agree that this is true for a large part of the areas.

COMMENT NO. 65: SEVERAL AREAS NEED TO BE PLACED IN AN ALLOCATION AKIN TO YOUR MANAGEMENT AREA 6, WITH THE FOLLOWING REVISIONS. NO TIMBER CUTTING BE ALLOWED IN THESE "BACKCOUNTRY" AREAS LIVESTOCK GRAZING BE REDUCED SUBSTANTIALLY AND FUNDS INTENDED FOR GRAZING IMPROVEMENTS BE USED FOR WILDLIFE AND FISHERIES-RELATED IMPROVEMENTS ANADROMOUS FISHERIES BE EMPHASIZED, ENHANCED, AND MAINTAINED IN THESE AREAS WHAT AN OPPORTUNITY TO IMPLEMENT PROJECTS THAT MAY BE MORE LOGISTICALLY DIFFICULT IN WILDERNESS BUT WILL BE SUPPORTED BY A LACK OF DEVELOPMENT ACTIVITIES WHICH OTHERWISE "UNDO" WHAT IS ACCOMPLISHED FOR FISHERIES & WILDLIFE (SIMPLY PUT, THERE WILL BE NO CHANCE OF COWS CHOMPING THE WILLOWS YOU JUST PLANTED OR HIGH STREAM FLOWS DUE TO HEADWATER LOGGING WIPING OUT THE GABIAN YOU JUST INSTALLED. AREAS TO BE PLACED IN SUCH AN ALLOCATION INCLUDE: TWIN MOUNTAIN, UPPER GRANDE RONDE, MARBLE POINT, GREENHORN, MT EMILY.

FOREST SERVICE RESPONSE

We agree that the measures you suggest could make protection of fisheries and wildlife more easily accomplished We also believe that it is possible to utilize the timber and forage resource and still protect the other resource values It may often require something less than "full" utilization of the timber and forage potential.

COMMENT NO. 66: ROADLESS AREA AVAILABLE FOR DISPOSITION INCLUDES 232,436 ACRES OF THIS AREA, 142,301 ACRES (57%) ARE SUITABLE FOREST LAND (APPENDIX C-7) ALTERNATIVE C HAS PLANS FOR CONVERTING 159,000 ACRES (68%) TO RURAL OR ROADED MODIFIED (HIGHLY DISTURBED SYSTEMS) TABLE C-3 (APPENDIX C-6) ON THE OTHER HAND CLAIMS THAT 43% OF THE ACRES SHOULD BE NON-DEVELOPED THIS MEANS 57% WOULD BE DEVELOPED -- AN APPARENT CONFLICT BETWEEN TABLES

FOREST SERVICE RESPONSE.

Although confusing, there is not really a conflict. In mapping recreation opportunity, the area considered influenced by roads extends approximately 1/2 mile from the road--even though the area within the 1/2 mile zone remains undeveloped This creates an overlap and duplication of acres counted.

COMMENT NO. 67 EXAMINING SOME INDIVIDUAL ROADLESS AREAS, WE SEE MILES OF ROAD TO BE BUILT WITHIN ONLY A FIRST DECADE (APPENDIX C-91). BOULDER PARK HAS 12,311 ACRES AND WILL HAVE A ROAD DENSITY OF 3.8 MILES/SQUARE MILE; LAKE FORK, MT. EMILY, AND SQUAW WILL HAVE DENSITIES OF 3.0, 2.8, AND 5.1 MILES/SQUARE MILE, RESPECTIVELY, AFTER ONLY THE FIRST DECADE OF ROADING AFTER FULL ROADING OF THESE AREAS, HOW GREAT WILL THE DENSITIES BE? HOW WILL THESE DENSITIES BE REDUCED TO COMPLY IN FACT AS WELL AS IN PRINCIPLE WITH GUIDELINES OF 1.5 OR 2.5 MILES/SQUARE MILE.

FOREST SERVICE RESPONSE

The guidelines refer to miles of open road per square mile as calculated on the average over an inventory compartment (averaging approximately 7,000 acres)

COMMENT NO. 68: PEREGRINE FALCONS HAVE BEEN SIGHTED IN HELLS CANYON AND JOSEPH CREEK IF THERE IS AN EMPHASIS ON RESTORING PEREGRINE FALCONS, WHY ARE THERE PLANS TO LOG JOSEPH CREEK? IN ADDITION TO BEING PEREGRINE HABITAT, JOSEPH CREEK BEARS ANADROMOUS FISH

FOREST SERVICE RESPONSE

Timber harvest could have detrimental effects on peregrine falcon habitat if it occurs near a nest site We know of no nest sites in the Joseph Canyon Roadless Area We agree that Joseph Creek is used by anadromous fish. See response to Comment 53

COMMENT NO. 69: OUTLINED BELOW IS LARGELY A COMPROMISE BETWEEN ALTERNATIVES E AND F: A LOWER TIMBER HARVEST THAN E AND HIGHER LEVELS OF WILDLIFE HABITAT AND ENVIRONMENTAL PROTECTION.

THE REMAINING ROADLESS AREAS SHOULD BE PLACED IN A BACK-COUNTRY MANAGEMENT AREA SIMILAR TO MS 6 (SEE PREVIOUS COMMENTS) THESE AREAS PROVIDE VALUABLE UNDISTURBED WILDLIFE HABITAT SUCH AS THE BIG GAME RANGE IN TOPE CREEK, DEAD-HORSE, AND JOSEPH CANYON ROADLESS AREAS AS CASTLE RIDGE, HUCKLEBERRY, MARBLE POINT, AND UPPER CATHERINE CREEK CONTAIN TRAILS AND/OR TRAILHEADS WHICH WOULD BE ADVERSELY AFFECTED BY ROADING AND/OR LOGGING. RA'S SUCH AS BOULDER PARK, LITTLE EAGLE MEADOWS, HURRICANE CREEK, LITTLE CREEK, LITTLE SHEEP, MONUMENT ROCK, AND RESERVOIR PROVIDE QUALITY WATER, HABITAT, RECREATION, VIEWS, AND BUFFER THE WILDERNESS FROM DEVELOPMENT IMPACTS, AND SHOULD REMAIN ROADLESS

ALL OF THE IDENTIFIED ROADLESS AREAS IN THE HELLS CANYON NRA HAVE GREAT NATIONAL SIGNIFICANCE FOR BOTH RECREATION AND WILDLIFE AND NEED TO BE PRESERVED UNDER A ROADLESS MANAGEMENT AREA. MT. EMILY RA PROVIDES A LOCAL RECREATION SITE FOR LA GRANDE ALONG WITH WATER AND SCENIC VIEWING WHICH WOULD BE IMPACTED BY LOGGING. TWIN MOUNTAIN OFFERS OUTSTANDING OPPORTUNITIES FOR SOLITUDE, VIEWS, AND SEMIPRIMITIVE RECREATION IN A SETTING WITH A WILDERNESS CHARACTER.

FOREST SERVICE RESPONSE

While your alternative may be a combination of Alternatives E and F, it also contains many features of the Forest Service preferred alternative

COMMENT NO. 70: I FEEL THE BUFFER ZONES AROUND THE WILDERNESS AREAS SHOULD BE TOTALLY ELIMINATED AS I FEEL IF THEY ARE KEPT, THEY WILL BE TURNED INTO WILDERNESS.

FOREST SERVICE RESPONSE:

It is true that undeveloped areas will be re-evaluated for wilderness study when the Forest Plan is revised in 10-15 years. We do not agree that such reconsideration means that eventual wilderness designation is likely, however

COMMENT NO. 71: BY ALLOWING THE BAKER VALLEY FACE OF THE ELKHORN MOUNTAINS TO BE PUT INTO A ROADLESS DESIGNATION IN YOUR PLAN, IT WOULD FURTHER THE EFFORT TO EXCLUDE THIS AREA FROM GENERAL USE, AND AN EFFORT WHICH I WOULD LIKE TO SEE QUELLED.

FOREST SERVICE RESPONSE:

It is unlikely that roads would be constructed in that portion of the Elkhorn Mountains, regardless of land allocation during this plan period. The portion of the area with high timber producing potential is within Areas 1 or 3, which permit timber harvest and roading.

COMMENT NO. 72: UNDEVELOPED LAND - (DEIS, PAGE S-27) FIGURE S-6 MINIMIZES THE FACT THAT THERE ARE 582,700 ACRES OF WILDERNESS ON THE WALLOWA-WHITMAN WHICH PROVIDE UNDEVELOPED LAND IN ADDITION TO THE NONWILDERNESS ACRES SHOWN HERE. THUS, EVEN UNDER ALTERNATIVE B-DEPARTURE, THERE WOULD STILL BE NEARLY 900,000 ACRES OF ROADLESS LAND ON THE FOREST

THIS EXAMPLE ILLUSTRATES A LARGER PROBLEM IN NATIONAL FOREST PLANNING THE PUBLIC HAS NOT BEEN FULLY INFORMED ABOUT THE WILDLIFE, RECREATION, AND SCENIC VALUES THAT ARE CURRENTLY BEING PRODUCED THROUGH LAND ALLOCATIONS SUCH AS WILDERNESS, RNA'S, AND THE HELLS CANYON NRA WHICH LIMIT OR PROHIBIT TIMBER MANAGEMENT. TIMBER VALUES THAT HAVE BEEN LOST TO THESE AND OTHER MANAGEMENT DESIGNATIONS ARE NOT CLEARLY PRESENTED IN THE PLAN ANALYSIS. THEREFORE, THE PUBLIC CANNOT EASILY DETERMINE THE ACTUAL LEVEL OF VALUES PROVIDED BY THE NATIONAL FOREST. THEY ALSO CANNOT EXAMINE TRADEOFFS THAT HAVE BEEN MADE BY PREVIOUS LAND ALLOCATION PROCESSES NOR TRACE THE CONTINUED EROSION OF THE COMMERCIAL FOREST LAND BASE SINCE THESE FIXED LAND ALLOCATIONS INVOLVE 42 PERCENT OF THE TOTAL WALLOWA-WHITMAN NATIONAL FOREST ACREAGE, THIS ISSUE MUST BE ADDRESSED

TO LEAVE OUT A DISCUSSION OF THE VALUABLE CONTRIBUTIONS TO RECREATION, WILDLIFE HABITAT, WATERSHED PROTECTION AND OTHER NON-MARKET VALUES THAT ACCRUE TO THE PUBLIC FROM LEGISLATIVE AND ADMINISTRATIVE DESIGNATION AND FROM MANAGEMENT AREAS THAT ARE NOT DECIDED THROUGH THIS PLANNING PROCESS IS DOING THE PUBLIC A GREAT DISSERVICE AND MAY VIOLATE NEPA AND NFMA REQUIREMENTS.

FOREST SERVICE RESPONSE:

Figure S-6 is intended to deal with the amount of nonwilderness, roadless area. This is one of the major issues the planning effort attempts to resolve. The amount of recreation use attributed to wilderness is shown in Chapter III of the EIS and the forested land which is removed from the timber base due to wilderness is illustrated in Appendix E. The specific resource values of the lands which are now wilderness were examined at length during the legislative and administrative processes leading to their classification. To again address the wilderness issues could be viewed as an attempt to cloud the roadless area issue and do the public a "disservice." Since wilderness, with the exception of one roadless area, was not an issue, we cannot agree that there is a violation of NEPA or NFMA.

COMMENT NO. 73 I AM ALSO APPALLED AT THE BIAS APPARENT IN THE ROADLESS AREA REVIEW, "THERE APPEARS TO BE NO REASON TO CONSIDER RETAINING THE AREAS (ROADLESS) FOR LATER WILDERNESS CONSIDERATION UNLESS THE PURPOSE IS ONLY TO ADD WILDERNESS ACRES .. INTEREST IN THE AREA HAS BEEN LOW WITH THOSE FAVORING WILDERNESS BEING THE SAME WHO SUGGESTED THAT ALL ROADLESS AREAS BE DESIGNATED WILDERNESS." WHAT A BIASED, SUBJECTIVE ANALYSIS. A VERY LOW LEVEL OF PROFESSIONALISM DISPLAYED. I PERSONALLY DON'T CARE IF THESE AREAS ARE WILDERNESS. THEIR CURRENT MANAGEMENT AS "BACKCOUNTRY" IS SATISFACTORY.

FOREST SERVICE RESPONSE

For the roadless areas to which these quoted phrases refer, we believe we are correct as to the need to retain them for future wilderness considerations.

COMMENT NO. 74: ROADLESS AREAS ARE WHERE MOST NONWILDERNESS-PRIMITIVE RECREATION OCCURS .

THEY ARE ALSO AREAS WHERE TIMBER PRODUCTIVITY IS USUALLY MARGINAL. THE DEIS MUST DO A MORE THOROUGH ANALYSIS OF DETERMINING WHICH ROADLESS AREAS SHOULD REMAIN UNDEVELOPED. THIS ANALYSIS SHOULD NOT ONLY COMPARE THE ECONOMIC VALUES OF RECREATION VERSUS TIMBER, BUT SHOULD TAKE INTO ACCOUNT ENVIRONMENTAL COSTS OF IMPACTS CAUSED BY INTENSIVE MANAGEMENT ACTIVITIES SUCH AS ROAD CONSTRUCTION AND TIMBER HARVESTING.

FOREST SERVICE RESPONSE:

The economic factors are accounted for in the FORPLAN analysis. We believe the environment's effects have been sufficiently addressed for this level of planning. Project level planning will further deal with site-specific effects.

COMMENT NO. 75: THE DRAFT PLAN PROPOSED TO DEVELOP OVER 1,000 MILES OF ROAD IN CURRENTLY ROADLESS AREAS OVER THE NEXT 30 YEARS (DEIS APPENDIX PG C-91 - 93). THE PRIMARY PURPOSE OF THESE ROADS IS FOR ACCESSING AND HARVESTING TIMBER. NEPA

REQUIRES IMPACT STATEMENTS TO ASSESS WHAT IMPACT WILL OCCUR AS THE RESULT OF A PROPOSED MANAGEMENT ACTION FROM A FEDERAL AGENCY THE DEIS HAS NOT ADEQUATELY EVALUATED THE ENVIRONMENTAL IMPACTS ON ROADLESS AREAS AS A RESULT OF ROAD DEVELOPMENT AND TIMBER HARVESTING ACTIVITIES. IN FACT, THE PACIFIC NORTHWEST REGION OF THE U.S. FOREST SERVICE (USFS) DIRECTED EACH NATIONAL FOREST TO PROVIDE PARTICULAR INFORMATION FOR VARIOUS SECTIONS OF THE PLANNING DOCUMENTS. FOREST PLANNING REGIONAL DIRECTION REGARDING APPENDIX C DIRECTS EACH FOREST TO DESCRIBE "SITE SPECIFIC CONSEQUENCES FOR SPECIFIC AREAS" UNDER THE VARIOUS MANAGEMENT ALTERNATIVES. THIS FOREST PLANNING REGIONAL DIRECTION ALSO STATES "BECAUSE EACH ROADLESS AREA IS TREATED DIFFERENTLY BY AT LEAST ONE OF THE ALTERNATIVES, THE DIFFERING ENVIRONMENTAL EFFECTS ON EACH ROADLESS AREA MUST BE DISCLOSED" (INCLUDING CUMULATIVE EFFECTS). THIS IS A SERIOUS OMISSION OF THE DEIS. THE DEVELOPMENT OF OVER 1,000 MILES OF ROAD AND TIMBER MANAGEMENT ACTIVITIES IN NOW ROADLESS AREAS WILL HAVE SIGNIFICANT IMPACTS ON THE WILDLIFE, FISHERIES, WATER AND AIR QUALITY, ADJACENT WILDERNESS AREAS, AND RECREATION OPPORTUNITIES OF THESE AREAS TARGETED FOR DEVELOPMENT. THE WALLOWA-WHITMAN NATIONAL FOREST MUST ISSUE A REVISED OR SUPPLEMENTAL DEIS WHICH CONTAINS THE ENVIRONMENTAL CONSEQUENCES OF THE MANAGEMENT ALTERNATIVES IT IS CONSIDERING IMPLEMENTING

FOREST SERVICE RESPONSE.

We believe the information about each roadless area, by alternative, in Appendix C, together with the information in Chapter IV, meets the intent of the Regional direction to which the writer refers.

COMMENT NO. 76: OF THE TEN ALTERNATIVES IN THE DEIS, NOT ONE WILL ENTER MORE THAN ONE-THIRD OF THE CURRENT ROADLESS AREAS IN THE FIRST DECADE THE RANGE OF ALTERNATIVES IS 0% TO 33% (DEIS, TABLE II-3a) THIS RANGE OF ALTERNATIVES DOES NOT MEET THE REQUIREMENT OF NEPA.

FOREST SERVICE RESPONSE:

Although your observation is correct, we cannot agree that this amounts to a violation of NEPA. When roadless areas, or any other areas designated for timber harvest, are entered is based largely in economic analysis. The transportation system for some roadless areas is fully established in the first decade while in others it is not economically sound to enter them until later decades, based on all resource development needs.

COMMENT NO. 77: THERE HAS BEEN TOO MUCH OVER-CUTTING IN THE NINE YEARS THAT WE WERE GONE FROM THIS AREA IT WAS APPALLING TO US TO SEE SOME OF THE WANTON WASTE IN THE HIGH MOUNTAIN AREA, IN THE ELKHORN RIDGE, AND OTHER PARTS OF THE THREE COUNTIES IN WHICH THE WWNF IS LOCATED THAT WE CAMPED IN THE PAST TWO SUMMERS.

WE NO LONGER DO MUCH HIKING ETC., BUT IT NEVERTHELESS SEEMS VERY IMPORTANT THAT THE ROADLESS AREAS BE LEFT AS THEY ARE. CERTAIN IT IS, THAT IF THE LUMBER INDUSTRY IS ALLOWED IN THESE AREAS IT WILL RESULT IN MUCH DESTRUCTION, NOT ONLY OF THE LAND ITSELF BUT OF THE WILDLIFE IT SUPPORTS. IN THE ELKHORN RANGE WHICH WE HAVE ENJOYED MUCH IN THE PAST THERE WOULD BE A COMPLETE CHANGE IN THE ENVIRONMENT WITH THE LOSS OF IT'S ROADLESS STATUS. THERE ARE 100'S OF MILES OF TRAILS, FRAGILE AND BEAUTIFUL ALPINE MEADOWS, GLORIOUS SMALL GLACIER LAKES ETC , ALL OF

WHICH WILL BE THREATENED BY INTRUSION OF THE LOGGING INDUSTRY PLEASE HELP US AND PRESERVE WHAT LITTLE WE HAVE LEFT BY HOLDING SELFISH INTERESTS AT BAY THANK YOU.

FOREST SERVICE RESPONSE:

While timber harvest changes the character of the land, many people will not agree that it results in the undesirable conditions you describe. Regardless, a large portion of the Elkhorn Range has been allocated by Management Area 6 which will favor the current recreational values.

COMMENT NO. 78: FROM EVERY STANDPOINT OF THE CATTLEMAN'S POINT OF VIEW, OUR USE OF THE LAKE FORK AREA AS A PERMITTEE IS ENHANCED BY THE EXISTING "NO ROAD" CONDITION OF THIS FOREST. ONCE IT IS CUT UP WITH ROADS ONE CANNOT TURN BACK. SO PLEASE, NO ROADS.

FOREST SERVICE RESPONSE:

We agree that roads are not necessarily advantageous to livestock permittees.

COMMENT NO. 79: SOME RESPONDENTS WERE CONCERNED ABOUT ROADING OF LAKE FORK, BUT NOT NECESSARILY OPPOSED TO ENTERING IT FOR TIMBER HARVEST.

FOREST SERVICE RESPONSE:

Some degree of roading would be necessary, regardless of how the timber were to be removed. It is likely that for the portion to be managed for timber production, a combination of logging methods will be used which will minimize road construction.

COMMENT NO. 80: I RECOMMEND THAT LAKE FORK BE WITHDRAWN FROM TIMBER HARVEST AND MANAGED IN A ROADLESS CONDITION. THE COST/BENEFIT RATIO IS LOW OR NEGATIVE FOR MOST OF THE AREA. LAKE FORK IS IMPORTANT FOR RECREATION, HUNTING, WILDLIFE HABITAT. IT OFFERS A MICROCOSM OF WILDERNESS IN AN AVAILABLE LOCATION. LAKE FORK IS AN INTEGRAL UNIT BOUNDED BY NATURAL BARRIERS AND IT OFFERS A WIDE RANGE OF ECOTYPES FROM HIGH TO LOW ELEVATION. FOR THESE REASONS IT SHOULD BE PRESERVED IN ITS ROADLESS CONDITION. THE TIMBER LOSSES TO SPRUCE BARK BEETLE WON'T BE FELT IN THE CURRENT MARKET AND INCREASED FIRE HAZARD WOULD BE ABATED WITHIN 5 YEARS.

FOREST SERVICE RESPONSE:

In the final plan, the majority of the acres in the Lake Fork Roadless Area are to be managed for unroaded recreation (Management Area 6)

COMMENT NO. 81: SPECIFICALLY, THE PLAN PROPOSES ENTRY INTO A FEW EXISTING ROADLESS AREAS I AM OPPOSED TO; PARTICULARLY, LAKE FORK ON PINE DISTRICT. THE FOREST SERVICE PAYS LIP SERVICE TO A POLICY CALLED "MULTIPLE USE". UNFORTUNATELY ALL I SEE IS CATTLE AND LOGGING INTERESTS BEING ADDRESSED ON THE WALLOWA-WHITMAN N F. IT IS ABOUT TIME THE FOREST SERVICE ACTUALIZE THE OTHER USES ON THE PUBLIC LANDS. WE ALL KNOW THESE OTHER USES DEMAND QUALITY UNDISTURBED TRACTS OF LAND. WHEN TIMBER MANAGEMENT OF AN AREA SUCH AS LAKE FORK (MARGINAL AT BEST), IS SERIOUSLY

BEING CONSIDERED, I QUESTION FOREST SERVICE POLICY. WHY SHOULD THE PUBLIC PAY FOR DEFICIT TIMBER SALES AND DEGRADATION OF A UNIQUE ECOLOGICAL SYSTEM? LAKE FORK COULD MEET MANY OF THE OTHER NEGLECTED MULTIPLE USES IF ALLOCATED AS A "ROADLESS NO CUT BACKCOUNTRY" DESIGNATION. THESE ACRES SHOULD BE DELETED FROM THE TIMBER BASE FOREVER! THE FOREST SERVICE IS ACTING IN A NEGLIGENT MANNER IF IT DOES NOT PROTECT SOME OF THESE PRECIOUS FEW ROADLESS AREAS WE HAVE LEFT. ENOUGH OF OUR PUBLIC LANDS ARE IN TIMBER PRODUCTION AND CATTLE ALLOTMENTS. THESE LANDS BELONG TO EVERYONE, NOT JUST THE LOGGING COMPANIES AND RANCHERS. OUR POPULATION IS INCREASING AND NEEDS MORE NATURAL RECREATIONAL AREAS, NOT LESS. IT IS INSULTING AND RIDICULOUS TO EXPECT THE PUBLIC TO SUPPORT DEFICIT TIMBER SALES AND DEGRADATION OF AN AREA THAT OFFERS SO MUCH MORE THAN MARGINAL TIMBER PRODUCTION! I AM IN FULL SUPPORT OF THE EXISTING ROADLESS AREAS SUCH AS LAKE FORK BEING DESIGNATED AS "NO CUT BACKCOUNTRY" AREAS. I ALSO SUPPORT PASSAGE OF THE HELLS CANYON NATIONAL RECREATION AREA CONSERVATION ACT, WHICH WOULD PROTECT LAKE FORK FROM ALL DEVELOPMENT. LET'S KEEP TIMBER PRODUCTION IN PRODUCTIVE LANDS AND ALLOW THE MARGINAL LANDS TO STAND AS THEY ARE: A WITNESS TO FAIRNESS AND SOUND FOREST PRACTICES BY THE U. S. FOREST SERVICE.

FOREST SERVICE RESPONSE:

The Lake Fork area resulted in more response than any of the roadless areas. Yours is a representative example. These comments were at least partially responsible for the land relocation adjustment shown in the preferred alternative.

COMMENT NO. 82: IT SEEMS, ACCORDING TO YOUR FORPLAN STUDIES, THAT ECONOMICALLY THIS IS NOT A VIABLE AREA TO HARVEST.

FOREST SERVICE RESPONSE:

In the FORPLAN analysis, the Lake Fork was handled as a separate entity in its entirety. This showed that if we were to harvest timber and construct roads through the area, it would result in negative returns. As shown by site-specific analysis, however, it would be possible to manage timber in portions of the area while omitting or delaying harvest on others, and have positive returns.

COMMENT NO. 83: REGARDING LAKE FORK, THE COMMUNITY AROUND, NOT SO MUCH INTO LOGGING WOULD BENEFIT SO MUCH MORE FROM IT'S USE AS A RECREATIONAL AREA. IF NOT IMMEDIATELY, AT LEAST IN THE FUTURE WHEN DEMAND IS FORECAST TO EXCEED SUPPLY FOR THIS COMMODITY.

FOREST SERVICE RESPONSE:

Many people from the Pine Valley area share your views.

COMMENT NO. 84: I UNDERSTAND THE IRRIGATION NEEDS OF RANCHERS COULD BE THREATENED BY A HEAVY HARVESTING OF THIS UNIQUE AREA.

FOREST SERVICE RESPONSE:

We believe irrigation values will be well protected by any activities we plan for the portion of the area on which timber harvesting will occur.

COMMENT NO. 85: WE FEEL THAT ANY ALTERNATIVE WHICH INCLUDES EXPANSION OF THE EXISTING ROAD SYSTEM IS NOT JUSTIFIED, NOT IN OUR INTEREST, AND NOT APPARENTLY IN THE COMMUNITY INTEREST. AS RANCHERS WHOSE IRRIGATION RIGHTS ARE SERVED BY THREE WATERSHEDS IN THE AREA UNDER REVIEW, WE ARE CONCERNED ABOUT THE IMPLICATIONS OF ROADING AND LOGGING THIS FRAGILE LAND; SPECIFICALLY WE ARE DISTURBED ABOUT THE POSSIBLE EFFECTS ON SEDIMENTATION, EROSION, AND WATER FLOW, BOTH IN QUANTITY AND MORE PARTICULARLY IN TIMING. PROTECTION OF OUR LATE (SEPTEMBER-OCTOBER) WATER RESOURCE FROM SPRINGS IN ASPEN CREEK IS OF CRITICAL IMPORTANCE TO FORAGE PRODUCTION ON OUR LAND AND THUS OUR ECONOMIC LIVELIHOOD

FOREST SERVICE RESPONSE:

We agree that water quality, water quantity, erosion potential, and sediment production are important considerations in deciding to access or harvest timber in an area such as Lake Fork. We believe, however, that through proper design and timing of projects these watershed values can be protected. Since much of the area has been allocated to Management Area 6 (Roadless Recreation) in the Final Plan, the rise of watershed damage has been reduced.

COMMENT NO. 86: HAVING USED THE AREA FOR HUNTING AND HIKING, WE BELIEVE THIS TO BE PRIME LATE SUMMER HABITAT FOR ELK WE ARE CONCERNED THAT DISTURBANCE IN THIS AREA MIGHT FORCE THE ELK DOWN ONTO OUR CATTLE PASTURES EARLIER THAN THEY ALREADY DO, CAUSING FURTHER DAMAGE TO OUR FORAGE SITUATION.

FOREST SERVICE RESPONSE:

We also believe the area contains important elk habitat, just as adjacent roaded areas do. We doubt that timber harvest on the relatively small portion of the Lake Fork area designated for this purpose will result in noticeable shifts in patterns of elk use.

COMMENT NO. 87: THE FOREST SERVICE SHOULD BE REQUIRED TO PAY FOR HALF THE FENCING OF PRIVATE PROPERTY ON THE BOUNDARY OF GRAZING ALLOTMENTS. RIGHT NOW IT IS UP TO THE LANDOWNER WHO MAY NOT BE A PERMITTEE TO KEEP ALLOTMENT CATTLE OFF HIS PROPERTY.

FOREST SERVICE RESPONSE:

The Forest Service owns no cattle and we cannot, therefore, justify spending public funds for boundary fences which are usually needed to keep cattle off the Forest. When National Forest permitted cattle are trespassing on adjacent private lands, the landowner can require the permittees to do whatever is necessary to prevent the illegal use.

COMMENT NO. 88: AS YOU ARE AWARE, THE LAKE FORK AREA, INCLUDING AN EXPANSE OF LAND MUCH LARGER THAN THE DESCRIBED MANAGEMENT UNIT BOUNDARY, IS INCLUDED IN PENDING FEDERAL LEGISLATION (S 1803), WHICH WOULD DESIGNATE THE AREA AS WILDERNESS. WE WHOLEHEARTEDLY SUPPORT THE INCLUSION OF THE ENTIRE LAKE FORK-ELK CREEK DRAINAGE INTO THE NATIONAL WILDERNESS PRESERVATION SYSTEM.

FOREST SERVICE RESPONSE:

This bill has not been introduced during the current session of Congress.

COMMENT NO. 89. IT IS MY BELIEF THAT WE ARE WELL ADVISED TO PRESERVE WHAT WE CAN OF OUR HERITAGE IN THE HOPES THAT THERE WILL BE SOME SMALL PORTION OF THAT AVAILABLE FOR UTILIZATION AND DISPOSITION BY OUR CHILDREN

ACCORDINGLY, I WILL HABITUALLY COME DOWN ON THE SIDE OF PRESERVATION AND EXTENSION OF THE NATURAL WEALTH WHICH WE FIND IN EXISTENCE

ON A LEVEL, PERHAPS MORE IMPORTANT TO THE SOCIETY AS A WHOLE, I'M CONCERNED ABOUT THE ECONOMIC WELFARE OF HALFWAY AND EASTERN OREGON IN GENERAL I'VE LIVED HERE FOR THE PAST SEVEN OR EIGHT YEARS AND IT IS MY OBSERVATION THAT THE TREND IS DOWNWARD IN TERMS OF ECONOMIC OPPORTUNITY AND IN THE TRADITIONAL METHODS OF MAKING A LIVING. THAT IS CATTLE, LOGGING, AND MINING HAVE ALL BEEN IN DECLINE ADDITIONALLY, THERE IS LITTLE ON THE HORIZON THAT WOULD SUGGEST ANY OF THESE BASIC ACTIVITIES, FORMERLY OF SUCH IMPORTANCE TO THIS AREA, ARE ABOUT TO RESURGE.

AS A RESULT OF THAT, I HAVE SPENT A GOOD DEAL OF TIME TRYING TO IMAGINE HOW THE RESIDENTS OF EASTERN OREGON WOULD MAKE A LIVING IN COMING YEARS IT IS MY CONCLUSION THAT THERE ARE ONLY TWO VIABLE ALTERNATIVES THAT CURRENTLY PRESENT THEMSELVES. THESE CONSIST OF THE ATTRACTION OF RETIREES AND OTHER PERSONS WHO COME HERE BECAUSE OF THE NATURAL ATTRACTIONS, SUCH AS LAKE FORK, OF THE REGION. ADDITIONALLY, THERE IS THE POSSIBILITY OF THE GROWTH OF A RECREATION-BASED ECONOMY IN WHICH PERSONS COME HERE FROM AREAS OF THE COUNTRY THAT HAVE LOST THEIR NATURAL HERITAGE IN ORDER TO REDISCOVER WHAT THAT IS

THESE PEOPLE WOULD, PRESUMABLY, PAY LOCALS TO GUIDE THEM AND TO SHOW THEM THE ATTRACTIONS THAT WE HAVE, AGAIN INCLUDING LAKE FORK.

BOTH THE ABOVE ECONOMIC ACTIVITIES CAN BE VIEWED AS 'TOURIST BASED', AND THEY BOTH DEPEND UPON THE MAINTENANCE OF AN ATTRACTIVE NATURAL ENVIRONMENT WHICH MUST INCLUDE AREAS SUCH AS LAKE FORK

I, THEREFORE, URGE YOU TO GIVE STRONG CONSIDERATION TO THE DEFERRAL OF ANY LOGGING OR SALVAGE ACTIVITIES IN THE LAKE FORK BASIN IN THE HOPES OF MAINTAINING THAT AREA AS A VIABLE ATTRACTION FOR THE ECONOMIC WELL BEING OF HALFWAY IN PARTICULAR AND BAKER COUNTY IN GENERAL.

FOREST SERVICE RESPONSE:

Yours is an opinion shared by others who wrote in regard to the Forest Plan. The Lake Fork area lies adjacent to the Eagle Cap Wilderness and Hells Canyon National Recreation Areas. We expect that its contribution to the recreational economy would be relatively insignificant compared to these two large areas

COMMENT NO. 90. MY RANGE-RELATED CONCERNS ARE THAT THE LAKE FORK AREA IS CURRENTLY HEAVILY OVERGRAZED. I SHARED MY OBSERVATIONS ON THIS LAST SUMMER WITH LINDA MCEWAN, AND WAS SADLY DISAPPOINTED TO READ OF A PROPOSED INCREASE IN CATTLE ALLOTMENTS I THINK THAT REST AND OPPORTUNITY FOR NATURAL RESEEDING IS

WHAT IS NEEDED THERE QUANTITIES OF ORGANIC FERTILIZER EXISTS THERE NOW, READY TO BE ABSORBED INTO THE SOIL AND PROMOTE NATIVE GRASS GROWTH IF IT COULD JUST BE GIVEN A BREAK FROM THE BOVINE SPECIES

FOREST SERVICE RESPONSE:

No increases in livestock numbers are planned for the Lake Fork area. A new plan which deals with the livestock distribution problems is currently being prepared and should alleviate the problems you describe.

COMMENT NO. 91: LAKE FORK IS ROADLESS IT IS A NETWORK OF STEEP DRAINAGES. LAKE FORK IS PRISTINE. IT ABOUNDS WITH MANY SPECIES OF WILDLIFE WHOSE ELEMENTAL NEEDS CAN BE MET IN AN UNDISTURBED SITE. LAKE FORK HAS A RICH DIVERSITY OF ECOTYPES, SOME OF THEM UNUSUAL FOR THIS AREA IT IS A QUALITY RECREATIONAL AREA AND WILDLIFE HABITAT IN ITS' UNALTERED STATE

FOREST SERVICE RESPONSE:

Many people share your opinion on the characteristics of this roadless area

COMMENT NO. 92: I INCLUDE THE LAKE FORK AREA IN WITH THE BALANCE OF THE FOREST TO BE INTENSIVELY MANAGED. IT WAS VERY UPSETTING TO ME TO READ IN THE LOCAL PAPER THAT YOU HAD REVERSED YOUR DECISION TO MANAGE THE LAKE FORK AREA FOR RESOURCE PRODUCTION. I GUESS YOU MUST REALIZE THE LOSS IN RESOURCE PRODUCTION WHICH YOUR DECISION OR LACK THEREOF CARRIES WITH IT

FOREST SERVICE RESPONSE:

To develop the area as was proposed in the decision to which you refer, would have precluded consideration of the area for unroaded recreation under the Forest Plan or another Environmental Impact Statement Recent court issues indicated that such preclusion may not have been legal. The Forest Supervisor was correct in withdrawing the decision to enter the area

COMMENT NO. 93 I AM OPPOSED TO ANY ROAD CONSTRUCTION OR TIMBER HARVEST IN THE LAKE FORK AREA FOR THESE REASONS.

1. LAKE FORK IS THE ONLY REMAINING AREA THAT HAS NATURAL BARRIERS WHICH HAVE NOT BEEN SIGNIFICANTLY BREACHED THIS HELPS PRESERVE IT AND COULD BE A MINI WILDERNESS EXPERIENCE
2. IT IS A UNIQUE HIGH ELEVATION TO LOW ELEVATION ECOSYSTEM WHICH OFFERS AN OPPORTUNITY FOR SCIENTIFIC RESEARCH.
3. IT SUPPLIES IMPORTANT WILDLIFE ESCAPEMENT AND FORAGE.
4. LAKE FORK IS AN IMPORTANT WATERSHED WHICH COULD BE AFFECTED BY LOGGING
5. THE HIGH COST OF HARVEST IN TODAY'S LOW LUMBER MARKET PROBABLY WILL NOT JUSTIFY A COMMERCIAL HARVEST OVER A MAJORITY OF THE AREA SINCE IT INCLUDES A LOT OF NONCOMMERCIAL FOREST LAND ENTERING A SMALL PART WILL AFFECT THE WHOLE

- 6 SALVAGE OF BLOWDOWN AND INSECT INFESTED TIMBER WILL PROBABLY NOT SOLVE THE INSECT PROBLEM ALSO, THE FUTURE ECONOMIC BENEFIT FROM SALVAGE WILL NOT JUSTIFY THE COST

FOREST SERVICE RESPONSE

Although your points are apparently based on personal judgement, they reflect the opinions of many of those who are interested in the Lake Fork area. Our studies show that portions of the area could justify commercial harvest on an economic basis in today's market, and we expect that future markets will be stronger.

COMMENT NO. 94 THE REFORESTATION OF LAKE FORK APPEARS DUBIOUS. EVEN NOW THERE ARE AREAS IN THE PINE DISTRICT THAT ALREADY MAY BE ABANDONED AS UNMANAGEABLE SOME OF THESE AREAS I HAVE PLANTED-TWICE. I NOTICE THESE UNITS ARE TO BE TREATED AGAIN. THEY SHOULD NEVER HAVE BEEN CUT.

FOREST SERVICE RESPONSE:

We believe the portion of the area we have designated for timber harvest and management can be reforested, although there may be occasional failures due to unusual weather, poor planting stock, or other unforeseen circumstances. Our continuing efforts to identify lands suitable for timber management should prevent most future plantation failure.

COMMENT NO. 95 THE LAKE FORK AREA IS A UNIQUE PIECE OF FOREST WHICH SHOULD BE LEFT IN ITS PRESENT STATE AND NOT FURTHER DISTURBED BY ANY SORT OF MANAGEMENT. NO LOGGING, NO ROADS, NO FOREST SERVICE "IMPROVEMENTS", NOTHING JUST LEAVE IT LIKE IT IS FOR THE ENJOYMENT OF US HAPPY LOCALS AND THE FEW TOURISTS AND OUTLANDERS WITH GOOD TASTE.

FOREST SERVICE RESPONSE:

The preferred alternative, as revised, will retain a large portion of the area in an undisturbed condition.

COMMENT NO. 96 LAKE FORK SHOULD BE DESIGNATED WILDERNESS

FOREST SERVICE RESPONSE

We do not agree as discussed in Appendix C of the EIS.

COMMENT NO. 97. I WOULD LIKE TO INDICATE MY STRONG SUPPORT FOR THE SPRUCE SALVAGE PROGRAM PRESENTLY BEING CONSIDERED IN THE LAKE FORK AREA OF YOUR DISTRICT I VIEW THE EFFECT OF THE SPRUCE BARK BEETLE INFESTATION AND THE PROPOSED SALVAGE OF THE INFESTED TIMBER FROM TWO PERSPECTIVES. FIRST, AS A PROFESSIONAL FORESTER, THE PROPOSED RECOVERY OF THE DEAD TIMBER IS REALLY THE ONLY LOGICAL MEANS TO REDUCE THE SPREAD OF THE SPRUCE BARK BEETLE AND RECOVER A PORTION OF THE ECONOMIC VALUE OF THE DEAD TIMBER BEFORE IT DETERIORATES. SECOND, FROM THE VIEWPOINT OF A FAMILY RECREATIONIST WHO CONSIDERS THE LAKE FORK AREA A "FAVORITE SPOT", I WOULD MUCH PREFER THE APPEARANCE OF A HARVESTED AND

REFORESTED AREA OVER AN EXTENSIVE SNAG PATCH OF DEAD TREES THAT WOULD CONTINUE TO BE A FIRE HAZARD FOR DECADES

FOREST SERVICE RESPONSE

We recognize that most of the large spruce will be killed, and this will result in many snags. We do not believe this will significantly detract from the scenery of the area – at least not in most people's eyes.

COMMENT NO. 98. I AM PART OF THE LARGE SEGMENT OF THE PUBLIC OPPOSED TO HARVESTING OF LAKE FORK, AND I AM WILLING TO THANK YOU FOR YOUR RECENT DECISION TO HALT LOGGING OF THAT COUNTRY. THOUGH LOGGING ITSELF CAN RESULT IN IMPROVED ELK HABITAT BY PROMOTING BROWSE, THE INEVITABLE ROADS WOULD NEGATIVELY IMPACT THE ELK BREEDING GROUNDS. A RECENT STUDY I READ STATES THAT FOR EVERY MILE OF ROAD, 225 ACRES OF ELK HABITAT ARE RENDERED UNUSEABLE, AND SINCE MANY ROADS ARE BUILT AT TAXPAYER EXPENSE TO BEGIN WITH, I CANNOT SUPPORT BUILDING ROADS AT THE EXPENSE OF PRIME ELK BREEDING GROUNDS. I URGE YOU TO SUPPORT A ROADLESS ALTERNATIVE FOR THE LAKE FORK AREA IN YOUR FINAL FOREST PLAN.

FOREST SERVICE RESPONSE:

Although we have revised the preferred alternative to retain the roadless character of much of the Lake Fork area, it is not because we necessarily think it will benefit elk (Roads could be closed during breeding season, for example)

COMMENT NO. 99 SOMETIMES, WE WONDER WHERE AND WHO SUPPLIES THE PUBLIC WITH THEIR FACTS. AS WE SEE IT IN AND AROUND THE BOUNDARIES OF OUR SALE, THE ELK DO NOT ABOUND. THERE IS NOT THE ABUNDANCE OF FEED AND NEVER WILL BE UNTIL THE OLD-GROWTH TIMBER IS SELECTIVELY HARVESTED. THUS, OPENING UP THE SOIL TO MAKE ROOM FOR NEW TREES AND GRASSES. IF YOU WERE TO EXAMINE THE GROUND AROUND THESE TREES, YOU WOULD SEE FOR YOURSELVES THE YEARS OF NEEDLES LEFT ON THE GROUND SO THE NEW SEEDS AND GRASSES CANNOT PENETRATE OR GROW. THE SEEDS NEED THE SUNLIGHT, THE AIR, AND THE BALANCE OF MINERALS TO SURVIVE. FROM WHAT WE HAVE SEEN THESE ELK HAVE MOVED OUT FOR LACK OF FEED. THAT IS WHY WE FIND THEM RIGHT DOWN HERE IN OUR LOWLANDS, FEEDING ON OUR YARDS, FIELDS AND HAYSTACKS. AS FOR ANY OTHER GAME, THAT TOO SEEMS TO BE OVERSTATED. WE HAVE SEEN MORE ELK, DEER, BEAR, AND GROUSE IN OUR BACK YARD THEN WE HAVE EVER SEEN IN LAKE FORK. AS ORDINARY PEOPLE WITH ORDINARY THOUGHTS, AND HAVING SEEN FOR OURSELVES FIRST HAND, WE FEEL THAT THE PEOPLE OF THIS AND SURROUNDING AREAS ARE IN FOR A RUDE AWAKENING IF SOME KIND OF A HAPPY MEDIUM ON THIS ISSUE IS NOT REACHED. WE ARE IN ECONOMICALLY DEPRESSED TIMES, BUT IF THE RADICAL ENVIRONMENTALISTS CUT OFF OUR TIMBERLAND, THEN WHAT ARE WE FACED WITH? WHAT HAPPENS TO OUR SO CALLED UTOPIA THEN?

FOREST SERVICE RESPONSE:

We hope the preferred alternative, as revised, is the happy medium you suggest

COMMENT NO. 100 I AM WRITING IN PROTEST OF THE DRAFT FOREST PLAN, PARTICULARLY AS IT WOULD AFFECT THE LAKE FORK AREA. I BELIEVE THAT TO ROAD AND LOG THIS ECOLOGICALLY DIVERSE AREA FOR THE SAKE OF MAKING UP A FEW MILLION BOARD FEET OF OUT OF

YOUR QUOTA FOR THE DISTRICT AND OF LINING THE POCKETS OF A FEW MILL OWNERS IN THE AREA WOULD BE A TRAVESTY OF THE FOREST SERVICE'S MULTIPLE-USE POLICY. WE ARE ONLY BEGINNING TO DISCOVER THE WIDESPREAD CONSEQUENCES OF MAN'S EXCESSIVE ABUSE OF THE PLANET'S NATURAL ENVIRONMENT, AND OWE IT TO OUR OWN RACE, TO SAY NOTHING OF OTHER SPECIES WHOSE FATE IS INEXORABLY LINKED TO OURS, TO STOP PLUNDERING WILD AREAS FOR OUR SHORT-TERM GAIN. THE TIMBER-SALE QUOTA CAN BE MADE UP ELSEWHERE. THE MILLS MAY GO UNDER, BUT IT WON'T BE BECAUSE OF RESTRICTING LOGGING IN THE FEW NON-WILDERNESS ROADLESS AREAS WE HAVE LEFT. SOME SPRUCE TREES MAY DIE OF BARK-BEETLE INFESTATION, BUT THE FOREST AS A WHOLE WILL GO ON AS IT ALWAYS HAS. CHANGE THE STATUS OF THE LAKE FORK AREA TO "NON-CUTTING ROADLESS" AND WE WILL ALL BE THE BETTER FOR IT.

FOREST SERVICE RESPONSE:

The preferred alternative has been revised so the major portion of the area will be managed for unroaded recreation (Management Area 6).

COMMENT NO. 101: IF I HAD TO CHOOSE AMONG THE ALTERNATIVES PRESENTED, I WOULD HAVE TO SELECT ALTERNATIVE F, MODIFIED TO ELIMINATE LOGGING OF LAKE FORK. I RECOGNIZE THE LOSS THIS ALTERNATIVE INVOLVES FOR THE NEAR TERM TIMBER INDUSTRY, BUT BELIEVE, THAT LONG TERM, THE AREA WOULD BE BETTER OFF BY PRESERVING WHAT REMAINS OF OUR NATURAL HERITAGE.

FOREST SERVICE RESPONSE:

Response to the Draft Forest Plan indicates that many people share your opinion about the Lake Fork area.

COMMENT NO. 102: I ALSO THINK YOUR LAKE FORK DECISION IS UNFOUNDED AND CERTAINLY VERY WASTEFUL OF A VALUABLE RESOURCE!

FOREST SERVICE RESPONSE

Many people share your opinion.

COMMENT NO. 103. WE CONSIDER THE LAKE FORK ECOSYSTEM VERY ESSENTIAL IN IT'S PRESENT ROADLESS, UNLOGGED, OLD-GROWTH STATE. THE AREAS WILDLIFE, CLEAN AND TIMELY WATER RESOURCE, DIVERSE SUB-ALPINE ECOTONE AND THE CONCERN FOR ANY-MORE BELOW-COST TIMER SALES INVOKES ME TO ASK YOU TO LEAVE LAKE FORK ALONE.

FOREST SERVICE RESPONSE.

The final plan has been revised to retain a large portion of the Lake Fork area in roadless recreation (Management Area 6) this includes the portion where below-cost sales are most likely to occur.

COMMENT NO. 104. THE FOREST SHOULD BE OPEN TO ALL PEOPLE, NOT JUST A FEW. THERE IS ALREADY PLENTY OF PRIMITIVE AREAS. WE NEED ROADS FOR BETTER RECREATION.

FOREST SERVICE RESPONSE

The amount of area available for roaded recreation use will be slightly increased over present as those currently unroaded areas which are scheduled for development have roads built into them. The amount of primitive area will be reduced.

COMMENT NO. 105: ROADLESS AREA RETENTION IN EXCESS OF THAT CURRENTLY LEGISLATED AS WILDERNESS IS SIMPLY NOT IN THE BEST INTERESTS OF THE PEOPLE AND COMMUNITIES OF NORTHEAST OREGON. THE CONTINUING DEBATE OVER LOCAL PLAY-GROUNDS SUCH AS THE LAKE FORK ROADLESS AREA NEEDS TO BE STOPPED.

FOREST SERVICE RESPONSE:

An opinion which others share

COMMENT NO. 106: THE LAKE FORK ROADLESS AREA INCLUDES 10,852 ACRES OF PRODUCTIVE FOREST LAND SUITABLE FOR TIMBER MANAGEMENT, APPROXIMATELY 73 PERCENT OF THE ROADLESS AREA (DEIS APPENDIX C-34). APPENDIX C OF THE ORIGINAL DEIS STATES: (1) THAT THE LAKE FORK ROADLESS AREA HAS BEEN TWICE CONSIDERED FOR ADDITION TO THE WILDERNESS SYSTEM; (2) THAT, EACH TIME, IT WAS DETERMINED THAT THE NEEDS OF SOCIETY WOULD BE BEST SERVED IF THE AREA WERE MANAGED AS NON-WILDERNESS;" AND (3) THAT THE AREA'S HIGH TIMBER VALUES CONTRIBUTED TO THESE DECISIONS, AS DID THE FACT THAT THE FEATURES FOUND WITHIN THE AREA ARE "WELL REPRESENTED IN CURRENTLY ESTABLISHED NEARBY WILDERNESSES" (DEIS APPENDIX C-34). WE AGREE WITH THIS ASSESSMENT AND BELIEVE THAT THE PRODUCTIVE FOREST LANDS WITHIN THE LAKE FORK ROADLESS AREA SHOULD BE MANAGED FOR SCHEDULED TIMBER PRODUCTION.

FOREST SERVICE RESPONSE:

The Lake Fork area received a great deal of attention from the public in the planning process. The revised land allocation in the final preferred alternative results from this interest including recommendation from the Governor of Oregon.

COMMENT NO. 107: ROADLESS AREAS, INCLUDING THE TWO ADDRESSED IN THE SUPPLEMENT, ARE OF PRIMARY CONCERN TO ME. THESE AREAS WERE RELEASED FOR AND SHOULD BE SCHEDULED FOR FULL DEVELOPMENT FOR MULTIPLE-USE INCLUDING COMMODITY PRODUCTION.

FOREST SERVICE RESPONSE:

Many reviewers shared this opinion.

COMMENT NO. 108: WE BELIEVE THAT THE REPORT OF RANDALL O'TOOLE OF CASCADE HOLISTIC ECONOMICS CONSULTANTS RAISES SOME SERIOUS QUESTIONS REGARDING THE ASSUMPTIONS USED IN FORPLAN REGARDING RATES OF GROWTH AS WELL AS TIMBER PRICES THAT MIGHT BE RECEIVED. FAILURE TO INCLUDE THE COSTS OF ROADING IN ROADLESS AREAS WOULD SEEM TO BE A SERIOUS FLAW IN DETERMINING THE TRUE RESULTS OF A TIMBER ALLOCATION IN THESE AREAS.

FOREST SERVICE RESPONSE:

We have reviewed O'Toole's comments and have responded to them elsewhere in this Appendix.

COMMENT NO. 109: IN MY OPINION THE BEAVER CREEK ROADLESS AREA IS A POWDER KEG WAITING TO BURN. WE NEED ROADS IN THIS AREA IN ORDER TO FIGHT THE FIRE WHEN IT BURNS WE ALSO NEED THIS AREA FOR OUR WATERSHED.

FOREST SERVICE RESPONSE:

An opinion shared by many reviewers We do not necessarily agree that roads are necessary to protect the area, but will agree that the high level of fuels increases the risk of watershed through wildfire.

COMMENT NO. 110: THE DESCRIPTION OF THE UPPER GRANDE RONDE IN THE SUPPLEMENT MAKES ITS OWN CASE FOR RETAINING IT AS A ROADLESS AND SEMIPRIMITIVE AREA. I CANNOT AGREE WITH THE CONCLUSION THAT "THE VALUES CAN AND WILL BE PROTECTED WITH OTHER LAND ALLOCATIONS AS WELL AS ROADLESS RECREATION OR WILDERNESS" UNLESS IT HAS A SPECIFIC DESIGNATION TO PROTECT IT, THERE WILL SURELY BE DISRUPTION OF ITS UNIQUE ECOLOGICAL SYSTEM IN THE FUTURE. ALSO, THOUGH IT MAY BE DEVOID OF ANY ONE OUTSTANDING FEATURE (PARAGRAPH 4,C-7), THERE IS SO MUCH BEAUTY, DIVERSITY, AND HISTORY IN THAT SMALL LOCATION THAT, AS A WHOLE, IT BECOMES AN OUTSTANDING FEATURE OF ITSELF. BECAUSE THE FOREST SERVICE HAS NOT LOOKED AT IT FOR MUCH OTHER THAN TIMBER OR FOR BIG GAME HABITAT, THEY HAVE NOT RECOGNIZED THE VALUES THAT IT DOES HAVE; THE SOURCE OF FOUR STREAMS, BOGS, MEADOWS, ALL THE INDIGENOUS TREE SPECIES WILDLIFE, BEAUTY OF PLANTS AND STREAMS, AND THE DEMARCATION BETWEEN THE COLUMBIA RIVER BASALTS AND THE ELKHORN GRANITES. THE OLD MINES, DITCHES AND THE SITE OF A CHINESE CAMP EXCITE HISTORY BUFFS AND ANTHROPOLOGISTS. THE GREATEST VALUE IT HAS IS THE SOURCE OF THE GRANDE RONDE RIVER IN THE FUTURE, WATER IS GOING TO BE MORE IMPORTANT THAN LUMBER. WE HAVE A RESPONSIBILITY TO BEGIN NOW TO KEEP ALL THE STREAMS IN THE FOREST AS PRODUCTIVE AND PRISTINE AS POSSIBLE. IT IS TRULY AN OUTSTANDING PLACE FOR HUNTING, HIKING, NATURE STUDY, HISTORY, AND CAMPING. IT IS ACCESSIBLE, CLOSE TO AREA PEOPLE AND WILL BE USED MORE AS THE NEED GROWS IT SHOULD BE PRESERVED AS ROADLESS AND UNDEVELOPED

FOREST SERVICE RESPONSE:

An opinion many share

COMMENT NO. 111: THE HOODOO CREEK SHOULD BE KEPT IN ITS PRESENT CONDITION. IT WAS CONSIDERED AS AN ADDED SOURCE OF WATER FOR THE CITY OF LA GRANDE AT ONE TIME AND IS STILL A GOOD POSSIBILITY SHOULD FUTURE EXPANSIONS REQUIRE IT AS IT IS, IT'S AN IMPORTANT TRIBUTARY TO BEAVER CREEK WHICH IS A GOOD STREAM FOR TROUT.

FOREST SERVICE RESPONSE:

Regardless of land management allocation, we intend that Hoodoo Creek will be protected

COMMENT NO. 112: THE ROADLESS RIDGE BETWEEN JORDAN CREEK AND BEAVER CREEK WATERSHED SHOULD BE EXCLUDED FROM TIMBER CUTTING AND ROAD BUILDING. IT IS USED EXTENSIVELY YEAR-ROUND FOR DEER AND ELK THERMAL COVER. THAT IS FAR MORE IMPORTANT THAN THE FEW THOUSAND FEET OF LUMBER THAT WILL EVER BE TAKEN FROM IT

FOREST SERVICE COMMENT:

We do not believe timber harvest will significantly affect long-term deer and elk use of this ridge

COMMENT NO. 113: THE BEAVER CREEK AND UPPER GRANDE RONDE ROADLESS AREAS ARE OF CONSIDERABLE INTEREST TO THE GRRC. GRRC HAS A LONG HISTORY OF INVOLVEMENT IN THE MANAGEMENT DECISION PROCESS FOR THE BEAVER CREEK WATERSHED. OUR STANCE CONTINUES TO BE THAT WATERSHED PROTECTION IS THE PARAMOUNT CONCERN AND CLEAN WATER PRODUCTION THE MOST IMPORTANT RESOURCE TO SUSTAIN IN THIS AREA

FOREST SERVICE RESPONSE:

We agree

COMMENT NO. 114: GRRC RECOMMENDS THE UPPER GRANDE RONDE RA BE MAINTAINED IN ITS PRESENT CONDITION. THE ESTIMATED 12 MMBF OF TIMBER THE AREA COULD CONTRIBUTE TO THE ASQ IS OF LESSER VALUE THAN THE WATER QUALITY, HABITAT, AND RECREATION THE AREA PROVIDES.

FOREST SERVICE RESPONSE:

We do not believe timber harvest as planned in several of the alternative management plans would deleteriously affect water quality or habitat. It would change the recreation experience available

COMMENT NO. 115: THE FOREST SHOULD PROVIDE INFORMATION ON THE COST OF HARVESTING THE UPPER GRANDE RONDE AREA, AND ROAD DEVELOPMENT AND MAINTENANCE COSTS SHOULD BE INCLUDED A SIMPLE ECONOMIC ANALYSIS SHOULD BE COMPILED THAT SHOWS THE DEFICIT OR PROFIT MARGIN OF INDIVIDUAL TIMBER SALES WITHIN THE RA

FOREST SERVICE RESPONSE:

Completed environmental analyses for the Tanner Creek Timber Sale promotes this information

COMMENT NO. 116: THE TASK FOR THE FOREST SERVICE IS TO BE SITE SPECIFIC ON AN ACRE-BY-ACRE BASIS ON THESE LANDS, NOT SIMPLY LUMP THE ENTIRE ROADLESS AREA INTO ONE MANAGEMENT SCHEME THE QUESTIONS ARE WHY ARE THEY ROADLESS, WHAT UNIQUE FEATURES ARE PRESENT, AND HOW CAN WE MAXIMIZE THE UNIQUE FEATURES YET ALLOW

TRUE MULTIPLE USE THIS IS THE CREATIVE THOUGHT CONGRESS EXPECTED AND THE PUBLIC DESERVES

FOREST SERVICE RESPONSE:

We believe the analysis process, as documented in Appendix C and elsewhere in the EIS provides the level of review intended

COMMENT NO. 117: THE REGION HAS CONSISTENTLY DELAYED ACTIVITIES IN THE ROADLESS AREAS ON THE PRETENSE THAT THE LAND ALLOCATIONS OF THE NEW FOREST PLAN WOULD RESOLVE THESE CONFLICTS. THIS VACUOUS LOGIC HAS NOW BEEN THOROUGHLY DEBUNKED BY THE CHIEF'S DECISION IN RE APPEAL IDAHO PANHANDLE NATIONAL FOREST. IN PANHANDLE, THE CHIEF STATED THAT THE PLAN ONLY SERVES TO SET A TARGET, IT IS NOT THE IRRETRIEVABLE OR IRREVERSIBLE COMMITMENT OF RESOURCES. DURING THE LAST FEW YEARS, THE REGIONAL FORESTER HAS, UPON APPEAL, AUTOMATICALLY PULLED ANY TIMBER SALE IN A ROADLESS AREA. IN JUSTIFYING HIS DECISION, THE REGIONAL FORESTER ARGUED THESE ISSUES WOULD BE RESOLVED IN THE FOREST PLAN. AS THE CHIEF HAS NOW MADE CLEAR, THE REGIONAL FORESTER WAS WRONG. BY FAILING TO DIRECTLY ADDRESS THE ROADLESS ISSUES EARLIER IN A SITE SPECIFIC ANALYSIS HE HAS ONLY BEGGED THE ISSUE HIS FAILURE TO MAKE THE LAND DECISION IN A TIMELY MANNER HAS GUARANTEED THE REGION WILL FACE ADDITIONAL YEARS OF CONTENTION AND LITIGATION

FOREST SERVICE RESPONSES:

Region Six has taken a different approach than Region One where the Idaho Panhandle is located The Chief's decision referred to Region One

COMMENT NO. 118: DEVELOPMENT COSTS NEED TO BE CONTROLLED, AS ALWAYS, BUT SHOULD NOT, AS A RESULT OF DEFICIENCIES WITHIN GOVERNMENT ACCOUNTING SYSTEMS, BE ALLOWED TO BECOME THE BASIS FOR ADDITIONAL STALL TACTICS ON THE PART OF PRESERVATIONISTS' INTERESTS. WE ARE UNABLE TO ACCEPT ANY ASSERTION THAT THE MAJORITY OF THESE LANDS ARE ECONOMICALLY INOPERABLE WHEN WE ARE ABLE TO PROFITABLY MANAGE SIMILAR TIMBERLANDS OF OUR OWN

FOREST SERVICE RESPONSE:

We do not contend that most of the roadless areas are not economically viable Some portions of them are, and some considered as a whole are

COMMENT NO. 119: NOW, THEREFORE BE IT RESOLVED, BY THE CITY COUNCIL OF THE CITY OF LA GRANDE, OREGON THAT THE FOREST SUPERVISOR OF THE WALLOWA-WHITMAN NATIONAL FOREST BE REQUESTED TO NOT ALLOCATE THE BEAVER CREEK ROADLESS AREA TO ROADLESS RECREATION USES AND THAT IT BE MANAGED FOR A VARIETY OF RESOURCE OUTPUTS, WITH THE PREDOMINANT USE BEING WATER QUALITY AND QUANTITY AND OTHER USES WHICH ARE COMPATIBLE WITH MANAGEMENT FOR WATER, AND, BE IT FURTHER RESOLVED, BY THE CITY COUNCIL OF THE CITY OF LA GRANDE, OREGON, THAT THE FOREST SUPERVISOR OF THE WALLOWA-WHITMAN NATIONAL FOREST BE REQUESTED TO NOT ALLOCATE THE BEAVER CREEK ROADLESS AREA TO ROADLESS RECREATION USE, IN ORDER TO PREVENT AN UNDUE NEGATIVE ECONOMIC IMPACT UPON UNION COUNTY AND THE CITY OF LA GRANDE BY REMOVING 1.13 MMBF OF TIMBER FROM THE ANNUAL ALLOWABLE YIELD

FOREST SERVICE RESPONSE:

We appreciate receiving the City's comments. They are an important cooperater in the municipal watershed which makes up a large part of the Beaver Creek Roadless Area.

COMMENT NO. 120: A MAJOR ERROR IN FORPLAN WAS THE FAILURE TO DISTINGUISH ROADED FROM ROADLESS ACRES WITH THE EXCEPTION OF THE UPPER GRANDE RONDE AND LAKE FORK AREAS, ROAD CONSTRUCTION COSTS IN ALL ROADLESS AREAS WERE ASSUMED TO BE IDENTICAL TO COSTS OUTSIDE OF ROADLESS AREAS BECAUSE OF HIGH ROAD CONSTRUCTION COSTS, FORPLAN DETERMINED THAT TIMBER SALES IN THE LAKE FORK AREA WOULD LOSE MONEY A SIMILAR CONCLUSION WOULD BE REACHED IN MANY OTHER AREAS IF ROAD COSTS WERE CORRECTLY ALLOCATED

FOREST SERVICE RESPONSE:

Lake Fork and Upper Grande Ronde Roadless Areas require construction of major roads to provide access. Consequently, higher road costs were identified in the FORPLAN model for these areas. The other roadless areas could generally be accessed with only "local" road construction, not significantly more costly through providing access elsewhere on the Forest.

COMMENT NO. 121: ANOTHER ISSUE WHICH I FEEL TO BE VERY PERPLEXING IS THAT OF ROADLESS AREAS. THE TWO ROADLESS AREAS PROPOSED IN YOUR DEIS ARE NEITHER WARRANTED NOR NECESSARY. THESE AREAS WERE RELEASED TO MULTIPLE USE, INCLUDING ROADING AND TIMBER HARVEST, THROUGH LANGUAGE CONTAINED IN THE WILDERNESS ACT OF 1984. SENATOR MARK HATFIELD AS ONE OF THE CO-FOUNDERS OF THIS BILL, HAS OPENLY STATED THAT ALL AREAS OTHER THAN THOSE LEGISLATED AS WILDERNESS SHOULD HAVE BEEN PUT BACK INTO PRODUCTION AND IT WAS NOT THE INTENT OF THIS BILL TO KEEP THOSE AREAS WHICH DID NOT QUALIFY AS WILDERNESS

FOREST SERVICE RESPONSE:

Court decisions have indicated that while the wilderness option was resolved for many areas by the 1984 Act, a full range of non-wilderness possibilities remains. This includes management for unroaded recreational opportunities.

COMMENT NO. 122: AT A DECEMBER 10 MEETING HELD IN RICHLAND, A LARGE TURN OUT OF EAGLE VALLEY FOLKS WERE POSTED ON ALL THINGS THAT HAD TAKEN PLACE DURING THE SPRING, SUMMER, AND FALL OF 1988. THE SUBJECT OF FUTURE LOGGING THE EAST EAGLE CREEK DRAINAGE IN THE NEW FOREST PLAN WAS DISCUSSED. THEN A HAND VOTE OF PEOPLE TAKEN AT THE MEETING RESULTED IN 100% WANTING THE EAST EAGLE DRAINAGE TO BE LEFT ALONE AND NOT LOGGED (THIS INCLUDES THE PROPOSED BACKSITE SALE)

FOREST SERVICE RESPONSE:

In the final Preferred Alternative C, most of the area referred to was reallocated to Management Area 6 which does not provide for scheduled timber harvest

COMMENT NO. 123: SEMIPRIMITIVE RECREATION - I FEEL THAT IN ORDER TO MAINTAIN A TRUE MULTIPLE USE CONCEPT, THIS TYPE OF RECREATION MUST BE PROVIDED TO THE PUBLIC.

FOREST SERVICE RESPONSE:

We agree that this is an important part of the recreational spectrum

COMMENT NO. 124: I AM NOT AGAINST WILDERNESS AND ROADLESS AREAS, BUT EASTERN OREGON HAS MORE THAN ENOUGH. CONSERVATIONISTS WILL NEVER BE SATISFIED

FOREST SERVICE RESPONSE:

An opinion many share.

COMMENT NO. 125: BEAVER CREEK CONTRIBUTES CRITICAL HIGH QUALITY WATER TO THE GRANDE RONDE SYSTEM. THE RA PROVIDES EXCELLENT SUMMER HABITAT FOR DEER AND ELK AND SUPPORTS ROADLESS RECREATIONAL USE. THESE VALUES OUTWEIGH THE VALUE AND COSTS OF DEVELOPING THE AREA.

FOREST SERVICE RESPONSE:

We do not believe that careful development of the area would negatively impact water or big game values. It would change the recreation experience opportunities from one of roadless recreation to roaded.

COMMENT NO. 126: I AM IN FULL AGREEMENT WITH THE REQUESTS OF "FRIENDS OF LAKE FORK, INC," CONCERNING THE MANAGEMENT OF THE "LAKE FORK" AND "EAST EAGLE" AREAS OF THE WALLOWA-WHITMAN NATIONAL FOREST.

LET'S TRY TO SAVE THE FEW ACRES OF VIRGIN FOREST WE HAVE LEFT.

FOREST SERVICE RESPONSE:

Many reviewers shared this view

**OLD GROWTH
Code 300**

COMMENT NO. 1: SINCE EVIDENCE SHOWS OWLS (GREY) ARE DOING OK IN A MAN MADE ENVIRONMENT, I THINK THE AMOUNT OF SET ASIDES SHOULD BE REDUCED FOR THEM, AND IN FACT, FOR MOST GAME SPECIES. I THINK THE AMOUNT OF SET ASIDE FOR OLD GROWTH SHOULD BE CUT DRASTICALLY

FOREST SERVICE RESPONSE

Old-growth stands have not been established specifically for the great grey owl although they may use the old-growth areas as do many species

COMMENT NO. 2: WE WOULD LIKE TO SEE A SIGNIFICANT QUANTITY OF OLD-GROWTH TIMBER RETAINED

WE ARE ALL LEARNING, PERHAPS BELATEDLY, THE IMMENSE VALUE OF OLD-GROWTH FOREST FOR WILDLIFE, FISHERIES HABITAT, AND WATER QUALITY PROTECTION. THE INTERRELATIONSHIP OF WILDLIFE, TREES, FUNGI, AND MICROBES ARE JUST NOW BEING UNDERSTOOD EACH COMPONENT IS DEPENDENT ON THE OTHERS

OLD-GROWTH FORESTS CAN PROVIDE HABITAT FOR UP TO 120 SPECIES OF VERTEBRATES ALONE, AND MORE THAN A THIRD OF THEM NEED THESE FORESTS FOR CRITICAL PORTIONS OF THEIR LIFE CYCLES THERMAL COVER FOR DEER AND ELK IN EASTERN OREGON IS JUST ONE OF THE IMPORTANT USES OF OLD-GROWTH FORESTS.

ALTHOUGH POORLY UNDERSTOOD, MOUNTING EVIDENCE POINTS TO THE IMPORTANCE OF FUNGI AND MICROBES THAT ARE FOUND ONLY IN THE MATURE FOREST. WE FIRMLY BELIEVE PRESERVATION OF THE REMAINING OLD-GROWTH STANDS SHOULD BE A PRIORITY OF THE USDA FOREST SERVICE.

FOREST SERVICE RESPONSE

We agree that the biological relationships are not fully known and that they may be more important than previously recognized. However, old growth is not the only source of thermal cover for big game By establishing old-growth stands as a minimum management requirement, we are recognizing the importance of old growth, albeit not to the extent that many reviewers would like.

COMMENT NO. 3: OLD-GROWTH TIMBER SHOULD BE PRESERVED, PARTICULARLY IN THE BEAR CREEK, CATHERINE CREEK, AND LAKE FORKS AREAS. OLD-GROWTH FORESTS ARE A SCARCE AND FAST-VANISHING RESOURCE UPON WHICH MANY WILDLIFE SPECIES DEPEND

FOREST SERVICE RESPONSE.

Extensive areas of old growth will be retained in the areas you mention, either through the old-growth allocations, wilderness, or Management Area 6.

COMMENT NO. 4. NOT ONLY IS IT IMPORTANT TO KEEP SUSTAINED YIELD TIMBER HARVESTING, BUT IT IS IMPORTANT TO RESPECT THE OLD-GROWTH FOREST AND THE WILDLIFE THAT LIVES THERE. THEY ARE DEPENDING ON YOU FOR THEIR PROTECTION. WE ARE DEPENDING ON YOU FOR THEIR PROTECTION

FOREST SERVICE RESPONSE

We recognize the responsibility to provide habitat for the variety of wildlife that are found on the Forest

COMMENT NO.5: OLD TREES, EVEN OLD LODGEPOLE, HAVE ECOLOGICAL FUNCTIONS TO FULFILL THAT MIGHT NOT BE POSSIBLE WITH MANAGED STANDS. ESPECIALLY IN PONDEROSA PINE STANDS, SNAGS SHOULD BE LEFT WHEREVER POSSIBLE, AND IN GENERAL, REPLACEMENT SNAGS SHOULD BE PROVIDED FOR HIGH SUSTAINABLE LEVELS OF CAVITY NESTERS. THESE BENEFITS TO THE ECOSYSTEM MAY NOT BE QUANTIFIABLE INTO A CONVENIENT PRESENT NET VALUE, BUT IT EXISTS, AND SHOULD BE CONSIDERED IN FOREST MANAGEMENT .

FOREST SERVICE RESPONSE

We agree and believe our standards and guidelines reflect this concern.

COMMENT NO. 6: ACCORDING TO APPENDIX B OF THE DEIS, ALL OF THE FOREST'S TREE STANDS HAVE BEEN MAPPED AND DESCRIBED IF THIS INFORMATION EXISTS, THE PHYSICAL CHARACTERISTICS OF EACH OLD-GROWTH SITE SHOULD BE PROVIDED IN AN APPENDIX TO THE DEIS IN A MANNER THAT WOULD MAKE IT POSSIBLE FOR THE REVIEWER TO CORRELATE THAT INFORMATION TO EACH OLD-GROWTH AREA DELINEATED ON THE ALTERNATIVE MAPS PROVIDED. THIS WOULD ALLOW FOR A MUCH MORE MEANINGFUL ANALYSIS OF EACH ALTERNATIVE'S IMPACT ON OLD GROWTH

FOREST SERVICE RESPONSE

See Response No 38, this section.

COMMENT NO. 7 PAGE 1-9, OLD GROWTH - THE LAST PARAGRAPH AND RELATED QUESTIONS PRESENTED IN THIS SECTION IMPLY THAT THE PROPOSED MINIMUM LEVELS OF OLD GROWTH TO BE MANAGED MAY NOT REALISTICALLY BE ADEQUATE TO SUPPORT VIABLE WILDLIFE POPULATIONS THE FWS SUGGESTS THAT A MORE REALISTIC MANAGEMENT LEVEL BE PRESCRIBED FOR OLD GROWTH AND THAT THE EMPHASIS SHOULD BE TO MAINTAIN VIGOROUS WILDLIFE POPULATIONS AS OPPOSED TO ONLY VIABLE WILDLIFE POPULATIONS, THUS REDUCING THE LEVEL OF RISK.

FOREST SERVICE RESPONSE.

We agree that the level of risk increases as the level of old growth is reduced There is, we feel, less risk on the Forest as a whole, however, than on some other National Forests, because of the large areas within the Hells Canyon National Recreation Area and within the four wildernesses, where the old growth will be retained in all alternatives. The risk, therefore, appears to be in distribution rather than actual risk of loss of any old growth using species

COMMENT NO. 8 PAGE II-74, TABLE II-2 OLD GROWTH - THE REDUCTION IN THE AREAS TO BE MANAGED FOR OLD GROWTH IS SUBSTANTIAL. THE POTENTIAL OF 76,919 ACRES IS REDUCED BETWEEN 36.6 AND 52.3 PERCENT. THE IMPACTS OF THIS LEVEL OF REDUCTION IN FISH AND WILDLIFE RESOURCES ARE NOT ADEQUATELY ADDRESSED IN THE DEIS. A MORE SPECIFIC ANALYSIS OF THESE IMPACTS WOULD IMPROVE THE QUALITY OF THE DEIS AND SHOULD BE INCLUDED IN THE FINAL

FOREST SERVICE RESPONSE:

As explained in the footnote on the referenced page, only 28,000 acres of the areas allocated to the old growth management area in Alternative A (no-change alternative) are currently in an old-growth condition. Alternative C, with over 38,000 acres of old-growth allocation is actually an increase. But there is much more old growth on the Forest, and will continue to be, because of the large amounts of old growth in other management areas as explained in Chapter IV

COMMENT NO. 9: PAGE IV-43 AND IV-44, EFFECTS OF ALTERNATIVES ON OLD-GROWTH FOREST - IN VIEW OF THE MANY RECOGNIZED ATTRIBUTES OF OLD GROWTH TO WILDLIFE AND FOREST ECOLOGY, WE ARE CONCERNED THAT ALL BUT ONE OF THE ALTERNATIVES WOULD REDUCE THE ACREAGE AND DISTRIBUTION OF OLD GROWTH ON THE FOREST. THE RATIONALE FOR THE PROPOSED REDUCTION SHOULD BE DESCRIBED IN THE PLRMP. THE DEIS SHOULD INCLUDE A DETAILED DESCRIPTION OF THE EXISTING OLD-GROWTH STANDS INCLUDING SIZE, SPATIAL DISTRIBUTION, ELEVATION, AND GENERAL CONDITION. THIS INFORMATION IS REQUIRED TO FULLY UNDERSTAND THE IMPACTS OF EACH ALTERNATIVE (APPENDIX B STATES THAT THIS INFORMATION HAS BEEN DEVELOPED.)

FOREST SERVICE RESPONSE

See Response No. 38, this section

COMMENT NO. 10: OLD GROWTH - THE 38,196 ACRES CONSTRAINED TO MINIMUM MANAGEMENT LEVELS FOR OLD GROWTH IS AN OVER STATEMENT OF THE MMR REQUIREMENTS. THE 17,954 ACRES OF OLD GROWTH PROVIDED BEYOND MMR'S WERE PROVIDED BY BACK-COUNTRY STRATEGY (MA-6) AND THE OLD-GROWTH MANAGEMENT AREA (MA-15). THE WALLOWA-WHITMAN ACKNOWLEDGES THAT:

"THERE IS NO WILDLIFE SPECIES KNOWN TO RELY SOLELY ON OLD-GROWTH HABITAT, THERE ARE 20 ANIMAL SPECIES ON THE WALLOWA-WHITMAN WHICH INDICATE A DEFINITE PREFERENCE FOR MATURE OR OLD-GROWTH FOREST" (DEIS, II-68). IT IS NOT SHOWN IN THE DEIS THAT THESE SPECIES MAY SURVIVE AND FLOURISH EQUALLY WELL IN SECOND-GROWTH FORESTS.

WE RECOMMEND THAT DEDICATED OLD-GROWTH STANDS BE REDUCED TO THE ABSOLUTE MINIMUM AS REQUIRED BY LAW.

FOREST SERVICE RESPONSE:

Your suggestion was carefully considered in arriving at a final preferred alternative. This was, in fact, the level shown for Alternative B. Our concern is that the minimum level leaves no room for error. As shown in 1986, old-growth stands can be quickly lost to fire

COMMENT NO. 11: OLD-GROWTH FOREST MY INPUT IS THAT NO MORE OLD GROWTH SHOULD BE LOGGED I WOULD WAGER THAT IF YOU STOPPED LOGGING ALL OLD GROWTH OVER 150 YEARS OF AGE, IT WOULD HAVE LITTLE OR NO EFFECT ON LOCAL ECONOMIES.

FOREST SERVICE RESPONSE.

We estimate that not harvesting any more old-growth stands (those meeting the definition in the glossary) would result in reducing annual timber harvest by 5 to 10 MMBF in Alternative C. However, not harvesting any more trees that are over 150 years would reduce first decade timber harvest levels about 60 percent in any alternative since so much of our current harvest comes from large trees which are well over 150 years of age.

COMMENT NO. 12 AGAIN, THE FINAL PLAN MUST RECOGNIZE THAT (1) IT IS UNLIKELY THAT TIMBER HARVEST OVER THE NEXT 10 YEARS WILL SUBSTANTIALLY REDUCE THE EXISTING ACREAGE OF OLD GROWTH ON THE FOREST; AND (2) THE PROGRAM CAN ALWAYS BE CHANGED IF MONITORING OR RESEARCH CLEARLY ESTABLISHES THAT IMPACTS ON OLD-GROWTH DEPENDENT WILDLIFE ARE EXCESSIVE. IN THE MEANTIME, A REASONABLE OLD-GROWTH MANAGEMENT PROGRAM WITH MINIMAL CONSTRAINTS ON TIMBER HARVEST WILL HELP AVOID POTENTIALLY NEEDLESS ADVERSE ECONOMIC IMPACTS ON LOCAL TIMBER-BASED ECONOMIES. THIS APPROACH CONFORMS TO THE BASIC CONCLUSIONS OF DEPUTY ASSISTANT SECRETARY OF AGRICULTURE DOUGLAS MACCLEERY'S DECISION ON THE REGION 6 REGIONAL GUIDE APPEAL

FOREST SERVICE RESPONSE:

Unless we were to consciously avoid inventoried old-growth stands, timber harvest during the *next decade will substantially reduce existing inventoried old growth. Wherever this may not be true as a general rule throughout Region 6, it is true for the Wallowa-Whitman, an old-growth deficit Forest*

COMMENT NO. 13. ALL OF THE REMAINING OLD GROWTH SHOULD BE RETAINED TO PROVIDE THERMAL COVER FOR THE WILDLIFE AND RECREATIONAL OPPORTUNITIES FOR THE PUBLIC THAT OWNS THE RESOURCE.

FOREST SERVICE RESPONSE:

We have considered your view, which many people share.

COMMENT NO. 14. AFTER HEARING CHRIS MASER'S TALK, PRESENTED AT EOSC, AND THE EXPERIENCE OF CHINA AND EUROPE'S FORESTS DYING AFTER A THIRD ROTATION, I AM CONVINCED THAT A DECREASE IN OLD-GROWTH TIMBER WILL HARM OUR ABILITY TO SUSTAIN THE OVERALL HEALTH OF THE COMPLEX ECOLOGICAL SYSTEM UPON WHICH ALL FOREST USERS ARE DEPENDENT I ASK THAT YOU PLEASE RECONSIDER YOUR PLAN TO REDUCE OLD GROWTH BY SUCH A DRASTIC AMOUNT IF TIMBER IS TO BE A RENEWABLE RESOURCE, WE MUST ESTABLISH AN ALLOWABLE CUT THAT DOES NOT DIMINISH THE FOREST'S NATURAL ABILITY TO RENEW ITSELF

FOREST SERVICE RESPONSE

In Alternative C, we are proposing to maintain 93% of the present old-growth level. We do not feel this amounts to a drastic reduction

COMMENT NO. 15. PRESCRIPTIONS FOR GRAZING IN OLD-GROWTH STANDS SHOULD ALSO REDUCE GRAZING WELL BELOW GENERAL LEVEL TO PROTECT THE ENTIRE PLANT AND ANIMAL COMMUNITIES OF THESE IMPORTANT REMNANT HABITATS.

FOREST SERVICE RESPONSE.

Because of the nature of the old-growth stands, they are generally not favored by livestock for grazing. The level of use there is much below the general level.

COMMENT NO. 16. THE OREGON DEPARTMENT OF FISH AND GAME, IN THEIR COMMENTS ON THE DRAFT FOREST PLAN FOR THE DESCHUTES NATIONAL FOREST HAS SUMMARIZED THE OLD GROWTH ISSUE VERY WELL. THE WNPS FULLY CONCURS WITH THE FOLLOWING QUOTATION FROM THAT COMMENT AND WITH THE SUGGESTED OLD-GROWTH GOAL STATEMENT CONTAINED THEREIN

"FOR WILDLIFE HABITAT VALUES IN OLD-GROWTH STANDS, IT IS PREFERABLE TO CONSIDER OLD GROWTH AS AN ECOSYSTEM THAT EVOLVED NATURALLY, WITHOUT HUMAN INTERVENTION OR DISTURBANCE. THE RECOGNITION OF OLD-GROWTH ECOSYSTEMS HAS BEEN RELATIVELY RECENT. THERE IS MUCH ABOUT OLD GROWTH THAT IS NOT KNOWN TODAY AND IS THE SUBJECT OF EXTENSIVE RESEARCH. AT THIS TIME WE DO NOT KNOW THAT OLD-GROWTH ECOSYSTEMS CAN BE MANAGED AT ALL AND STILL MAINTAIN THE INTEGRITY OF THE ECOSYSTEMS. THE MANAGEMENT OF OLD GROWTH THROUGH TIMBER HARVEST CAN AT BEST BE REGARDED AS EXPERIMENTAL. SINCE THE OLD-GROWTH SYSTEM EVOLVED NATURALLY AND WE ARE NOT CERTAIN THAT TIMBER HARVESTS WILL MAINTAIN OR ENHANCE THESE INFORMATION IS GATHERED. THE BEST AVAILABLE INFORMATION SUGGESTS THAT TO MAINTAIN OLD-GROWTH ECOSYSTEMS, FROM 5 TO 15 PERCENT OF THE FOREST IN EACH MAJOR PLANT COMMUNITY BE DEDICATED TO OLD-GROWTH ECOSYSTEMS AND SHOULD BE WELL DISTRIBUTED BY SLOPE, ASPECT, AND ELEVATION. "THE DEPARTMENT RECOMMENDS THE GOAL FOR OLD GROWTH BE REWRITTEN AS FOLLOWS: 'GOAL: TO PROVIDE NATURALLY EVOLVED OLD-GROWTH ECOSYSTEMS FOR (1) PRESERVATION OF NATURAL GENETIC POOLS, (2) HABITAT FOR PLANTS AND WILDLIFE SPECIES ASSOCIATED WITH OLD-GROWTH ECOSYSTEMS, AND (3) CONTRIBUTIONS TO THE DIVERSITY SPECTRUM '" (EMPHASIS ADDED)

FOREST SERVICE RESPONSE:

We agree with this statement, and we have strived to achieve the distribution suggested.

COMMENT NO. 17. THE WNPS WOULD LIKE TO STRESS THAT THERE IS A CLEAR NEED TO MANAGE FOR THE PRESERVATION OF A FULL RANGE OF OLD-GROWTH ECOSYSTEMS AND THEIR ASSOCIATED WILDLIFE AND NATIVE PLANTS. THE CONCEPT OF OLD-GROWTH ECOSYSTEMS APPLIES AS WELL TO HARDWOOD FOREST TYPES (E.G. BLACK COTTONWOOD/ MAPLE ASSOCIATIONS IN RIPARIAN AREAS), TO NATIVE GRASSLANDS, AND TO OTHER COMMUNITY TYPES.

THE REDUCTION LEVELS FOR OLD-GROWTH HABITATS THAT WOULD BE CAUSED BY THE PA ARE UNACCEPTABLY HIGH. DUE TO THE HISTORICAL DISREGARD FOR THE PRESERVATION OF OLD GROWTH AND THE VERY SMALL ACREAGES REMAINING ON THE FOREST, IT IS INCUMBENT UPON THE WALLOWA-WHITMAN TO PRESERVE ALL REMAINING NATURALLY-OCCURRING OLD GROWTH. THE PROPOSED LEVELS OF THE PA SHOW A BLATANT DISREGARD FOR THE MAINTENANCE OF OLD-GROWTH COMMUNITIES AND SHOULD BE MODIFIED SUBSTANTIALLY. ALL REMAINING OLD GROWTH SHOULD BE RETAINED, AND A NETWORK OF MATURE FOREST DISPERSAL CORRIDORS MUST BE MAINTAINED CONNECTING THE OLD-GROWTH DEDICATED

GROVES ONLY IN THIS MANNER CAN OLD-GROWTH SPECIES BE PROPERLY MAINTAINED IN ACCORDANCE TO THE PRINCIPLES OF ISLAND BIOGEOGRAPHY

FOREST SERVICE RESPONSE

The size of old-growth areas and dispersions of them that we have employed was determined by a team of biologists which developed the minimum management requirements for the Pacific Northwest Regions. We appreciate your feeling that the amount specified in the Forest Service Alternative is too low. It does, however, exceed the minimum management level.

COMMENT NO. 18: ACCORDING TO THE FOREST SERVICE PUBLICATION, MANAGEMENT OF WILDLIFE AND FISH HABITATS IN FORESTS OF WESTERN WASHINGTON AND OREGON, BOTH OPTIMAL COVER AND OPTIMAL WINTER FORAGE ARE PROVIDED BY MATURE AND OLD-GROWTH FORESTS. THE VALUE OF SUCH FORESTS IS PARTICULARLY UNIQUE AND IMPORTANT IN WINTER, WHEN FORAGE IN OTHER AREAS IS BURIED DEEPLY UNDER SNOWS. TIMBER HARVEST IS THE PRIMARY REASON FOR REDUCTION OF OLD GROWTH, SNOW INTERCEPT/THERMAL COVER FOR DEER, AND SNAG NUMBERS. GIVEN THE ABOVE INFORMATION, TIMBER MANAGEMENT PRESCRIPTIONS SHOULD PRECLUDE ANY HARVESTING OF MATURE AND OLD-GROWTH TIMBER STANDS AND SHOULD BE DESIGNED TO OPTIMIZE THE NUMBER OF ACRES IN SUCH AGE CLASSES THAT WILL BE PROVIDED IN THE FUTURE. SUCH PROTECTION FOR MATURE AND OLD-GROWTH STANDS SHOULD BE CLEARLY STATED IN THE TIMBER MANAGEMENT PRESCRIPTIONS.

FOREST SERVICE RESPONSE:

Many respondents share your opinion. Your recommendation was carefully considered.

COMMENT NO. 19: I ALSO AGREE WITH THE OLD-GROWTH DESIGNATION POLICY TO SET ASIDE AREAS IN PERPETUITY FOR OLD GROWTH. HOWEVER, THE PREFERRED ALTERNATIVE STILL CALLS FOR A 30 PERCENT REDUCTION OF THE REMAINING OLD GROWTH. I AM ALREADY ALARMED AT HOW LITTLE OLD GROWTH REMAINS. AN OLD-GROWTH FOREST PROVIDES HOMES FOR NON-GAME WILDLIFE LIKE WOODPECKERS, PINE MARTENS, AND GREAT GRAY OWLS. I SEE OLD GROWTH AS RESERVOIRS FOR WISE FOREST MANAGEMENT. WHEN SILVICULTURE PRACTICES FAIL ON A MANAGED FOREST, LOOK TO A NATURAL ECOSYSTEM THAT HAS SUSTAINED ITSELF FOR THOUSANDS OF YEARS FOR ANSWERS TO PROBLEMS. THERE MAY BE ALREADY TOO LITTLE OLD GROWTH LEFT ON THE WALLOWA-WHITMAN. NOW IS THE TIME TO PROTECT ALL THE OLD-GROWTH QUALIFYING STANDS, WHILE THEY ARE STILL THERE.

FOREST SERVICE RESPONSE:

While we do not agree that it is necessary to protect all of the remaining old growth, we have taken steps through this planning process to protect a large amount, well distributed over the Forest, in a variety of ecosystems.

COMMENT NO. 20: FINALLY, OLD GROWTH IS IMPORTANT TO ME -- JUST TO LOOK AT I GAIN SPIRITUAL REJUVENATION FROM A WALK IN A BIG TREE FOREST. THERE IS SOMETHING MAGICAL ABOUT A GROVE OF 300 YEAR OLD TREES -- AND HUMBLING TOO. THOSE TREES HAVE BEEN HERE LONG BEFORE WHITE MEN CAME TO THIS CONTINENT. WHO ARE WE TO KNOW WHAT IS BEST FOR THE ANCIENT FOREST? THERE IS WISDOM, BEAUTY AND SPIRIT IN THE OLD-GROWTH FORESTS. ONCE DESTROYED, WE WILL ALL SUFFER FROM A LOSS OF BEAUTY IN OUR WORLD.

FOREST SERVICE RESPONSE

Many share your view. We are confident that sufficient old-growth areas will remain to provide the experiences you describe.

COMMENT NO. 21. RECOMMENDATION. OLD GROWTH

1. NO PONDEROSA PINE OF ANY AGE BE CUT
2. NO SITE WITH TREES OVER 80 YEARS IN AGE BE CUT

FOREST SERVICE RESPONSE.

Such an approach would limit timber harvest to what we believe would be an unacceptably low level.

COMMENT NO. 22: WITH THE RECENT FINDINGS ON THE COMPLEX SYSTEM OF LIFE IN OUR OLD-GROWTH FORESTS, IT SEEMS NOTHING SHORT OF INSANITY TO CONTINUE TO RAPE THESE MAGNIFICENT ECOSYSTEMS

FOREST SERVICE RESPONSE.

We appreciate your opinion.

COMMENT NO. 23: OLD GROWTH IS ALSO REPORTED TO BE 38,196 ACRES OR 1.6% OF THE TOTAL NEW WWNF (PLAN 4-15). IT IS ALSO REPORTED THAT THE CURRENT OLD-GROWTH ALLOCATION IS 76,919 ACRES AND THE PRESENT OLD-GROWTH CONDITION IS FOUND ON 27,260 ACRES (DEIS-II-27). ON THE (76,919-27,260) = 49,656 ACRES WHICH DO NOT MEET THE OLD-GROWTH DEFINITION, THESE ACRES ARE EXPECTED TO GROW INTO OLD GROWTH. HOW MANY OF THESE ACRES WILL BE RETAINED TO GROW INTO OLD GROWTH?

FOREST SERVICE RESPONSE:

The 38,196 acres refers to the amount in Management Area 15, Old Growth. Old growth is also found within other management areas and will total over 161,000 acres in the selected alternative. All of the area in the old-growth management areas would be permitted to grow into old growth if it does not currently meet the definition.

COMMENT NO. 24: WITHOUT HAVING AN OLD-GROWTH MAP SHOWING ACTUAL BOUNDARIES OF OLD-GROWTH STANDS, LOCATION OF OLD GROWTH BECOMES A SHELL GAME BY MERELY INDICATING IT AS A TRIANGLE ON A MAP. THE NUMBER OF TRIANGLES BY ITSELF ON A MAP AT FOUR MILES/INCH SCALE GIVES THE IMPRESSION OF WELL-DISTRIBUTED OLD GROWTH, BUT IT IS STILL QUESTIONABLE HOW WELL LINKED THE VARIOUS UNITS ARE. THERE MAY BE TWO TO FOUR MILES AT LEAST BETWEEN MANY OF THE UNITS. WHAT PERCENTAGE OF THE TRIANGLES ARE REALLY AROUND 20 ACRES IN SIZE AND HOW MANY ANIMALS DEPENDING ON OLD GROWTH CANNOT MAINTAIN VIABLE POPULATIONS IN TRACTS AS SMALL AS 20 ACRES AND WITH THE LOW DEGREE OF INTEGRATION OF MA-15 UNITS ANTICIPATED.

FOREST SERVICE RESPONSE

The old-growth symbols represent 394 stands, of which 33 (8%) are 20 acres or less. However, the small areas lie close to larger areas or are grouped so that we do not believe the sizes of individual stands will be limiting

COMMENT NO. 25: UNDER THE PRESENT LAND MANAGEMENT PLAN 73,000 ACRES ARE MANAGED FOR OLD GROWTH IN 131 AREAS. CURRENTLY, 28,000 ACRES MEET THE OLD-GROWTH DEFINITION (PLAN 2-21). ELSEWHERE, IT WAS REPORTED THAT 38,000 ACRES OF OLD-GROWTH GROVES (30 TO 600 ACRES EACH) ARE DISPERSED IN MANAGEMENT AREAS 1, 3, AND 18 (PLAN 4-14). HOW MANY OF THESE AREAS ACTUALLY WILL BE RETAINED IN MA 1 AND 3 ALONE?

FOREST SERVICE RESPONSE.

There are approximately 36,400 acres of the old-growth management area surrounded by Management Areas 1 and 3

COMMENT NO. 26 FURTHERMORE, ALTERNATIVE B HAS SEVERAL DRAWBACKS FROM THE STANDPOINT OF OTHER RESOURCES FOR EXAMPLE, ALTERNATIVE B WILL INVOLVE A "SUBSTANTIAL REDUCTION" IN TOTAL REMAINING OLD GROWTH AND PROVIDE OLD-GROWTH FOREST ACREAGES AT A LEVEL ONLY "SLIGHTLY ABOVE THE MINIMUM AREA AND DISTRIBUTION REQUIRED TO PROVIDE VIABLE POPULATIONS OF DEPENDENT WILDLIFE SPECIES" (DEIS TABLE II-1, II-32) THESE AND OTHER DIFFERENCES COULD MAKE ALTERNATIVE B UNACCEPTABLE TO OTHER USER GROUPS, ESPECIALLY HUNTERS

FOREST SERVICE RESPONSE

We agree that these factors would make Alternative B undesirable to some user groups

COMMENT NO. 27: THE FOUR W-W WILDERNESS AREAS, THE WENAHA-TUCANNON AND NORTH FORK UMATILLA WILDERNESS OF THE UMATILLA NF, ALONG WITH THOSE LANDS FALLING UNDER STRATEGY 10 (HCNRA) STRATEGY 7-WILD & SCENIC RIVER CORRIDORS, AND RESEARCH NATURAL AREAS (STRATEGY 14) PROVIDE AN ADEQUATE QUANTITY, DIVERSITY AND DISTRIBUTION OF OLD GROWTH WITHOUT PLACING THIS CONSTRAINT ON ANY OF THE REMAINING FORESTLAND IDENTIFIED AS SUITABLE FOR TIMBER PRODUCTION. ELIMINATE STRATEGY 15 (OLD GROWTH) OR, AT LEAST, GREATLY REDUCE IT.

FOREST SERVICE RESPONSE

Many people share your opinion. The additional old-growth areas are provided to meet legal requirements which call for wildlife habitat to be distributed over the planning area in such a manner that individual species can interact.

COMMENT NO. 28 REGARDING OLD GROWTH, IF WE CAN HAVE WHAT I THINK IS PROVIDED BY THE PLAN, WE SHOULD BE SATISFIED

FOREST SERVICE RESPONSE

Several respondents share your opinion

COMMENT NO. 29 I DO BELIEVE STRONG CONSIDERATIONS SHOULD BE GIVEN TO A REDUCTION IN "OLD-GROWTH" AREAS WITHIN 10 MILES OF WILDERNESS OR ROADLESS AREAS THAT ALREADY SUPPORT UNTOUCHED STANDS

FOREST SERVICE RESPONSE:

The proximity of old-growth stands within wilderness was considered in determining the distribution of old growth and meeting minimum management requirements.

COMMENT NO. 30: YOUR SCATTERED DIVERSITY APPROACH WITH OLD-GROWTH STANDS IS GOOD

FOREST SERVICE RESPONSE:

This appears to be a widely held point of view from within as well as outside the scientific community.

COMMENT NO. 31 IN A COUNTY THAT HAS AS MUCH WILDERNESS AS WE HAVE, THERE IS NO EXCUSE FOR ANY MORE LAND BEING SET ASIDE FOR OLD GROWTH. (THE ENVIRONMENTALISTS ARE SO FOND OF WILDERNESS, LET THEM GO THERE TO VIEW THE "OLD GROWTH")

FOREST SERVICE RESPONSE.

There are 67,000 acres of old growth within wilderness on the Wallowa-Whitman Regulations require that habitat be well distributed throughout the planning area. Minimum management requirements, based on this regulation, specify dispersion of old-growth habitat throughout the Forest. (See Appendix G.)

COMMENT NO. 32: THE FOREST SERVICE ALT. C LEAVES AN EXCESSIVE AMOUNT OF OLD GROWTH. OLD TREES THAT WILL ROT AND DIE AND BE OF NO USE TO ANYONE FOR ANY PURPOSE. IF YOU WILL REDUCE THE OLD GROWTH TO 131,000 ACRES AS OUR PLAN CALLS FOR, WE CAN STILL MAINTAIN VIABLE SPECIES THAT YOU SAY PREFER OLD GROWTH, WHILE SELECTIVELY LOGGING THE REMAINDER

FOREST SERVICE RESPONSE:

As pointed out elsewhere in this section and in the EIS, the value of old-growth stands goes beyond the utility of the wood by man. The level of old growth you suggest would be a viable alternative as it would approximate the minimum management level. We believe a level slightly higher than the minimum is warranted considering the unknown factors about the value of old growth. The amount could be reduced in future Forest Plans.

COMMENT NO. 33: I AM WRITING IN PROTEST TO THE FOREST SERVICE LOGGING OF OLD-GROWTH TIMBER NEAR PINE VALLEY IN EASTERN OREGON. THE AREA IS DEARLY LOVED BY

MYSELF AND MY FAMILY, AND WE PROTEST THE DETRIMENTAL IMPACT TO THE AREA SUCH LOGGING WOULD PRODUCE

FOREST SERVICE RESPONSE

As shown on the map for Alternative C, there will be old-growth stands retained in the Pine Valley area and in the not so distant Eagle Cap Wilderness and Hells Canyon National Recreation Area

COMMENT NO. 34 OLD-GROWTH FORESTS, ONCE THOUGHT TO BE "BIOLOGICAL DESERTS" AND DECADENT WASTERS OF RESOURCES ARE NOW SEEN AS MODELS OF ECONOMY AND EFFICIENCY. FOREST SOILS IN THE PACIFIC NORTHWEST ARE GENERALLY DEFICIENT IN NITROGEN, A CRITICAL PLANT NUTRIENT MUCH RECENT RESEARCH HAS FOCUSED ON THIS ASPECT OF OLD-GROWTH FORESTS ONE RECENTLY DISCOVERED SOURCE OF NITROGEN INVOLVES COMPLEX FUNGUS-TREE-SMALL MAMMAL RELATIONSHIPS WHICH PROVIDE A SIGNIFICANT AMOUNT OF THIS IMPORTANT SUBSTANCE WHICH IS ABSORBED BY THE TREES OLD GROWTH IS IMPORTANT FOR THE HEALTH OF THE FOREST, BY ANY DEFINITION OF "OLD GROWTH" YET, THE DRAFT PLAN REDUCES EXISTING OLD GROWTH BY 30%, LEAVING ONLY 5% OF THE FOREST IN OLD GROWTH. THOSE AREAS SCHEDULED FOR RETENTION HAVE BEEN SCATTERED IN SMALL PARCELS THROUGHOUT THE FOREST. WE URGE THAT ALL REMAINING AREAS AS IDENTIFIED IN THE CURRENT DIRECTION ALTERNATIVE BE PRESERVED

FOREST SERVICE RESPONSE

The preferred alternative would reduce inventoried old growth approximately 7 percent by retaining 161,000 of 173,000 acres.

COMMENT NO. 35 5) MONITORING - THE MONITORING PLAN FOR OLD-GROWTH HABITAT CALLS FOR REMEDIAL ACTION IF ANY PRIORITY ONE STANDS ARE LOST WHY NOT PRIORITY TWO STANDS? AND WHY IS THE INDICATED REMEDIAL ACTION SO SOFTLY WORDED ("CONSIDER DESIGNATION OF REPLACEMENT STAND") I RECOMMEND REQUIRING THE REPLACEMENT OF A LOST STAND WITH ANOTHER. IF NONE IS AVAILABLE, A REPLACEMENT STAND OF YOUNGER AGE SHOULD BE DESIGNATED AND WITHDRAWN FROM THE TIMBER BASE

FOREST SERVICE RESPONSE

We have revised the monitoring direction to require selection of replacement stands for any designated old-growth stands that are lost

COMMENT NO. 36. IF YOU WILL REDUCE THE OLD GROWTH TO 131,000 ACRES, WE CAN STILL MAINTAIN VIABLE SPECIES THAT YOU SAY PREFER OLD GROWTH, WHILE SELECTIVELY LOGGING THE REMAINDER FOR THESE SPECIES LIVE THROUGHOUT THE FOREST, NOT JUST IN OLD GROWTH.

FOREST SERVICE RESPONSE

If properly distributed, the amount you suggest would approximate the minimum management requirements.

COMMENT NO. 37. THE FINAL COMPLAINT IS YOUR PLANNED OBLITERATION OF THE OLD-GROWTH FOREST LEFT ON THE FOREST. A REDUCTION FROM 30% TO 4% REMAINING ON THE FOREST IS SCANDALOUS, "CROWELLISM", AND HAS SPRUNG FROM A SHORT-SIGHTED POLICY THIS WILL WIPE OUT OLD-GROWTH DEPENDENT SPECIES ON THE FOREST.

FOREST SERVICE RESPONSE:

The old-growth allocation meets the minimum management requirement for habitat distribution and quantity. Viable populations of all species are expected to remain.

COMMENT NO. 38 OLD-GROWTH FORESTS: IT IS VERY DIFFICULT TO ASSESS EITHER CURRENT STATUS OR FUTURE CONDITION OF THESE AREAS. NOT ONLY ARE THERE DISCREPANCIES IN THE DOCUMENTS, (E.G., P. III-28 "THERE ARE SOME 173,000 ACRES OF OLD GROWTH ... ON THE FOREST, INCLUDING SOME 67,000 ACRES IN CLASSIFIED WILDERNESS" P 2-21 "THERE ARE SOME 173,000 ACRES ON THE WALLOWA-WHITMAN THAT MEET THE DEFINITION OF OLD GROWTH .. INCLUDED ARE SOME 10,900 ACRES IN CLASSIFIED WILDERNESS."), BUT THE FAILURE TO INCLUDE MAPS MAKES IT PARTICULARLY DIFFICULT.

FOREST SERVICE RESPONSE

We regret the error. The 173,000 figure was correct in the DEIS. The Forest Plan has been corrected.

To illustrate the actual old-growth boundaries in the planning documents, would require a larger scale map. We surmised that most reviewers would be satisfied with the maps we provided which show general locations of the old growth for each alternative. Public response, we believe, verifies that this assumption was correct. We have maps available for public review which show the specific locations, size, and configuration of the old-growth stands.

COMMENT NO. 39 ON P. IV-43, IT IS STATED THAT "IF AN OLD-GROWTH STAND IS LOST, A REPLACEMENT STAND WILL BE SELECTED." ONE CAN ONLY WONDER WHERE, IN THE INTENSIVELY MANAGED FOREST OF THE FUTURE, THESE REPLACEMENT STANDS ARE TO BE FOUND. THERE IS NO RESEARCH TO SUGGEST THAT A MANAGED STAND, ALLOWED TO GROW OLD, WILL TAKE ON THE CHARACTERISTICS OF AN OLD-GROWTH FOREST.

FOREST SERVICE RESPONSE

Over time, it will be necessary to select replacement stands from stands that had previously been managed for timber production. We are confident that, given time, such stands will acquire old-growth characteristics and know of no research that would show this assumption to be in error.

COMMENT NO. 40: BIOLOGICAL EVALUATIONS: WE ARE PLEASED TO SEE THIS PROCESS DISCUSSED (III-39, 4-29, 4-24), BUT THE TEXT SHOULD BE MODIFIED TO STATE THAT A BIOLOGICAL EVALUATION NEEDS TO BE DONE FOR ALL GROUND-DISTURBING PROJECTS, NOT JUST THOSE WHERE SENSITIVE SPECIES ARE KNOWN TO OCCUR (FSM 2672.12). IT IS DURING THE PROCESS OF A BIOLOGICAL EVALUATION THAT LIKELIHOOD OF OCCURRENCE OF SENSITIVE SPECIES IS DETERMINED, AS WELL AS THE NEED FOR A FIELD SURVEY. GIVEN THE WIDE VARIETY OF SENSITIVE SPECIES ON THE WALLOWA-WHITMAN, IT WOULD SEEM THAT NEARLY ALL PROJECTS WOULD NEED TO HAVE FIELD SURVEYS DONE.

FOREST SERVICE RESPONSE

While it is true that the Wallowa-Whitman has a widely diverse number of habitats, and therefore a large variety of plant and animal species, the majority of the sensitive species are confined to either our canyonland grasslands or subalpine-alpine habitats where major ground disturbing activities do not occur. If we had species that were more regularly affected by road building, timber sales, prescribed fire, and other endeavors, we would include a biological evaluation in the process.

COMMENT NO. 41 THE DEPARTMENT (OREGON DEPARTMENT OF FISH AND WILDLIFE) RECOMMENDS THAT A MINIMUM OF 5% TO 15% OF EACH MAJOR PLANT COMMUNITY IN THE FORESTLAND BASE BE DEDICATED TO OLD-GROWTH STANDS, WELL DISTRIBUTED BY SLOPE ASPECT, AND ELEVATION. FROM THE INFORMATION IN THE PLANNING DOCUMENTS, THE DEPARTMENT CANNOT DETERMINE HOW WELL THE PLAN MEETS THE DEPARTMENT RECOMMENDATION. THE FINAL PLAN NEEDS TO DISPLAY AN INVENTORY OF EXISTING AND PROPOSED OLD-GROWTH AREAS.

FOREST SERVICE RESPONSE

This information has been provided to the Department.

COMMENT NO. 42: A STRICT WATERSHED PROTECTION STRATEGY, ENTAILING NO TIMBER HARVEST AND NO ROAD BUILDING, SHOULD BE INCORPORATED INTO THE PROPOSED ACTION FOR THE BAKER AND LA GRANDE CITY WATERSHEDS.

FOREST SERVICE RESPONSE

Your recommendation was carefully considered. Our analysis and experience does not show that such strict protection is necessary or desirable in light of the planning issues involved.

COMMENT NO. 43. THE DEDICATED OLD-GROWTH SCHEME IN THE DP IS SUPPORTED AS THE BEST MANAGEMENT AND MERELY NEEDS TO HAVE A BROADER ALLOCATION. ONRC UNDERSTANDS THAT ONLY 38,000 ACRES OUTSIDE OF WILDERNESS, BACKCOUNTRY, AND THE HELLS CANYON NRA IS DESIGNATED OLD GROWTH IN THE DP. MORE ACRES SHOULD BE ALLOCATED EVEN IF THOSE ACRES DO NOT FULLY MEET ALL BIOLOGICAL CRITERIA FOR OLD GROWTH.

IT SEEMS IMPROBABLE THAT ONLY 40,000 ACRES OF OLD GROWTH NOT UNDER CONTRACT REMAINS OUTSIDE OF WILDERNESS, HELLS CANYON NRA, AND BACKCOUNTRY. HOW MUCH OLD GROWTH IS NOW UNDER CONTRACT? ONLY 4,000 ACRES OF OLD GROWTH ARE IN BACKCOUNTRY IN THE DP, WHICH ALSO INDICATES THAT BACKCOUNTRY ALLOCATIONS SHOULD BE ENLARGED TO PROTECT OLD-GROWTH HABITAT. THE PINE-DOUGLAS FIR COMPONENT SHOULD BE 45 PERCENT OF THE TOTAL RATHER THAN 21 PERCENT. OLD GROWTH CAN ALWAYS BE CUT DOWN QUICKLY, BUT IT IS BEST TO LEAVE PERHAPS TOO MUCH NOW THAN TOO LITTLE LATER.

FOREST SERVICE RESPONSE

We expect that to the casual observer, there appears to be more than the 40,000 acres to which you correctly refer. This amount is based on the definition provided in the Glossary.

Many people probably find an "old-growth experience" in stands not meeting the strict definition .

COMMENT NO. 44: DAMN, JUST DRIVE FROM SUMPTER TO GRANITE AND THE CLEARCUTS AND LOGGING DOMINATE. I DON'T BELIEVE THINGS HAVE TO GO THAT WAY.

FOREST SERVICE RESPONSE

Most of the clearcuts in that particular area result from harvesting insect killed lodgepole pine. Had it not been utilized, it would have soon fallen, creating a different, but perhaps no less desirable landscape. The openings are stocked with rapidly growing trees which should change the area's appearance over the next few years.

COMMENT NO. 45: THE WALLOWA-WHITMAN NATIONAL FOREST HAS SET THEIR MMR (MINIMUM MANAGEMENT REQUIREMENT) AT 28,000. THE 10,000 ACRE DIFFERENCE SHOULD BE DEVELOPED. PRESENTLY THERE ARE 105,000 ACRES OF OLD GROWTH IN BOTH THE WILDERNESS AREAS AND THE HELLS CANYON NATIONAL RECREATION AREA. THE MMR OF 28,000 WILL BE MORE THAN ADEQUATE TO COVER THE NEED FOR OLD-GROWTH TIMBER STANDS

FOREST SERVICE RESPONSE:

We believe the MMR level will be adequate and have essentially adopted your suggestion (See discussion in the Record of Decision)

COMMENT NO. 46: IT APPEARS THAT OLD-GROWTH AREAS ON THE WWNF ARE SIMPLY THE POOREST EXAMPLES OF AVAILABLE FOREST STANDS CONTAINING SOME OLD TREES.

FOREST SERVICE RESPONSE:

We believe the selected areas represent a broad range of old-growth conditions. It is likely, however, that the best examples have been harvested long ago.

COMMENT NO. 47: DOES THE WWNF ANTICIPATE LOSS OF ANY PLANT OR ANIMAL SPECIES IF THERE IS NO NEARBY OLD GROWTH TO ACT AS A SOURCE OF COLONISTS?

FOREST SERVICE RESPONSE.

We do not expect the loss of any species due to reduction in old growth.

COMMENT NO. 48. MMR'S REQUIRE THAT EACH OLD-GROWTH OR MATURE STAND HAVE AN ADDITIONAL 300 ACRES WHERE SNAG LEVELS SHOULD EXCEED 40% (DEIS IV-37) WHAT WILL THE STANDARD FOR WWNF BE - AT LEAST 40% EVERYWHERE? DOES THIS MEAN POPULATION LEVELS EVERYWHERE WILL BE 40% OF LEVELS WITHOUT MANAGEMENT?

FOREST SERVICE RESPONSE:

We have recently revised the standards to be no less than the 40 percent level of snags greater than 10 inches, but less than 20 inches on the average everywhere. We expect this would

result in something less than 40% population levels because of the relatively low levels of large snags (over 20") in areas where timber production is emphasized

COMMENT NO. 49: IT IS ASSUMED THAT POPULATION DENSITIES OF PILEATED WOODPECKERS WILL BE SIMILAR TO THOSE FOUND BY THOMAS (1979) IN THE BLUE MOUNTAINS. ALSO, 60% OCCUPANCY AND 300 ACRES/PAIR ARE ASSUMED. GIVEN THE 161,000 ACRES OF OLD GROWTH UNDER ALTERNATIVE C, THE WWNF CAN SUPPORT 323 PAIRS HOW IS 60% OCCUPANCY DERIVED?

FOREST SERVICE RESPONSE

The 60% occupancy was based on the judgement of the wildlife biologist on the planning team

COMMENT NO. 50: THE POLICY OF THE WWNF OF RETAINING ONLY THE POOREST EXAMPLES OF OLD GROWTH IN AN "OLD-GROWTH" STATE MAKES IT DOUBTFUL THAT THE NUMBER OF PAIRS OF PILEATED WOODPECKERS CAN BE ARRIVED AT BY SIMPLE MULTIPLICATION BY ACRES. THIS POINT IS ESPECIALLY EMPHASIZED BY THE FACT THAT PILEATED WOODPECKERS PREFER PONDEROSA PINE ABOVE ALL OTHER TREE SPECIES IN THE BLUE MOUNTAINS (THOMAS 1979). IF 300 ACRES ARE REQUIRED PER PAIR, HOW MANY INTACT 300 ACRE PLOTS ARE AVAILABLE? GIVEN THE HOME RANGE OF THE BIRD, HOW WELL CAN DISCONTINUOUS BLOCKS OF OLD GROWTH SATISFY THEIR NEEDS.

FOREST SERVICE RESPONSE:

We disagree that only the poorest old-growth stands are retained. There will be well over 300 old-growth blocks available outside wilderness when the Forest becomes fully managed. The amount and distribution of old growth is based on the minimum management requirements which are intended to satisfy the needs of the birds sufficiently to ensure that viable population levels are maintained.

COMMENT NO. 51: HOW WILL THE WWNF PREVENT FUELWOOD GATHERING IN OLD-GROWTH AREAS?

FOREST SERVICE RESPONSE

A variety of regulatory and enforcement measures are at our disposal. It may take some time to see what is most effective. Signing will be a first step.

COMMENT NO. 52: WHAT ARE SNAG LEVELS ON OLD-GROWTH AREAS TO BE RETAINED?

FOREST SERVICE RESPONSE.

All snags are to be retained. We expect this will average at least 100%.

COMMENT NO. 53: POPULATION NUMBERS DEPEND AS MUCH ON SNAG NUMBERS AND QUALITY (SIZE DISTRIBUTION, TREE SPECIES) AS ON ACRES. GIVEN THE FACTS THAT OLD-GROWTH STANDS WILL DETERIORATE AND THAT THEY MAY HAVE TO BE REPLACED BY 80 YEAR OLD STANDS, WHAT ARE PROJECTED WOODPECKER NUMBERS THROUGH THE 50 YEAR PERIOD? GIVEN THE DEGREE OF DISCONTINUITY OF OLD-GROWTH STANDS, ARE ALL ACRES

WHICH ARE TO BE RETAINED EQUALLY EFFECTIVE? ARE 323 PAIRS REALLY A VIABLE POPULATION SIZE OR EVEN FEASIBLE GIVEN THE FUTURE FOREST STATE?

FOREST SERVICE RESPONSE

There is much to be learned about the dynamics of old-growth stands. This matter will be reevaluated each time the Forest Plan is revised. We believe the 323 pairs do represent a viable population of pileated woodpeckers, recognizing, of course, that this is an indicator species, representing other species as well.

COMMENT NO. 54. OLD-GROWTH LOGS ARE NECESSARY FOR 5/4 SHOP AND 12" SELECTS AND THEY ARE THE MONEY MAKERS. IT LOOKS LIKE THIS "COMMUNITY STABILITY ALTERNATIVE" MAKES GOOD SENSE

FOREST SERVICE RESPONSE:

Under the "Community Stability" alternative, or any of the alternatives described in the Environmental Impact Statement, large trees decline until a time when most lumber will be sawn from trees 20" or less in diameter. The larger trees will last longer under alternatives such as F or H which provide lower rates of harvest.

COMMENT NO. 55. THE PLANNING PROBLEM IS VIRTUALLY IMPOSSIBLE TO SOLVE SUBJECT TO THE OVERLY COMPLICATED, INCONSISTENT, AND CONFLICTING DIRECTION THAT HAS BEEN IMPOSED UPON THE FOREST TEAMS. UNDER THESE CIRCUMSTANCES, FEW PLANS HAVE BEEN WRITTEN WHICH WOULD WITHSTAND RIGOROUS CHALLENGE AND THE SUBJECT PLAN IS NO EXCEPTION. THE CURRENT PLANNING SYSTEM PLACES COMMODITY BENEFITS IN TERMS OF MAXIMUM LEVELS NOT-TO-BE-EXCEEDED WHILE AMENITIES ARE EXPRESSED IN TERMS OF MINIMUMS WHICH MUST BE MET AND SURPASSED. THUS, EXPECTED COMMODITY VALUES BECOME RESIDUALS AFTER AMENITIES ARE ASSURED TO THEIR LIMITS OF POTENTIAL.

FOREST SERVICE RESPONSE:

Certainly "amenity" values such as threatened and endangered species, archaeological resources, water quality, and habitat requirements to prevent species elimination described are in terms of minimum levels which must be met or exceeded. There are no required minimum levels for recreation uses or aesthetic values. The maximum levels for commodities such as timber are those imposed by the ability of the land to produce. It is true that commodities are constrained by the required amenity minimums, but such seems to have been the intent of Congress in passing various natural resource acts including the National Forest Management Act. We agree that the planning problem is complicated.

COMMENT NO. 56. TREES NEED TO BE HARVESTED AT THE PROPER TIME. OLD OR INFESTED TREES BECOME A MAN TRAP SETTING EVERYONE UP FOR A MASSIVE FOREST FIRE

FOREST SERVICE RESPONSE:

There is a risk of fire when fuels are permitted to accumulate as is the case with old-growth stands. There are many who believe the habitat and variety provided by the old-growth area is worth the risk.

COMMENT NO. 57: AN ISSUE I FEEL THAT HAS NOT BEEN PROPERLY DEALT WITH IS THE JUSTIFICATION FOR SETTING ASIDE OLD-GROWTH STANDS FOR CERTAIN SPECIES OF ANIMALS. IT MAY HAVE BEEN SHOWN THAT THESE ANIMALS DO INDEED PREFER OLD GROWTH BUT HAS IT BEEN PROVEN THAT SAID ANIMALS DO IN FACT NEED THIS HABITAT FOR THEIR SURVIVAL

FOREST SERVICE RESPONSE

It can be shown that some species require large snags and down logs for nesting and feeding. *Providing old-growth areas is a convenient means of providing such conditions, thereby permitting intensive wood fiber production on other acres* As can be seen by reviewing other comments in this section, old growth is desired for more than wildlife habitat

COMMENT NO. 58: OLD GROWTH: RE EIS P. III-28-29, MANAGEMENT PLAN P 4-55, AND DEFINITION P 6-15: THESE WWNF DOCUMENTS DO NOT CLEARLY DEFINE OLD-GROWTH ECOSYSTEMS THE SNAG DIAMETER OF 21 INCHES IN MANAGED STANDS (P 4-55) ALONG WITH THE DEFINITION OF OLD GROWTH (P. 6-15) WITH 30 ACRE - 300 ACRE PLOTS (MAP) CLEARLY INDICATES THAT THE CONSIDERATION OF OLD GROWTH IN THE MANAGEMENT PLAN IS INADEQUATE BY ANY REASONABLE SCIENTIFIC STANDARD.

IN MY OPINION, 400 YEARS IS NECESSARY TO ESTABLISH MINIMUM OLD-GROWTH FOREST CHARACTERISTICS IN THE TRANSITION AND CANADIAN LIFE ZONES ON THE WWNF, AND THESE LIFE ZONES CONTAIN THE VAST MAJORITY OF TIMBER ON THE FOREST THE MANAGEMENT PLAN VIRTUALLY IGNORES THE FINDINGS OF MASER AND TRAPP (P. III-28) AND OTHERS IN REGARDS TO OLD-GROWTH FORESTS

FOREST SERVICE RESPONSE

There are differences of opinion about what constitutes old growth. The general definition we have used is that provided for the Pacific Northwest Region in the Regional Guide Many trees within the old-growth stands exceed 400 years in age.

COMMENT NO. 59 THE PLAN DOES NOT PRESENT THE SCIENTIFIC BASIS FOR ESTABLISHING A THREE MILE RADIUS FOR OLD-GROWTH GROVES THIS SHOULD BE SUBJECT TO NEPA REVIEW

FOREST SERVICE RESPONSE:

This requirement has been revised to one of requiring habitat per area size For the Blue Mountain Zone, this is one old-growth habitat for each 12,000 to 13,000 acres for pileated woodpeckers and one old-growth habitat for each 4,000 to 5,000 acres for marten

COMMENT NO. 60 THE DRAFT FOREST PLAN PERMITS TIMBER MANAGEMENT IN OLD-GROWTH STANDS WHEN THE STANDS NO LONGER MEET THE DRAFT PLAN'S DEFINITION OF OLD-GROWTH AND/OR CATASTROPHIC DESTRUCTION OCCURS (PG 4-86) THE PREVAILING THOUGHT IN THE SCIENTIFIC COMMUNITY AND THE OREGON STATE DEPARTMENT OF FISH AND WILDLIFE (ODFW) RECOGNIZES "OLD GROWTH AS AN ECOSYSTEM THAT EVOLVED NATURALLY WITHOUT HUMAN INTERVENTION OR DISTURBANCE IT IS BEST TO LEAVE THE STANDS UNDISTURBED UNTIL MORE INFORMATION IS GATHERED " (ODFW REVIEW OF DESCHUTES NATIONAL FOREST PLAN 3/31/86) THE DRAFT PLAN SHOULD REDEFINE OLD-GROWTH TIMBER STANDS RECOGNIZING OLD-GROWTH FORESTS AS ECOSYSTEMS THAT HAVE EVOLVED OVER

LONG TIME PERIODS AND THAT BECOME IRREVERSIBLY IMPACTED ONCE TIMBER MANAGEMENT ACTIVITIES OCCUR WITHIN THE STANDS. THE DRAFT PLAN MUST REVISE MANAGEMENT AREA 15 TO PREVENT ANY TIMBER MANAGEMENT ACTIVITIES FROM OCCURRING ON OLD-GROWTH STANDS. WE CONCUR WITH THE OREGON STATE DEPARTMENT OF FISH AND WILDLIFE COMMENTS ON THE WALLOWA-WHITMAN PLAN THAT THE FOREST PLAN NEEDS TO DISPLAY AN INVENTORY OF EXISTING AND PROPOSED OLD-GROWTH AREAS.

FOREST SERVICE RESPONSE:

Our definition of old growth comes from the Regional Guide, an "umbrella" document for all of the Forest Plans in the Pacific Northwest Region. However, we believe there is general acceptance that current old-growth stands have developed naturally without human influence. Our intent is to leave the designated stands undisturbed as long as they meet the old-growth definition. We believe that Management Area 15 is adequate in describing the limited conditions when timber harvest could occur. Maps showing the old-growth inventory are available for review at the Supervisor's Office in Baker City, Oregon.

COMMENT NO. 61. 16 U.S.C 1604 (G) (3) (B) REQUIRES THE FOREST PLAN TO "PROVIDE FOR DIVERSITY OF PLANT AND ANIMAL COMMUNITIES". 36 C.F.R. 219.27 (G) STATES THAT "REDUCTIONS IN . EXISTING DIVERSITY MAY BE PRESCRIBED ONLY WHERE NEEDED TO MEET OVERALL MULTIPLE USE OBJECTIVES". THE PREFERRED ALTERNATIVE WILL REDUCE CONSIDERABLY THE QUANTITY OF OLD-GROWTH FOREST COMPARED WITH WHAT CURRENTLY EXISTS. THE OLD-GROWTH FOREST COMPONENT IS PARTICULARLY IMPORTANT TO BIOLOGICAL DIVERSITY OF THE FOREST SINCE IT IS THE FOREST COMPONENT MOST DIFFICULT TO REPLACE ONCE IT DISAPPEARS. IT IS ALSO THE FOREST COMPONENT LEAST PROVIDED BY ANY OTHER LANDOWNER. THE DRAFT PLAN AND DEIS SHOULD FORMULATE AND DEVELOP MANAGEMENT ALTERNATIVES WHICH USE BIOLOGICAL DIVERSITY AS A SIGNIFICANT CRITERION. IN ADDITION, THE DEIS SHOULD INCLUDE A MAP WHICH ILLUSTRATES WHICH FOREST LOCATIONS WILL LOSE THEIR OLD-GROWTH COMPONENT OVER THE NEXT 50 YEARS.

FOREST SERVICE RESPONSE:

We cannot agree that use of biological diversity as a decision or evaluation criterion would have been useful. The Wallowa-Whitman contains a high degree of vegetative and animal diversity and this diversity will be maintained in all alternatives for the Forest as a whole. In general, Management Areas 1, 3, and 18 will lose their old growth over the next 50 years. These areas are shown in the alternative maps.

COMMENT NO. 62 (OLD-GROWTH) THE REMAINING OLD-GROWTH FOREST ON THE WALLOWA-WHITMAN AND THROUGHOUT THE REGION HAVE BEEN SIGNIFICANTLY REDUCED FROM NATURAL LEVELS FROM JUST A CENTURY AGO. THE AMOUNT REMAINING MAY BE CLOSE TO THE MINIMUM NEEDED FOR THE FOREST TO PERPETUATE ITSELF WITH ALL OF ITS COMPONENTS. BECAUSE OF THIS, FURTHER CUTTING OF OLD-GROWTH FORESTS MUST BE AVOIDED. OLD-GROWTH FORESTS ARE IN PRACTICAL FACT A NON-RENEWABLE RESOURCE, AND IN LIMITED SUPPLY, SO WE MUST BEGIN TO WEAN THE TIMBER INDUSTRY FROM ITS DEPENDENCE ON OLD GROWTH WHILE THERE IS STILL THE POSSIBILITY OF THE CONTINUED HEALTHY SURVIVAL OF THIS ENDANGERED ECOSYSTEM. FUELWOOD CUTTING SHOULD NOT BE PERMITTED IN THESE AREAS.

PRESCRIBED NATURAL FIRE IS A GOOD MANAGEMENT TOOL AND MAY BE NECESSARY FOR THE PERPETUATION OF OLD-GROWTH PONDEROSA PINE FORESTS.

FOREST SERVICE RESPONSE:

We agree in general with your observations. The timber industry in the area is revamping its factories in order to process an increasing portion of smaller trees.

COMMENT NO. 63 OLD GROWTH IS NOT A RENEWABLE RESOURCE. IT TOOK TOO LONG TO PRODUCE AND TOO LITTLE TIME TO DESTROY. WHEN THE OLD GROWTH IS CUT, IT TAKES OVER A HUNDRED YEARS BEFORE SOME MEAGER FRACTION OF THE RESOURCES CAN BE REPLACED.

FOREST SERVICE RESPONSE

Many people would agree that for practical purposes, old growth is not a renewable resource because of the time factors involved.

COMMENT NO. 64. A GREATER LEVEL OF RISK IS JUSTIFIED THAN PROPOSED BY THE PREFERRED ALTERNATIVE (DEIS III-28) GIVEN THE SCIENTIFIC UNCERTAINTY INVOLVED, THE OLD-GROWTH MANAGEMENT AREA MODELED BY ALTERNATIVE B APPEARS TO BE A REASONABLE "COMPROMISE." THIS APPROACH WOULD INCREASE THE PREFERRED ALTERNATIVE'S TIMBER PRODUCTION POTENTIAL BY 1.4 MMCF PER YEAR WHILE PROVIDING OLD-GROWTH PROTECTION AT A LEVEL "SLIGHTLY ABOVE THE MINIMUM AREA AND DISTRIBUTION REQUIRED TO PROVIDE VIABLE POPULATIONS OF DEPENDENT WILDLIFE SPECIES WELL DISTRIBUTED IN THE PLANNING AREA" (DEIS IV-45, II-32)

FOREST SERVICE RESPONSE.

Lower levels of old growth were considered in several alternatives. Our calculations show that reducing old growth to the minimum management requirement level would increase timber harvest potential 0.5 MMCF. See Response No. 32.

COMMENT NO. 65. FOREST MANAGEMENT IS A LOT MORE THAN PLANTING AND HARVESTING TREES - AND THIS REALIZATION MUST BE CONVEYED TO WASHINGTON D.C. IT BOTHERS ME TO HEAR THE FOREST SERVICE REFER TO TREES AS 'STICKS' AND AREAS AS EITHER 'HARVESTED' OR 'UNHARVESTED'.

FOREST SERVICE RESPONSE:

We agree that these terms tend to imply value judgments and can be offensive. But, recognizing that growing and harvesting trees for human use is a legitimate purpose of the National Forest, such terms become a part of our vernacular -- especially with those who work directly in timber management on a continuing basis.

COMMENT NO. 66: MANAGEMENT AREA 15 (TIMBER, P. 4-87). HOW CAN AN OLD-GROWTH STAND, BY ITSELF, CEASE OVER TIME TO MEET THE CRITERIA FOR OLD GROWTH (THUS ALLOWING IT TO BE RETURNED TO THE REGULATED TIMBER BASE)?

FOREST SERVICE RESPONSE.

When it becomes decadent to the point where it no longer provides old growth conditions that are enjoyable for people or provide habitat for the intended wildlife indicator species.

COMMENT NO. 67: AS AN INTERIM MEASURE, UNTIL ALL UNCERTAINTIES ARE RESOLVED, EVALUATE PROPOSED CUTTING OF ANY EXISTING OLD GROWTH TO BE SURE THAT IT IS NOT MATERIALLY REDUCING THE VALID OLD-GROWTH INVENTORY BELOW A LEVEL THAT ASSURES LONG-TERM VIABILITY. INITIALLY, THIS WOULD PROBABLY SHARPLY REDUCE OLD-GROWTH HARVEST, BUT ANY REASONABLE EFFORT APPLIED WOULD PRODUCE ANSWERS, PRESUMABLY, THAT WOULD ALLOW SOME RELAXATION WITHIN SEVERAL YEARS.

FOREST SERVICE RESPONSE:

Considering the large proportion of old growth in wilderness and other areas where timber harvest does not occur, plus the old-growth allocation of Alternative C, a low level of old-growth harvest will occur

COMMENT NO. 68: WE NEED AN ACCURATE DEFINITION OF AND DETERMINATION OF HOW MUCH OLD GROWTH REMAINS IN EASTERN OREGON. THE DEFINITION OF OLD GROWTH IN THE DRAFT PLAN IS TOTALLY INADEQUATE, AND THE ESTIMATES OF THE AMOUNT OF OLD GROWTH REMAINING HAVE BEEN GROSSLY EXAGGERATED, SOME SAY BY AS MUCH AS 60 PERCENT

FOREST SERVICE RESPONSE:

We expect that the definition will continue to evolve. At present, we see no reason to revise the decision provided in the EIS glossary.

COMMENT NO. 69: IN ALMOST EVERY RESPECT, ALTERNATIVE E IS SUPERIOR TO ALTERNATIVE C, YET THE FOREST SERVICE DESIGNATED C AS THE PREFERRED ALTERNATIVE. E PRODUCES MORE TIMBER YET IT PROTECTS ALL ROADLESS AREAS FROM TIMBER MANAGEMENT DIFFERENCES IN THE OUTPUTS OF MOST OTHER RESOURCES ARE INSIGNIFICANT. AS A RESULT, ALTERNATIVE E PRODUCES MORE OF WHAT MOST PEOPLE WANT THAN ALTERNATIVE C.

FOREST SERVICE RESPONSE:

There was very little support for Alternative E in comments to the draft documents

COMMENT NO. 70: I HIKE OFTEN AND FIND SPIRITUAL REGENERATION IN WILD OLD-GROWTH AREAS.

FOREST SERVICE RESPONSE:

Others share your view. Old-growth trees are more than wildlife habitat

COMMENT NO. 71: I AM UNEASY OVER THE CONCEPT OF OLD-GROWTH MANAGEMENT AREAS AS "DEDICATED AREAS," AND TAKEN OUT OF TIMBER BASE. AS A GENERAL RULE I WOULD PREFER "MANAGED OLD GROWTH" WHERE ENOUGH OF THE FOREST IS MANAGED ON A LONG ROTATION TO GIVE THE DESIRED TOTAL ACRES OF OLD-GROWTH OR MATURE FOREST AT ANY ONE TIME. THIS KEEPS IT ALL IN THE TIMBER BASE AND ALLOWS FUTURE MANAGEMENT DECISIONS TO BE MADE IN ACCORDANCE WITH TIMBER BASE AND ALLOWS FUTURE MANAGEMENT DECISIONS TO BE MADE IN ACCORDANCE WITH FUTURE CONDITIONS AND NEEDS OF THE FOREST. FOR EXAMPLE, I BELIEVE THAT EXPERIENCE AND RESEARCH WILL

ALLOW FOREST MANAGERS TO BUILD IN OLD-GROWTH CHARACTERISTICS MORE QUICKLY THAN THESE HAVE OCCURRED NATURALLY OVER TIME. I EXPECT THAT WILDLIFE SUITABILITY AND ECOLOGICAL DIVERSITY CAN BE JUST AS GOOD, OR BETTER, IN MANAGED OLD GROWTH AS IN DEDICATED OLD GROWTH.

FOREST SERVICE RESPONSE:

Others share your concern and this was considered in the analysis. The rationale for "dedicated old growth" is shown in Appendix B, Part VIII.

**WILDLIFE IN GENERAL
Code 400**

COMMENT NO. 1: CLOSE ROADS ON A SEASONAL BASIS TO PROTECT WILDLIFE DURING CALVING.

FOREST SERVICE RESPONSE.

At present, specific elk calving areas are not identified. Should they become known, road closures could be considered. Since calving occurs in the spring when use of the Forest by people is relatively light, there does not presently appear to be a significant conflict.

COMMENT NO. 2 ELK GET ALONG FINE WITH TIMBER HARVESTING THEY NEED THE GRASS THAT GROWS AFTER SOME TREES ARE CUT THEIR PROBLEM WITH ROADS IS THE HUNTERS ON THEM, NOT THE ROADS THEMSELVES.

FOREST SERVICE RESPONSE:

We agree that timber harvesting can be compatible with elk needs. Harvesting often results in more available forage. Research also shows that elk need the cover which trees provide, both for security and shelter from weather. By varying the methods of harvest and the timing, we believe both cover needs and forage needs can be met. We agree that roads are not necessarily a problem for game, but that human use of the roads can be

COMMENT NO. 3· IT SEEMS PITIFUL INDEED THAT WILDLIFE AGENCIES NOW HAVE TO PUT OUT BLUEBIRD BOXES TO MAKE UP FOR MAN'S GREED AND TO SPEND MILLIONS ON FISH HATCHERIES WHEN AT ONE TIME WE HAD ENOUGH NATURAL SPAWNING AREAS TO PROVIDE FISH FOR ALL. IT SADDENS ME WHEN I HEAR OF ALL THE ENDANGERED SPECIES OF CREATURES DIMINISHED FOR THE QUEST OF THE ALMIGHTY DOLLAR. BEYOND THE BLUEBIRD, THE SPOTTED OWL, AND THE ANADROMOUS FISH, I FEEL THAT A WHOLE BIOLOGICAL SYSTEM HAS BEEN RAPED AND I WONDER ABOUT THE PRICE WE'LL HAVE TO PAY LATER. THE FOREST IS ALREADY DEALING WITH A TREMENDOUS PLAGUE OF HARMFUL INSECTS WHICH I FEEL WAS BROUGHT ABOUT BY MAN'S INTERFERENCE.

FOREST SERVICE RESPONSE.

Although we do not think the situation is as bleak as you do, we agree that substantial funds and time are expended in mitigating management activities.

COMMENT NO. 4· THROUGHOUT THE DEIS AND FLRMP, FISH AND WILDLIFE RESOURCES FREQUENTLY ARE COMBINED AND CONSIDERED AS A SINGLE RESOURCE. EACH REPRESENTS A VERY DISTINCT GROUP OF RESOURCES WITH ITS OWN HABITAT REQUIREMENTS, PROBLEMS, AND ATTRIBUTES AND SHOULD BE CONSISTENTLY ANALYZED AND OTHERWISE TREATED INDEPENDENTLY OF ONE ANOTHER.

FOREST SERVICE RESPONSE:

Although fish and wildlife are often discussed in the same sections of the EIS, we do not think of them as a single resource.

COMMENT NO. 5 FISHING AND WILDLIFE INCREASES SHOULD BE A PRIMARY CONCERN WITH KEY HABITATS BEING PROTECTED INSTEAD OF MANAGED.

FOREST SERVICE RESPONSE.

As more of the National Forest is subjected to intensive timber management, there will be decreases in populations of wildlife species dependent on older, more decadent timber stands, and increases in those species that thrive with a younger age class. "Wildlife Habitats in Managed Forests of the Blue Mountains" by Jack Ward Thomas, et al, discusses this in detail, and provides a list of those wildlife species dependent on each age class. Key habitats planned for protection are considered the minimum required to maintain viable populations of certain species. The Plan provides for land management techniques and constraints which are expected to result in improved water quality, fisheries, and fish habitat

COMMENT NO. 6: GRAZING SHOULD BE ELIMINATED COMPLETELY SO THAT THE DEER AND ELK HERDS CAN BE INCREASED. THE ECONOMIC IMPACT OF THE ADDITIONAL GAME ANIMALS WILL BE MUCH MORE THAN THE CURRENT INCOME FROM GRAZING FEES

FOREST SERVICE RESPONSE:

Without an in-depth analysis of the limiting factors for each deer and elk herd on the Forest, it cannot be positively said that providing more summertime forage for either or both species will increase the population. Wintertime forage, largely on private land, plays a major role as do hunting, predation, weather, and other factors. The plan presently provides for summertime forage and other habitat needs for the objective population level of each animal as determined by the Oregon Fish and Wildlife Commission in December 1981.

COMMENT NO. 7 A PROPERLY MANAGED FOREST, WITH SUSTAINED YIELD AS A PRIMARY CONCERN, IS MORE BENEFICIAL TO WILDLIFE THAN A "HANDS-OFF" POLICY WE HAVE MORE DEER AND ELK IN THIS AREA THAN AT ANY TIME IN HISTORY.

FOREST SERVICE RESPONSE:

As it relates strictly to deer and elk, this statement is probably more true than false. However, other species of wildlife will benefit more with the "hands off" policy. The difficult management challenge is to provide adequate habitat for maintenance of viable populations of all species and for more than viable populations for certain other species which are used for recreation, such as deer or elk.

COMMENT NO. 8. FRAGILE PLANT HABITATS, SUCH AS BOGS, WET MEADOWS, TALUS AND CLIFF SLOPES, MARSHES, SEEPS, AND SPRINGS SHOULD RECEIVE SPECIFIC MANAGEMENT PROTECTION ACROSS THE RANGE OF LAND USE PRESCRIPTIONS

FOREST SERVICE RESPONSE

Direction to protect these resources is found in Chapter 4 of the Plan

COMMENT NO. 9. THE DRASTIC DECLINES IN OLD GROWTH INDICATORS, SUCH AS THE PILEATED WOODPECKER, PINE MARTEN AND WHITE-HEADED WOODPECKER, ARE UNACCEPTABLE AND ARE IN VIOLATION OF NEPA REGULATIONS DEIS P. IV-49 INDICATES THAT THESE

SPECIES WOULD SUFFER SUBSTANTIAL DECLINES THROUGH ALL ALTERNATIVES EXCEPT ALTERNATIVE F. IT IS CLEARLY IRRESPONSIBLE TO PROPOSE A PLAN WHICH WILL RESULT IN SERIOUS [REDUCTIONS IN] POPULATIONS OF THE PLAN'S INDICATOR SPECIES

FOREST SERVICE RESPONSE:

As old growth and mature forests are harvested, populations of wildlife species dependent on those habitats will decrease. This is not a violation of NEPA or the National Forest Management Act as long as an adequate NEPA analysis is conducted and viable populations are maintained. The NEPA analysis provided the information to which you refer

COMMENT NO. 10: IT APPEARS AS THOUGH FISH AND WILDLIFE CONCERNS ARE THE MAJOR CONTRIBUTING FACTORS TO TIMBER HARVESTING REDUCTIONS. THE ALTERNATIVE SHOWING THE LOWEST TIMBER HARVEST HAS THE HIGHEST DEER AND ELK NUMBERS. THE PERCENTAGE DIFFERENCE FROM THE HIGHEST TO LOWEST ALTERNATIVE RELATIVE TO DEER AND ELK PRODUCTION IS ONLY 1,600 (8%) ANIMALS, YET THE DIFFERENCE IN TIMBER OUTPUT FROM THE SAME ALTERNATIVES (B AND F) IS 59 MMBF OR 59%. IT APPEARS TO ME THAT TIMBER PRODUCTION IS PAYING TOO HIGH A PRICE FOR MARGINAL GAINS IN WILDLIFE NUMBERS

FOREST SERVICE RESPONSE:

It is true that protecting fish and wildlife habitat reduces timber harvest. However, considerations for deer or elk habitat only make up a part of these total effects. Consideration for species dependent on older age stands of timber or on components of those stands, such as dead wood, and considerations for water quality or fish habitat also have an effect

COMMENT NO. 11: IN FOREST PLANNING, HOW DO THE NEEDS OF WILDLIFE POPULATIONS REALLY CONSTRAIN SPATIAL ORGANIZATION OF THE CUTTING UNITS? HAVE ANY PRINCIPLES SUCH AS THOSE EXPRESSED IN L. D. HARRIS' (1984) "THE FRAGMENTED FOREST" BEEN CONSIDERED IN HARVEST PLANNING?

FOREST SERVICE RESPONSE:

In Management Areas 1, 3, and 18, as described in the Forest Plan, harvesting will be spatially distributed to achieve a variety of resource goals including wildlife, visual quality, and to meet the requirements set by the National Forest Management Act. Where spatial distribution is designed for wildlife needs (Management Areas 3 and 18), it is based on the principles found in "Wildlife Habitats in Managed Forests, the Blue Mountains of Oregon and Washington" by Jack Ward Thomas, et. al. We have not consciously used any principles from "The Fragmented Forest" (Harris 1984) but there are similarities

COMMENT NO. 12: ALTERNATIVE A HAS AN ARTIFICIALLY HIGH PNV AS A RESULT OF LAX MMR'S FOR WILDLIFE.

FOREST SERVICE RESPONSE:

Of the ten alternatives considered in the DEIS, Alternative A has the second lowest PNV. It meets management requirements for wildlife

COMMENT NO. 13. THE OREGON CHAPTER TWS [THE WILDLIFE SOCIETY] RECOMMENDS BIGHORN SHEEP BE GIVEN PRIORITY OVER DOMESTIC LIVESTOCK IN SUITABLE HABITATS. WE SUPPORT THE NORTHEAST REGION ODFW INTERIM BIGHORN SHEEP RESTORATION PLAN WHICH IDENTIFIES MANY LOCATIONS ON THE WALLOWA-WHITMAN FOREST. THE DEIS ON PAGE 111-35 RECOGNIZES THE CONFLICT BETWEEN DOMESTIC SHEEP AND BIGHORN SHEEP IF AUM'S ARE INCREASED AS PROJECTED USING DOMESTIC SHEEP AS THE CLASS OF LIVESTOCK, IT APPEARS THAT SEVERAL BIGHORN SHEEP WOULD BE PRECLUDED IF THESE ALLOTMENTS MUST BE FILLED, WE RECOMMEND USING CATTLE AS THE CLASS OF LIVESTOCK

FOREST SERVICE RESPONSE.

None of the higher-priority sites for bighorn reintroduction, listed in the state's Bighorn Restoration Plan, are in existing domestic sheep allotments. Prior to any bighorn reintroduction, we complete an environmental analysis which evaluates all known concerns in the reintroduction area as they relate to the reintroduction. Providing quality habitat for the bighorn has been a major concern of ours, including providing, as much as possible, a disease-free environment. We believe the potential conflict between domestic and bighorn sheep is an issue best left to project level analysis such as a grazing allotment environmental analysis and management plan or a bighorn sheep proposed reintroduction.

COMMENT NO. 14. TRAPPING AND ALL FORMS OF PREDATOR CONTROL SHOULD BE PROHIBITED IN ALL BUT THE MOST EXTREME EMERGENCIES

FOREST SERVICE RESPONSE:

The only form of predator control presently sanctioned by the Forest is trapping for coyote control, outside of wilderness, in areas where domestic sheep graze on the Forest. Such control work is approved on an annual basis by the District Ranger after consultation with the domestic sheep permittee and the predator control agent. Those areas comprise a very small portion of the Forest.

COMMENT NO. 15. I FEEL YOUR PROPOSED 10-YEAR PLAN WOULD NOT SIGNIFICANTLY BENEFIT THE WILDLIFE OF THIS AREA

FOREST SERVICE RESPONSE

It is correct that populations of some species of wildlife (notably species dependent on mature and old-growth timber) will be reduced as plan implementation occurs. Some other species, however, will benefit as their habitats improve.

COMMENT NO. 16. ELK AND DEER AND OTHER WILDLIFE AREAS AND HABITAT SHOULD RECEIVE TOP PRIORITY IN FOREST MANAGEMENT, AND ANY DEVELOPMENT OR ACTIVITY IN PRIME HABITAT SHOULD BE POSTPONED, DENIED, OR REDUCED IF AT ALL POSSIBLE

FOREST SERVICE RESPONSE:

Many respondents expressed similar opinions.

COMMENT NO. 17. THE WILDLIFE MANAGEMENT IS TOTALLY IRRATIONAL. AS TIMBER PRODUCTION HAS INCREASED OVER THE LAST TWO OR THREE DECADES AND THE DOCUMENTED

LICENSED HUNTERS HAVE INCREASED, SO ALSO HAVE THE HERDS OF ELK AND DEER INCREASED.

FOREST SERVICE RESPONSE:

This is essentially true for elk, but deer have not necessarily responded in the same manner as they are affected more by winter range conditions and weather. Although timber harvest has increased the last two or three decades, some level of both hiding and thermal cover for big game has been maintained. Available research and studies demonstrate the importance of these habitats to big game and hunting recreation. As timber management practices intensify in the future, we believe it to be prudent to plan for the maintenance of minimum levels of both these habitats.

COMMENT NO. 18: MANAGEMENT AREAS FOR THE WOLVERINE, GREAT GREY OWL AND THE PEREGRINE FALCON SHOULD BE ADDED

FOREST SERVICE RESPONSE.

We considered these species, but our information indicates that habitats for them can be well provided within the areas selected.

COMMENT NO. 19 THE PLAN IS OBVIOUSLY SKEWED TOWARD WILDLIFE MANAGEMENT THIS IS SEEN IN THE DRAMATIC ALLOCATION OF ACREAGE TO MANAGEMENT AREA 3 IN MY CONVERSATION WITH THE GOVERNOR, HE INDICATED THAT THE ONLY STATE DEPARTMENT THAT INDICATED ANY PREFERENCE TO THE PREFERRED ALTERNATIVE WAS THE DEPARTMENT OF FISH AND WILDLIFE. THAT IS NOT SURPRISING AS I UNDERSTAND THEIR INPUT WEIGHED HEAVILY ON THE DECISION TO ALLOCATE THE LARGER AMOUNT OF ACREAGE TO THIS MANAGEMENT AREA. I QUESTION THE NEED FOR THE THERMAL COVER AND DISPERSAL RESTRICTIONS IN MANAGEMENT AREAS 2 AND 3. IT SEEMS AS IF MUCH OF THE INFORMATION AVAILABLE REGARDING HABITAT EFFECTIVENESS IS ONLY OPINION RATHER THAN FACT SUBSTANTIATED BY SCIENTIFIC KNOWLEDGE. THERE ARE FEW CONCLUSIVE STUDIES THAT WOULD INDICATE THE NECESSITY OF THIS STRINGENT MANAGEMENT STYLE. THE COMMUNITIES, AT LEAST IN THE NEAR FUTURE, CANNOT AFFORD THE LOSS OF TIMBER AVAILABLE DUE TO THE RESTRICTIONS OF MANAGEMENT AREA 3. COVER REQUIREMENTS ARE ADEQUATE IN AREA 1 AND, IF SEASONAL ROAD CLOSURES ARE IMPLEMENTED INTELLIGENTLY, THE DISTURBANCE TO ELK DUE TO ROAD TRAFFIC DURING CALVING AND HUNTING SEASONS WILL BE MINIMAL.

FOREST SERVICE RESPONSE.

We disagree that the Plan is "skewed" toward wildlife management. Granted, the restrictions, special guidelines, and allocations for such things as old growth areas, riparian habitat management, dead woody material, road density, visuals, and big-game winter range were largely influenced by fisheries, wildlife, recreation, and factors other than maximum timber production. This is in recognition of such things as (1) importance of the Forest for big-game hunting; (2) maintenance of certain amounts of habitat for more than 380 species of fish and wildlife; (3) more than some 600 miles of anadromous fish spawning and rearing stream; and (4) the importance of visual resource management. A large part of the Forest, however, is proposed for management emphasizing timber and other commodity outputs.

COMMENT NO. 20 DEER AND ELK HERDS GROW AND FLOURISH IN MANAGED FORESTS THEY DON'T NEED A LOT OF JUST "OLD-GROWTH" STANDS TO LIVE IN

FOREST SERVICE RESPONSE

We agree. Old-growth forests are retained as a means of providing for such species as pileated woodpeckers which require large trees, and for people to enjoy.

COMMENT NO. 21: CONCERNING THE FISH AND WILDLIFE OF THESE AREAS, AGAIN, "PROTECTION" SHOULD BE THE KEY CONCEPT. ANY IMBALANCE IN ONE AREA OF A WILDERNESS WILL AFFECT ALL OTHER REGIONS SOONER OR LATER. MEADOWS, WATER, AND UNINHABITED AREAS MUST BE PRESERVED FOR THIS WILDLIFE TO SUSTAIN ITSELF WE MAY ALSO CONSIDER THE WILDLIFE TO BE A "NATURAL RESOURCE, AS HUNTERS AND FISHERMEN ARE ATTRACTED TO THE AREA THUS HELPING THE LOCAL ECONOMY.

FOREST SERVICE RESPONSE

We agree that for a few fish or wildlife species, habitat protection may be a key management concept. We think that for most of the species on the Forest, coordinated resource management is a better concept. We believe the Plan provides for that concept by such actions as making allocations of old-growth forest and big-game winter range, improving riparian habitat, and special management of dead woody material. Fish and wildlife have been recognized as a natural resource in all National Forests for many years.

COMMENT NO. 22. INDICATOR SPECIES ISSUES. IN SEVERAL CASES, AN ADEQUATE RANGE OF APPROPRIATE INDICATOR SPECIES HAVE NOT BEEN SELECTED. SELECTION OF THE YELLOW WARBLER AS THE SOLE RIPARIAN VEGETATION INDICATOR HAS SEVERAL WEAKNESSES. VARIOUS STRUCTURAL PHASES OF THE RIPARIAN VEGETATION SPECTRUM DO NOT SUPPORT YELLOW WARBLERS OR CONTAIN MORE APPROPRIATE INDICATORS THAT ARE LIMITED TO A SPECIFIC STRUCTURAL PHASE. THE RED-EYED VIREO, EASILY IDENTIFIED BY SONG IN THE BREEDING SEASON, WOULD MAKE A BETTER INDICATOR FOR MATURE, MULTI-LAYERED RIPARIAN FOREST WITH A WELL-DEVELOPED CANOPY LAYER. YELLOW WARBLER OR YELLOW-BREASTED CHAT WOULD BEST BE USED AS INDICATORS OF RIPARIAN WILLOW THICKET.

FOREST SERVICE RESPONSE

Selection of management indicator species, their monitoring methods, and frequency of monitoring have been reconsidered since the DEIS was published. Changes are reflected in Appendix G and elsewhere.

COMMENT NO. 23: INCLUDE IN THE PLAN THE RESTORATION OF BIGHORN SHEEP TO THEIR NATIVE HABITATS

FOREST SERVICE RESPONSE

The Plan, in Chapter 4, provides for restoration of bighorn sheep into their native habitats, subject to a case-by-case environmental analysis. We have been and plan to continue, cooperating with the Oregon Department of Fish and Wildlife on their Rocky Mountain bighorn sheep reintroduction plan.

COMMENT NO. 24: APPENDIX A, PAGE A-1 - AN EXPLANATION NEEDS TO BE PROVIDED AS TO WHY THERE ARE NO WILDLIFE AND/OR FISHERIES PROJECTS IDENTIFIED AS PROJECTED ACTIVITIES.

FOREST SERVICE RESPONSE

No completed environmental analyses for wildlife/fisheries projects existed on the date indicated in the table. Projects have been included in the Final Plan.

COMMENT NO. 25: WE RECOMMEND THE THIRD PARAGRAPH ON PAGE 4-41 BE DELETED. THAT PARAGRAPH DEPICTS HOW THE FOREST INTENDS TO MANAGE BIGHORN SHEEP POPULATIONS. BY MASTER MEMORANDUM OF UNDERSTANDING, THE MANAGEMENT OF FISH AND WILDLIFE POPULATIONS IS CLEARLY THE STATE'S RESPONSIBILITY, WHILE THE HABITAT MANAGEMENT RESTS WITH THE LAND MANAGING AGENCY. THE FOREST SERVICE AND DEPARTMENT COOPERATE IN FORMULATING POPULATION AND HABITAT PLANS, BUT THE ULTIMATE RESPONSIBILITY FOR MANAGEMENT DECISIONS RESTS UPON ONE AGENCY OR THE OTHER DEPENDING UPON WHETHER THE MANAGEMENT PERTAINS TO ANIMAL POPULATION OR HABITAT.

FOREST SERVICE RESPONSE.

We agree. We did not intend to imply that the Forest Service will manage bighorn populations. It has been changed in the final document.

COMMENT NO. 26. WOODPECKERS, CAVITY NESTERS, PINE MARTEN, AND FISHER ALL DECLINE UNDER THE DP SPECIAL PROVISIONS TO MAINTAIN THESE WILDLIFE, AT LEAST AT CURRENT POPULATIONS, SHOULD BE MADE. SPECIAL CONSIDERATIONS MUST ALSO BE MADE FOR COUGAR, BEAR, MOUNTAIN GOATS, BIGHORN SHEEP, AND POSSIBLE WOLVERINE (SIGHTED NEAR TABLE ROCK SEVERAL YEARS AGO). WILDLIFE IS A VALUABLE AESTHETIC AND ECONOMIC RESOURCE AND THESE VALUES SHOULD BE REFLECTED IN THE FINAL PLAN AND ECONOMIC ANALYSIS.

ONRC [OREGON NATURAL RESOURCES COUNCIL] COMMENDS AND SUPPORTS THE DP'S PROPOSAL TO REESTABLISH FOUR PAIRS OF PEREGRINE FALCONS AND EIGHT PAIRS OF BALD EAGLES.

THE TIME HAS COME TO RESTORE OUR NATURAL WILDLIFE HERITAGE. PROTECTION OF THE WEST FORK BURNT RIVER BALD EAGLE HABITAT IS ALSO COMMENDED.

FOREST SERVICE RESPONSE.

Thank you for your comment.

COMMENT NO. 27: THE SETTING ASIDE OF 465,000 ACRES OR 35% OF THE AVAILABLE LANDS FOR ELK MANAGEMENT IS A FARCE. THE ELK HERDS ARE PRESENTLY AT THEIR HIGHEST LEVELS BECAUSE OF THE STEADY HARVEST OF TIMBER. ACCORDING TO YOUR PLAN, 21,000 ELK IS YOUR TARGET NUMBER. A QUICK REVIEW OF TABLE II-3A, OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT, SHOWS ME THAT THERE IS VERY LITTLE IMPACT ON ELK THROUGHOUT ALL THE ALTERNATIVES. THE MOST IMPORTANT IMPACT ON ELK NUMBERS IS HOW THE OREGON STATE DEPARTMENT OF FISH AND WILDLIFE MANAGES THEIR NUMBERS. TIMBER

HARVESTING AND ELK PRODUCTION CAN GO HAND IN HAND WITHOUT PLACING A SERIES OF NEEDLESS RESTRICTION ON HARVESTING AND REGENERATION PRACTICES

YOU STATE IN THE PROPOSED FOREST PLAN THAT BECAUSE OF THE OVER-HARVESTING OF ADJACENT PRIVATE FOREST LANDS THERE IS A NEED TO PRESERVE AND MANAGE FOREST LANDS FOR OPTIMUM ELK HABITAT. ACCORDING TO OREGON DEPARTMENT OF FISH AND WILDLIFE FIGURES, USING COW/CALF RATIOS AS AN INDICATOR OF HERD HEALTH, SOME OF THE HEALTHIEST HERDS IN EASTERN OREGON OCCUR ON HEAVY TO PRIVATE RANGES. IN ADDITION, SOME OF THE HEAVY HARVESTED FOREST LAND SUSTAINS SOME OF THE HEALTHIEST HERDS. SOME OF THE LOWEST COW/CALF RATIOS OCCUR IN THE WILDERNESS AREAS AND THE HELLS CANYON NATIONAL RECREATION AREA

IN ALL OF THE ALTERNATIVES, YOU SHOW BASICALLY THE SAME AMOUNT OF ELK. LET'S FACE THE FACTS, OTHER COMMODITIES DON'T HAVE TO SUFFER FOR ELK YOU WILL HAVE JUST AS MANY ELK ON THE AREA 1 LANDS AS YOU WOULD HAVE ON THE AREA 3 LANDS OREGON DEPARTMENT OF FISH AND WILDLIFE ARE THE PEOPLE WHO WILL CONTROL ELK NUMBERS THROUGH REGULAR SEASON HUNTS AND SPECIAL HUNTS WHICH ARE DEVELOPED BY THEIR MANAGEMENT.

FOREST SERVICE RESPONSE:

Available research information indicates that elk certainly prefer, and perhaps require, certain amounts of thermal cover on at least portions of their summer and winter range. Planned research for the Starkey Experimental Forest and Range will further test that research. Past and recent timber harvest practices have maintained at least minimum levels of such cover, however, there is no provision in Area No 1 for maintenance of any thermal cover. If that area were expanded to all timber portions of existing winter range, it is possible that all thermal cover could be eliminated. Until more definite research is available, which indicates the absolute habitat requirements of deer and elk, we don't believe providing for possible total elimination of thermal cover is prudent management.

COMMENT NO. 28 WHAT KIND OF COORDINATED PLANNING IS THERE AMONG FORESTS IN THE AREA TO SUSTAIN HEALTHY ANIMAL POPULATIONS? FOR EXAMPLE, IF DEER AND ELK MIGRATE BETWEEN FORESTS, ARE CORRIDORS PLANNED FOR THEM JOINTLY?

FOREST SERVICE RESPONSE:

We have not coordinated with adjacent Forests on migration corridors. We will do this during Plan implementation. There has been considerable coordination on various timber harvest areas, however, which will maintain various levels of both hiding cover and thermal cover for State population objective levels of deer and elk.

COMMENT NO. 29 WILDLIFE AND FISH WFUD'S ARE EXPECTED TO INCREASE 54% IN 50 YEARS (PLAN 4-6), DEIS II-86) IF ELK AND FISH NUMBERS ARE PROJECTED TO BE STATIC, HOW WILL THESE INCREASES OCCUR?

FOREST SERVICE RESPONSE:

Fish numbers are expected to increase somewhat over the next 50 years. Regardless, fishermen and to a greater degree hunters, will have to accept a lower rate of success than they currently experience.

COMMENT NO. 30: I WANT YOU TO MAINTAIN WILDLIFE NUMBERS AT THE PRESENT LEVELS.

FOREST SERVICE RESPONSE.

Many people expressed this opinion

COMMENT NO. 31 THE AMOUNT OF LAND YOU PROPOSE TO LOCK UP FOR WILDLIFE MANAGEMENT IS CRAZY. WHY NOT LET THE ELK MANAGE THEMSELVES. THEY CAN HANDLE IT.

FOREST SERVICE RESPONSE:

There are no provisions in the Plan for locking up land for wildlife. We have, however, constrained certain activities to allow for the maintenance of habitat which we believe is needed by different forms of wildlife. Examples of this are dead woody material, snags, old-growth/mature trees, riparian/streamside zones, and thermal and hiding cover for elk, particularly on their winter ranges.

COMMENT NO. 32: AS A RANCHER IN UNION COUNTY, IT SEEMS I HAVE LITTLE TO SAY ABOUT THE ACTIVITIES IN OUR AREA BECAUSE OF THE WILDLIFE ADVOCATES & A MINORITY, I AM LOSING ABOUT 20% OF INCOME TO LOSS FROM DAMAGE CAUSED BY ELK, DEER & COYOTES.

FOREST SERVICE RESPONSE

Short of reducing populations of deer, elk, or coyotes, which is the responsibility of the Oregon Department of Fish and Wildlife, we would like to have ideas on what the Forest Service could do in our management activities that would help reduce income losses of private landowners.

COMMENT NO. 33. WE RIGHT NOW FEED THE DEER AND ELK FROM OUR ALFALFA FIELDS. EACH YEAR WE TAKE CARE OF WINTER FEEDING THE GAME. TOO BAD WE AREN'T REIMBURSED FOR THAT

FOREST SERVICE RESPONSE.

Although we can appreciate your problem, wildlife damage or feeding on private land is beyond the scope of the Forest Management Plan. See also response to Comment No. 32.

COMMENT NO. 34: WE DO NOT LIKE TO SEE WHERE THE YOUNG GROWTH IS CUT AND LEFT LYING HELTER SKELTER ALL OVER THE GROUND IT IS SO BAD IN PLACES THAT I DON'T THINK EVEN THE GAME CAN USE IT AND GRASS CERTAINLY HAS A HARD TIME GETTING THROUGH

FOREST SERVICE RESPONSE:

We assume you are talking about the thinning we do in some young timber stands to improve the timber growth rate in the remaining trees. The thinned (cut) slash is often left in place because removal of it would be cost-prohibitive and could cause damage to the "leave" trees. Generally, within two to three years, the slash has been "pushed" low to the ground by snow. Only in isolated cases is it a problem to big game movement, and then only for a short period of time

COMMENT NO. 35: I BELIEVE THAT THE COMMUNITY STABILITY PLAN PROVIDES ADEQUATELY FOR THE WILDLIFE OF THE FOREST MANY SPECIES ARE AS PROLIFIC AS THEY CAN BE IN THIS HARSH CLIMATE EVEN IF ALL THE PEOPLE WERE DRIVEN OUT OF NORTHEAST OREGON PERMANENTLY, AND THESE CREATURES HAD THE FORESTS ALL TO THEMSELVES, THERE WOULD NOT BE MANY MORE OF THEM AROUND THAN THERE ARE NOW BECAUSE THESE MOUNTAINS CANNOT SUSTAIN LIFE IN THE WINTER EVEN WITH HUMAN HELP, WE HAVE LOST THOUSANDS OF ANIMALS IN THE LAST COUPLE OF HARSH WINTERS. WITHOUT OUR HELP, MANY MORE WOULD NOT MAKE IT.

FOREST SERVICE RESPONSE:

We agree that the "Community Stability" Alternative may come close to providing most of the habitat needs for deer and elk. Of concern would be large areas without suitable thermal cover.

COMMENT NO. 36: ROAD CLOSURES IN CERTAIN AREAS DURING HUNTING SEASONS ARE AMPLE TO PROTECT THE WILDLIFE--IT DOESN'T NEED TO GO UNHARVESTED

FOREST SERVICE RESPONSE

There are no provisions in the Plan for leaving timber unharvested in areas where big-game habitat is emphasized. There are, however, provisions for a delay in harvest for periods of time to provide for various forms of habitat for many wildlife species including deer and elk. Road closures are intended to improve habitat for deer and elk during times of the year when many people are in the woods (hunting season). The plan calls for significant reductions in open road densities.

COMMENT NO. 37: STANDARDS AND GUIDELINES
WILDLIFE - INADEQUATE NEEDS SECTIONS FOR:

1. NON-GAME AND SMALL GAME
2. BIG GAME
3. FISH
4. RIPARIAN

FOREST SERVICE RESPONSE:

These suggestions submitted by the Powder River Sportsmen's Club were considered in developing the Final Plan. There have been many changes made in the Standards and Guidelines as a result of these suggestions and others.

COMMENT NO. 38. THE FOREST SERVICE SHOULD ANALYZE THE IMPACTS OF THE SUPPLEMENTAL ELK FEEDING PROGRAM. THE REQUIREMENT FOR SUPPLEMENTAL FEEDING IS AN INDICATION THAT THE POPULATION LEVELS ARE IN EXCESS OF THE CARRYING CAPACITY OF THE LAND.

FOREST SERVICE RESPONSE

This analysis has largely been completed by the Oregon Department of Fish and Wildlife and is available from them upon request.

COMMENT NO. 39 MANAGEMENT AREA 18 IS NOT PROVIDING "OPTIMUM HABITAT FOR ANADROMOUS FISH AND HIGH QUALITY HABITAT FOR BIG GAME," UNDER SUCH WEAK PROVISIONS I SUGGEST A SEPARATE MANAGEMENT AREA FOR FISHERIES AND BIG GAME

FOREST SERVICE RESPONSE:

The standards and guidelines applicable to Management Area 18 will, we believe, result in high quality habitat.

COMMENT NO. 40 YOUR BIOLOGISTS SPEND TOO MUCH TIME DRAWING CIRCLES ON AERIAL PHOTOS AND VERY LITTLE TIME ON THE GROUND WITH THEIR CREWS

FOREST SERVICE RESPONSE:

There isn't a fisheries or wildlife biologist on the Forest who wouldn't agree that more time should be spent working with different on-ground crews. This has, however, been done many times in the past and will continue, but must be balanced with other work priorities and methods. Aerial photos and satellite imagery are useful tools for making evaluations of effects of larger-sized projects.

COMMENT NO. 41 PROPER FOREST MANAGEMENT SHOULD SEEK TO INCREASE, NOT DECREASE, THE NUMBERS OF DEER AND ELK.

FOREST SERVICE RESPONSE:

We agree that this is a desirable goal to the extent it is necessary to meet State management objectives. However, we must consider other resources as well. We believe the Plan is a reasonable balance among all resources and uses of the Forest.

COMMENT NO. 42 ELK NUMBERS IN NORTHEAST OREGON HAVE INCREASED TO THE POINT WHERE THE AVAILABILITY OF WINTER RANGE IS APPARENTLY THE LIMITING FACTOR. CONFLICTS WITH OTHER USES ON THE PRIVATELY OWNED, NATURAL WINTER RANGE ARE INCREASING. BY CONTINUING TO OPTIMIZE THE AVAILABLE SUMMER AND WINTER ELK RANGE ON THE FOREST, THE WALLOWA-WHITMAN MAY BE MANAGING ITS LAND FOR ELK NUMBERS THAT CANNOT BE SUPPORTED BY THE TOTAL HABITAT. IN LIGHT OF THE OTHER RESOURCE USES ON THE FOREST, AT WHAT POINT WILL THE MARGINAL VALUE OF ADDITIONAL ELK BE EXCEEDED BY THE MARGINAL COST OF PROVIDING THE HABITAT?

FOREST SERVICE RESPONSE:

After several years of analysis and consideration, the Oregon Fish and Wildlife Commission, in December 1981, adopted population objectives for deer and elk for each of the State wildlife management units. These objectives considered limiting factors such as winter forage. Optimization of summer/fall ranges will not necessarily result in an increased population of these animals. The Preferred Alternative of the Forest Plan provides for habitat for approximately those objective population levels.

COMMENT NO. 43: THE FOREST SERVICE HAS THE RESPONSIBILITY TO MANAGE THE FOREST RESOURCES FOR MULTIPLE USE. WHILE THE OREGON DEPARTMENT OF FISH & WILDLIFE MAY ESTABLISH GAME POPULATION LEVELS ON THE FOREST, THE FOREST SERVICE IS NOT

AUTHORIZED TO IMPLEMENT THE POPULATION LEVELS IF THEY CONFLICT WITH MULTIPLE USE MANAGEMENT, OTHER FEDERAL REGULATIONS, OR ADVERSELY AFFECT THE FOREST

FOREST SERVICE RESPONSE:

We work closely with the game management agencies (Idaho and Oregon) to ensure that population levels are in harmony with habitat. Through this plan we are obligated to provide habitat for the levels of deer and elk near those specified in the State management objectives.

COMMENT NO. 44: WE HAVE PROBLEMS ALL OVER EASTERN OREGON WITH ELK TRESPASSING ON PRIVATE GROUND. THE ELK ARE DOING FINE AND MUCH ACREAGE COULD COME OUT OF THE WILDLIFE HABITAT.

FOREST SERVICE RESPONSE:

By making special timber harvest restrictions on National Forest portions of elk winter range, we are, among other things, trying to encourage the animals to remain on National Forest land during the winter rather than moving onto private land.

COMMENT NO. 45: WITH ALL OF THE PLANS FOR INTENSIVE BIG GAME MANAGEMENT, NONE OF THE PROPOSED PLANS SHOWS AN INCREASE OF GAME HERDS THAT ONE SHOULD EXPECT WITH SUCH AN EFFORT. PLEASE TAKE THIS INTO CONSIDERATION AND REALIZE THAT GAME HERDS ACTUALLY THRIVE IN LOGGED AREAS BECAUSE OF THE INCREASED FORAGE BESIDES, IF YOU PUT THAT MANY PEOPLE OUT OF WORK, THE GAME NUMBERS WILL PROBABLY DECREASE BECAUSE PEOPLE AFFECTED WILL BE EATING VENISON AND ELK STEAK ALL YEAR LONG INSTEAD OF WAITING FOR HUNTING SEASON.

FOREST SERVICE RESPONSE:

Deer and elk populations are controlled by many factors including the habitat conditions. Considering these habitat or other biological conditions, the State has established population objective levels and, through regulation, they are striving to maintain animals at those levels.

COMMENT NO. 46: "QUALITY AND PRIMITIVE" AREAS TO HUNT ELK AND DEER ARE DECLINING AT THE SAME TIME THAT THE DEMAND FOR SUCH HUNTING IS INCREASING. DESPITE THESE FACTS, YOUR PLAN WOULD DECREASE THE DEER AND ELK POPULATIONS AND WOULD FOREVER TERMINATE THIS "QUALITY AND PRIMITIVE" AREA OF BEAR CREEK.

FOREST SERVICE RESPONSE:

This plan would adversely affect the primitive hunting quality in many areas including the lower reaches of Bear Creek. There will continue to be a large portion of the Forest where such experiences are available, however.

COMMENT NO. 47: AS YOU STATED IN THE DEIS, THE ELK IN THE WALLOWA-WHITMAN WAS INTRODUCED IN THE 1920'S AND THE HERD HAS GROWN CONCURRENTLY WITH LOGGING UNTIL NOW, THE HERD IS AROUND 20,000 ANIMALS, HIGHEST IT HAS EVER BEEN. THE STATE OF OREGON HAS ASKED THE FOREST TO MANAGE FOR AN ELK HERD OF 21,000 ANIMALS. IT IS EVIDENT THAT THE ELK HERD IS TOO LARGE FOR THE WINTER RANGE, WHICH IS MOSTLY ON PRIVATE GROUND. I WAS INFORMED THAT THE ELK HERD IN THE WALLOWA-WHITMAN USE

ABOUT 10% OF THE SUMMER RANGE AT ANY ONE TIME. IF THESE FACTS ARE TRUE THE CONTINUED EFFORTS TO MANAGE TO OPTIMIZE ELK HERDS IN THE SUMMER RANGE IS NOT WHAT WE WANT. YOU WOULD CONTINUE TO OVERPRODUCE FOR THE WINTER RANGE WHICH MEANS HERD LOSSES THROUGH STARVATION AND STABILIZING OF HERD NUMBERS WE ARE POSSIBLY THERE NOW. THE NET BENEFIT THEN FROM THE MANAGEMENT EFFECT IS PRACTICALLY NOTHING YOU HAVE LAND ALLOCATED ON DIFFERENT ALTERNATIVES WHERE MANAGEMENT IS FOR ELK ENHANCEMENT. YOU DO NOT NEED THIS. I BELIEVE A HARVEST PROGRAM AT THE CURRENT LEVEL WILL CONTINUE TO PROVIDE A COVER-FORAGE RATIO THAT HAS ALLOWED THE ELK HERD TO BUILD TO THIS LEVEL. AS YOU HAVE STATED IN THE DEIS, TIMBER HARVESTING IS A MAJOR TOOL IN WILDLIFE MANAGEMENT. CONTINUE TO USE THIS TOOL AT ITS CURRENT LEVEL TO KEEP THE ELK POPULATION WHERE IT IS, AND PROVIDE A STABLE ECONOMY IN EASTERN OREGON TO ALLOCATE LAND FOR ELK MANAGEMENT WOULD BE FRUITLESS, HARMFUL TO THE EASTERN OREGON ECONOMY, AND POSSIBLY HARMFUL TO THE ELK HERD ITSELF

FOREST SERVICE RESPONSE:

The elk herds were supplemented in the 1920's (the EIS has been corrected). Elk are native to the Blue Mountain area, but around the turn of the century their numbers were much lower than now. They are now near the population objective level established in 1981. Winter range capacity was one of the considerations in that population objective level and we do not believe it is evident that the numbers are exceeding capacity. The Preferred Alternative of the Plan requires special timber harvest constraints for timbered portions of some big-game winter ranges to maintain a component of thermal cover. We do not view this as enhancement as much as maintenance of habitat to provide for the population objective level

COMMENT NO. 48: YOUR PLAN FAILS TO ACCEPT REALITY. THE BEST EXAMPLE IS THE HISTORIC PRODUCTION OF ELK AND TIMBER. THE ATTACHED CHART INDICATES THE RELATIONSHIP BETWEEN ELK HARVEST AND TIMBER HARVEST SINCE 1933. THE CHART SPEAKS FOR ITSELF. AS A FOREST LANDOWNER, I SEE NO DETRIMENTAL RELATIONSHIP BETWEEN PROFESSIONALLY MANAGED FORESTS FOR TIMBER PRODUCTION AND ELK PRODUCTION. I DO SEE, HOWEVER, A DETRIMENTAL RELATIONSHIP BETWEEN UNCONSTRAINED HUNTING AND ELK PRODUCTION. FIRST, YOU EITHER DO NOT UNDERSTAND THIS RELATIONSHIP OR ARE UNWILLING TO CLARIFY THIS RELATIONSHIP IN DEFINITIVE AND UNDERSTANDABLE LANGUAGE. PERHAPS YOUR COZY RELATIONSHIP WITH THE OREGON FISH AND WILDLIFE DEPARTMENT LIMITS YOUR OBJECTIVITY IN THIS AREA

FOREST SERVICE RESPONSE.

We agree that professionally managed forests can complement elk production. That, along with other things, has much to do with past increases in elk population numbers. We believe that professional forest management includes the maintenance of certain amounts of thermal cover, particularly on big-game winter range. Considering the importance of the National Forest in providing habitat for big game and other wildlife, coordination with State wildlife agencies is essential.

COMMENT NO. 49: BIG GAME AND SOME OTHER WILDLIFE SPECIES DECLINE SLIGHTLY OR SIGNIFICANTLY UNDER THE DP. WITH INCREASED DEMANDS FOR HUNTING, WILDLIFE VIEWING, AND OUTDOOR RECREATION, THE FINAL PLAN SHOULD PROVIDE FOR MORE WILDLIFE, NOT LESS. REFER TO BIG GAME MA AND ONRC ALT FOR RECOMMENDATIONS ON MANAGEMENT. ALSO, PLEASE CONSIDER POSSIBLE BIG GAME WINTER RANGES JUST NORTH OF BULL RUN MTN. AND ALONG THE FOREST BOUNDARY NEAR THE SOUTH FORK BURNT RIVER.

FOREST SERVICE RESPONSE:

We recognize that the plan results in some wildlife tradeoffs that many Forest users find unsatisfactory. We suggest, however, that changes will not be great, and that most visitors will see little if any difference in wildlife numbers

The lands normally used as winter range in the two areas you specify are, we believe, outside the Forest boundary although some animals may use the National Forest during relatively open winters

COMMENT NO. 50 THE REAL ISSUE AT STAKE APPEARS TO BE HUNTING "QUALITY" RATHER THAN IMPACTS ON POPULATION NUMBERS. TABLE S-1 SHOWS THAT EVEN ALTERNATIVE B WOULD MEET 95 PERCENT OF THE STATE'S ELK POPULATION TARGETS, COMPARED TO 97 PERCENT FOR BOTH THE PREFERRED ALTERNATIVE AND ALTERNATIVE D (DEIS S-18). THESE STATISTICS SUGGEST THAT ADVERSE IMPACTS ON DEER AND ELK POPULATIONS SHOULD NOT BE A SIGNIFICANT FACTOR LIMITING THE FOREST'S ABILITY TO INCREASE TIMBER HARVEST ABOVE THE PROPOSED LEVEL. HOWEVER, THE DEIS ALSO STATES THAT, WHERE TIMBER HARVEST OCCURS, "ANIMALS MAY BE HARVESTED MORE RAPIDLY THAN IN UNDEVELOPED AREAS" (DEIS IV-34). IT FURTHER NOTES THAT DIFFERING DEGREES OF HABITAT EFFECTIVENESS COULD "CAUSE THE STATE WILDLIFE AGENCIES TO ADJUST SEASON LENGTHS OR HUNTER NUMBERS TO COMPENSATE FOR INCREASED OR DECREASED RATES OF HARVEST" (DEIS IV-41). IN FACT, ACCORDING TO THE DEIS, THE "ONE RECREATION CATEGORY IDENTIFIED AS CHANGING BETWEEN ALTERNATIVES IS THAT ASSOCIATED WITH BIG-GAME HUNTING OUTSIDE WILDERNESS" (DEIS II-123). THESE STATEMENTS CLEARLY SUGGEST THAT THE BIG-GAME WILDLIFE ISSUE IS A RECREATION ISSUE RATHER THAN A BIOLOGICAL ONE.

FOREST SERVICE RESPONSE.

We agree that the issue is recreational as well as biological. Because of the convoluted linkage between big-game numbers, hunter numbers, hunting season, and hunting days, no difference in big-game hunting is shown among the alternatives in the FEIS. Changes are shown as resulting from shifts in land in the Recreation Opportunity Spectrum.

COMMENT NO. 51: YESTERDAY THERE WERE OVER 200 HEAD OF MATURE ELK IN A 1400 ACRE PASTURE WITH THE CATTLE. THERE IS NO TIMBER IN THIS AREA AND THE ELK STAY THERE YEAR AROUND. THEY TEAR DOWN A LOT OF FENCE AND EAT A LOT OF GRASS.

FOREST SERVICE RESPONSE.

Although we are attempting not to worsen the problem, it is not the intent of the Forest Plan to deal with big-game use of private land. That is a matter for which the Oregon Department of Fish and Wildlife is primarily responsible. On National Forest land, wildlife use of vegetation is a recognized and accepted use. In the case of deer and elk, National Forest forage allowances have been made for the population management objective level (set by the state in December 1981) for each wildlife management unit.

COMMENT NO. 52: I HAVE SEEN, A MANY A TIME, ELK AND DEER FEEDING ON DOWNED TIMBER, AND CUTTERS WITHIN PLAIN SIGHT, AND CHAINSAWS BUZZING.

FOREST SERVICE RESPONSE

It is not uncommon to find some elk in and adjacent to active timber sales. However, our observations, which are supported by research, indicate that elk prefer areas away from human activity

COMMENT NO. 53: PAGE III-36 OF THE DEIS DETAILS SOME OF THE HISTORY OF ELK NUMBERS IN NORTHEAST OREGON. THE FIRST PARAGRAPH GIVES THE MISTAKEN IMPRESSION THAT ELK WERE NOT PRESENT UNTIL BEING INTRODUCED IN THE 1920'S. ELK ARE A NATIVE SPECIES IN NORTHEAST OREGON. ONLY A FEW DOZEN ELK WERE RELEASED AROUND 1920 TO SUPPLEMENT EXISTING NUMBERS. THERE WERE SEVERAL FACTORS WHICH CONTRIBUTED TO LOW ELK NUMBERS AT THAT TIME, AND THERE ARE FACTORS IN ADDITION TO HABITAT CHANGES THAT HAVE RESULTED IN THE NUMBERS FOUND TODAY. THE DEPARTMENT RECOMMENDS THAT THE FIRST SENTENCE ON PAGE III-36 OF THE DEIS BE DELETED AND REPLACED BY THE FOLLOWING LANGUAGE:

ELK NUMBERS HAVE INCREASED IN RESPONSE TO PROTECTION, MANAGEMENT AND FAVORABLE HABITAT CONDITIONS SINCE THEIR LOW POPULATIONS OF THE EARLY 1900'S

FOREST SERVICE RESPONSE:

We have revised the text in accordance with this suggestion

COMMENT NO. 54: CONSIDERING THE W-W IS FORTUNATE ENOUGH TO HAVE THE LARGEST ELK POPULATION OF ANY NF IN THE STATE AND SUPERIOR ANADROMOUS FISH STREAMS, THE FOREST HAS A RESPONSIBILITY TO PROTECT AND ENHANCE THOSE RESOURCES AND TO DEMONSTRATE THESE ARE COMMODITIES THAT BENEFIT LOCAL COMMUNITIES

PAGE S-15 GIVES A VERY FALSE IMPRESSION OF COMMODITY VS. AMENITY ALTERNATIVES, REVEALING THE PLANNER'S OBVIOUS BIAS TOWARDS TIMBER EMPHASIS. THERE SHOULD BE 5 OR MORE ALTERNATIVES MORE "EXTREME" TOWARDS PROTECTION OF NON-TIMBER HARVEST VALUES TO GIVE THE PUBLIC A FAIR CHOICE. F IS DEFINITELY NOT HIGHLY PROTECTIVE OF FISH, WILDLIFE, OLD GROWTH, ETC

FOREST SERVICE RESPONSE

The National Forest Management Act and subsequent regulations provide considerable direction for managing and protecting riparian habitat. This direction is common to all alternatives. Thus, a case could be made that there is bias toward fish and wildlife.

COMMENT NO. 55: MANAGEMENT AREA 2 --- THIS MA WAS DEVELOPED TO MAINTAIN "CURRENT HUNTABLE POPULATIONS" (DEIS APPENDICES, B-122) OF BIG GAME. THIS AREA REDUCES TIMBER HARVEST APPROXIMATELY 4 MMBF PER YEAR FOR THE FIRST DECADE. THERE IS NO EVIDENCE THAT THIS CONSTRAINT IS NECESSARY TO MAINTAIN ELK POPULATIONS AT THE MANAGEMENT OBJECTIVE AS SET BY THE OREGON DEPARTMENT OF FISH AND WILDLIFE. THERE IS NO DIRECTION GIVEN TO THE WALLOWA-WHITMAN TO MAINTAIN "HUNTABLE POPULATIONS" OF ELK.

FOREST SERVICE RESPONSE:

It is true that the connection between elk habitat quality and elk populations is not well understood. It is necessary, however, to take elk habitat and elk numbers into consideration during Forest planning, especially given the importance of elk hunting on the Wallowa-Whitman National Forest. There is no direction to maintain huntable populations of elk, but direction to consider a wide range of Forest management alternatives necessitates analysis of different options for managing wildlife habitat. (We anticipate that current studies on the Starkey Experimental Forest and Range will help answer questions about elk habitat needs.)

COMMENT NO. 56: EFFECTS ON BIG GAME POPULATIONS ARE BASED SOLELY ON CHANGES TO HABITAT AND FAIL TO CONSIDER THE INFLUENCE OF HUNTERS AND HUNTING POLICY

THE BIG GAME POPULATIONS ARE INFLUENCED BY BOTH HABITAT AND HUNTER POPULATION MANAGEMENT DECISIONS. THE WALLOWA-WHITMAN HAS CONSIDERED THE HABITAT SIDE OF THE EQUATION, BUT HAS IGNORED THE EFFECTS OF HUNTING. THE NATIONAL FOREST MANAGEMENT ACT REGULATIONS STATE THAT,

"ACCESS AND DISPERSAL PROBLEMS OF HUNTING, FISHING, AND OTHER VISITOR USES SHALL BE CONSIDERED" IN THE PLAN 36 CFR 219.19(a)(4).

FOREST SERVICE RESPONSE:

To a large degree, the influences of hunters and hunting policy on big-game populations are beyond the control of the Forest Service. Policies on numbers of hunters and their distribution across the various game management units, are developed by state wildlife agencies. The level of access to individual areas is controlled by road management. This is accomplished through the open road density guidelines found in the management area direction of the Forest Plan and through seasonal road and area closures developed in coordination with state agencies and the public.

COMMENT NO. 57: THE FOREST SERVICE BELIEVES THAT SILVICULTURE IS THE PRIMARY ANSWER TO A PERCEIVED NEED FOR QUALITY HUNTING AND LARGER BULL ELK. THIS MEANS SETTING ASIDE LARGE AREAS OF HABITAT WHERE PRECOMMERCIAL THINNING IS POSTPONED, HARVEST UNITS ARE MORE WIDELY DISPERSED, AND ROAD DENSITIES ARE RESTRICTED. THE EMPHASIS ON SILVICULTURE IS BECAUSE THE FOREST SERVICE IS RESPONSIBLE FOR MANAGING THE HABITAT BUT NOT THE HUNTERS OR ANIMALS. HOWEVER, ALTHOUGH THE FOREST SERVICE IS RESPONSIBLE FOR HABITAT, THIS DOES NOT MEAN THEY CAN IGNORE THE POSSIBILITY OF ACHIEVING OBJECTIVES THROUGH HUNTER AND ANIMAL MANAGEMENT. THE MANDATES OF NFMA TO COORDINATE WITH STATE AGENCIES AND TO EVALUATE THE EFFECTS OF HUNTING REQUIRE THE PLANS TO CONSIDER ACHIEVING BIG GAME GOALS WITH MEANS OTHER THAN SILVICULTURE.

FOR EXAMPLE, SEASONAL ROAD CLOSURES COULD MINIMIZE HARASSMENT WITHOUT REDUCING ROAD DENSITIES. THE NUMBER OF HUNTING PERMITS AND TYPES OF ANIMALS TAKEN ALSO COULD BE USED TO ACHIEVE "QUALITY" HUNT OBJECTIVES.

BOISE CASCADE RECOMMENDS THE WALLOWA-WHITMAN REVIEW ITS WILDLIFE MANAGEMENT CONSTRAINTS, INCORPORATING METHODS OF "HUNTER MANAGEMENT" TO MEET THE ODFW MANAGEMENT OBJECTIVES FOR BIG GAME.

FOREST SERVICE RESPONSE:

Road management is an important mitigation measure. Silviculture provides an additional means by influencing the amount of feed and cover.

COMMENT NO. 58 (PAGE II-72, PARA. 8) WILDLIFE, PRODUCTION, DEER AND ELK: ESSENTIALLY EVERY ALTERNATIVE LISTS A DECREASE IN WILDLIFE! THE FORESTS SHOULD BE MANAGED FOR INCREASES IN WILDLIFE. WHERE DO YOU GET THESE PERCENT DECREASE FIGURES? WHERE IS THE DATA OR THE REFERENCES? PLEASE INCLUDE THEM.

FOREST SERVICE RESPONSE:

Existing wildlife models (references have been added to the EIS) show that road use, and in some situations timber harvest, can adversely affect the quality of big-game habitat. Although the relationship between habitat quality and elk populations is not well defined, we have chosen to use elk habitat effectiveness index as a means of portraying possible changes in elk populations. Under any alternative, populations may actually increase or decrease, depending on such variables as weather conditions or hunting pressure. The elk population numbers presented in the EIS reflect only variation due to habitat. Under no alternative are large changes in elk populations projected.

COMMENT NO. 59, SOLUTION: THE FOREST SERVICE CAN MEET BOTH HISTORIC TIMBER SALES LEVELS AND ELK MANAGEMENT LEVELS UNDER CURRENT FOREST MANAGEMENT PRACTICES. DO NOT PLACE CONSTRAINTS ON TIMBER PRODUCTION TO MEET ELK POPULATION OBJECTIVES WHEN THERE IS OVERWHELMING EVIDENCE THESE TWO OBJECTIVES ARE COMPATIBLE. THE COMMUNITY STABILITY ALTERNATIVE WILL MEET TIMBER SUPPLY DEMAND AND PROVIDE ELK.

FOREST SERVICE RESPONSE:

Thank you for your comments. Also see response to Comment No 2

COMMENT NO. 60: THE DEIS STATES THAT "SIGNIFICANT SHORTAGES OF COVER (FOR BIG GAME) EXIST NATURALLY OR HAVE BEEN CAUSED BY TIMBER HARVEST ON PORTIONS OF THE FOREST," BUT DOES NOT DISCLOSE THE LOCATION OR FATE OF THESE AREAS. THERE IS NO INFORMATION ON HOW THE TEN-YEAR SALE PLAN WILL AFFECT THE COVER AND BIG GAME IN THESE AREAS.

FOREST SERVICE RESPONSE

The EIS was not intended to address specific areas, either in terms of existing conditions or how they would be affected by future actions. Site-specific analysis will be conducted for each timber sale. General effects of the different management areas are discussed in Chapter IV of the FEIS and in Chapter 4 of the Plan.

COMMENT NO. 61. SINCE SOME WINTER RANGE AREAS RECEIVE HEAVIER USE THAN OTHERS, WOULD NOT MORE INTENSIVE MANAGEMENT OF THESE PREFERRED RANGES AND LESS ON THE REMAINDER BE MORE DESIRABLE AND PROMOTE BOTH BIG GAME AND TIMBER WITH LOWER MANAGEMENT COSTS?

FOREST SERVICE RESPONSE

We agree that intensive management of the big game winter range forage resources is desirable. This must be balanced, however, with maintenance of certain amounts of big-game hiding and particularly thermal cover. We believe that Management Area 3 does that.

COMMENT NO. 62. WHAT COSTS AND PROPERTY DAMAGE MAY BE INCURRED BY ADJACENT LANDOWNERS THROUGH ELK MIGRATION AND HUNTING RECREATION? HOW WILL THE FOREST'S ACTIONS AFFECT THIS PROBLEM? HOW ARE THESE COSTS FACTORED INTO THE PLAN'S ANALYSIS?

FOREST SERVICE RESPONSE:

These effects are difficult to assess. It is reasonable to expect that changes in elk numbers and changes in habitat quality could result in differences in the amount of damage to private lands. Although Chapter IV of the EIS discusses these effects, they have not been quantified.

COMMENT NO. 63: I GENERALLY FEEL BIG GAME WINTER RANGE ALLOCATIONS SHOULD BE GIVEN GREATER CONSIDERATION PRIMARILY ALONG THE FACE OF THE ELKHORN RANGE

FOREST SERVICE RESPONSE

Very little of the National Forest land along the face of the Elkhorn Range is suitable for winter use by big game. Nearly all of the big game winter range in that area is located on private lands, or other public lands lower in the valley.

COMMENT NO. 64: WINTER RANGE AREAS SHOULD HAVE TOTAL CLOSURES TO MOTORIZED VEHICLES EXCEPT MAJOR HIGHWAYS.

FOREST SERVICE RESPONSE:

Although desirable from a wildlife standpoint, this level of road closure on 350,000 acres would be very difficult to implement. Some higher level of motorized access is needed to provide for recreation, timber harvesting, and management of these lands.

COMMENT NO. 65. THE REGION 4 GUIDELINE FOR ELK COVER CALLS FOR A 4-1/2 FOOT HEIGHT. THE WALLOWA-WHITMAN ARBITRARILY INCREASED THEIR ELK COVER HEIGHT TO 10 FEET. THIS SEEMINGLY SUBTLE MANEUVER DROPS THE AREA THAT CAN BE CUTOVER IN THE FIRST DECADE FROM 33% TO 12.7%. THIS APPEARS TO BE AN ACTION OF PERSONAL BIAS OF THE PLANNING STAFF WHO ARE VERY PRESERVATIONIST ORIENTED.

FOREST SERVICE RESPONSE:

Our observations, and those of the Oregon Dept. of Fish and Wildlife, are that 4-1/2 foot trees do not hide elk. We used the 10-foot height, and greater forest-opening dispersion requirement, for areas designated to emphasize elk habitat.

COMMENT NO. 66. PAGE IV-38 AND IV-39 - THE DISCUSSIONS ON HIDING AND THERMAL COVER SHOULD INCLUDE A BRIEF DESCRIPTION OF 1) WHAT IS CURRENTLY PROVIDED ON THE

FOREST, 2) WHAT IS CONSIDERED TO BE OPTIMUM, AND 3) AS SPECIFICALLY AS POSSIBLE, HOW THE EXISTING COVER HABITATS WILL BE IMPACTED. PHRASES SUCH AS " LESS THAN OPTIMUM SIZE AND SPACING " NEED TO BE FURTHER QUANTIFIED TO BE MEASURABLE AND FULLY UNDERSTOOD THE SPECIFIC TRADEOFFS BETWEEN TIMBER AND BIG GAME SHOULD BE IDENTIFIED AND ANALYZED FOR THE PROPOSED ACTION

FOREST SERVICE RESPONSE:

Additional discussion has been added to the EIS.

COMMENT NO. 67. PAGE IV-40, FIRST PARAGRAPH - THIS PARAGRAPH IMPLIES THAT THE ASSIGNED RPA IS TOO HIGH IN TERMS OF THE RESULTANT IMPACTS ON WILDLIFE. IF THIS ANALYSIS IS CORRECT, IT SHOULD BE FULLY DISCUSSED AND VIABLE OPTIONS PRESENTED. THE DEIS SHOULD INDICATE WHETHER OR NOT THE ASSIGNED RPA CAN BE REDUCED, AND IF SO, HOW.

FOREST SERVICE RESPONSE

It is intended that future RPA assessments will take into account the results of the analyses completed for individual Forests

COMMENT NO. 68: CURRENTLY, THE WALLOWA-WHITMAN NATIONAL FOREST STILL PROVIDES FINE ELK, DEER, AND FISH HABITAT IN MANY KEY AREAS HOWEVER, A SIGNIFICANT PORTION OF THOSE HABITATS WILL DISAPPEAR RAPIDLY IF THE PREFERRED ALTERNATIVE IS SELECTED.

FOREST SERVICE RESPONSE.

Although we agree that big game habitat will be adversely affected in some areas, there are also areas where habitat will be improved through reduced open-road densities and increased cover Overall, we expect big-game habitat quality to decrease slightly and fish habitat quality to improve significantly.

COMMENT NO. 69: "ELK HABITAT EFFECTIVENESS" INDICES ARE CERTAINLY FASCINATING NUMBERS, BUT IT IS IMPOSSIBLE FOR INTERESTED REVIEWERS TO DETERMINE WHAT IS THE SIGNIFICANCE OF THESE NUMBERS RELATIVE TO EACH OTHER AND PRESUMABLY ATTENDANT ELK POPULATION NUMBERS WHICH DO NOT VARY SIGNIFICANTLY OVER THE VARIOUS ALTERNATIVES PRESENTED. FOR EXAMPLE, WHAT IS THE MEANING OF THE #77 RELATIVE TO THE #75 IN ANOTHER ALTERNATIVE? IS THE 2 POINT SPREAD SIGNIFICANT WITHIN THE CONFIDENCE LEVEL OF THE INDEX NUMBERS? THERE IS NO DOCUMENTATION OF THE INDEX ANALYSIS THAT PRESUMABLY TOOK PLACE TO ARRIVE AT THESE THE INDEX LEVELS. WHAT IS THE "R SQUARED" OF INDEX NUMBER 76? WHAT IS THE ERROR OF THE ESTIMATE? I.E IS THE 2 POINT DIFFERENTIAL BETWEEN THE #77 AND THE #75 SIGNIFICANT IN TERMS OF THE AGGREGATE RELIABILITY OF THE RATS NEST OF ESTIMATES AND SUBJECTIVE JUDGMENTS THAT CONTRIBUTED TO EACH OF THESE INDEX LEVELS? IF THESE DIFFERENCES IN INDEX LEVELS ARE INDEED SIGNIFICANT PLEASE EXPLAIN THE REASONABLY EXPECTED CONSEQUENCES IN PLAIN ENGLISH.

FOREST SERVICE RESPONSE

We agree that it is difficult to assess the significance of minor changes in habitat effectiveness. As we attempted to explain in the EIS, elk populations are also affected by other factors such as hunting, climatic conditions, off-Forest winter range conditions, and feeding programs

6

COMMENT NO. 70: LOGGING DOES NOT DESTROY FORESTS, IT BUILDS THEM. LOGGING DOES NOT KILL ELK - 90,000 HUNTERS IN ONE AREA DO. LOGGING ENCOURAGES ECONOMIC GROWTH AND A LIVELIHOOD FOR CITIZENS IN A COMMUNITY BUILT AROUND TIMBER.

FOREST SERVICE RESPONSE

Thank you for your comment

COMMENT NO. 71: OSFD [OREGON STATE FORESTRY DEPARTMENT] CONTENDS THAT INSUFFICIENT DOCUMENTATION IS PROVIDED TO EXPLAIN WHY ADDITIONAL REDUCTIONS IN TIMBER HARVEST LEVELS ARE NEEDED TO ACHIEVE "HIGH QUALITY HABITAT FOR BIG GAME, CREATE RECREATIONAL VARIETY, AND MORE CHALLENGING HUNTING OPPORTUNITIES * A MINIMUM OF 357,726 ACRES OF SUITABLE TIMBER LAND AREA IS ALLOCATED TO ONE OR MORE OF THE AREAS NOTED ABOVE IN ALL ALTERNATIVES

FOREST SERVICE RESPONSE:

The rationale for selecting an alternative which recognizes the importance of big-game habitat is discussed in the Record of Decision for the EIS. Also see the following comment and response.

COMMENT NO. 72 ODFW [OREGON DEPARTMENT OF FISH AND WILDLIFE] MAINTAINS THAT THE WALLOWA-WHITMAN WILDLIFE GOALS SHOULD SHOW THE INTENT TO MEET OREGON'S BIG-GAME MANAGEMENT OBJECTIVES ODFW IS REQUESTING THAT ADDITIONAL FOREST LAND BE ALLOCATED TO THERMAL AND HIDING COVER FOR ELK.

FOREST SERVICE RESPONSE:

Recognizing that projected big-game numbers are only index values, we believe that maintaining Oregon's big-game management objectives is viable under the selected alternative. However, since so many factors besides habitat affect population numbers we have not chosen to set specific population levels as Forest goals. Also see preceding comment and response.

COMMENT NO. 73. THE WALLOWA-WHITMAN PLAN HAS RECOGNIZED THE IMPORTANCE OF PROVIDING SOME SUMMER RANGE AND WINTER RANGE FOR BIG GAME ANIMALS. MANAGEMENT AREAS 2, 3, AND 18 MANAGE TIMBER HARVEST ACTIVITIES IN ORDER TO MAINTAIN ESSENTIAL HABITAT TYPES. OSFD [OREGON STATE FORESTRY DEPARTMENT] CONSIDERS THE NUMBER OF ACRES ASSIGNED TO THESE MANAGEMENT AREAS MAY BE ACTING AS EXCESSIVE CONSTRAINTS ON TIMBER HARVEST. ODFW [OREGON DEPARTMENT OF FISH AND WILDLIFE] CLAIMS THAT MANAGEMENT AREA 1 AREAS WILL BE HARVESTED TOO FAST TO MAINTAIN BIG GAME COVER

IN ORDER TO MAINTAIN BOTH TIMBER AND RECREATIONAL EMPLOYMENT WHILE PROTECTING NATURAL RESOURCES, THE WALLOWA-WHITMAN NATIONAL FOREST WILL NEED TO BALANCE

WILDLIFE HABITAT OBJECTIVES AND TIMBER MANAGEMENT DEMANDS. THROUGH THIS BALANCE, ECONOMIC STABILITY CAN BE MAINTAINED LOCALLY AND WILDLIFE POPULATIONS CAN BE KEPT AT DESIRABLE LEVELS.

FOREST SERVICE RESPONSE:

We agree that achieving a balance between competing uses is important. There is often disagreement, however, on just where this point of balance lies. We believe that the preferred alternative represents a good balance.

COMMENT NO. 74: WHEREVER POSSIBLE, OLD GROWTH, RIPARIAN ZONES, WILDERNESS, AND WILDLIFE HABITAT SHOULD BE GROUPED ON THE SAME LANDS. SEPARATE ACRES SHOULD NOT BE SET ASIDE FOR EACH COMPONENT.

FOREST SERVICE RESPONSE

Where possible, this has been done.

COMMENT NO. 75: ELK WILL DO WELL WITH OR WITHOUT TIMBER BECAUSE OF THEIR ABILITY TO ADAPT. THEY STARTED OUT AS A PLAINS ANIMAL AND SURVIVED QUITE WELL WITH VERY LITTLE THERMAL COVER.

FOREST SERVICE RESPONSE:

We agree that elk are a very adaptive animal. We also believe there is probably a limitation to such adaptation, whereby the animals will move to more preferred areas. Where that limit is, we are not sure. Research ongoing at the Starkey Experimental Forest and Range may help give the answer. Considering the importance of elk hunting recreation on the Forest, we do not believe it would be prudent to cause significant movement of the animals off National Forest land.

COMMENT NO. 76: I AM AN AVID ELK HUNTER, BUT I DO NOT BELIEVE WE NEED TO SET ASIDE RESTRICTED FOREST AREAS FOR ELK. IN MY OPINION, LOGGING AND INTENSE MANAGEMENT ENHANCES ELK POPULATIONS. ELK NUMBERS ARE PRIMARILY LIMITED BY THE GAME COMMISSION POLICIES AND RESULTANT HUNTER PRESSURE.

FOREST SERVICE RESPONSE

It has been well documented through research that vehicle activity will cause elk to seek areas of more solitude or nondisturbance. In addition, hunter surveys have indicated that many hunters prefer hunting in areas where motorized vehicle travel is limited. Providing some areas of limited motor vehicle activity during hunting season (or in some cases, longer) is done to provide additional security habitat for elk as well as a certain form of hunting experience.

COMMENT NO. 77: UNFORTUNATELY, ABOUT 29% OF THE SUMMER RANGE AND 49% OF THE WINTER RANGE ARE LOCATED ON PRIVATELY OWNED LAND. UNTIL THE STATE STARTS REIMBURSING LAND OWNERS FOR THIS USE, THERE IS NO JUSTIFICATION FOR ADDING ANY ADDITIONAL ECONOMIC BURDEN ON LOCAL RANCHERS AND FARMERS WHO ARE ALREADY SUFFERING FROM A SEVERE ECONOMIC RECESSION.

FOREST SERVICE RESPONSE

We do not view the Forest Plan as providing for either an increase or a decrease in big-game numbers on either the National Forest or adjacent private land, but merely providing habitat for numbers of big-game that have been determined, in December 1981, by the Oregon Fish and Wildlife Commission for each of their management units.

COMMENT NO. 78 I AM CONCERNED THAT ON LANDS WHERE *NEAR OPTIMUM HIDING COVER, THERMAL COVER, AND FORAGE CONDITIONS* ARE TO BE MAINTAINED FOR BIG GAME SUMMER AND WINTER RANGES (PG 4-2) IS DESCRIBED UNDER MANAGEMENT AREA 3 AS *PROVIDES A BROAD ARRAY OF FOREST USES AND OUTPUTS WITH EMPHASIS ON TIMBER PRODUCTION . (WITH CONSTRAINTS* I FEEL THE OBJECTIVE IN THESE AREAS SHOULD BE OPTIMUM BIG GAME CONDITIONS WHICH WOULD PROBABLY LEAD TO LONGER ROTATION AGES AND A SCHEDULED HARVEST TO MEET COVER CONDITIONS INSTEAD OF CONSTRAINTS. THE LONGER ROTATIONS WOULD MEAN LONGER PERIODS BETWEEN HARVEST ACTIVITIES WITHIN DRAINAGES THIS BEING A MAJOR IMPACTOR ON ELK USE DURING AND FOR SOME TIME AFTER THE ACTIVITY

FOREST SERVICE RESPONSE

By lengthening the time between harvest entries, which Management Area 3 does, the impact on habitat is reduced We anticipate that it will take 20 years for newly established stands to reach 10 feet in height - and this height must be achieved before openings may be created next to such a stand

COMMENT NO. 79 I ALSO FEEL THAT SNOW CLOSURE OF ROADS IS INADEQUATE ON WINTER RANGES (SNOW DEPTH WILL BE LIGHT ON WINTER RANGES ESPECIALLY DURING CRITICAL PERIODS OF HUNTING SEASON.) CLOSURES THAT LIMIT ALL MOTORIZED VEHICLES INCLUDING SNOWMOBILES SHOULD BE IMPOSED ON ROADS TO BE CLOSED

FOREST SERVICE RESPONSE

Our intent is that snow closure will be considered adequate control only where snow depths are normally sufficient to achieve the 1.5 mile/sq.mile limit Otherwise, other means will be necessary Snowmobile use will continue to be regulated through the annual Forest Travel Plan.

COMMENT NO. 80 THE WALLOWA-WHITMAN HAS THE LARGEST ELK POPULATION OF ANY NATIONAL FOREST IN THE UNITED STATES AND IT NEEDS MORE STRINGENT RESTRICTION ON DEVELOPMENTS WITHIN ITS DEER AND ELK HABITATS. A MANAGEMENT AREA MUST BE DESIGNED SPECIFICALLY TO PROTECT WILDLIFE HABITAT. PRIMITIVE HUNTING OPPORTUNITIES SHOULD BE RETAINED PROVIDING THAT ELK AND DEER NUMBERS ARE MAINTAINED OR INCREASED

FOREST SERVICE RESPONSE.

Many hunters share your sentiments. Through the several management areas employed in the preferred alternative, we intend that a variety of hunting experiences will be available

COMMENT NO. 81: THE LACK OF COVER ON SUMMER RANGE IN MANAGEMENT AREA 1 AREAS IS NOT WELL ADDRESSED IN THE PLAN. THE COVER IS LOST WHEN LOGGING AND THINNING OCCURS. THE FOREST PLAN INCLUDES POSITIVE AREAS TO PROTECT WINTER RANGE COVER THROUGH MANAGEMENT AREA 3. ODFW FIELD BIOLOGISTS REPORT THERE IS A CURRENT LACK OF THERMAL COVER ON MANY SUMMER RANGES AND THE PROBLEM WILL REMAIN FOR AT LEAST ANOTHER 15-20 YEARS. THE BIOLOGISTS REPORT REDUCTIONS IN ELK AND DEER USE OF THOSE AREAS AND POSSIBLE REDUCTIONS IN DEER AND ELK PRODUCTIVITY.

BECAUSE MANY SUMMER RANGES ON THE FOREST ARE NOW COVER DEFICIENT, MANY ELK AND DEER ARE BEGINNING TO AVOID LONG-USED SUMMER RANGES AND ARE STARTING TO USE TRADITIONAL WINTER RANGES LONGER, OR EVEN IN SOME CASES, YEAR AROUND. SINCE MANY WINTER RANGES IN NORTHEAST OREGON ARE ON PRIVATE LAND, THIS ADDITIONAL ELK AND DEER USE COULD RESULT IN INCREASED CONFLICT BETWEEN WILDLIFE AND LANDOWNERS.

IMPLEMENTATION OF MANAGEMENT AREA 1 IN ITS PROPOSED FORM WILL PROBABLY RESULT IN FURTHER REDUCTIONS OF ELK AND DEER USE OF TRADITIONAL FOREST SUMMER RANGES DUE TO REDUCED COVER AND HIGH ACCESSIBILITY. ELK AND DEER WILL TEND TO BE CROWDED INTO INCREASINGLY FEWER AND SMALLER AREAS OF UNDISTURBED COVER, INCLUDING THAT ON PRIVATE LANDS. AS ELK AND DEER CONCENTRATE IN THESE LIMITED AREAS, HUNTING PRESSURE AND HUNTER CROWDING WILL INCREASE IN THESE AREAS. THIS WILL RESULT IN REDUCED HERD PRODUCTIVITY AND REDUCED BULL AND BUCK SURVIVAL LEADING TO INCREASINGLY RESTRICTIVE HUNTING SEASONS AND REDUCED HUNTING RECREATION. IT WILL ALSO LEAD TO INCREASED PRIVATE LAND CONFLICTS.

THE DEPARTMENT RECOGNIZES THAT THE MOUNTAIN PINE BEETLE IN THE SOUTHWEST PORTION OF THE FOREST HAS RESULTED IN LOSS OF COVER. ELK PRODUCTIVITY WILL BE REDUCED FOR AT LEAST TWO DECADES. THE DEPARTMENT RECOMMENDS THAT AREAS NOW COVER DEFICIENT, INCLUDING LODGEPOLE AREAS, BE MANAGED TO PROVIDE ADEQUATE COVER IN THE FUTURE.

IN ORDER TO REDUCE THE SHORTAGE OF USEABLE SUMMER RANGE, THE DEPARTMENT RECOMMENDS THAT THE FOREST PLAN BE MODIFIED TO MAINTAIN COVER IN MANAGEMENT AREA 1 AREAS AT 20% HIDING, 10% THERMAL, AND 10% MIXED HIDING AND THERMAL.

THERE IS A NEED TO PROVIDE SECURE HABITAT DURING MIGRATION BETWEEN SUMMER RANGE AND WINTER RANGE. TIMBER HARVEST CAN OCCUR IN MIGRATION CORRIDORS, BUT THERE IS A NEED TO MAINTAIN COVER CHARACTERISTICS IN THE CORRIDOR UNTIL HARVESTED STANDS REACH AT LEAST HIDING COVER CONDITION.

THE DESIRED COVER CHARACTERISTICS IN MIGRATION CORRIDORS ARE AT LEAST; 20% HIDING, 10% THERMAL, AND 10% MIXED THERMAL AND HIDING COVER.

FOREST SERVICE RESPONSE:

We recognize that there is probably a tradeoff of elk cover in the Area 1 areas and feel this has been addressed in the environmental impact statement. This tradeoff is necessary if we are to achieve the levels of timber production shown in several of the management alternatives, including the Forest Service preferred alternative. We are optimistic that studies currently underway on the Starkey Experimental Forest and Range will shed further light on the seriousness of other changes brought about by timber management activities.

COMMENT NO. 82: DEAD AND DOWN WOOD HABITAT - THE DEPARTMENT RECOMMENDS THAT DEAD AND DOWN WOOD HABITAT BE PLANNED FOR AND PROVIDED IN ORDER TO MAINTAIN DEPENDENT WILDLIFE SPECIES AND TO PREVENT OVER-SIMPLIFICATION OF THE FOREST ECOSYSTEMS. PAGE 4-43 OF THE PROPOSED PLAN INDICATES THAT THIS IMPORTANT FEATURE WILL NOT BE PROVIDED FOR THE PROPOSAL INDICATES THAT REMOVAL FOR FUELWOOD GATHERING WILL BE EMPHASIZED AND RESIDUE IN EXCESS OF THOSE NEEDED ON-SITE WILL BE DISPOSED OF. THE GOALS AND STANDARDS NEED TO BE REVISED TO DISPLAY THAT THE NEEDED QUANTITY OF DEAD AND DOWN WOOD HABITAT WILL BE MAINTAINED.

FOREST SERVICE RESPONSE:

Our current site-specific environmental analyses for timber sales consider this factor. It is not intended that woody material be disposed of unless it is in excess of site needs.

COMMENT NO. 83: THE WILDLIFE GOALS NEED TO BE EXPANDED TO SHOW THE INTENT TO PROVIDE HABITAT TO MEET OR EXCEED OREGON'S BIG GAME MANAGEMENT OBJECTIVES. THE RECOMMENDED LANGUAGE IN THE GOAL READS AS FOLLOWS: TO PROVIDE NEAR-OPTIMUM HIDING COVER, THERMAL COVER AND FORAGE CONDITIONS ON BIG GAME WINTER RANGES AND SELECTED SUMMER RANGES SO OREGON'S MANAGEMENT OBJECTIVE LEVELS FOR BIG GAME CAN BE MET.

FOREST SERVICE RESPONSE:

This suggestion was carefully considered. We elected not to change the goal which addresses all wildlife species and conforms more closely to implementing regulations for the National Forest Management Act.

COMMENT NO. 84: BUREAU OF INDIAN AFFAIRS AND TRIBAL STUDIES SUGGEST THAT SUBSTANTIAL PORTIONS OF THE 5,500 OR MORE ELK WINTERING ON THE UMATILLA INDIAN RESERVATION IN RECENT YEARS UTILIZE THE UPPER GRANDE RONDE BASIN AS WELL AS PORTIONS OF THE NORTH FORK OF THE POWDER RIVER AND UPPER NORTH FORK JOHN DAY RIVER AS SUMMER RANGE. THE TRIBE DEEMS THESE AREAS TO BE OF SPECIAL IMPORTANCE FOR QUALITY HABITAT AND RECOMMENDS ONLY MANAGEMENT AREAS 3A, 4, 6, AND 18 BE CONSIDERED IN THESE SUMMER RANGE AREAS.

FOREST SERVICE RESPONSE:

This recommendation was considered in arriving at the management direction for the areas mentioned.

COMMENT NO. 85: THE TRANSPORTATION CORRIDORS BETWEEN THESE SUMMER RANGES AND THE WINTER RANGE ON OR ADJACENT TO THE RESERVATION ARE ALSO OF GREAT IMPORTANCE AS IS THE WINTER RANGE ON FOREST LAND ITSELF BETWEEN THE RESERVATION AND SUMMER RANGES. THE CONFEDERATED TRIBES THEREFORE RECOMMENDS ONLY MANAGEMENT AREAS 3, 4, 6, AND 18 BE CONSIDERED IN THESE WINTER RANGES IN ORDER TO PROVIDE ADEQUATE THERMAL, HIDING, AND SECURITY HABITAT FOR ELK. THE EXCEPTIONS ARE THE STARKEY EXPERIMENTAL FOREST WHICH SHOULD REMAIN UNDER AREA 14 AND THE CURRENT R N A AREA 12 AREA. MANAGEMENT AREAS 1 AND 2 DO NOT PROVIDE ADEQUATE PROTECTION FOR ELK AND ENHANCEMENT OF THEIR HABITAT DUE TO INCREASED THERMAL COVER LOSS IN SUMMER RANGES, INADEQUATE FORAGE/COVER RA-

TIOS, AND ESPECIALLY IMPACTING HIGH ACTIVITY LEVEL FROM INCREASED ROADS AND THEIR USE.

FOREST SERVICE RESPONSE.

Many of the areas have been placed in Management Area 3 as recommended by the Tribes.

COMMENT NO. 86: RECOMMENDATIONS OF AGRICULTURE HANDBOOK #553 (THOMAS) SHOULD BE UTILIZED AND ENFORCED WITH REGARD TO VISUAL BUFFER, CANOPY CLOSURE FOR THERMAL COVER ON BOTH WINTER AND SUMMER RANGE, AND EFFECTIVE SIZE OF CREATED OPENING.

FOREST SERVICE RESPONSE:

This handbook was used extensively in the planning process

COMMENT NO. 87: WINTER RANGES MAY BE CLOSED TO SNOWMOBILES TO PREVENT CONFLICTS PLAN 4-54). HAS THIS EVER BEEN DONE AND BEEN SUCCESSFUL?

FOREST SERVICE RESPONSE

We currently have several elk and deer winter range areas closed to snowmobiles and these closure are considered successful

COMMENT NO. 88: MA-18 IS TO MAINTAIN CONDITIONS NEAR OPTIMUM FOR BIG GAME YET INDEX HERE IS ONLY 74% IF OPTIMUM CONDITIONS FOR ELK ARE TO BE FOUND IN TERRAIN WITH 60% FOREST CLEARINGS (THOMAS 1979), HOW CLOSE IS MA-18 TO OPTIMUM? WHAT LIMITS ELK IN THIS AREA? IT WOULD APPEAR NOT TO BE TOO FEW CLEARCUTS BECAUSE MA-1 HAS A LOWER EHE.

FOREST SERVICE RESPONSE:

Open roads are the primary factor which precludes a higher habitat effectiveness index in Management Area 18.

COMMENT NO. 89: IS THE EHE RATING LINEARLY RELATED TO POTENTIAL ELK POPULATION SIZE AND WHICH REFERENCES COULD BE CITED ON ITS USE? IF EHE IS NOT A LINEAR FUNCTION, IT IS NOT AS USEFUL A "RELATIVE" INDEX OF POTENTIAL ELK NUMBERS, AS IS ASSUMED.

FOREST SERVICE RESPONSE:

As explained in the EIS, the rating is "loosely" related to elk populations and is linear. It is based on "Habitat Effectiveness Index for Elk on Blue Mountain Winter Ranges," Thomas, et al

COMMENT NO. 90: HOW CAN IT BE SAID THAT "NEAR OPTIMUM" HIDING COVER, THERMAL COVER, AND FORAGE CONDITIONS ARE PROVIDED ON WINTER RANGE AND SELECTED SUMMER RANGE IN ALTERNATIVE C WHEN THE EHE IN THESE AREAS IS 74% AND IT IS LESS

ELSEWHERE. IN ADDITION, IT APPEARS THAT DESPITE THE EXTREMES IN MANAGEMENT PROVIDED BY ALTERNATIVES THERE IS LITTLE VARIATION IN ELK NUMBERS.

FOREST SERVICE RESPONSE:

We agree that 74% could be considered less than near optimum. To achieve a significantly higher index would require closure of all roads. Current studies on the Starkey Experimental Forest and Range may shed new light in the influence of roads on elk use. There is little variation in numbers because of the relatively narrow range of management alternatives, in terms of influence on habitat, and factors which influence numbers which are external to National Forest management.

COMMENT NO. 91: THERE ARE TRACTS OF LAND WITHIN NORTHEASTERN OREGON THAT HAVE BEEN LOGGED TWO OR THREE TIMES. THEY ARE NOW PRODUCING GOOD ELK HABITAT, DEER HUNTING, FISHING, OWL AND HAWK NESTING AREAS, LOTS OF PROTECTION FOR COYOTE, BOBCAT, AND OCCASIONAL COUGAR, LIVESTOCK GRAZING, AND ARE STILL GROWING TIMBER. PROPER MANAGING CAN BE DONE TO ACCOMPLISH THE ABOVE RESULTS WITH NO EXTRA EXPENSE TO THE FOREST SERVICE AND VERY LITTLE REDUCTION IN REVENUES TO THE COUNTIES.

FOREST SERVICE RESPONSE

We would have to more closely review specific areas with the writer before agreeing or disagreeing with the comment.

COMMENT NO. 92: WILDLIFE HABITAT IMPROVEMENT ACRES. THE PREFERRED ALTERNATIVE SCHEDULED 1,000 ACRES OF WILDLIFE HABITAT IMPROVEMENT PROJECTS EACH YEAR. THE COMMUNITY STABILITY ALTERNATIVE WOULD SUPPORT ADDITIONAL PROJECTS IN THIS AREA.

THERE APPEARS TO BE A NEED FOR ADDITIONAL INFORMATION CONCERNING HABITAT REQUIREMENTS. WE WOULD SUPPORT A COORDINATED EFFORT BETWEEN INDUSTRY, THE FOREST SERVICE, AND THE ODFW TO BETTER ASCERTAIN COVER REQUIREMENTS. APPEAR TO BE OVER REACTION TO INDIVIDUAL PROBLEMS DUE TO HARVEST PRACTICES ON SPECIFIC AREAS OF THE FOREST. AN EXAMPLE OF THIS WOULD BE WHAT IS PERCEIVED TO BE EXCESSIVE CLEAR CUTTING IN THE LODGEPOLE PINE AREAS.

FOREST SERVICE RESPONSE

Current studies underway on the Starkey Experimental Forest and Range are directed at these information needs.

COMMENT NO. 93: THE PLAN DOES NOT DISPLAY CURRENT FOREST COVER/FORAGE RATIOS NOR PROJECTED RATIOS BY THE VARIOUS ALTERNATIVES. THE PLAN ALSO OMITTED A VERY CRITICAL "HABITAT EFFECTIVENESS TABLE" ON PAGE G-22 OF THE APPENDICES AS IT RELATES TO ELK HABITAT. THE PLAN DOES PROJECT A LONG-TERM AVERAGE OF 62 PERCENT HABITAT EFFECTIVENESS (HE) ON AREA 1 LANDS (PAGE 4-51 - PROPOSED PLAN).

FOREST SERVICE RESPONSE.

The HE table has been included in the final documents and was provided to those requesting it during review of the draft

COMMENT NO. 94: THE OREGON DEPARTMENT OF FISH AND WILDLIFE (ODFW) IS CURRENTLY FACING INCREASED LIMITED ENTRY BIG GAME HUNTING PROPOSALS PRIMARILY DUE TO LOW BULL AND BUCK RATIOS, OVER-CROWDING IN POPULAR HUNTING AREAS, AND REDUCED PRODUCTIVITY IN SOME HERDS (ODFW STAFF REPORT TO OREGON FISH AND WILDLIFE COMMISSION 1986). MANAGEMENT AREA 1 WILL REDUCE BIG GAME COVER, INCREASE ELK VULNERABILITY TO HUNTING, AND REDUCE PRODUCTIVITY OF BIG GAME HERDS THE IMPACTS TO BENCHMARKS ESTABLISHED BY ODFW FOR BUCK AND BULL RATIOS, HUNTER MEMBERS AND HERD PRODUCTIVITY ARE NOT ADDRESSED IN THE PLAN

FOREST SERVICE RESPONSE.

There was some information included in the DEIS, Chapter IV. Additional information has been added to the Final EIS.

COMMENT NO. 95: THE POTENTIAL FOR INCREASED CONFLICT BETWEEN WILDLIFE AND PRIVATE LANDOWNERS ADJACENT TO THE FOREST IS NOT ADDRESSED

FOREST SERVICE RESPONSE:

This was recognized in the DEIS, Chapter IV Additional information is included in the FEIS.

COMMENT NO. 96: RECENTLY, ELK AND DEER ON MANY RANGES HAVE BEEN OBSERVED USING TRADITIONAL WINTER RANGES YEAR-ROUND, PRIMARILY AS A RESULT OF COVER REMOVAL AND HUMAN ACTIVITY ON THE FOREST. THE IMPLICATIONS OF MANAGEMENT AREA 1 AS IT RELATES TO THIS PROBLEM HAS ALSO NOT BEEN ADDRESSED

FOREST SERVICE RESPONSE:

This possible problem was identified in Chapter IV of the DEIS. Additional information has been included in the FEIS

COMMENT NO. 97 IN ADDITION TO ALL THE OTHER LAND ALLOCATIONS WHICH PROHIBIT OR LIMIT TIMBER PRODUCTION ON OTHERWISE SUITABLE LANDS, THE FOREST HAS CONSTRAINED TIMBER MANAGEMENT ON ADDITIONAL ACRES TO PROVIDE "HIGH QUALITY HABITAT FOR BIG GAME", "GREATER RECREATIONAL VARIETY", AND "MORE CHALLENGING HUNTING OPPORTUNITIES" (MANAGEMENT AREAS 2, 3 AND 18). A MINIMUM OF 357,726 ACRES OF SUITABLE TIMBER LAND ARE ALLOCATED TO ONE OR MORE OF THESE AREAS IN ALL ALTERNATIVES. INSUFFICIENT DOCUMENTATION IS PROVIDED TO EXPLAIN WHY ADDITIONAL REDUCTIONS IN TIMBER HARVEST LEVELS ARE NEEDED TO ACHIEVE THESE OBJECTIVES

FOREST SERVICE RESPONSE

Constraints applied to the alternatives to maintain quality big-game habitat vary from minimal protection on 172,800 suitable forested acres in Alternative B to a high level of protection on 686,500 suitable forested acres in Alternative F. The appropriateness of providing for the

needs of big game is widely accepted within and outside of the Forest Service and is supported by existing research (see references in the EIS)

COMMENT NO. 98: THE REAL CONCERN SHOULD BE HUNTER MANAGEMENT AND NOT HABITAT MANAGEMENT. I HAVE DISCUSSED THIS IN DEPTH WITH YOUR PLANNING TEAM ON A NUMBER OF OCCASIONS I SUGGEST A MORE COMPLETE AND OBJECTIVE ANALYSIS OF THIS RELATIONSHIP BE PRESENTED IN THE FINAL DRAFT

FOREST SERVICE RESPONSE:

Many of the alternatives, including the selected alternative, will likely require significant hunter management in addition to habitat management in order to retain a healthy elk herd and a quality hunting experience. We work closely with state wildlife agencies on such hunter controls as road and area closures. Other control measures, such as setting hunting season or regulating the numbers of hunters, are state responsibilities.

COMMENT NO. 99: MANAGEMENT AREA 3 — THIS MA WAS FORMULATED TO OPTIMIZE ELK AND ELK HUNTING THE MODEL WAS CONSTRAINED "TO ENSURE MAINTENANCE OF HIGH QUALITY BIG-GAME (PARTICULARLY ELK) HABITAT AND MORE CHALLENGING HUNTING OPPORTUNITIES" (PROPOSED PLAN, 4-52) THE VEGETATIVE MANIPULATION CONSTRAINTS ARE OVERLY RESTRICTIVE AND THEY ARE BASED ON HIGHLY THEORETICAL AND UNTESTED DATA (JACK THOMAS, PERSONAL COMMUNICATION) THE FOREST SERVICE PLACES VERY SEVERE CONSTRAINTS ON THE PRECOMMERCIAL THINNING, REGENERATION HARVEST AND OVERSTORY REMOVAL TO MAXIMIZE HABITAT AND THEN THEY USE "INDICES (WHICH) TEND TO OVER-ESTIMATE THE IMPACTS OF TIMBER HARVEST ON ELK HABITAT TO THE DEGREE THAT OTHER YOUNGER SUCCESSIONAL STAGES OR UNECONOMIC LANDS ARE INTERSPERSED WITH THESE MATURE STANDS" (DEIS, APPENDICES G-22). THE HABITAT EFFECTIVENESS INDEX (HEI) WAS NOT MODELED IN FORPLAN BUT AN ARBITRARY CONSTRAINT OF MAXIMUM AREA OF AREA CLASS 0 OF 12.7% PER DECADE WAS APPLIED THROUGH ALL DECADES THERE IS NO DIRECTION GIVEN TO THE WALLOWA-WHITMAN TO MODEL FORPLAN USING THESE SEVERE CONSTRAINTS.

THE OVERLY RESTRICTIVE AREA REDUCES TIMBER HARVEST BY 2.32 MMCF (12.76 MMBF) PER YEAR THERE IS NO EVIDENCE SHOWN IN THE DEIS THAT THIS RESTRICTION IS NECESSARY TO MAINTAIN VIABLE POPULATIONS OF ELK OR THE MANAGEMENT OBJECTIVE AS SET BY THE ODFW. IT IS OUR UNDERSTANDING THAT THE OREGON DEPARTMENT OF FISH AND WILDLIFE INSISTED THAT THE PLANNING STAFF DEVELOP AND USE MA-3 WE FEEL THIS IS HIGHLY INAPPROPRIATE AS THE ODFW SHOULD BE IN AN ADVISORY CAPACITY ONLY.

FOREST SERVICE RESPONSE:

The modeling constraint applied in FORPLAN provides an estimate of the rate at which harvest can occur under the management direction provided for Management Areas 3, 3a, and 18. It results in about a 20 percent reduction in per acre harvest volume from what would occur under Management Area 1. The Oregon Department of Fish and Wildlife was consulted many times during the development of the plan, but at no time "insisted" that we develop or use any specific management area.

COMMENT NO. 100. I AM CONCERNED ABOUT WHAT I'LL TERM UNMANAGED FOREST ISLANDS IN THE MIDDLE OF INTENSIVELY MANAGED TIMBER AREAS, OR WITHIN NON-COMMERCIAL TIMBER AREAS (SUCH AS THE STRINGERS OF TIMBER IN JOSEPH CANYON) I SEE THESE

'ISLANDS' -- SOME AS LITTLE AS 30-50 ACRES -- AS HOLDOUTS FOR NONGAME WILDLIFE SPECIES AS WELL AS BIG GAME. I HAVE OFTEN BEEN IMPRESSED WALKING THROUGH AREAS LIKE THAT AT THE CONCENTRATION OF THE UNUSUAL BIRDS--LIKE GOSHAWKS, BLACK BACKED WOODPECKERS AND WARBLERS--, AND THE MANY ELK AND DEER BEDS THERE SHOULD BE SOME KIND OF POLICY PROTECTING THESE LITTLE ISLANDS THAT ARE TOO SMALL TO MEET OLD-GROWTH FOREST DEFINITION, BUT ARE UNIQUE AND CRUCIAL BECAUSE THEY REPRESENT THE ONLY HAVENS FOR WILDLIFE IN A CERTAIN GEOGRAPHIC AREA

FOREST SERVICE RESPONSE.

We agree that, from a wildlife standpoint, it would be desirable to maintain these areas in their existing condition. Some of these areas will certainly remain for one or more decades of plan implementation. However, meeting harvest targets will eventually necessitate bringing these areas under management, unless future forest plans establish a lower allowable harvest.

COMMENT NO. 101 WE REALIZE THAT THE FOREST SERVICE IS BOUND BY REGULATIONS TO PROTECT WATER QUALITY AND HABITAT, SUCH AS THE CLEAN WATER ACT. HISTORY SHOWS THAT QUALITY FISHERY HABITAT REQUIRES MORE.

FOREST SERVICE RESPONSE.

We have improved the standards and guidelines for managing fish habitat in the final plan

**DIVERSITY
Code 405**

COMMENT NO. 1: THIS ISSUE IS ALSO ALLUDED TO IN THE DIVERSITY DISCUSSION THAT IS INCLUDED IN APPENDIX G--WILDLIFE. IN THIS SECTION, THE FOREST CORRECTLY ASSERTS THAT DIVERSITY CANNOT BE ASSESSED BY MERELY SUMMING UP ACRES OF SUCCESSIONAL COMMUNITIES AND EVALUATING THE EVENNESS OF THE DISTRIBUTION. THE PATTERNING OF THESE SUCCESSIONAL COMMUNITIES IS ALL IMPORTANT IN ASSESSING WHETHER NATURAL DIVERSITY IS BEING MAINTAINED ON THE FOREST IN SUCH A MANNER THAT WILL HAVE REAL, BENEFICIAL EFFECTS ON THE SPECIES AND ASSOCIATIONS OR GUILDS OF SPECIES PRESENT. THE ASSERTION MADE IN POINT 4 ON G-21 THAT 'REDUCED DIVERSITY ASSOCIATED WITH THE LOSS OF MATURE SUCCESSIONAL STAGES IS OFTEN COMPENSATED FOR BY THE INCREASED DIVERSITY INDUCED BY EARLY SUCCESSIONAL STAGES' IS PARTICULARLY POORLY TAKEN AS STATED THROUGHOUT THIS APPENDIX, DIVERSITY INDICES ARE PRONE TO ERROR DUE TO THE ASSUMPTION MADE IN THEIR COMPUTATION AND THEIR USE IS THEREFORE USUALLY INAPPROPRIATE IN EVALUATING FOREST MANAGEMENT EFFECTS ON NATURAL DIVERSITY

IN SUMMARY, IT APPEARS THAT THE FOREST IS AWARE OF THE EFFECTS THE PREFERRED ALTERNATIVE WILL HAVE ON NATURAL DIVERSITY, PARTICULARLY IN OLD-GROWTH FOREST COMMUNITIES THEREFORE, IT SEEMS THE FOREST SHOULD PROMOTE MANAGEMENT ACTIONS THAT WILL ADDRESS THE ISSUE OF NATURAL DIVERSITY, ESPECIALLY ACTIONS THAT DEAL DIRECTLY WITH THE PRIMARY THREATS TO NATURAL DIVERSITY. BY INCLUDING THE CURRENT OLD GROWTH (ESTIMATED AT 73,000 ACRES IN THE COMMERCIAL FOREST LAND BASE ACCORDING TO THE DEIS P. 111-28) IN LONG TERM ROTATION MANAGEMENT PLANS WITH CORE OLD-GROWTH PRESERVATION ZONES, THE FOREST WILL BE ABLE TO PROTECT THIS VALUABLE RESOURCE WHILE AT THE SAME TIME PROVIDE FOR ADDITIONAL OLD GROWTH IN THE FUTURE THROUGH PROPER MANAGEMENT.

FOREST SERVICE RESPONSE:

Thank you for your comments.

COMMENT NO. 2: ABOVE ALL, I BELIEVE THAT SPECIES DIVERSITY SHOULD BE MAINTAINED AND PERPETUATED, AND TENDENCIES TOWARD MONOCULTURAL FOREST FARMING SHOULD BE AVOIDED.

FOREST SERVICE RESPONSE:

We intend that species diversity will be maintained, though managed areas as large as 40 acres may tend to be more dominated by a single species than was the case prior to harvest and replanting

COMMENT NO. 3. DIVERSITY IN ALL SPECIES IN THE FOREST IS A NECESSARY CRITERION IF WE ARE TO HAVE A HEALTHY FOREST. DIVERSITY OF PLANT AND ANIMAL COMMUNITIES IS NOT SOME MINIMUM MANAGEMENT AMENITY THAT THE USDA FS IS PUSHING, BUT IT IS THE BASIC BUILDING BLOCKS OF THE FOREST IF YOU CONTINUE TO POORLY MANAGE THE FOREST, REMOVING MORE AND MORE INTACT ECOSYSTEMS AND REPLACING THEM WITH A MONOCULTURE OF DOUGLAS-FIR, YOU WILL FIND THE VIABILITY OF THE FOREST DECREASING AS YOU GO. THERE ARE SO MANY THINGS YOU REMOVE THAT HELP THE TREES GROWN AND KEEP THEM DISEASE FREE (EX. RED ALDER ADDS NITROGEN TO THE SOIL WHICH IS SEVERELY

LACKING IN NUTRIENTS BY THE TIME THAT THE FOREST SERVICE IS DONE) THEREFORE, MY BACKGROUND SHOWS THAT THE MORE INTACT UNDISTURBED AREAS THAT YOU HAVE, THE BETTER OFF THE FORESTS AND STREAMS WILL BE

FOREST SERVICE RESPONSE

While we agree that there are distinct advantages to leaving the forest undisturbed, we believe it is possible to utilize resources without significantly affecting streams or productivity

COMMENT NO. 4: ANOTHER ISSUE IN NATURAL DIVERSITY MAINTENANCE ON THE WALLOWA-WHITMAN NATIONAL FOREST IS RAISED IN THE DEIS ON P 111-30. HERE IT IS MENTIONED THAT CLEARCUTTING (REGENERATION HARVEST) HAS RESULTED IN GREATER DIVERSITY BETWEEN AND WITHIN STANDS WHILE THIS MAY BE TRUE, THE GOAL OF DIVERSITY PLANNING IN THE FOREST IS NOT FOR GREATER DIVERSITY BUT RATHER THE MAINTENANCE OF THAT LEVEL OF DIVERSITY THAT IS ASSOCIATED WITH THE FOREST COMMUNITIES UNDER NATURAL CONDITIONS.

FOREST SERVICE RESPONSE

Our point was that while some management actions may reduce diversity, others may increase it. Assuming that plant and animal diversity is directly related to plant community diversity, we expect that overall diversity will be similar to present conditions

COMMENT NO. 5: IT IS NOT EASY TO ASSESS THE EFFECT OF THE PREFERRED ALTERNATIVE ON NATURAL DIVERSITY IN THE WALLOWA-WHITMAN FOREST GIVEN THE INFORMATION PRESENTED IN THE FOREST PLAN AND THE DEIS HOWEVER, SOME CLUES TO THE FUTURE DIVERSITY OF THE FOREST OCCUR IN THE FOREST PLAN IN SECTION 4-12, DESIRED FUTURE CONDITION OF THE FOREST. IN THIS SECTION, IT IS INDICATED THAT THE FOREST WILL TAKE ON A DIFFERENT CHARACTER AS LODGEPOLE PINE STANDS ARE CLEARCUT AND REPLACED WITH PLANTATIONS ON A LARGE SCALE IT IS ALSO MENTIONED THAT THERE WILL BE A GRADUAL BUT STEADY DECREASE IN LARGE TREES AS THE OLD-GROWTH FORESTS ARE LIQUIDATED AND REPLACED BY YOUNG STANDS. THESE CHANGES WILL BE TAKING PLACE PREDOMINATELY IN THE COMMERCIAL TIMBERLANDS OF THE FOREST (MANAGEMENT AREAS 1, 3, AND 18) AND TO A LIMITED EXTENT IN MANAGEMENT AREA 11 IN HELLS CANYON NRA. OBVIOUSLY IN THESE AREAS, WHICH COMPROMISE 1,256,381 ACRES (TABLE 4-2, FOREST PLAN) OR 53% OF THE ENTIRE FOREST, THERE WILL BE SIGNIFICANT IMPACT TO THE NATURAL DIVERSITY.

GIVEN THAT HALF THE FOREST WILL BE UNDERGOING LARGE SCALE MODIFICATION, IT APPEARS THAT THERE IS A SERIOUS QUESTION AS TO WHETHER THE FOREST IS TRULY PROVIDING FOR A MAINTAINING DIVERSITY OF PLANT AND ANIMAL COMMUNITIES AS SPECIFIED IN THE REGULATIONS (36 CFR 219.27 (G)) THE ISSUE OF PRESERVATION OF DIVERSITY IS FURTHER CHALLENGED IN THE SPECIFIC MANAGEMENT DIRECTIONS FOR INDIVIDUAL MANAGEMENT AREAS (P. 4-48) IN THE FOREST PLAN) UNDER MANAGEMENT AREA 1, IT IS SAID THAT MANAGED TIMBER STANDS WILL NORMALLY BE HARVESTED AT THE POINT OF CULMINATION OF MEAN ANNUAL INCREMENT, OR 40-50 YEAR FOR LODGEPOLE PINE AND 80-100 YEARS FOR OTHER COMMERCIAL SPECIES. GIVEN THIS DIRECTION THERE WILL BE NO PROVISION FOR OLD GROWTH/ LONG ROTATION SCHEDULES AND THUS THERE WILL BE NO SUSTAINED, DYNAMIC OLD GROWTH STANDS IN THE FUTURE FOREST OTHER THAN THOSE THAT OCCUR IN WILDERNESS AREAS. DYNAMIC OLD-GROWTH STANDS DIFFER FROM THE OLD GROWTH SPECIFIED UNDER MANAGEMENT AREA 15 IN THAT THEY INCLUDE STANDS THAT ARE CURRENTLY CLASSIFIED AS MATURE TIMBER OR EVEN EARLIER SUCCESSIONAL STAGES THESE

STANDS ARE DYNAMIC OLD GROWTH IN THAT THEY WOULD BE ALLOWED TO MATURE TO TRUE OLD-GROWTH CONDITION.

FOREST SERVICE RESPONSE:

While the management areas to which you refer amount to 53% of the Forest, many of the lands are nontimbered inclusions, unproductive timberlands, or timberlands unsuited for timber production. Timber management will occur on 832,000 acres, or about 35% of the Forest within the preferred alternative.

"Dynamic" old growth will be available in certain of the Management Area 6 lands, as well as wilderness, and to considerable extent the old-growth management areas will be dynamic, i.e., they are still developing. We agree, however, there will be less old growth in transition than is now present, and much less than was once present. We intend that the old-growth issue will be evaluated during each scheduled Forest Plan revision.

COMMENT NO. 6: TO THE CREDIT OF THE WALLOWA-WHITMAN NATIONAL FOREST, THE PREFERRED ALTERNATIVE DOES MAKE PROVISIONS FOR THE PRESERVATION OF A NUMBER OF CURRENT OLD-GROWTH STANDS TOTALLING 38,196 ACRES. THE FOREST PLAN SPECIFIES THAT THERE WILL BE NO SCHEDULED TIMBER HARVEST IN THESE STANDS EXCEPT FOR SALVAGE OPERATIONS FOLLOWING CATASTROPHIC DESTRUCTION. IT IS ASSUMED THAT SALVAGE OPERATIONS WILL NOT BE CONDUCTED IN EVERY INSTANCE OF DOWNED WOOD IN THESE OLD GROWTH STANDS AS DOWNED WOOD IS ONE OF THE PRINCIPAL COMPONENTS OF OLD-GROWTH ECOSYSTEM. UNFORTUNATELY, THE DISTRIBUTION OF OLD GROWTH IS STATED TO BE NOT ADEQUATE TO MEET THE MINIMUM MANAGEMENT REQUIREMENTS FOR SPECIES NEEDING OLD-GROWTH OR MATURE TIMBER (DEIS, III-29). SPECIES REQUIRING LARGE SNAGS WILL BE ESPECIALLY IMPACTED BY THE FOREST MANAGEMENT DIRECTION OF SHORT ROTATION PERIODS AND SALVAGE LOGGING OPERATIONS (P. 4-52, FOREST PLAN). FOR THIS REASON I WOULD LIKE TO PROPOSE A SOLUTION TO THIS DILEMMA THAT WILL ACT TO ENHANCE THE OLD GROWTH FORESTS AND OLD GROWTH DEPENDENT SPECIES ON THE WALLOWA-WHITMAN NATIONAL FOREST IN THE FUTURE.

LONG TERM ROTATION SCHEDULES FOR TIMBER HARVEST ARE A RELATIVELY NEW FORESTRY PRACTICE THAT HAS NOT YET BEEN ADOPTED BY THE NATIONAL FORESTS BUT HAS BEEN EXTENSIVELY REFERENCED IN THE LITERATURE. PERHAPS THE BEST REFERENCE FOR THIS IS LARRY HARRIS' BOOK, THE FRAGMENTED FOREST. LONG TERM ROTATIONS ALLOW FOR THE CONTINUED HARVEST OF OLD-GROWTH STANDS IN LANDSCAPE PATTERNS THAT PROMOTE REPLACEMENT OF THESE THROUGH EARLY AND LATE SUCCESSIONAL STAGES. ROTATION LENGTHS ARE TWO TO THREE TIMES AS LONG AS CURRENTLY SPECIFIED IN THE FOREST PLAN, OR UPWARDS TO 300 YEARS OR MORE. LONG-TERM ROTATIONS ARE BEST PLANNED ON A WATERSHED OR BASIN SCALE IN ORDER TO MAKE SALE UNIT LAYOUT FOLLOW LOGICAL, ECOLOGICAL PATTERNS FOR THE BENEFIT OF OLD-GROWTH DEPENDENT SPECIES. A BASIC PREMISE OF LONG TERM ROTATION SCHEDULING IS THAT THERE WILL BE CENTRAL, CORE AREAS OF OLD GROWTH THAT WILL NEVER BE CUT. THESE CORE AREAS TYPICALLY FOLLOW STREAMS AND RIVER CHANNELS AND ARE CRITICAL FOR A WIDE VARIETY OF FISH AND WILDLIFE SPECIES CONCERNS. THE CORE AREAS WOULD CORRESPOND TO THE AREAS BEING INCLUDED UNDER MANAGEMENT AREA 15--OLD GROWTH.

FOREST SERVICE RESPONSE

The reference in the DEIS, page III-29, refers to current management plans (Unit Plans). Under other alternatives, old-growth distribution is adequate, and with some adjustment (choosing some new areas) the current direction (Alternative A) could also provide adequate distribution.

of old growth. We appreciate your suggested approach to old-growth perpetuation and management. It will be considered in future plan revisions.

COMMENT NO. 7: TYPE CONVERSION - THE DEPARTMENT IS DEEPLY CONCERNED THAT THE NATURAL FOREST, THROUGH TIMBER REMOVAL AND COVER MANIPULATION, IS GRADUALLY BECOMING SIMPLIFIED, LEADING TO REDUCED HABITAT DIVERSITY. A PARTICULAR PRACTICE CONTRIBUTING TO DIMINISHED DIVERSITY IS TYPE CONVERSION. THE TRUE FIRS AND OTHER SHADE TOLERANT VEGETATIVE SPECIES CONTRIBUTE TO HABITAT AND VEGETATIVE DIVERSITY AS WELL AS PROVIDE HIGH QUALITY COVER FOR BIG GAME. THESE SPECIES ARE BEING REMOVED AND REPLACED, REDUCING FOREST SPECIES DIVERSITY. DURING THE DECADES WHEN COVER IS DEFICIENT, THE DEPARTMENT RECOMMENDS TYPE CONVERSION BE MINIMIZED.

FOREST SERVICE RESPONSE

Type conversion is counter to Regional policy and we have no plans for it. Even when we plant one species in a clearcut, natural seeding usually results in a variety of species being present in the resulting stand.

COMMENT NO. 8. "EFFECTS OF TIMBER MANAGEMENT ON DIVERSITY OF PLANT AND ANIMAL SPECIES" OTHER THAN BEING AESTHETICALLY PLEASING, DIVERSITY IS A NECESSARY COMPONENT TO A HEALTHY FOREST. YOU FAIL TO MENTION HERE THE POTENTIAL LOSSES OF TIMBER BECAUSE OF MASSIVE PEST OR DISEASE ATTACKS ON A CLOSELY PLANTED MONOCULTURE.

FOREST SERVICE RESPONSE:

We do not intend to create monocultures where they have not previously existed. But regardless, insect or disease attacks will be recognized and accounted for in timber inventories.

**SNAGS
Code 407**

COMMENT NO. 1: PAGE IV-37 - THE DISCUSSION OF THE EFFECTS OF TIMBER MANAGEMENT ON SNAGS AND THEIR ASSOCIATED WILDLIFE SPECIES IS CONFUSING. HOWEVER, IT APPEARS THAT THE FOREST AS A WHOLE PRESENTLY PROVIDES LESS THAN 55 PERCENT OF WHAT IS BELIEVED TO BE THE OPTIMUM NUMBER OF LARGE SNAGS (PER 100 ACRES) FOR WILDLIFE, AND THAT THE NUMBER OF LARGE SNAGS PER 100 ACRES WILL BE REDUCED BY 50 PERCENT IF THE PREFERRED ALTERNATIVE IS IMPLEMENTED. IN VIEW OF THE ABOVE, THE FWS BELIEVES LARGE SNAG HABITAT WILL BE REDUCED TOO MUCH. WE RECOMMEND THE FINAL EIS INCLUDE A DISCUSSION OF ALTERNATIVE TIMBER MANAGEMENT TECHNIQUES WHICH COULD PROVIDE FOR MORE LARGE SNAGS THROUGHOUT THE FOREST WITHOUT SIGNIFICANTLY REDUCING TIMBER VOLUME YIELDS

FOREST SERVICE RESPONSE

Your interpretation of the discussion in the DEIS is correct. An important effect of growing and harvesting trees is that there are fewer trees, particularly large trees, from which large snags can develop. The only alternative techniques we know of that would provide for more large snags are those which allow more trees to grow to larger sizes and be left to develop into snags. We know of no way to accomplish this without a direct reduction in timber yield.

COMMENT NO. 2: SNAGS. I AM APPALLED THAT ALL OF THE ALTERNATIVES ALLOW DRAMATIC REDUCTIONS IN SNAG LEVELS. CAVITY DWELLING SPECIES HAVE BEEN SO IMPACTED FROM INSENSITIVE FOREST MANAGEMENT PRACTICES IN THE PAST THAT SUCH AN ADDITIONAL PLANNED REDUCTION IS UNACCEPTABLE.

FOREST SERVICE RESPONSE:

Others share your view, but many believe that the resulting snag levels are still too high, considering the timber volumes foregone.

COMMENT NO. 3: SNAGS FOR WILDLIFE. WE STRONGLY URGE YOU TO ADOPT A FOREST-WIDE PROHIBITION ON THE CUTTING OF SNAGS FOR FUELWOOD THAT IS STRICTLY ENFORCED. SNAGS ARE SO CRITICAL AS WILDLIFE HABITAT FOR A WEALTH OF SPECIES, THAT ALL SNAGS SHOULD BE PRESERVED AS A GENERAL FOREST SERVICE POLICY. ANY ADDITIONAL LOSS OF HABITAT FOR CAVITY NESTERS IS AN "UNACCEPTABLE LOSS".

FOREST SERVICE RESPONSE:

To many people, the value of snags for fuelwood outweighs their concern for the wildlife habitat snags provide. We have adopted a dead tree policy which is intended to retain a significant amount of snag habitat.

COMMENT NO. 4: I AM CONCERNED THAT SNAG HABITAT IS NOT BEING MANAGED AT THE 40% OR HIGHER LEVEL (A REGIONAL DIRECTION). FIRST, THE LEVELS PREDICTED DO NOT MEET THE 40% LEVEL FOR ALL SIZE CLASSES, AND SECOND, THE LEVELS ARE ONLY ASSUMED LEVELS NOT TO BE MANAGED FOR LEVELS.

I FEEL SNAG HABITAT SHOULD BE AT LEAST AT THE 40% LEVEL AND THIS SHOULD BE IN THE TERMS OF MANAGEMENT DIRECTION RATHER THAN ASSUMPTIONS SNAG DEPENDENT SPECIES ARE NOT THE ONLY CONSIDERATION HERE. INTERACTIONS WITH THE WHOLE SYSTEM HAS BEEN SHOWN TO BE IMPORTANT AND INTERACTIONS WE DON'T KNOW ABOUT COULD BE EVEN MORE IMPORTANT.

FOREST SERVICE RESPONSE

By providing old growth stands throughout the Forest, where snag levels of all sizes are normally more than the 100 percent level, we are exceeding the minimum management *direction for wildlife species which rely on large snags* We are also providing snags in areas where they can more effectively be protected from woodcutters as well as wind. There are, as discussed in the EIS, many areas other than old growth where snags will exceed the 40 percent level

COMMENT NO. 5: WHAT IS THE PLANNED SNAG DENSITY IN THE 300 AC FEEDING AREAS? THE DEIS APPEARS TO BE BASED ON A SNAG DENSITY ADEQUATE TO SUPPORT 40% OF THE POTENTIAL CAVITY NESTER POPULATION FOR ALL SIZE CLASSES (P IV-37), YET THE PLAN CALLS FOR 2 SNAGS/AC 10"DBH, THESE TWO STANDARDS ARE VERY DIFFERENT.

FOREST SERVICE RESPONSE:

The planned snag density in the 300 acre feeding areas is 40 percent and does not necessarily include large snags, such as found in the adjacent old-growth stands.

COMMENT NO. 6: 3) SNAG MANAGEMENT - THE PLAN APPEARS TO BE IN CLEAR VIOLATION OF NFMA WITH RESPECT TO THE MAINTENANCE OF VIABLE POPULATIONS OF CAVITY NESTING WILDLIFE THOMAS, IN THE HABITAT MANAGEMENT IN MANAGED FORESTS OF THE BLUE MOUNTAINS PUBLICATION (P 72), SUGGESTED THAT A POPULATION SIZE 40% LEVEL IS NOW ACCEPTED THROUGHOUT THE LITERATURE (INCLUDING YOUR OWN MANUAL, FSM 2630.3) IN LIGHT OF THIS, HOW CAN YOU JUSTIFY A PLANNED LARGE SNAG DENSITY THAT WILL SUPPORT ONLY 27% OF THE POTENTIAL POPULATION SIZE OF SPECIES DEPENDENT ON THESE SNAGS (P IV-37)? THE FACT THAT THE "WILDLIFE ALTERNATIVE" (ALTERNATIVE F) IS PREDICTED TO SUPPORT ONLY 40% OF THE POTENTIAL POPULATION SUGGESTS THAT A FULL RANGE OF ALTERNATIVES WAS NOT CONSIDERED. THE 40% LEVEL SHOULD BE CONSIDERED AS A LEGAL CONSTRAINT ON THE MODEL, A BASELINE, AND NOT AN OPTIMUM CONDITION ATTAINABLE ONLY UNDER A MANAGEMENT SCHEME EMPHASIZING NONCOMMODITY RESOURCES.

FOREST SERVICE RESPONSE:

We believe any of the alternatives provide snag levels necessary for maintaining or exceeding viable populations of dependent wildlife species This is what NFMA requires. The reduction in large snags over the long term is one of the more notable consequences of maintaining *relatively high levels of timber production* This is why we attempted to make it visible, and our mail indicates we were successful.

COMMENT NO. 7: THE PLAN ASSUMES THAT SNAGS SMALLER THAN 20" DBH WILL BECOME AVAILABLE IN MANAGED STANDS THROUGH NATURAL MORTALITY (DEIS II-41) AT LEVELS NECESSARY TO SUPPORT VIABLE POPULATIONS OF CAVITY NESTERS USING THESE SNAGS YOUR ANALYSIS INDICATES THAT ABOUT 60 SMALL SNAGS/100 AC WILL BE AVAILABLE THROUGH TIME (P IV-37). THIS DENSITY IS NOT SUFFICIENT FOR VIABLE POPULATIONS OF

WHITEHEADED WOODPECKERS, THE MANAGEMENT INDICATOR SPECIES FOR SMALL SNAG HABITAT (40% LEVEL IS ABOUT 90 SNAGS/100 AC, THOMAS P 390)

FOREST SERVICE RESPONSE

The Regional Wildlife Management Requirement (MR) for small snags is the 20 percent level (reference Table 8, Appendix G of EIS). Sixty snags per 100 acres would be about the 27 percent level. Whether or not our estimate of 60 is correct will need to be determined through monitoring.

COMMENT NO. 8. THE MANAGEMENT OBJECTIVE FOR ALTERNATIVE F (40% OF BIOLOGICAL POTENTIAL) SHOULD BE THE MINIMUM CONSIDERED IN ANY ALTERNATIVE, IF VIABLE POPULATIONS OF DEPENDENT WILDLIFE ARE TO BE ASSURED. THE PREDICTED AVERAGE LEVELS OF 30% OR LESS FOR MOST ALTERNATIVES, COMBINED WITH PROBABLE INADEQUATE DISTRIBUTIONS ("... THERE WILL EVENTUALLY BE ...TIMBER AREAS..AS LARGE AS 400 ACRES WHERE THERE WILL BE NO LARGE SNAGS." IV-37), INDICATE UNACCEPTABLE LEVELS OF SNAG MANAGEMENT

FOREST SERVICE RESPONSE

Others share your opinion about the minimum level desired. Four hundred acres may not have a particularly high impact on large snag dependent species since spacing for territorial needs will usually result in areas of larger size that are not used for nesting.

COMMENT NO. 9: THE USE OF ARTIFICIAL NESTING OR ROOSTING SITES IS MENTIONED ON PAGE 4- 41. IT MUST BE STRESSED THAT THIS IS THE ABSOLUTE LAST RESORT IN MANAGEMENT, TO BE USED IN AREAS WHERE PAST MANAGEMENT HAS PRECLUDED THE OPTION OF RETAINING OR CREATING SNAGS. ARTIFICIAL STRUCTURES DON'T PROVIDE SUITABLE HABITAT FOR MOST PRIMARY CAVITY NESTERS, DON'T PROVIDE FORAGING HABITAT, AND DON'T PROVIDE DOWN LOGS. MANAGEMENT MUST BE DIRECTED TO PROVIDING ADEQUATE NUMBERS AND DISTRIBUTION OF SNAGS IN PERPETUITY, AND THE PLAN MUST IDENTIFY HOW THIS IS TO BE ACHIEVED

FOREST SERVICE RESPONSE

We agree with your point about artificial structures, but mentioned it as a tool that is available. We have found the use of bird boxes to be quite successful on certain parts of the Forest, particularly for song birds. How snags will be provided will largely be through protection of those that occur naturally, but other means are not ruled out. We disagree that the Forest Plan must identify how this is to be achieved.

COMMENT NO. 10: THE FWS IS CONCERNED THAT THE LEVELS OF SNAG MANAGEMENT RECOMMENDED FOR THE FOREST ARE NOT ADEQUATE TO MAINTAIN VIABLE POPULATIONS OF WILDLIFE SPECIES DEPENDENT UPON SNAG HABITAT. THE FOREST'S OWN SNAG COUNTS SHOW THAT IN MANAGED TIMBER AREAS, ONLY 19 PERCENT OF THE OPTIMUM NUMBER OF SNAGS IS PRESENT, AND YET FOR THE PROPOSED ALTERNATIVE IT IS ESTIMATED THAT 40 PERCENT OF OPTIMUM SNAG LEVELS WILL BE PROVIDED IN AREAS ACTIVELY MANAGED FOR TIMBER. THIS APPARENT DISCREPANCY SHOULD BE EXPLAINED. FURTHER, INVENTORIES OF THE FOREST'S OLD GROWTH TIMBER STANDS SHOW THAT COLLECTIVELY THEY SUPPORT ONLY 55 PERCENT OF WHAT IS CONSIDERED OPTIMUM SNAG HABITAT, AND YET THE REVIEWER IS LED TO BELIEVE THAT OLD GROWTH WILL PROVIDE NEAR OPTIMUM SNAG HABITAT FOR

SNAG DEPENDENT WILDLIFE SPECIES. ACCORDINGLY, IT IS NOT CLEAR WHAT LEVEL OF SNAG HABITAT ACTUALLY WILL BE PROVIDED. THE ANALYSIS CONCERNING SNAG MANAGEMENT SHOULD CLEARLY IDENTIFY WHAT LEVEL OF SNAGS WILL BE AVAILABLE IN ALL MANAGEMENT AREAS BY SIZE CATEGORY.

FOREST SERVICE RESPONSE:

We don't believe we made the claim that we would provide the 40 percent snag level in all areas actively managed for timber. We know of no inventories of the number of snags in the designated old-growth stands, but regardless, the numbers of snags is likely to increase over time if we are successful in eliminating wood cutting in them. Additional information on snag levels has been added to management area direction, but we have not estimated numbers of small snags in old growth, wilderness, or Area 6 land management areas.

COMMENT NO 11 THE [OREGON] DEPARTMENT [OF FISH AND WILDLIFE] RECOMMENDS THE FOREST PROVIDE SUFFICIENT HABITAT TO MAINTAIN CAVITY DWELLING SPECIES AT 100% OF THE POPULATION POTENTIAL IN AREAS MANAGED FOR OLD GROWTH, FOR CAVITY DWELLING SPECIES, AND IN RIPARIAN ZONES. FURTHER, THE FOREST OVERALL SHOULD PROVIDE HABITAT TO MAINTAIN CAVITY DWELLING SPECIES AT OR ABOVE 60% OF THE POPULATION POTENTIAL.

A MAJOR CONCERN IS THE PLAN PROPOSAL TO SUPPLY CONSIDERABLY LESS SNAG HABITAT THAN NEEDED TO MAINTAIN CAVITY DWELLING SPECIES. THE DEPARTMENT RECOMMENDS MANAGEMENT AT OR ABOVE 60% OF POTENTIAL. MANAGEMENT AT OR BELOW 40% OF POTENTIAL THREATENS CAVITY DWELLING SPECIES WITH SERIOUS DEPLETION. THE WALLOWA-WHITMAN PREFERRED ALTERNATIVE PROJECTS FUTURE LARGE SNAG LEVELS AT 27% OF POTENTIAL WHICH IS CONSIDERABLY BELOW THE THRESHOLD OF VIABILITY FOR SNAG USING SPECIES.

THE EXISTING LEVEL OF SNAGS MAY BE NATURALLY LOW ON UNHARVESTED PORTIONS OF THE FOREST AND MAY BE VERY LOW ON HARVESTED PORTIONS. SAMPLING OF SNAGS DONE ON THE WALLOWA-WHITMAN FOREST FOUND SNAG HABITAT AT 54% OF POTENTIAL ON AREAS THAT HAD NEVER BEEN HARVESTED AND AT 18.4% OF POTENTIAL ON ACREAGE THAT HAD BEEN LOGGED (UNPUBLISHED USFS DATA ON FILE AT W-W N.F. IN BAKER CITY). THE PROPOSED FOREST PLAN DOES NOT MEET USFS REGION VI POLICY WHICH SAYS IN PART: "AS A MINIMUM, DEAD AND DEFECTIVE TREE HABITAT SHALL BE PROVIDED IN SUFFICIENT QUALITY, QUANTITY, AND DISTRIBUTION SO AS TO MAINTAIN PRIMARY EXCAVATORS IN EXCESS OF 40 PERCENT OF THEIR POPULATIONS ON COMMERCIAL FOREST LANDS." THE DEPARTMENT URGES THE FOREST TO INCREASE THE PROPOSED FUTURE SUPPLY OF CAVITY DWELLER HABITAT TO MEET THE DEPARTMENT RECOMMENDATIONS LISTED ABOVE. AN AGGRESSIVE SNAG MANAGEMENT PLAN IS NEEDED THAT ADEQUATELY PROTECTS AND MONITORS CAVITY DWELLER HABITAT. THE STANDARDS AND GUIDELINES IN THE PROPOSED PLAN NEED TO BE REVISED TO REFLECT THAT PROTECTION. THE FINAL EIS SHOULD ALSO INCLUDE AN INVENTORY OF EXISTING AND POTENTIAL SNAG HABITAT AND A BETTER MONITORING PLAN. THE METHOD OF MONITORING LISTED IN TABLE 5-1 OF THE PLAN INDICATES SNAGS WILL BE INVENTORIED AS "PART OF PROJECTS, INCIDENTAL OBSERVATIONS." THOSE TECHNIQUES ARE HAPHAZARD AT BEST AND OBJECTIVE COMPREHENSIVE INVENTORY METHODS SHOULD BE USED.

IF MONITORING SHOWS THAT SNAG OBJECTIVES ARE NOT BEING MET, THE PLAN PROPOSES TO "CONSIDER PLAN AMENDMENT." THAT ACTION WILL NOT ASSURE THAT SNAG OBJECTIVES WILL BE MET. THE DEPARTMENT RECOMMENDS THE ACTION INDICATED BE CHANGED TO READ "REVISE PROJECTS AND PROGRAMS TO ASSURE SNAG MANAGEMENT GOALS ARE MET."

FOREST SERVICE RESPONSE

The Department's recommendations were carefully considered. We agree that monitoring will be a vital part of plan implementation and hope to work closely with the Department on this aspect

COMMENT NO. 12: THERE IS VERY LITTLE DISCUSSION IN THE EIS CONCERNING SNAG RECRUITMENT AND REPLACEMENT

WE WOULD LIKE TO SEE A DETAILED ACCOUNT OF SNAG RECRUITMENT AND REPLACEMENT FOR THE NEXT 50 YEARS IN THE EIS

FOREST SERVICE RESPONSE:

How trees will be recruited to meet required snag levels is yet to be determined. A first step will be to protect current snags

COMMENT NO. 13. THE OREGON CHAPTER [OF THE WILDERNESS SOCIETY] RECOMMENDS THE FOREST SERVICE PROVIDE SUFFICIENT HABITAT TO MAINTAIN CAVITY NESTING SPECIES AT A MINIMUM OF 60% OF POPULATION POTENTIAL FOREST-WIDE. IN ADDITION, RIPARIAN ZONES AND OLD GROWTH ALLOCATIONS SHOULD PROVIDE SNAG LEVELS TO MAINTAIN CAVITY NESTING SPECIES OF 100% OF THE POPULATION POTENTIAL.

FOREST SERVICE RESPONSE.

We believe the old growth management area will provide habitat potential that will meet or exceed the 100 percent level for these particular acres. Others shared your recommendation for snag levels in other management areas and your recommendation was considered

COMMENT NO. 14 THE CONFEDERATED TRIBES RECOMMEND A MINIMUM OF 60% OF CAVITY DWELLING SPECIES POPULATION POTENTIAL BY HABITAT PROVISIONS FOREST-WIDE. PAST FOREST PRACTICES HAVE FAVORED CUTTING PONDEROSA PINE OLD GROWTH STANDS AND LEAVING OLD GROWTH STANDS OF LESSER QUALITY FOR SNAG AND OLD GROWTH HABITAT SPECIES. AGRICULTURE HANDBOOK # 553 (THOMAS) STATES PONDEROSA PINE AS THE MOST HIGHLY FAVORED TREE SPECIES BY PILEATED WOODPECKERS AND THEREFORE THESE STANDS ARE ESPECIALLY IMPORTANT

FOREST SERVICE RESPONSE:

The Tribe's recommendation was carefully considered.

COMMENT NO. 15: WHY ARE SNAGS CUT ALONG WITH ANY FOREST STAND? IF THERE IS A DANGER FROM A FALLING SNAG AT THE TIME OF TIMBER HARVEST, THE DANGER EXISTS BEFORE THE STAND IS HARVESTED. DOES THAT MEAN ALL SNAGS MUST BE CUT SO THEY DO NOT FALL UNEXPECTEDLY?

FOREST SERVICE RESPONSE:

Most snags are not felled during timber harvest; only those that present an obvious danger to loggers

COMMENT NO. 16. LET THE MILLS CUT THE DEAD TREES, OR THE WOODCUTTERS TAKE THEM, THEY ARE NO GOOD JUST STAYING THERE. IN FACT IT IS MORE OF A DANGER THAN ANYTHING ELSE

FOREST SERVICE RESPONSE

Many others expressed similar views.

COMMENT NO. 17: IN PREVIOUS YEARS PEOPLE WERE HIRED TO FALL SNAGS TO BE LEFT TO ROT ON THE GROUND. I DON'T SEE WHERE THAT HURT EITHER THE ELK OR THE WOODPECKER POPULATIONS.

FOREST SERVICE RESPONSE:

We now recognize snags as an important resource -- not just a nuisance and fire hazard as was once the case

COMMENT NO. 18 TABLE IV-12 ON PAGE IV-37 OF DEIS DOES NOT ACCURATELY DISPLAY LEVELS OF FUTURE SNAGS AND SHOULD BE CORRECTED

FOREST SERVICE RESPONSE.

The table is only intended to provide an estimate of the levels of large snags.

COMMENT NO. 19. A CONCERN IS A PROVISIONAL LACK OF ACCOUNTABILITY WRITTEN INTO THE MANAGEMENT PLAN. FOR EXAMPLE, P 4-48 PARA 2, OF THE MANAGEMENT PLAN STATES, "PLANNING ASSUMPTIONS ARE NOT INTENDED AS DIRECTION " AND THEN PLACES SNAG MANAGEMENT UNDER PLANNING ASSUMPTIONS, P 4-55, PARA 5 SUFFICIENT RESEARCH ON THE IMPORTANCE OF SNAGS IN FOREST ECOSYSTEMS EXISTED PRIOR TO THE WRITING OF THE WWNF PLAN; SIGNIFICANT PORTIONS OF THIS RESEARCH WAS DONE ON THE WWNF. PLACING SNAG MANAGEMENT UNDER "ASSUMPTIONS" AVOIDS ACCOUNTABILITY FOR SNAG MANAGEMENT, THUS PROVIDING A CONVENIENT LOOP-HOLE FOR SLOPPY MANAGEMENT

IN MY OPINION, SNAG MANAGEMENT SHOULD BE PLACED UNDER "DIRECTION" WITH SPECIFIC SNAG TARGETS ENUMERATED

FOREST SERVICE RESPONSE.

Snag management was shown as direction in some management areas and not in others. However, Forest-wide standards and guidelines now establish snag direction for nearly all areas of the Forest.

COMMENT NO. 20 I DO NOT SEE HOW ALT. F EMPHASIZES WILDLIFE HABITAT, RECREATION DIVERSITY, ETC., WHEN 40 PERCENT OF THE ROADLESS AREAS WILL BE HARVESTED AND SNAGS WILL BE PROTECTED ONLY AT THE 40 PERCENT LEVEL

FOREST SERVICE RESPONSE.

We agree that perspectives differ on this point

COMMENT NO. 21: WE SUGGEST THAT THE NUMBER OF SNAGS MAINTAINED PER ACRE BE AT LEAST FIVE (IN A VARIETY OF CONDITIONS) WITH ENOUGH LIVE REPLACEMENT TREES TO LAST THE ROTATION UNTIL ENOUGH IS KNOWN ABOUT THE NUMBER OF SNAGS PER ACRE NECESSARY TO MAINTAIN SNAG DEPENDANT SPECIES

FOREST SERVICE RESPONSE:

This would be a reasonable approach, but it was not used due to the other issues involved
- especially timber harvest levels and local economies

COMMENT NO. 22. ACTUAL ATTAINMENT OF EVEN SUGGESTED POPULATION LEVELS OF CAVITY DWELLING SPECIES IS VERY SUSPECT DUE TO PREVIOUS LACK OF ENFORCEMENT AND RETAINMENT OF HISTORICALLY PLANNED SNAG LEVELS

FOREST SERVICE RESPONSE:

We do not necessarily agree that past enforcement has been unsuccessful, but we certainly agree that future enforcement to protect snags will be a challenge.

MANAGEMENT REQUIREMENTS
Code 420

COMMENT NO. 1 4) MANAGEMENT INDICATOR SPECIES - AS I READ THE NFMA IMPLEMENTING REGULATIONS, PLANNING IS TO "MAINTAIN AND IMPROVE THE HABITAT OF MANAGEMENT INDICATOR SPECIES" (36 CFR 219 12G) YOUR PROPOSED PLAN DOES NOT MAINTAIN THE CURRENT LEVEL OF HABITAT FOR PILEATED WOODPECKERS OR PINE MARTENS - THE ONLY CONCERN APPEARS TO BE TO PROVIDE SOME OLD-GROWTH REMNANTS THROUGHOUT THE PLANNING HORIZON

FOREST SERVICE RESPONSE:

The 36 CFR 219 19 regulation directs that we maintain viable populations of existing native and desired nonnative species. According to our analysis, the proposed plan will provide conditions for meeting or exceeding this requirement

COMMENT NO. 2: VIABLE POPULATION ESTIMATES SHOULD BE CLEARLY IDENTIFIED AND DOCUMENTED INCLUDING THE FACTUAL BASIS AND RELIABILITY OF THE ESTIMATES, HOW THE POPULATION OF INDICATOR SPECIES RELATE TO THE CHARACTER AND LOCATIONS OF HABITAT, AS WELL AS THE PROBABLE CONSEQUENCES OF MAINTAINING THESE SPECIES AT POPULATION LEVELS OTHER THAN THAT INDICATED AS "VIABLE." DESCRIBE FOR EXAMPLE, WHY DISCRETE NUMBERS OF PINE MARTEN VARY BY 36 BETWEEN ALTERNATIVE A, B, AND C (WITH THE PA BEING CREDITED WITH THE LARGEST POPULATION) WHEN THE FOREST SERVICE HAS NO CONTROL OVER THE TAKING OF THIS SPECIES IN ANOTHER INSTANCES, PLEASE EXPLAIN WHY THE POPULATION OF PILEATED WOODPECKERS REMAINS THE SAME FOR THE FIRST DECADE, I E , THE PLAN PERIOD FOR ALL ALTERNATIVES PRESENTED, WHEN ON PAGE G-2, THIS BIRD IS DESCRIBED AS A "PRINCIPAL INDICATOR SPECIES FOR MATURE AND OLD-GROWTH FORESTS" - WHICH VARY CONSIDERABLY BETWEEN ALTERNATIVES IN DISTRIBUTION AND AMOUNT OF AREA LATER, THEN, ON PAGE IV-40, TABLE IV-13, UNDEFINED "LONG-TERM POPULATION LEVELS FOR PAIRS OF PILEATED WOODPECKERS BY ALTERNATIVE VARY BY 59 PAIRS BETWEEN ALTERNATIVES A, B, AND C. PLEASE DEFINE "LONG-TERM" AS IT RELATES TO THE 10-15 YEAR PLAN PERIOD AND EXPLAIN THE RELIABILITY OF THE PRESENT POPULATION ESTIMATE RELATIVE TO THE 59 PAIR "LONG-TERM DIFFERENTIAL PRESENTED

FOREST SERVICE RESPONSE

Numbers of pine marten were not estimated. Figures for pileated woodpeckers for the year 2030 were unfortunately misplaced in Table II-3a so as to appear to indicate pine marten numbers. Numbers of pileated woodpeckers are shown for year 1986 to be the same for all alternatives in Table II-3a It is shown as a basis for comparison for later time periods, after the alternative plan is implemented. Long term is more than 10 years, but in this case it more specifically means after the entire Forest is under management. Any wildlife numbers shown are indices, based on amount of habitat. Actual numbers may vary considerably due to other factors. The figures we have used are based on biologists' judgement considering habitat needs and territorial requirements.

COMMENT NO. 3. UNDER APPENDIX G, WE NOTE INSTRUCTIONS FROM THE REGIONAL OFFICE THAT THE FORESTS SHOULD DOCUMENT THE TECHNIQUES USED TO INCORPORATE MMR'S IN THE ANALYSIS. NO SUCH DOCUMENTATION IS IN EVIDENCE IN THE DEIS

FOREST SERVICE RESPONSE:

How MR's are incorporated is shown in Appendix B under development of benchmarks and alternatives.

COMMENT NO. 4 ANIMAL HABITAT NEEDS TO BE THE NUMBER ONE CONSIDERATION IN ALL POLICY DECISIONS

FOREST SERVICE RESPONSE:

We agree that it should be an important consideration -- but not always first

COMMENT NO. 5 AS ALTERNATIVE A DOES NOT MEET THE TENETS OF THE NFMA CONCERNING MMR'S, HOW CAN YOU ASSUME TO OFFER IT AS A CHOICE?

FOREST SERVICE RESPONSE

As described in the correction notice that accompanied the DEIS, it was determined that it did meet the MR's.

COMMENT NO. 6 THE MINIMUM MANAGEMENT REQUIREMENTS ARE AN INTEGRAL PART OF THE DECISION MAKING PROCESS YET THEY HAVE NOT BEEN SUBJECT TO PUBLIC REVIEW AND COMMENT OR NEPA ANALYSIS. BEFORE A DECISION IS MADE, THE MMR'S SHOULD BE SUBJECT TO NEPA REVIEW.

FOREST SERVICE RESPONSE

Public review of the MR's was provided following publication of the Supplement to the DEIS. The public review period ended December 12, 1988.

COMMENT NO. 7. MINIMUM MANAGEMENT REQUIREMENTS. THE PROCESS USED TO DEVELOP MMR'S IS CRUCIAL SINCE THE MMR'S ARE IMPOSED AS MINIMUM STANDARDS IN EACH PLANNING ALTERNATIVE. THE DEPARTMENT OF AGRICULTURE'S DECISION ON THE REGIONAL GUIDE APPEAL MANDATED A REANALYSIS OF THE MMR ISSUE IN A REPORT SCHEDULED FOR PUBLICATION THIS SUMMER THE WALLOWA-WHITMAN PLAN SHOULD NOT HAVE BEEN PUBLISHED UNTIL AFTER THIS REPORT IS COMPLETE. THE DEPARTMENT'S APPEAL DECISION STATED THAT

"IF MMR'S ARE UNNECESSARILY RESTRICTIVE, THEY COULD SIGNIFICANTLY LIMIT THE "DECISION SPACE" WHICH COULD BE AVAILABLE TO LINE OFFICERS, AND COULD MAKE PLANS VULNERABLE TO SUCCESSFUL LEGAL CHALLENGE BASED ON GROUNDS THAT THE RANGE OF ALTERNATIVES IS UNNECESSARILY RESTRICTIVE AND COULD INVOLVE SIGNIFICANT AND UNNECESSARY OPPORTUNITY COSTS". (DOUGLAS W. MACCLEERY, MARCH 9, 1985 DECISION, PAGE 8)

THE MMR'S ON THE WALLOWA-WHITMAN HAVE IMPOSED SIGNIFICANT AND UNNECESSARY REDUCTIONS ON THE WALLOWA-WHITMAN DECISION SPACE UNIT SIZE AND DISPERSION, PINE MARTEN TRAVELWAYS, RIPARIAN ZONES, DEDICATED OLD-GROWTH, ELK AND DEER HABITAT IN THE NRA, AND THE NRA CMP HAVE REDUCED THE FIRST DECADE HARVEST VOLUMES BY 75 MCMF. (DEIS APPENDICES, B-104) THE DEIS DOES NOT ADEQUATELY EXPLAIN

THE COSTS, LOSS OF REVENUES, AND OTHER LOST OPPORTUNITY COSTS WHICH RESULT FROM THESE EXCESSIVE.

THE MMR'S USED IN THE DEIS ARE NOT BASED ON SOLID SCIENTIFIC RESEARCH, SPECIFIC TO WALLOWA-WHITMAN CIRCUMSTANCES, NOR ARE THE RESEARCH NEEDS OF THE WALLOWA-WHITMAN IDENTIFIED AN ADEQUATE RESEARCH AND MONITORING PROGRAM IS REQUIRED BY NFMA (SECTION 219.28) AND FURTHER BY SECRETARY MACCLEERY'S MARCH 8, 1985 DECISION

"IT MAY WELL BE PREFERABLE, WHEN THE VALUE OF THE RESOURCE OPPORTUNITIES ARE CONSIDERED, TO FIND AN ADEQUATE MONITORING PROGRAM AND RESEARCH EFFORT, THAN TO ESTABLISH MMR'S THAT ARE SO CONSERVATIVE THAT SIGNIFICANT RESOURCE MANAGEMENT OPTIONS THAT WOULD OTHERWISE BE VIABLE ARE FORE-GONE "

THE DEIS INCLUDES NO INFORMATION ON THE NUMBER OF HABITATS PROVIDED FOR THE PINE MARTEN AND OTHER WILDLIFE WHICH "DEPEND ON" OLD-GROWTH TIMBER THE REGION'S WILDLIFE MMR MATRIX DATED AUGUST 22, 1984 IS THE MOST RECENT DATA WE HAVE SEEN ON THIS SUBJECT THE MATRIX STATES THAT THE WALLOWA-WHITMAN WILL MANAGE FOR 332 PINE MARTEN HABITATS TO PROVIDE A WELL DISTRIBUTED, MINIMUM VIABLE POPULATION IN COMPARISON, THE UMATILLA AND MALHEUR NATIONAL FORESTS ARE PROVIDING 98 AND 95 PINE MARTEN HABITATS RESPECTIVELY TO ACHIEVE THE SAME OBJECTIVE BECAUSE OF THE SIMILARITIES BETWEEN THE THREE FORESTS, IT APPEARS THAT THE WALLOWA-WHITMAN PINE MARTEN MMR IS EXCESSIVE THE DEIS SHOULD DOCUMENT THE NEED FOR THESE ADDITIONAL HABITATS

NO PURPOSE OR RATIONALE OR TRADE-OFFS ARE PRESENTED WHICH JUSTIFY THE NEED FOR MMR CONSTRAINTS FOR ELK AND DEER IN THE NRA. THIS IS CERTAINLY AN AREA WHERE RESEARCH AND MONITORING SHOULD BE CONDUCTED

WE RECOMMEND THAT THE WALLOWA-WHITMAN REDUCE THEIR MMR CONSTRAINTS IN ACCORDANCE WITH SECRETARY MACCLEERY'S DIRECTION PRIOR TO THE FINAL EIS PUBLICATION AND MAKE THE LAND ALLOCATION CORRECTIONS AS NECESSARY BASED ON THE NEW MMR'S.

FOREST SERVICE RESPONSE:

A supplement to the DEIS was distributed on August 8, 1988 This supplement provides additional information on MR's and their effects

Although the Wallowa-Whitman is similar to the Umatilla and Malheur National Forests in some ways, it has significantly more of the high-elevation habitat which pine martens prefer. This is reflected in the higher number of pine marten habitats required for the Wallowa-Whitman.

COMMENT NO. 8: WILDLIFE INDICATOR SPECIES WILL BE DIFFICULT TO FIND AND MONITOR AND WERE SELECTED WITHOUT ANALYZING ALTERNATIVES THE WALLOWA-WHITMAN HAS SELECTED WILDLIFE MANAGEMENT INDICATOR SPECIES FOR CERTAIN FOREST HABITATS. THE INDICATOR SPECIES ARE SELECTED BECAUSE "THEIR POPULATION CAN BE USED AS AN INDICATOR OF THE HEALTH OF A SPECIFIC TYPE OF HABITAT " (DEIS III-35). UNFORTUNATELY, THE WALLOWA-WHITMAN DID NOT ANALYZE ANY ALTERNATIVES TO THE INDICATOR SPECIES SELECTED

FOREST SERVICE RESPONSE

Since the DEIS was published, substantial effort has been put into establishing Regional consistency in management indicator species, looking at which species should be used as indicators, (alternatives) and determining how to accomplish the monitoring of their populations as required by 36 CFR 219.19 This updated information is presented in Chapter III of the FEIS and in Appendix G

COMMENT NO. 9. NFMA REGULATIONS REQUIRE FISH AND WILDLIFE HABITAT TO BE MANAGED TO MAINTAIN VIABLE POPULATIONS OF EXISTING SPECIES IN THE PLANNING AREA

- (1) HABITAT MUST BE PROVIDED TO SUPPORT AT LEAST A MINIMUM NUMBER OF REPRODUCIBLE INDIVIDUALS
- (2) THE HABITAT MUST BE WELL-DISTRIBUTED SO INDIVIDUALS CAN INTERACT WITH OTHERS IN THE PLANNING AREA (DEIS III-35).

THESE REGULATIONS ARE IN BIZARRE CONTRAST TO REGIONAL GUIDELINES STATING THAT 'IN PROVIDING FOR LIMITING HABITATS, ALL OPPORTUNITIES SHOULD BE USED TO MINIMIZE THE TOTAL ACREAGE ALLOCATED FOR KEY VULNERABLE SPECIES' (APPENDIX G-6).

NFMA REGULATIONS REQUIRE SUPPORTING 'AT LEAST' VIABLE POPULATIONS (36 CFR 219.19). THIS IS PERVERTED TO READ, IN EFFECT, 'SUPPORT THE MINIMUM POPULATION SIZE POSSIBLE'. SINCE THERE IS ALSO THE ASSUMPTION THAT PRESENT CONDITIONS REPRESENT VIABLE POPULATION LEVELS FOR ALL SPECIES (APPENDIX G-19), THEN ANY POPULATION SIZE MEETS THE REQUIREMENT. SPECIAL PROVISIONS ARE SAID NOT TO BE NEEDED TO MAINTAIN VIABLE POPULATIONS BECAUSE BMP'S WILL MAINTAIN EXISTING HABITAT CAPACITY (APPENDIX G-13). THIS PHILOSOPHY EMBODIES A RECKLESS DISREGARD FOR RESOURCES IS IT ALSO ASSUMED THAT PRESENT CONDITIONS HAVE TO BE A STANDARD FOR THE FUTURE BECAUSE THINGS CAN ONLY GET WORSE.

WHY DOES THE WWNF NOT TAKE RESPONSIBILITY FOR EVIDENCE OF POOR MANAGEMENT IN THE PAST AND TRY TO IMPROVE CONDITIONS FOR ALL FOREST RESOURCES? BMP'S DO NOT ENSURE COMPLIANCE WITH ANY STANDARD. IF BMP'S ARE THE MOST THAT CAN BE DONE AND THIS STILL DOES NOT SATISFY PROTECTION OF RESOURCES, THEN THE MANAGEMENT ACTIVITY MUST BE STOPPED. ONLY A GOOD MONITORING PROGRAM CAN ASCERTAIN WHETHER THE BMP IS USEFUL

FOREST SERVICE RESPONSE:

We do not see the inconsistency you infer from the EIS While the NFMA regulations direct us to maintain viable populations, Regional guidance tells us to minimize the costs of doing so. We have not interpreted this to mean that we should manage for minimum viable populations and, in fact, we are not proposing that populations of any species be reduced to the minimum level

The EIS acknowledges situations where resource damage has and is occurring BMP's are intended to prevent resource damage In dealing with anadromous fish, for example, BMP's are being used in combination with rehabilitation to improve habitat capability

We agree that it is important to monitor implementation of BMP's and their adequacy

COMMENT NO. 10: FUTURE PILEATED WOODPECKER POPULATION SIZE - THE SIZE OF THE PILEATED WOODPECKER POPULATION AT ANY GIVEN POINT OF TIME WAS PREDICTED BY A FORMULA THAT DIVIDES THE NUMBER OF ACRES OF OLD-GROWTH PRESENT BY 300 AC (PILEATED TERRITORY SIZE) (P 4-87) AND MULTIPLYING THIS RESULT BY AN ASSUMED OCCUPANCY RATE OF .6 (P IV-40), RESULTING IN TABLE IV-13. THIS METHOD HAS SEVERAL GROSS FLAWS. FIRST, MOST OLD-GROWTH AVAILABLE WILL BE DUE TO INSUFFICIENT STAND SIZE (LESS THAN 300 AC BY YOUR ASSUMPTIONS), INAPPROPRIATE COMMUNITY TYPE LODGEPOLE PINE OR SUBALPINE FIR COMMUNITIES), OR STAND STRUCTURE (ALLOCATED STANDS NOT YET IN OLD-GROWTH OR MATURE CONDITION). I WOULD SUGGEST THAT THE NUMBER OF LARGE PONDEROSA PINE OR MIXED CONIFER OLD-GROWTH STANDS AVAILABLE IN THE LONG TERM IS FAR FEWER THAN THE 323 SUGGESTED IN TABLE IV-43, AND THEREFORE THE PROPOSED ACTION SHOULD RESULT IN AN INADEQUATE POPULATION SIZE AND DISTRIBUTION OF PILEATED WOODPECKERS

FOREST SERVICE RESPONSE

You may be correct. Monitoring will be necessary to determine the accuracy of the predictions. If the predictions are in error, there will be the opportunity to adjust in the next Forest Plan or by amending the current plan.

COMMENT NO. 11: WHAT IS THE SIGNIFICANCE OF THE "MINIMUM LEVEL" IN TABLE 3A OF THE DEIS (P II-79)? WITH RESPECT TO PILEATEDS, ONLY ALTERNATIVE F MEETS THIS MINIMUM LEVEL. IS THE LEVEL THAT OF A VIABLE POPULATION? IS IT AN MMR? IN EITHER CASE, THE PLAN WOULD APPEAR TO BE IN VIOLATION WITH RESPECT TO PLANNED PILEATED POPULATION SIZE (AND THEREFORE THOSE OF PINE MARTENS AND 3-TOED WOODPECKERS)

FOREST SERVICE RESPONSE

The "minimum level" referred to is the Minimum Level Benchmark. This benchmark specifies the minimum level of management which would be needed to maintain the Wallowa-Whitman National Forest as a part of the National Forest system. A high level of pileated woodpeckers would be expected because no additional old-growth timber would be harvested.

COMMENT NO. 12 PILEATED WOODPECKER FEEDING AREAS - A FEW QUESTIONS AND INCONSISTENCIES AROSE WHEN I COMPARED THE DEIS TO THE PLAN WITH RESPECT TO THESE AREAS SPECIFICALLY; WILL THESE AREAS ACCOMPANY EACH MA 15 STAND (DEIS P IV-37) OR JUST THOSE LARGER THAN 300 AC (PROPOSED PLAN P.4-87)? PILEATED CAN AND DO USE STANDS SMALLER THAN 300 AC FOR NESTING, YOUR ASSUMPTION OF 300 AC AS THE MINIMUM SIZE FOR A NEST STAND IS APPROPRIATELY CONSERVATIVE, BUT SHOULD NOT PREVENT THE MANAGEMENT OF SMALLER STANDS AS POTENTIAL PILEATED NEST STANDS (WHEN LARGER STANDS ARE NOT AVAILABLE). THEREFORE, I SUGGEST ATTACHING THE 300 AC FEEDING ZONES TO ALL MA 15 AREAS.

FOREST SERVICE RESPONSE

The 300-acre feeding areas will accompany only the designated old-growth stands. If pileated woodpeckers choose to occupy smaller old-growth patches, there may be sufficient levels of

dead and dying trees in riparian areas, unsuited lands and other surrounding areas, to meet their feeding needs

COMMENT NO. 13: I HAVE SEEN AND HEARD A GOOD NUMBER OF PILEATED WOODPECKERS, BUT HAVE NEVER SEEN ONE WHERE THERE HASN'T BEEN PAST TIMBER HARVEST

FOREST SERVICE RESPONSE

We can only speculate that you may have spent more time in areas where there has been timber management activity. Pileated woodpeckers are certainly found there as well as where no activity has occurred.

COMMENT NO. 14. THE PINE MARTEN WAS ADOPTED AS AN INDICATOR OF MIXED CONIFER OLD GROWTH. HOWEVER, THE MARTEN IS A RECLUSIVE ANIMAL WITH ONLY A FEW SITINGS CONFIRMED ON THE ENTIRE FOREST. THE NFMA REQUIREMENTS FOR MONITORING INDICATOR SPECIES CANNOT BE ACHIEVED WITH THE MARTEN. BECAUSE THE WALLOWA-WHITMAN FAILED TO EVALUATE ALTERNATIVES FOR INDICATOR SPECIES AND BECAUSE MONITORING WILL BE DIFFICULT IF NOT IMPOSSIBLE, THE WALLOWA-WHITMAN SHOULD MORE CAREFULLY RECONSIDER ITS SELECTION OF INDICATOR SPECIES.

FOREST SERVICE RESPONSE

We agree that monitoring of pine marten populations will be difficult. Also see Response No 9

COMMENT NO. 15: PINE MARTEN HABITAT - THE DEIS INCLUDES NO INFORMATION ON THE NUMBER OF HABITATS PROVIDED FOR THE PINE MARTEN AND OTHER WILDLIFE WHICH "DEPEND ON" OLD-GROWTH TIMBER. THE REGION'S WILDLIFE MMR MATRIX DATED AUGUST 22, 1984 IS THE MOST RECENT DATA WE HAVE SEEN ON THIS SUBJECT. THAT MATRIX STATES THAT THE WALLOWA-WHITMAN WILL MANAGE FOR 332 PINE MARTEN HABITATS TO PROVIDE A WELL DISTRIBUTED, MAXIMUM VIABLE POPULATION. IN COMPARISON, THE UMATILLA AND MALHEUR NATIONAL FORESTS ARE PROVIDING 98 AND 95 PINE MARTEN HABITATS RESPECTIVELY TO ACHIEVE THE SAME OBJECTIVE.

BECAUSE OF THE SIMILARITIES BETWEEN THE THREE FORESTS, IT APPEARS THAT THE WALLOWA-WHITMAN PINE MARTEN MMR MAY BE EXCESSIVE. THE DEIS SHOULD DOCUMENT THE NEED FOR THESE ADDITIONAL HABITATS.

FOREST SERVICE RESPONSE.

See response to Comment No 7

COMMENT NO. 16: THERE IS NO DISCUSSION OF HOW THE MINIMUM MANAGEMENT REQUIREMENTS (MR'S) FOR ANADROMOUS FISH AND WATER QUALITY WERE SELECTED OR THE LEVEL OF PROTECTION PROVIDED.

FOREST SERVICE RESPONSE:

Much discussion on this subject took place between the draft EIS and the Final documents. More information has been added to the plan and the FEIS.

COMMENT NO. 17: THE SUPPLEMENT LACKS AN EVALUATION OF ALTERNATIVE MEANS TO MEET MINIMUM MANAGEMENT REQUIREMENTS**FOREST SERVICE RESPONSE:**

As explained in Appendix M, alternative means to meet Management Requirements were not evaluated if the expected effects on Present Net Value or timber outputs were not significant. In many cases the effects are insignificant (less than two percent). The two percent figure was chosen because it is very small compared to the reliability of the predictive models. When the effects of implementing the means or ways to meet management requirements were significant, they were examined and displayed in Appendix M.

COMMENT NO. 18: THE SUPPLEMENT DOES NOT EXPLAIN WHY THE TERM "MANAGEMENT REQUIREMENT" RATHER THAN "MINIMUM MANAGEMENT REQUIREMENT" IS USED. THIS CREATES CONFUSION.**FOREST SERVICE RESPONSE:**

Appendix M of the FEIS was modified to explain the change. The change in title is more in keeping with the language used in the planning regulations (36 CFR 219.27). The change was intended to reduce confusion by being more consistent with the regulations.

COMMENT NO. 19: MMR'S HAVE NOT BEEN DEVELOPED AS AN INTEGRATED PART OF THE OTHER PLANNING STEPS; THEY WERE DEVELOPED USING A SEPARATE PLANNING PROCESS. THIS VIOLATES 16 USC 1604(f)(1) WHICH STATES THAT ONE INTEGRATED PLAN MUST BE PREPARED FOR EACH UNIT OF THE NATIONAL FOREST SYSTEM.**FOREST SERVICE RESPONSE:**

The following is added to Appendix M: The standards and guidelines found at 36 CFR 219.27 are "[t]he *minimum* specific management requirements to be met in accomplishing the goals and objectives for the National Forest System....These requirements guide the development, analysis, approval, implementation, monitoring, and evaluation of Forest Plans (emphasis added). These management requirements are an interpretation of the non-impairment standards of the National Forest Management Act (NFMA). Section 6 of NFMA required the Secretary of Agriculture to promulgate regulations specifying resource protection guidelines to insure species diversity, to insure timber is harvested only where there will be no irreversible damage to the soil, slope, or watershed conditions and only where protection is provided for streams, lakes, or watershed conditions and fish habitat. Management requirements in Forest Plans are a detailed and specific interpretation of the 219.27 standards and guidelines. They are the smallest set of constraints possible and are limited to those specified by statute.

The ways or means of meeting these requirements are integrated in each step of the planning process including the analysis which indicates the most efficient means of implementation.

COMMENT NO. 20: THE MMR'S WERE DEVELOPED WITHOUT PUBLIC PARTICIPATION AS REQUIRED BY NFMA AND NEPA

**FISH HABITAT
Code 440**

COMMENT NO. 1 ANADROMOUS FISHERIES AND WATERSHED AREAS REQUIRE COMPLETE PROTECTION FROM LOGGING, ROADBUILDING, THINNING, FIREWOOD CUTTING, ETC. THESE AREAS ARE NOT REPLACEABLE, AND SHOULD BE MANAGED WITH THAT IN MIND MAINTAINING EXISTING QUALITY SHOULD BE A PRIORITY, RATHER THAN A MINDLESS EFFORT AT "ENHANCEMENT" AFTER IS IS TOO LATE.

FOREST SERVICE RESPONSE.

We do not agree that all watershed areas that support anadromous fish require complete protection from the activities mentioned. If this were literally followed, more than one-half of the Forest would be placed in a wilderness status. We believe that existing direction and the current "state-of-the-art" makes it possible to manage all lands, within limits, and still either maintain or enhance both anadromous and resident fisheries.

COMMENT NO. 2 QUALITY FISHING ON THE WALLOWA-WHITMAN IS LIMITED TO AREAS OFF THE BEATEN TRACK. FOREST PLAN ALTERNATIVE C WOULD RESULT IN ELIMINATION OF MANY OF THESE AREAS. PAST EXPERIENCE TELLS US THAT EASY ACCESS MEANS REDUCED WATER QUALITY, REDUCED HABITAT AND EXPENSIVE SUBSTITUTION OF HATCHERY STOCK FOR NATIVE STOCKS.

FOREST SERVICE RESPONSE

Although Alternative C will result in some additional roads, most streams or lakes that currently provide remote fishing opportunities will remain without easy access.

COMMENT NO. 3. FISH HABITAT IMPROVEMENTS WOULD BE MEASURED. THIS IS APPROPRIATE. HOWEVER, NOWHERE IS FISH HABITAT CONDITION, AWAY FROM IMPROVEMENT PROJECTS DISCUSSED. THIS IS A SIGNIFICANT OMISSION. NOT ONLY SHOULD THE PLAN EMPHASIZE AVOIDING PROBLEMS (I.E., AVOIDING THE NEED FOR IMPROVEMENTS), BUT WITHOUT AMBIENT CONDITION MONITORING NEW NEEDS FOR IMPROVEMENT PROJECTS OR MANAGEMENT DIRECTION MODIFICATION COULD NOT BE EASILY IDENTIFIED OR PREDICTED. ALSO, THE REPORTING PERIOD FOR HABITAT CONDITION MONITORING WOULD NEED TO BE MORE FREQUENT THAN EVERY FIVE YEARS IF INDIVIDUAL PROJECTS ARE TO BE REVISED BEFORE SIGNIFICANT DAMAGE HAS OCCURRED.

FOREST SERVICE RESPONSE

More detailed discussion of fish habitat and monitoring has been added to the standards and guidelines and to the Monitoring Plan.

COMMENT NO. 4 PROJECTIONS FOR SUBSTANTIAL INCREASES IN ADULT SALMON AND STEELHEAD FISHERIES ARE OVERLY OPTIMISTIC (ANY ASSUMPTIONS SHOULD BE JUSTIFIED IN THE DEIS.)

FOREST SERVICE RESPONSE

Millions of dollars have recently been, and will continue to be, spent by many agencies on the maintenance and improvement of Columbia River anadromous fish runs. Recent runs of these fish have been much higher than the previous 30 year average. We believe the estimates are reasonable.

COMMENT NO. 5: THE LACK OF SPECIFIC FISHERIES LANGUAGE IN ALTERNATIVE C MUST BE REMEDIED. WHILE THE OREGON CLEAN WATER ACT DOES PROVIDE SOME PROTECTION, IT IS NOT NEARLY ENOUGH. WILD SALMON, STEELHEAD, AND RESIDENT TROUT REQUIRE MUCH MORE, INCLUDING NUTRIENT CYCLING, TIMED RUN OFF, CHANNEL OBSTRUCTION, GRAVEL MOVEMENT, AND HEALTHY RIPARIAN VEGETATION WITH ASSOCIATED AQUATIC INSECT LIFE. AT A TIME WHEN ALL NATIVE SALMON AND TROUT SPECIES ARE AT CRITICALLY LOW LEVELS, IT IS IMPERATIVE THAT WE SUPPLY THE BEST MANAGEMENT WE KNOW HOW. RESEARCH BY DR. KEN CUMMINGS, UNIVERSITY OF OREGON, SHOWS THE CRITICAL IMPORTANCE OF PRISTINE FIRST AND SECOND ORDER CREEKS. RESEARCH BY J. R. SEDELL AND J. L. FOGGAT SHOWS THE IMPORTANCE OF TERRESTRIAL INFLUENCE ON LARGER RIVERS. RESEARCH BY CHRIS MASER, B. L. M. AND OREGON STATE UNIVERSITY, POINTS TO THE IMPORTANCE OF OLD GROWTH AND OTHER NATURAL HABITAT IN ECOSYSTEM VIABILITY AND WATER QUALITY. IF THE FOREST SERVICE KNOWS OF STUDIES LINKING LOGGED AND ROADED WATERSHEDS TO EQUALLY PRODUCTIVE NATIVE FISH HABITAT, I WOULD BE VERY INTERESTED IN SEEING THEM.

FOREST SERVICE RESPONSE.

The Forest Plan was not intended to contain specific management direction relating to all circumstances for fishery (or any other program) habitat management. We believe the first paragraph under Standards and Guidelines places the proper emphasis on the importance of water courses and streamside management units. "Management and enhancement of water quality and protection of water courses and streamside management units (SMU's) will have priority over uses described or implied in all other management standards or guidelines."

COMMENT NO. 6. THERE AREN'T ENOUGH FISH IN THE STREAMS IN THE SOUTH HALF OF WALLOWA-WHITMAN TO BE A FACTOR.

FOREST SERVICE RESPONSE.

There are many fishermen that frequent the streams of the south half of the Forest that would disagree with this statement. Many of these same streams have high potential for habitat improvement.

COMMENT NO. 7. THE WATER QUALITY IN THE STREAMS IS GOOD AND FISH ARE ABUNDANT.

FOREST SERVICE RESPONSE

As a general statement applying to the entire Forest, this is true. However, there are many specific cases where water quality and particularly fish habitat are not what they should be. As funding and priorities dictate, we will improve these streams.

COMMENT NO. 8: IT IS TIME TO MAKE FISHERIES AND RECREATION A PRIORITY IN EASTERN OREGON.

FOREST SERVICE RESPONSE

We agree.

COMMENT NO. 9. ANADROMOUS FISHERIES MUST HAVE COMPLETE PROTECTION. WE KNOW WHAT HAS HAPPENED IN OUR OWN COOS BAY AREA OVER THE PAST 50 TO 75 YEARS TO THE ONCE SPLENDID ANADROMOUS RUNS OF SALMON AND STEELHEAD LOGGING PRACTICES HAVE CONTRIBUTED TO THE ALARMING DECLINE ON COHO, CHINOOK, AND STEELHEAD RUNS NOW WE ARE IN THE EXPENSIVE PROCESS OF TRYING TO UNDO WHAT GREEDY AND THOUGHTLESS OPERATORS HAVE DONE TO A GREAT NATURAL RESOURCE.

FOREST SERVICE RESPONSE

We agree that Forest management activities must be constrained in order to maintain or enhance anadromous fisheries. However, we do not agree that the only way of managing these streams is by complete protection from all Forest activities. We believe the first paragraph under Standards and Guidelines for watershed management places the management priority in proper perspective.

COMMENT NO. 10: SOME OTHER CONCERNS ARE THE CRITICAL CONDITION OF ANADROMOUS FISH RUNS THROUGHOUT THE W-W MORE EMPHASIS SHOULD BE PLACED ON IMPROVING FISH HABITAT AND RIPARIAN ZONES.

THE RIPARIAN ZONE ALONG THE GRANDE RONDE RIVER IS IN ESPECIALLY POOR CONDITION IT OFFERS THE BEST OPPORTUNITY TO IMPROVE SPAWNING AND REARING HABITAT.

FOREST SERVICE RESPONSE

We agree with this comment and we believe that the Forest Plan establishes the suggested emphasis. Much work has been accomplished the past two years that will improve habitat in the Upper Grande Ronde.

COMMENT NO. 11: HOW CAN ANADROMOUS FISH PRODUCTION BE NEARLY THE SAME FOR ALL ALTERNATIVES EVEN THOUGH SOME ALTERNATIVES HAVE FAR MORE ROADBUILDING AND GROUND-DISTURBING ACTIVITIES? ARE MITIGATION AND MANMADE ENHANCEMENT THE ONLY FACTORS CONSIDERED IN FISH PRODUCTION? ONRC HAS NEVER KNOWN ROADS AND LOGGING TO IMPROVE WATER QUALITY OR FISH HABITAT. WHY DO MORE INTENSIVE DEVELOPMENT ALTERNATIVES NOT SHOW LOSSES IN WATER QUALITY AND FISHERIES? A MUCH GREATER EMPHASIS SHOULD BE PLACED ON ANADROMOUS AND NATIVE FISHERIES IN THE FINAL PLAN. QUALITY, EXISTING HABITAT MUST BE FIRST PRIORITY FOR COMPLETE PROTECTION, AHEAD OF MITIGATION OR ENHANCEMENT PROJECTS.

ANADROMOUS FISH IS NOT A MAJOR ISSUE, CONCERN, OR OPPORTUNITY IN THE DP, EVEN THOUGH HALF THE WALLOWA-WHITMAN CONTAINS ANADROMOUS RIVER SYSTEMS, INCLUDING THE NORTH FORK JOHN DAY, GRANDE RONDE, AND IMNAHA RIVER SYSTEMS. WHY NOT? WHY DOESN'T THE W-W HAVE SEVERAL PERMANENT FISHERIES BIOLOGISTS, AT LEAST ONE FOR EACH DISTRICT?

FOREST SERVICE RESPONSE

We do not anticipate any significant adverse effects on fish habitat from future logging or roadbuilding. Consequently, we do not display, for any alternative, a drop in fish production due to these activities. We recognize, however, that many of our anadromous fishery streams have been impacted by past timber harvest and grazing activities and that in some areas recovery is being prevented or significantly slowed by current activities. The alternatives were compared on the basis of how quickly habitat problems would be corrected, i.e., how much investment would be made in habitat rehabilitation. The selected alternative includes an ambitious rehabilitation program.

Because of comments received on the DEIS, fish habitat has been added as an issue in the FEIS.

We agree that it would be desirable to have a fisheries biologist on every District. Efforts are currently underway to hire additional fishery biologists.

COMMENT NO. 12 WE ARE JUST STARTING TO GET SOME RESULTS FROM OUR MULTI-MILLION DOLLAR INVESTMENTS IN OUR AREA'S FISH HATCHERIES. WE ARE ENJOYING OVER 300 TO 500 PERCENT INCREASE IN OUR SALMON AND STEELHEAD RESOURCES, WITHIN OUR SEVEN MAJOR RIVER SYSTEMS ON THE WALLOWA-WHITMAN. THESE SEVEN RIVER'S HEADWATERS AND WATERSHEDS NEED PROTECTION FROM ROADING, LOGGING, OR ANY DEVELOPMENT. WE DO NOT TRUST YOUR DEFINITION FOR AREA 18. WE KNOW OF NO WAY MAN CAN IMPROVED WATER SHEDS THAN THEIR OWN PRESENT NATURAL STATE. FISH AND WILDLIFE RESOURCE PEOPLE NEED TO WRITE A BETTER DEFINITION OF AREA 18 THAT PROTECTS ALL THESE RESOURCES IN THESE WATERSHEDS.

FOREST SERVICE RESPONSE

We agree that maintaining a watershed in pristine condition will, in most instances, provide the least risk of damage to fish habitat. The mission of the Forest Service, however, is multi-resource management. In most situations, we believe that timber management and fish habitat management are compatible. Management Area 18 is designed to assure that timber management, and other activities occurring within the North Fork John Day basin, will be accomplished in a way that will protect the anadromous fishery values of the area.

COMMENT NO. 13: ANADROMOUS FISHERIES MUST BE COMPLETELY PROTECTED. THIS MEANS MAINTAINING EXISTING HABITAT PROTECTION AND LEAVING EXISTING BUFFER STRIPS ALONG STREAMS AND RIVERS. SPECIAL MANAGEMENT PRACTICES MUST BE IN PLACE TO PRESERVE THIS RESOURCE.

FOREST SERVICE RESPONSE.

We agree with this emphasis on anadromous fisheries. There may be some difference of opinion on the definition of complete protection. Special habitats and buffer strips will be created and maintained, however, we plan to continue with most other activities in the anadromous fish watershed provided we document through the analysis process that the planned activity will not have significant detrimental effect on the fishery or fishery habitat.

COMMENT NO. 14: A REGION-WIDE ANALYSIS NEEDS TO BE UNDERTAKEN TO ASSESS THE CUMULATIVE IMPACTS OF FOREST PLANS ON THE ANADROMOUS FISHERY OF THE COLUMBIA

BASIN. A FULL DISCLOSURE TO THE PUBLIC SHOULD BE PROVIDED REGARDING HABITAT DAMAGING ACTIVITIES AND THEIR IMPACTS ON ANADROMOUS HABITAT AND THE FISHERY.

FOREST SERVICE RESPONSE:

Chapter IV of the FEIS includes a discussion of the cumulative effects on the anadromous fishery of the Columbia River Basin.

COMMENT NO. 15: IN RECENT YEARS, THERE HAS BEEN TREMENDOUS SUCCESS ON GETTING ANADROMOUS FISH RUNS REESTABLISHED. (THE WALLOWA RIVER IS A GOOD EXAMPLE) YOU CAN'T MAKE THE UPPER GRANDE RONDE RIVER COUNTRY LOOK LIKE A JIGSAW PUZZLE WITH LOGGING ROADS AND EXPECT THE FISH RUNS TO COME BACK. WHEN YOU TEAR UP THE SOIL, YOU LOSE THE FISHERY.

FOREST SERVICE RESPONSE

We agree that timber harvest and other management activities increase the risk of damage to fish habitat. We have provided direction within the Forest Plan to conduct management activities in ways which will protect or enhance this resource. Recent successes in fish run improvement reflect increased efforts at providing smolt escapement past dams and improved habitat condition, primarily in areas where other management activities (including timber harvest) are occurring.

COMMENT NO. 16: COHO ARE MENTIONED ON DEIS PAGE III-40, BUT DO NOT APPEAR IN TABLE III-8 OR SUBSEQUENT DISCUSSIONS OTHER THAN THIS OVERSIGHT, TABLE III-8 WAS VERY USEFUL (ALTHOUGH WE ARE AWARE THERE MAY BE SOME DISPUTE OVER SOME OF THE SPECIFIC NUMBERS). THE METHOD USED OF SEPARATING THE VARIOUS ANADROMOUS SPECIES SHOULD CARRY THROUGH TO OTHER AREAS OF THE DOCUMENT.

FOREST SERVICE RESPONSE:

The reference to coho salmon was an error. Historically, they were in the Wallowa River system, but probably below the Forest boundary. Thank you for calling this to our attention.

COMMENT NO. 17: PAGE 4-16, TABLE 4-3 - THIS TABLE SHOULD INCLUDE A SUMMARY OF ANADROMOUS FISH "PROPOSED AND PROBABLE PROJECTS."

FOREST SERVICE RESPONSE:

In the Final Plan, we plan to indicate the amount, and possibly the location, of future anadromous fish habitat improvement work.

COMMENT NO. 18: THE ANADROMOUS FISH ISSUES IN THE WALLOWA-WHITMAN NATIONAL FOREST ARE COMPLICATED BECAUSE OF A DIMINISHED FISHERY RESOURCE AND EXISTING DEGRADED HABITAT. THE DEIS SHOULD DEFINE A CLEAR DIFFERENCE BETWEEN ACHIEVABLE LEVELS OF HABITAT QUALITY (THE BEST THAT CAN BE EXPECTED GIVEN THE DEGRADED HABITAT) VERSUS IDEAL LEVELS (100 PERCENT OF UNDERGRADED OR NATURAL CONDITIONS). WITHOUT THIS INFORMATION, WE ARE UNABLE TO DETERMINE WHAT ARE REALISTIC AND ACHIEVABLE LEVELS OF HABITAT QUALITY AND THUS RESOURCE PRODUCTION. THE

CONCERN LISTED ABOVE MAKES OUR EVALUATION OF THE DEIS AND ITS CONCLUSIONS TENTATIVE

FOREST SERVICE RESPONSE:

We have clarified the improvement potential for anadromous fish habitat in the FEIS.

COMMENT NO. 19: WITH REGARD TO FISH PRODUCTION AND HABITAT CONDITION, THERE ARE SEVERAL DIFFERENT AND OPPOSING IMPRESSIONS OBTAINED BY NMFS FROM READING THE DEIS. THE INITIAL MESSAGE IS THAT THERE IS AN ABUNDANCE OF HABITAT THAT IS NOT BEING USED BECAUSE OF HEAVY FISH LOSSES AT SNAKE AND COLUMBIA RIVER HYDROELECTRIC PROJECTS. WE ACKNOWLEDGE THAT LOSSES OCCUR AT MAINSTEM PROJECTS. THE DEIS CORRECTLY STATES THAT TREMENDOUS EFFORTS ARE NOW UNDERWAY BY THE STATES, INDIAN TRIBES, AND THE U S GOVERNMENT TO RECTIFY THAT PROBLEM. GIVEN THAT LEVEL OF EFFORT TO RESTORE FISH RUNS IN THE COLUMBIA AND SNAKE RIVERS, THERE WILL SURELY BE AN INCREASE OF SALMON AND STEELHEAD ON THE WALLOWA-WHITMAN FOREST THE DEIS, AND THE FOREST PLAN NEED TO ADDRESS SPECIFIC MEASURES AND MANAGEMENT PRACTICES THAT WILL INSURE THAT HIGH QUALITY SPAWNING AND REARING HABITAT WILL CONTINUE TO BE AVAILABLE FOR GRADUALLY INCREASING FISHERY RESOURCES IN THE FUTURE.

FOREST SERVICE RESPONSE:

These specific practices are discussed in Chapter 4 of the Plan

COMMENT NO. 20: THE OTHER, SOMEWHAT CONFLICTING MESSAGE IN THE DOCUMENT, IS THAT DEFINITE HABITAT DEGRADATION PROBLEMS DO EXIST DUE TO FOREST ACTIVITIES SUCH AS LOGGING, ROAD BUILDING AND GRAZING THAT NEED TREATMENT IMMEDIATELY. WE SUPPORT THESE ACTIVITIES STRONGLY, ESPECIALLY THOSE AIMED AT MODERATING LOW FLOW AND HIGH TEMPERATURE SUMMER CONDITIONS IN STREAMS USED FOR REARING OF JUVENILE ANADROMOUS FISH. THE ESTIMATES OF "HABITAT CAPABILITY" MAY, THEREFORE, NEED TO BE REVISED BASED ON PRESENT CONDITIONS OR POSSIBLY DISPLAYED AS A MORE COMPLETE RANGE, BY ALTERNATIVE, OF EXISTING AND FUTURE FISHERY VALUES.

FOREST SERVICE RESPONSE:

In the Final Plan we provide a more specific expression of potential improvement opportunities. The long-term goal, of course, is to improve all streams, both resident and anadromous, to a near optimum production condition, subject to the availability of funding

COMMENT NO. 21: DEVELOP A HABITAT MANAGEMENT PROGRAM DESIGNED TO MANAGE TOWARD A LEVEL OF ACHIEVABLE HABITAT QUALITY, NECESSARY TO PROVIDE OPTIMUM HABITAT FOR CHINOOK AND STEELHEAD.

FOREST SERVICE RESPONSE

A Forest Fish Habitat Management Program is being developed

COMMENT NO. 22: PAGE II-79, TABLE II3A PLEASE SEPARATE STEELHEAD FROM CHINOOK ADULTS IN THIS TABLE WE ARE UNABLE TO DETERMINE WHAT THESE VALUES MEAN IN TERMS

OF STEELHEAD AND CHINOOK. A PRIMARY CONCERN WE HAVE IDENTIFIED THROUGHOUT THE DEIS IS THE LUMPING OF DIFFERENT SPECIES WHEN DISCUSSING GENERAL IMPACT AND PRODUCTION ESTIMATES. THE TWO SPECIES OF ANADROMOUS FISH HAVE SIGNIFICANTLY DIFFERENT SPAWNING AND REARING HABITAT REQUIREMENTS AND REACT DIFFERENTLY TO ENVIRONMENTAL IMPACTS. ALSO, HOW IS 'FULL ESCAPEMENT' DERIVED?

FOREST SERVICE RESPONSE:

In the final plan we display tables that separate steelhead and salmon by major drainage. We also make comparisons between existing smolt production, with full escapement (or full seeding) without habitat enhancement and with full seeding and habitat enhancement. Another term used for full escapement is full seeding. This implies that spawning and rearing habitat is fully seeded or occupied.

COMMENT NO. 23: PAGE III-42, TABLE III-8 THE DEIS AND THE APPENDIX TO THE DEIS DO NOT PROVIDE A CLEAR DESCRIPTION OF THE BASIS FOR THESE ESTIMATES. THE MIX OF CHINOOK AND STEELHEAD INTO A SINGLE VALUE MAKES EVALUATION OF THE CONCLUSIONS IMPOSSIBLE. A LISTING OF THE POTENTIAL SPAWNING AREA (IN SQUARE YARDS) BY SPECIES AND RIVER/TRIBUTARY WOULD IMPROVE THE PRODUCT. OUR GENERAL CONCERNS WITH THE VALUES CONTAINED IN THE DEIS ARE EXPRESSED IN THE 'GENERAL COMMENTS' SECTION OF THIS EVALUATION. ALSO, WE DO NOT AGREE WITH THE CONCEPT PRESENTED IN THE TEXT AND QUANTIFIED HERE, THAT 96 PERCENT OF THE LOSS TO ANADROMOUS FISHERIES IS DUE TO MAINSTEM HYDROELECTRIC PROJECTS. FOR EXAMPLE, SOCKEYE SALMON WERE EXTINCT IN THE GRANDE RONDE SYSTEM WELL BEFORE THE 1950 BENCHMARK DATE. ON AND OFF FOREST WATER DIVERSIONS, ROADBUILDING, LOGGING, STOCK GRAZING, AND MINING ALL HAVE PLAYED A SIGNIFICANT ROLE IN THE DECLINE OF SALMON AND STEELHEAD RETURNING TO THE FOREST.

FOREST SERVICE RESPONSE:

We have significantly revised these tables using the most recent Oregon Department of Fish and Wildlife information on salmon and steelhead production for the three drainages (Imnaha, Grande Ronde, and North Fork John Day). Amount of spawning gravel available was one of the considerations in the Department's estimate of potential production. Although the eight dams on the Columbia and Lower Snake Rivers are the most significant cause of mortality in migrating fish, we did not intend to imply that 96 percent of the fish loss was due entirely to these dams. The FEIS will indicate that with full seeding (rather than full escapement) the smolt to returning adult ratio is 1.5 percent for steelhead and .34 percent for Chinook salmon (except for the North Fork John Day). We have removed reference to sockeye salmon.

COMMENT NO. 24: PAGE III-67 THE SECOND PARAGRAPH DISCUSSES RESTORATION EFFORTS FOR ANADROMOUS FISH. THE LAST SENTENCE SHOULD BE CHANGED TO INCLUDE DAMS ON THE MAINSTREAM OF THE COLUMBIA RIVER.

FOREST SERVICE RESPONSE:

This change has been made.

COMMENT NO. 25: THE FOREST NEEDS TO EMPHASIZE FUTURE PROPER MANAGEMENT OF ALL FISHERIES, ESPECIALLY ANADROMOUS FISH. SOME STREAMS WILL NEED COMPLETE PROTECTION, UP THROUGH THE SPAWNING TRIBUTARIES - CATHERINE CREEK, MINAM,

IMNAHA, ETC THE PLAN SHOULD GIVE FIRST PRIORITY TO MAINTAINING AND ENHANCING EXISTING WATER QUALITY AND STREAM HABITATS ALL AREAS THAT PRODUCE ANADROMOUS FISH SHOULD RECEIVE EXTRA SPECIAL MANAGEMENT, WITH ANY NECESSARY RESTRICTIONS ON LOGGING, ROADING, AND GRAZING.

FOREST SERVICE RESPONSE:

This is our intent Direction to do so is found in Chapter 4 of the Forest Plan.

COMMENT NO. 26: FISHERY DATA - THE SECOND PARAGRAPH ON PAGE III-43 OF THE DEIS PREDICTS SUBSTANTIAL INCREASES IN ADULT SALMON AND STEELHEAD DUE TO HABITAT IMPROVEMENTS. STEELHEAD ARE PROJECTED TO INCREASE FROM 1,000 IN 1984 TO MORE THAN 9,000 AND SALMON COULD INCREASE FROM 300 TO 2,000 WITHIN THE GRANDE RONDE BASIN. THE PROJECTED INCREASES ARE SUBSTANTIAL AND ASSUMPTIONS LEADING TO THOSE NUMBERS NEED TO BE LISTED

THE DEPARTMENT SUPPLIES THE FOREST SERVICE WITH FISHERY DATA LEADING TO TABLE III-8 IN THE DEIS AND TABLE 2-7 OF THE PLAN SINCE THEN, MORE CURRENT INFORMATION HAS BEEN ASSEMBLED AND IS AVAILABLE THROUGH THE ODF&W PORTLAND OFFICE THE NEW INFORMATION SHOULD BE USED TO UPDATE THE TABLES

FOREST SERVICE RESPONSE:

The most current information that the State has on existing and potential anadromous fish production for each of the three major drainage basins on the Forest is used in the Final EIS and Plan

COMMENT NO. 27: YOU HAVE ALLOTTED 62,000 ACRES FOR MIGRATORY FISH EMPHASIS AND OPTIMUM CONDITIONS FOR BIG GAME THIS IS AN UNNECESSARY WASTE OF VIABLE TIMBER LAND. TIMBER PRODUCTION CAN GO HAND-IN-HAND WITH MIGRATORY FISH HABITAT AND OPTIMUM BIG GAME HABITAT THIS ALLOCATION IS JUST ANOTHER BUFFER ZONE TO AN EXISTING WILDERNESS AREA THESE LANDS ARE COVERED UNDER SECTION 6, OF THE OREGON WILDERNESS ACT, AND SHOULD BE DEVELOPED THE JOHN DAY NATIONAL FOREST WILDERNESS WAS SET ASIDE TO PROTECT MIGRATORY FISH AND THE BIG GAME. THIS LAND ALLOCATION IS UNNECESSARY.

FOREST SERVICE RESPONSE:

A May 1984 report from the Senate Committee on Energy and Natural Resources states that in developing its recommendation for the North Fork John Day Wilderness, the committee has given high priority to protection of fisheries habitats "The committee notes that it has excluded nearly 100,000 acres which was included in the house proposal In doing so, the Committee wishes to emphasize that its action does not reflect lack of concern for protection of fisheries in the excluded areas Rather, the Committee feels that in the development of Forest Plans for these areas, the Forest Service can and should afford recognition of the importance of this habitat." The area referred to by the Committee includes that in Management Area 18 We believe this is in keeping with Senate intent

COMMENT NO. 28. ALL SPRING CHINOOK AND STEELHEAD STREAMS SHOULD HAVE HABITAT PROTECTION AND ENHANCEMENT PRACTICED TO ACHIEVE 90% SMOLT HABITAT CAPABILITY

INDEX HABITAT CAPABILITY MUST BE BASED ON THE TOTAL POTENTIAL OF THE SITE, NOT NECESSARILY ON THE PRESENT HABITAT CONDITION

FOREST SERVICE RESPONSE

Although we have not used the figure of 90 percent of smolt habitat capability, the intent of the Plan is to improve anadromous fish habitat capability, based on total site potential, to as near optimum as possible. The kinds of improvement work, costs, and timing of doing such will vary from one stream to another

COMMENT NO. 29: MANAGE STREAMSIDE VEGETATION TO MAINTAIN AN 80% SHADE CANOPY IN AREAS OF NATURALLY OCCURRING SHADE ALONG ALL STREAMS USED BY ANADROMOUS FISH. PREVIOUS FOREST SERVICE INTERPRETATION HAS BEEN AN AVERAGE OF 80% OF ENTIRE LENGTH WHICH CAN LEAVE LARGE GAPS IN TREATED AREAS AND ADJACENT TO STREAMS AND IS UNACCEPTABLE

FOREST SERVICE RESPONSE:

Our current direction is in accordance with the first sentence of this comment.

COMMENT NO. 30 GIVEN THE IMPORTANCE OF THE ANADROMOUS FISH RESOURCE, VERY LITTLE RELIANCE SHOULD BE PLACED ON MITIGATION MEASURES THAT DO NOT HAVE A PROVEN RECORD OF EFFECTIVENESS. THE DEIS SHOULD BE REVISED TO INCLUDE ANALYSES OF KNOWN MITIGATION TECHNIQUES THESE ANALYSES SHOULD INCLUDE EVALUATIONS OF EFFECTIVENESS, STANDARDS FOR APPLICATION, AND ANY OTHER INFORMATION THAT MIGHT BE OF AID IN DECIDING WHETHER A GIVEN MITIGATION TECHNIQUE IS APPROPRIATE IS RELIANCE ON HABITAT ENHANCEMENT AS MITIGATION APPROPRIATE IN THE FACE OF CURRENT FEDERAL BUDGET CRUNCH?

FOREST SERVICE RESPONSE.

We believe the standards and guidelines indicated in Chapter 4 of the Plan indicate the high emphasis we are placing on riparian, aquatic, and fishery habitat. Numerous publications exist which describe optimum fish habitat. These, plus advice from state and tribal biologists, are used in planning our maintenance or improvement projects. The planned Meadow Creek Study will provide some much needed information on effectiveness of various improvement techniques. We question the cost effectiveness of evaluating all mitigation methods or techniques when numerous examples exist of what good condition streams or riparian habitat should look like.

COMMENT NO. 31: THE NFMA REGULATIONS REQUIRE THAT FISH AND WILDLIFE HABITAT BE MANAGED TO MAINTAIN VIABLE POPULATIONS OF VERTEBRATE SPECIES IN THE PLANNING AREA IN ADDITION, THESE VIABLE POPULATIONS MUST BE WELL DISTRIBUTED IN THE PLANNING AREA. 36 C F R SECTION 219.19 THUS, MANAGEMENT MUST MAINTAIN HABITAT FOR CERTAIN POPULATION LEVELS AND ASSURE APPROPRIATE DISTRIBUTION SECTION 219.19 ALSO MANDATES THE SELECTION OF MANAGEMENT INDICATOR SPECIES "BECAUSE THEIR POPULATION CHANGES ARE BELIEVED TO INDICATE THE EFFECTS OF MANAGEMENT ACTIVITIES." ID IT ALSO REQUIRES MONITORING OF POPULATION TRENDS AND IDENTIFICATION OF THE EFFECTS OF HABITAT CHANGES ON THESE POPULATIONS ID ALL IN ALL, SECTION 219.19 NECESSITATES IDENTIFICATION OF FISH POPULATIONS, IDENTIFICATION OF HABITAT AND

FISH POPULATION LOCATIONS, AND IDENTIFICATION OF THE EFFECTS OF CHANGES IN HABITAT ON FISH POPULATIONS

THE DEIS DOES NOT FULFILL THESE REQUIREMENTS THERE IS NO EVIDENCE THAT VIABLE POPULATIONS AND APPROPRIATE DISTRIBUTIONS OF ANADROMOUS FISH HAVE BEEN IDENTIFIED AND THE MEANS TO MONITOR POPULATION TRENDS DETERMINED INSTEAD, THE FOREST PROPOSES INCREASED MANAGEMENT IN THOSE DRAINAGES WHERE THE DATA INDICATES THAT HABITAT IS THE LIMITING FACTOR ON FISH POPULATIONS.

FOREST SERVICE RESPONSE.

Chapter III of the FEIS indicates the existing distribution of anadromous fish on the Forest We consider all these populations as viable at this time, but still recognize they are highly vulnerable to both downstream and upper watershed impacts We also have some additional information on stream habitat tributary to the ones identified. We are in the process of installing permanent monitoring stations on some of these streams to measure changes in habitat and will do some monitoring of fishery populations to measure any change However, we will be using the annual redd-count data collected by the State for most of the fishery population monitoring Except for certain relatively undeveloped basins or sub-basins, the plan proposes an overall decrease in management (decline in timber harvest level, lower road density, more constraints in use of riparian area by livestock or for timber harvest). The first paragraph under the Watershed Standards and Guidelines in the proposed plan places the protection of water quality, water courses, and streamside management units as highest priority.

COMMENT NO. 32 NEITHER THE NFMA NOR THE REGULATIONS PROVIDE THE FOREST SERVICE WITH THE AUTHORITY TO ASSUME THE EXISTENCE OF THAT WHICH BOTH THE ACT AND THE REGULATIONS REQUIRE ASSUMING THAT SUFFICIENT HABITAT EXISTS TO SUPPORT VIABLE POPULATIONS IS ANALOGOUS TO ASSUMING THAT EXISTING TIMBER OUTPUTS PROVIDE ADEQUATE SUPPORT FOR LOCAL COMMUNITIES. THE ONLY DIFFERENCES ARE THAT (1) THE FOREST SERVICE IS FAR TOO SOLICITOUS OF THE PERCEIVED "NEEDS" LOCAL TIMBER ECONOMIES TO EVER MAKE THIS KIND OF ASSUMPTION; AND (2) THERE IS NO STATUTORY REQUIREMENT THAT TIMBER OUTPUTS BE DETERMINED BY THE AMOUNT OF SUPPORT LOCAL TIMBER ECONOMIES ALLEGEDLY NEED.

FOREST SERVICE RESPONSE:

We have chosen to provide habitat for anadromous fish at a level much higher than that required to maintain viable populations Given this situation, the need to discuss, in detail, the habitat requirements needed to provide for just minimum viable populations is significantly reduced

COMMENT NO. 33. THE REGIONAL DIRECTIVE IS ALSO SERIOUSLY FLAWED IN ANOTHER WAY IT CONTENDS THAT "IT IS NOT APPROPRIATE TO DEFINE FOREST SERVICE RESPONSIBILITIES FOR MAINTAINING VIABLE POPULATIONS OF FISH IN TERMS OF ACTUAL POPULATIONS." ID THIS MIGHT BE TRUE IF NO ANADROMOUS FISH EXISTED ON NATIONAL FOREST LAND HOWEVER, THEY DO EXIST ON NATIONAL FOREST LAND AND WHERE THEY DO EXIST, THE FOREST SERVICE IS RESPONSIBLE FOR ENSURING THAT ITS ACTIONS DO NOT VIOLATE ITS DUTY TO PROVIDE FOR VIABLE POPULATIONS DISTRIBUTED THROUGHOUT THE PLANNING AREAS MOREOVER, THE FACT THAT NATURALLY SPAWNING POPULATIONS ARE BELOW VIABLE LEVELS MAKES IT EVEN MORE VITAL TO PROTECT THAT SPAWNING AND REARING HABITAT CURRENTLY USED TO FULFILL THIS NEED, EACH NATIONAL FOREST MUST GENERATE THE INFORMATION NECESSARY TO INVENTORY AND RANK SPAWNING AND REARING

HABITAT SO THAT FURTHER DEPREDATIONS ON THE EXISTING PRECARIOUS POPULATIONS DO NOT RESULT SINCE NOT ALL HABITAT IS CREATED EQUAL, DRAINAGE-SPECIFIC INFORMATION IS NEEDED TO ENSURE THAT FOREST SERVICE DECISIONMAKERS CAN MAKE AN INFORMED JUDGMENT AS TO WHETHER TIMBER MANAGEMENT ACTIVITIES IN A DRAINAGE WILL HINDER OR PREVENT A NATIONAL FOREST FROM MAINTAINING VIABLE FISH AND WILDLIFE POPULATIONS

FOREST SERVICE RESPONSE

We agree with the need to develop this information. We plan to begin in Fiscal Year 1988 with the development of a Forest-wide fishery habitat management and improvement program which, when completed, will accomplish those things mentioned. This program will be developed along with the sub-basin fishery plans requested by Bonneville Power Administration and will speak to not only anadromous, but to resident fish

COMMENT NO. 34: THE TRIBES' TREATIES PROVIDE INDEPENDENT SOURCES OF FEDERAL AUTHORITY FOR GENERATION AND COMPILATION OF THE DATA THE FOREST SERVICE NEEDS TO ENSURE THAT VITAL SPAWNING AND REARING AREAS ARE IDENTIFIED AND PROTECTED TO FULFILL THE TRIBES' TREATIES, GREATER FISH PRODUCTION IS REQUIRED. THE BURDEN IS ON THE FOREST SERVICE TO ENSURE THAT ITS MANAGEMENT ACTIVITIES WILL NOT FURTHER DIMINISH THE BASIN'S FISH PRODUCTION. THE FIRST STEP TOWARDS FULFILLING THIS DUTY IS TO GENERATE THE INFORMATION NEEDED TO SHOW THAT ITS ACTIVITIES WILL NOT FURTHER HINDER PRODUCTION SINCE FISH LIVE IN DRAINAGES AND DIFFERENT DRAINAGES SUPPORT DIFFERING LEVELS OF FISH, DRAINAGE-SPECIFIC INFORMATION IS NEEDED. THIS FACT IS DRAMATICALLY ILLUSTRATED IN TABLE III-8 WHICH INDICATES THAT HABITAT APPEARS TO BE THE LIMITING FACTOR ON SUMMER STEELHEAD AND SPRING CHINOOK IN THE NORTH FORK JOHN DAY WHEREAS DOWNSTREAM CONDITIONS APPEAR TO BE THE LIMITING FACTOR FOR SPRING CHINOOK FROM THE IMNAHA. THESE DIFFERING CONDITIONS SHOULD ENTAIL DIFFERING MANAGEMENT RESPONSES FROM THE WALLOWA-WHITMAN NATIONAL FOREST.

FOREST SERVICE RESPONSE

We accept the burden mentioned and believe the first paragraph under Watershed Standards and Guidelines of the plan demonstrates this. To our knowledge, there has never been an objective factor analysis completed for any salmonid stream on the Forest. This has certainly been identified as one of our information needs and will be accomplished as soon as funds and manpower permit. In the meantime, however, we must rely, as we have in the past, on the collective professional judgment of Forest Service, State, and Tribal fishery biologists as to fishery habitat and population problems and the most cost-effective methods of resolving those problems.

COMMENT NO. 35: GIVEN CONGRESS' IMPOSITION OF THESE SPECIFIC REQUIREMENTS, IT SEEMS INCREDIBLE THAT REGION VI WOULD ESSENTIALLY *PUNT* ITS MANAGEMENT RESPONSIBILITIES FOR WATER QUALITY AND FISH HABITAT TO THE STATES. THE REGIONAL DIRECTIVE (DEIS APPENDIX G AT 16) DECLARES THE *(S)PECIAL PROVISIONS TO ENSURE VIABLE POPULATIONS OF FISH NEED NOT BE DEVELOPED, HOWEVER, SINCE IN MOST CASES REQUIRED COMPLIANCE WITH THE CLEAN WATER ACT (THROUGH THE USE OF BEST MANAGEMENT PRACTICES) WILL MAINTAIN EXISTING LEVELS OF FISH HABITAT CAPABILITY, WHICH ARE SUFFICIENT TO SUSTAIN VIABLE POPULATIONS OF VARIOUS SPECIES OF ANADROMOUS AND RESIDENT FISH* (EMPHASIS ADDED)

IN WHAT CASES WILL COMPLIANCE WITH THE CLEAN WATER ACT NOT BE SUFFICIENT TO MAINTAIN EXISTING LEVELS OF FISH HABITAT CAPABILITY AND EXISTING FISH POPULATIONS? WHAT IS THE EXISTING WATER QUALITY THAT WOULD BE MAINTAINED BY THE USE OF BEST MANAGEMENT PRACTICES? ARE CURRENT BEST MANAGEMENT PRACTICES ADEQUATE? THE STATE OF OREGON DOES NOT HAVE A WATER QUALITY STANDARD FOR SEDIMENTATION SUCH AS COBBLE EMBEDDEDNESS. AS A RESULT, EXISTING STATE WATER QUALITY STANDARDS ARE PROBABLY NOT ADEQUATE TO PROTECT FISH HABITAT ACCORDING TO OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY, SEDIMENTATION IS A SEVERE PROBLEM ON BOTH THE LOSTINE AND IMNAHA RIVERS SEE OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY, OREGON'S STATE-WIDE ASSESSMENT OF NONPOINT SOURCE PROBLEMS (AUGUST 1978) HAVE THE SEDIMENTATION PROBLEMS ABATED? IF SO, TO WHAT EXTENT? SINCE THE FOREST SERVICE HAS APPARENTLY ELECTED TO NOT ADOPT ANY WATER QUALITY STANDARDS AND HAS NOT DEFINED SERIOUS AND ADVERSE HARM TO WATER CONDITIONS AND FISH HABITAT, HOW CAN IT DETERMINE WHETHER IT IS IN COMPLIANCE WITH EITHER THE NFMA OR THE TRIBES' TREATY RIGHTS?

FOREST SERVICE RESPONSE:

More specific standards for managing riparian and aquatic habitats have been added to the final Forest Plan. This includes a standard for sedimentation of stream substrates. Sedimentation of the Lostine and Imnaha Rivers within the National Forest are largely the result of Natural geologic erosion, offering limited opportunity for restoration or rehabilitation. Also see response to Comment No. 32.

COMMENT NO. 36: WHAT PERCENTAGE OF THE 140 MILES OF THE GRANDE RONDE WHICH NEED REHABILITATION WOULD THIS AMOUNT TO? IT IS DIFFICULT TO IMAGINE HOW ACRES APPLY TO STREAMS WITHOUT A MORE COMPLETE DESCRIPTION.

FOREST SERVICE RESPONSE

Fishery habitat tables revised since publication of the draft indicate a total of about 550 miles of National Forest spawning and rearing stream in the Grande Ronde and Imnaha Basins. Of this, about 157 miles (or 40 percent of the 393 miles) in the Grande Ronde Basin have been identified as needing some form of improvement. We have removed any reference to this 600 acres per year of stream habitat improvement.

COMMENT NO. 37: DESPITE THE POTENTIAL FOR INCREASE IN FISH NUMBERS, THERE IS ONLY AN 8% INCREASE IN SPAWNING ADULTS PROJECTED IN 50 YEARS UNDER ALTERNATIVE C (DEIS II-86) THIS IS ALSO TRUE OF ALTERNATIVE F IN WHICH ALL ANADROMOUS STREAMS ARE MANAGED BY MA-18. WHY IS SUCH SLOW IMPROVEMENT EXPECTED? WHY ARE ALL ALTERNATIVES THE SAME? IF THE SIMILARITY IS DUE TO THE SIMILARLY IN S AND G'S FOR MA 1, 3, AND 18 THEN IT MIGHT APPEAR THAT MA-18 DOES NOT REALLY HAVE AN ANADROMOUS EMPHASIS AT ALL OR THAT OTHER FACTORS SUCH AS GRAZING INTENSITY ARE GOING TO LIMIT CAPACITY REGARDLESS OF ALTERNATIVE OR AREA. IT APPEARS THAT THE BENEFITS OF REAL PROTECTION ARE BEING SEVERELY UNDERESTIMATED AND CONSEQUENTLY, IT IS ALL TOO EASY TO ACCEPT ALTERNATIVE C. THE LIMITED USE OF MA-18 ITSELF APPEARS NOT TO PROVIDE A FULL RANGE OF OPTIONS

FOREST SERVICE RESPONSE

We believe compliance with standards and guidelines for riparian zones, streams, and fisheries will provide nearly the same aquatic habitat and fisheries outputs as will Management Area 18.

COMMENT NO. 38: IS SMALL GAME INCLUDED IN CALCULATION OF WFUD'S? DEMAND FOR FISH AND WILDLIFE RESOURCES FAR EXCEEDS SUPPLY. IF ANADROMOUS FISH WERE RESTORED TO ANYTHING APPROACHING FORMER LEVELS, WFUD'S COULD BE SIGNIFICANTLY GREATER

FOREST SERVICE RESPONSE:

Small game-related recreation is included in the calculation of wildlife-fish-user days (WFUD's).

It is true that, if the direct and indirect real costs associated with some forms of recreation were to remain constant or were to decline, and if the supply of those recreation opportunities were to be increased, that more recreation would occur.

We have projected increased anadromous fishing as a result of our continuing efforts to improve those fisheries.

COMMENT NO. 39: BENEFITS FROM TIMBER, RANGE, AND RECREATION UNDER ALTERNATIVE C ARE, RESPECTIVELY, \$417, \$39, AND \$595 MM (TABLE B-34). RECREATION EXCEEDS TIMBER AND RANGE COMBINED AND HAS THE POTENTIAL FOR MUCH GREATER GROWTH AND STIMULATION OF LOCAL ECONOMIES IF UNDERESTIMATES OF FISH NUMBERS ARE CORRECTED, BENEFITS COULD BE FAR GREATER. THE LACK OF CONCERN FOR ANADROMOUS FISH IS EVIDENT FROM LUMPING FISH WITH WATER IN TABLE B-34.

FOREST SERVICE RESPONSE:

The lumping of fish benefits was done in the interest of making the document more readable -- a process which frequently results in the loss of detail

COMMENT NO. 40. EXPLANATION OF CALCULATIONS OF FISHERIES DATA ARE SPARCE (SEE PLAN 2-13). THE CITATION FOR TABLE 2-7 IS ONLY TO ODF&W IS THIS A PUBLISHED REPORT? WHAT KINDS OF METHODS AND ASSUMPTIONS ARE INVOLVED HERE? FOR INSTANCE, IF THE NUMBER OF SPAWNING ADULTS IS TAKEN AS A CONSTANT AND THE NUMBERS OF SMOLTS GENERATED ARE CALCULATED FROM THIS, WHAT ASSUMPTIONS ARE MADE? WHAT ARE EGG TO SMOLT SURVIVAL RATES, EGGS PER FEMALE, MALE/FEMALE RATIOS? WHAT ARE THE SOURCES FOR SMOLT SURVIVAL? THERE APPEAR TO BE SOME ERRORS IN THE TABLE. FOR EXAMPLE, ON THE NORTH FORK JOHN DAY, A TOTAL OF 1,200 CHINOOK REACH THE OCEAN, 900 ARE CAUGHT, AND 300 ADULTS SPAWN.

FOREST SERVICE RESPONSE

Tables for calculations of fishery data have been updated and clarified.

COMMENT NO. 41: THERE SEEMS TO BE NO OCEAN OR UPSTREAM MIGRATION MORTALITY. FOR THE SNAKE RIVER 430 FISH REACH THE OCEAN, 284 FISH ARE CAUGHT, AND 500 SPAWN.

THE NUMBERS DO NOT ADD UP CORRECTLY WHAT IS THE SHCI FOR EACH STREAM? HOW WAS THIS DETERMINED? WHAT STREAM SURVEYS ARE AVAILABLE WHICH WOULD INDICATE SMOLT CAPABILITY? ARE THERE DATA ON POOL QUALITY OR POOL/RIFFLE RATIOS, MEAN DEPTHS, ETC , FOR ANADROMOUS STREAMS? THE FIRST STEP IN MANAGING HABITAT IS TO SURVEY PRESENT CONDITIONS. ANY STREAM HABITAT DATA AVAILABLE WOULD BE VERY HELPFUL IN IDENTIFYING PROBLEM AREAS

FOREST SERVICE RESPONSE:

Revised tables which appear in the final plan indicate the estimated number of smolts produced for each major drainage and the estimated number of returning adults. As you can see, there is a high mortality, but we have no accurate way of breaking the mortality down as to dams, predators, disease, sport, or commercial catch. The table indicates what the estimated smolt habitat capability index is by major subbasin and the footnotes explain the source of that information.

We do have a number of stream habitat surveys, but the estimated number of smolts produced are basically a reflection of past and potential redd count derived from ODF&W data.

The habitat inventories on some streams have some information on pool quality, pool/riffle ratio, mean depth, etc. Unfortunately, we do not have a fish habitat inventory available yet for all streams where improvement work is projected. Those inventories are planned prior to actual improvement work implementation.

COMMENT NO. 42: THE MAIN CONCEPT TO BE OBTAINED FROM TABLE 2-7 MAY SIMPLY BE THAT WITH FULL ESCAPEMENT, NUMBERS SPAWNING MAY INCREASE BY 1.5 TO 10 TIMES OVER PRESENT LEVELS DEPENDING ON SPECIES AND STREAM. WITH HABITAT ENHANCEMENT, SPAWNING NUMBERS MAY AGAIN DOUBLE IN CERTAIN CASES. WHY DOES FULL ESCAPEMENT WITH HABITAT ENHANCEMENT NOT PRODUCE ANY GAIN IN STREAMS SUCH AS THE WALLOWA, IMNAHA, AND SNAKE? IS THERE NO ENHANCEMENT PLANNED FOR THESE OR ARE THEY CONSIDERED TO BE IN GOOD SHAPE? HOW WERE FULL-SEEDING LEVELS ASSESSED FOR EACH STREAM? HOW WAS THE NATURAL POTENTIAL OF EACH STREAM EVALUATED? THAT IS, WHAT WAS THE CAPACITY OF EACH STREAM HABITAT SYSTEM TO PRODUCE FISH BEFORE MANAGEMENT?

IT WOULD SEEM THAT KNOWLEDGE OF THIS WOULD ESTABLISH A FRAMEWORK TO DECIDE HOW MUCH HABITAT ENHANCEMENT COULD DO. IS THE FULL-ESCAPEMENT LEVEL BASED ON PRESENT DEGRADED CONDITIONS?

FOREST SERVICE RESPONSE:

Very little to no enhancement work is planned in the Wallowa, Imnaha, or Snake Rivers because of a joint ODF&W, Tribal, Forest Service biologist opinion that these streams are in relatively good condition or are of such size that habitat improvement work would not be very practical. The documents used to construct the tables we sent to the respondent under separate cover. We believe the standards and guidelines indicated in Chapter 4 of the Land and Resource Management Plan speak for themselves as to the emphasis that we are placing on maintaining or improving anadromous fish habitat.

COMMENT NO. 43: AS FOR THE EFFECTS ON FISH, WHY DON'T YOU LIST OR MAP OUT WHERE YOU ARE GOING TO SIGNIFICANTLY DECREASE OR DESTROY ANADROMOUS FISH HABITAT

THIS HAS BEEN THE U S F S. RECORD SO FAR AND THE GUIDELINES THAT YOU HAVE MENTIONED ARE INADEQUATE OR NEVER ENFORCED

FOREST SERVICE RESPONSE:

There are no areas where we expect to significantly decrease anadromous or resident fish habitat.

COMMENT NO. 44 IF WE ARE CONCERNED WITH ANADROMOUS FISH RUNS, IT'S ESSENTIAL THAT WE PROTECT THESE STREAMS FROM FURTHER HYDRO DEVELOPMENT.

FOREST SERVICE RESPONSE:

We agree.

COMMENT NO. 45 ANADROMOUS FISH -- APPROXIMATELY 39,000 SPAWNING ADULT ANADROMOUS FISH SHOULD BE PRODUCED UNDER THE COMMUNITY STABILITY ALTERNATIVE THE INCREASE IN WILDLIFE AND WATERSHED IMPROVEMENT PROJECTS SHOULD HELP TO EXCEED THIS OUTPUT. ACTUALLY, THERE IS LITTLE, IF ANY, CHANGE IN NUMBERS OF SPAWNING FISH IN ANY OF THE RUNS. MAXIMUM TIMBER, MAXIMUM LIVESTOCK, AND MAXIMUM ELK RUNS ALL ARE PROJECTED TO PRODUCE THE HIGHEST POPULATIONS. ACTUALLY, THE MAJOR PROBLEM APPEARS TO BE ESCAPEMENT, NOT NECESSARILY DESTRUCTION OF HABITAT

AS A RESULT, THE COMMUNITY STABILITY ALTERNATIVE WOULD PROVIDE NO ADDITIONAL RESTRICTIONS FOR ANADROMOUS FISH. PRUDENT LOGGING AND ROAD BUILDING, IF DONE CORRECTLY, WILL NOT HAVE A DETRIMENTAL EFFECT ON THIS POPULATION.

FOREST SERVICE RESPONSE:

Thank you for your comments with which we generally agree

COMMENT NO. 46: WE ARE CONCERNED THAT THE DEIS AND PROPOSED FOREST PLAN DO NOT PRESENT A FOREST-SPECIFIC AND SEPARATE SET OF STANDARDS, GUIDELINES, AND OBJECTIVES FOR MANAGING RIPARIAN HABITAT AREAS. THERE NEEDS TO BE A SEPARATE MONITORING PROGRAM FOR FOREST-SPECIFIC MANAGEMENT ACTIVITIES IN RIPARIAN AREAS AS WELL. RIPARIAN HABITATS NEED TO BE RECOGNIZED AS UNIQUE AREAS THAT ARE VERY SENSITIVE TO THE VARIETY OF MANAGEMENT ACTIVITIES THAT OCCUR IN THE FOREST

FOREST SERVICE RESPONSE:

Chapter 4 of the Forest Plan provides detailed standards and guidelines for management of riparian areas. Monitoring of riparian areas, aquatic habitat and fish populations is discussed in the Monitoring Plan in Chapter 5

COMMENT NO. 47 (ANADROMOUS FISH HABITAT): ANADROMOUS FISH STREAMS SHOULD BE MANAGED AS WE RECOMMENDED FOR STREAMSIDE MANAGEMENT UNITS EXCEPT THE BUFFER ZONE SHOULD BE 200 FEET AND SELECTION HARVEST SHOULD BE USED FOR 1/4 MILE FROM STREAMS. FISH PRODUCTION GOALS SHOULD BE DEVELOPED ON A DRAINAGE-BY-DRAINAGE BASIS SO THAT EACH STREAM MAINTAINS THE DESIRED LEVELS.

CAREFUL MONITORING SHOULD BE USED TO DETECT AND HALT ANY DEGRADATION IN WATER QUALITY AND SHOULD BE BASED ON SPECIFIC MEASURABLE STANDARDS OF QUALITY AND CAPABILITY SUCH AS PERCENT FINES, PERCENT COBBLE EMBEDDEDNESS, AND TEMPERATURE. THE MONITORING SYSTEM SHOULD HAVE DIRECT FEEDBACK LINKAGES WITH THE PLAN THAT WOULD INITIATE IMMEDIATE CORRECTIVE ACTION IF GOALS ARE NOT BEING MET

FOREST SERVICE RESPONSE.

We believe that carefully-implemented management activities can occur within riparian areas with no adverse effects on fish habitat. Consequently, we have chosen to restrict but not exclude timber harvest from these areas. Riparian management direction (Chapter 4 of the Forest Plan) clearly states that protection and enhancement of water quality will have priority over other uses of riparian areas. Monitoring is planned (Forest Plan Chapter 5) to assure that this direction is implemented correctly.

COMMENT NO. 48: THE PLANNING TEAM INDICATES IN THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (P.IV-42) THAT 'BEST MANAGEMENT PRACTICES' USED IN TIMBER HARVEST AND ROADING ARE SUFFICIENT TO MEET MINIMAL REQUIREMENTS FOR PROTECTING ANADROMOUS FISH. THEY ARE QUICK TO POINT OUT THAT ANADROMOUS FISH PRODUCTION DEPENDS ON DOWNSTREAM ESCAPEMENT, FISH STOCKING PROGRAMS, AND THE SUCCESS OF STREAM HABITAT IMPROVEMENTS AND THAT THESE OFF-FOREST CONSIDERATIONS ARE BEYOND THE SCOPE OF THE FOREST PLANNING PROCESS. THE IMPACTS OF OFF-FOREST ACTIVITIES ON THE VIABILITY OF ANADROMOUS FISH POPULATIONS FOUND ON THE FOREST ARE UNDENIABLE. HOWEVER, THIS DOES NOT IMPLY THAT THE PLANNING TEAM CANNOT PLAY AN IMPORTANT ROLE--FOR BETTER OR WORSE--IN ANADROMOUS FISH PRODUCTION ON THE FOREST. IN ADDITION, IT IS NOT CLEAR THAT BEST MANAGEMENT PRACTICES ALONE ARE SUFFICIENT TO AVOID ADVERSE IMPACTS ON ANADROMOUS FISH DUE TO TIMBER HARVESTS, TRANSPORTATION OR LIVESTOCK GRAZING ON THE FOREST.

IT IS A SERIOUS MISTAKE FOR PLANNERS TO APPROACH ANADROMOUS FISH ISSUES IN A PIECEMEAL FASHION. IN ADDITION TO THE JOHN DAY RIVER DRAINAGE, COMPREHENSIVE PLANS TO PROTECT AND ENHANCE HABITAT AS WELL AS MAINTAIN ADEQUATE STREAM-FLOWS SHOULD BE FORMULATED FOR THE MINAM, LOSTINE, WALLOWA, IMNAHA, AND GRANDE RONDE RIVER DRAINAGES. A COMPREHENSIVE PLAN FOR PROTECTION OF ANADROMOUS FISH ON THE FOREST SHOULD BE COORDINATED WITH THE ACTIVITIES OF THE NORTHWEST POWER PLANNING COUNCIL, STATE FISH AND WILDLIFE AGENCIES, AND INDIAN TRIBES. HOWEVER, IT IS UP TO THE FOREST PLANNERS TO INSURE THAT DEGRADATION OF THE RESOURCE DOES NOT OCCUR AS A RESULT OF MANAGEMENT ACTIVITIES. IT IS INAPPROPRIATE FOR THE PLANNING TEAM TO USE PROBLEMS OFF-FOREST TO JUSTIFY NOT GIVING THIS IMPORTANT ISSUE THE SPECIAL ATTENTION IT DESERVES.

FOREST SERVICE RESPONSE

The discussion in Chapter IV of the EIS is not intended to downplay the importance of habitat management in improving anadromous fish production. It is there so the reader understands there are things other than on-Forest habitat conditions which currently affect fish numbers and will continue to do so in the future. We agree with the importance of comprehensive planning and coordination with other organizations and agencies in achieving long-term objectives for anadromous fish. Discussion of our role in the overall process is found in Chapter III of the FEIS.

COMMENT NO. 49 WE DON'T FEEL THE PROPOSED PLAN MEETS CONGRESSIONAL INTENT FOR ANADROMOUS FISH. THE HABITAT PROVIDED ON THE WALLOWA-WHITMAN IS CRITICAL TO THE SURVIVAL OF THE LAST WILD RUNS OF SALMON AND STEELHEAD IN EASTERN OREGON . STEPS NEED TO BE TAKEN TO INSURE IMPROVEMENT OF HABITAT TO MAINTAIN AND ENHANCE POPULATIONS OF THESE FISH

FOREST SERVICE RESPONSE

We believe the plan meets the congressional intent for anadromous fish and that the standards and guidelines in Chapter 4 reflect the high emphasis we are placing on fishery values

COMMENT NO. 50 THE BOTTOM LINE IS THAT NATIVE SALMON, STEELHEAD, AND RESIDENT TROUT POPULATIONS ARE CRITICALLY LOW. IN MANY AREAS WE DON'T EVEN KNOW IF VIABLE POPULATIONS STILL EXIST.

FOREST SERVICE RESPONSE:

We agree that populations are very low. For anadromous fish particularly, the primary cause of this has been identified as downstream hydropower dams. Although not certain, we suspect that viable populations still exist in nearly all streams and we are committed to do whatever we can, within funding and legal constraints, to increase these populations

COMMENT NO. 51: WE AGREE WITH EMPHASIS BEING PLACED ON UNDERTAKING FISH HABITAT IMPROVEMENT PROJECTS. IT SHOULD ALSO BE EMPHASIZED THAT FISH HABITAT IMPROVEMENT WORK, WHILE IMPORTANT AND POTENTIALLY VERY SUCCESSFUL, DOES NOT TAKE THE PLACE OF AVOIDING IMPACTS FROM THE BEGINNING.

FOREST SERVICE RESPONSE

We agree.

COMMENT NO. 52: WHILE DAMS ON THE COLUMBIA AND SNAKE RIVERS LIMIT THE NUMBER OF ANADROMOUS FISH RETURNING TO STREAMS ON THE WALLOWA-WHITMAN NATIONAL FOREST, THE TEMPERATURE QUALITY AND QUANTITY OF WATER ARE MAIN FACTORS LIMITING FISH PRODUCTION AND SURVIVAL IN NORTHEAST OREGON THE HABITAT BASE FOR WILD FISH PRODUCTION HAS BEEN SHRINKING OVER TIME DUE TO CUMULATIVE IMPACTS. IMPLEMENTATION OF THE STANDARDS AND GUIDELINES WILL PREVENT FURTHER DEGRADATION AND SHOULD ALLOW NATURAL RESTORATION OF FISH HABITAT

FURTHER STREAM HABITAT ENHANCEMENT EFFORTS ARE ALSO ENCOURAGED THE COOPERATIVE EFFORTS BETWEEN USFS, BPA, AND ODF&W REPRESENT SUBSTANTIAL CAPITOL INVESTMENTS. THE FOREST NEEDS A GOOD WATERSHED PROTECTION PROGRAM TO INSURE THE INVESTMENTS REMAIN PRODUCTIVE MANY OF THE PROJECTS ARE INTENDED TO DELIVER HIGH QUALITY WATER DOWNSTREAM AND IT WOULD BE COUNTERPRODUCTIVE TO ALLOW OTHER RESOURCE PROGRAMS TO DEGRADE FISH HABITAT

FOREST SERVICE RESPONSE:

We agree

COMMENT NO. 53: THE CONFEDERATED TRIBES BELIEVE THAT "DOWNSTREAM IMPACTS" PLACE EVEN GREATER IMPORTANCE ON THE QUALITY AND QUANTITY OF FISHERIES HABITAT IDENTIFIED LIMITING FACTORS OF FISHERIES PRODUCTIVITY ARE LOW SUMMER FLOWS, HIGH SUMMER WATER TEMPERATURES, HIGH SEDIMENTATION LEVELS, REDUCTION OF CANOPY, STREAM CHANNELIZATION, AND POOR RIFFLE POOL RATIOS. ALL OF THESE VARIABLES ARE ASSOCIATED WITH DEGRADED RIPARIAN HABITAT AND WATERSHED QUALITY. IT IS IMPERATIVE THAT THE FOREST PLAN RECOGNIZE THESE VARIABLES AND PROVIDE FOR NON DEGRADATION RIPARIAN MANAGEMENT GUIDELINES.

FOREST SERVICE RESPONSE:

The Plan calls both for nondegradation of riparian areas and for restoration of riparian areas currently in a damaged condition

COMMENT NO. 54: THIS IMPACT AND ITS EFFECT ON THE FISHERY CAN BE SEEN ON THE UPPER GRANDE RONDE RIVER WHERE ROADS HAVE ELIMINATED RIPARIAN VEGETATION AND INCREASED SEDIMENTATION. IT SHOULD ALSO BE STRESSED THAT ROAD ACCESS TO FISHERIES IMPACTS NATIVE STOCKS BY "JUSTIFYING" INCREASED USE OF HATCHERY STOCKS

FOREST SERVICE RESPONSE

We agree that roads and the resulting sediment have contributed to fish habitat loss. How much, we don't know In some cases, riparian vegetation has been eliminated on roads constructed many years ago The standards and guidelines of the Land and Resource Management Plan will significantly decrease stream and riparian habitat impacts from roads and other activities

COMMENT NO. 55: OREGON TROUT STRONGLY URGES THE FOREST SERVICE TO INCLUDE SPECIFIC MANAGEMENT LANGUAGE FOR FISHERIES IN THE GRANDE RONDE RIVER BASIN, POWDER RIVER BASIN, IMNAHA RIVER BASIN, NORTH FORK JOHN DAY RIVER BASIN, AND IN THE BULL RUN CREEK DRAINAGE IN THE MONUMENT ROCK ROADLESS AREA NATIVE POPULATIONS OF SALMON, STEELHEAD, AND RESIDENT TROUT MUST BE TARGETED FOR SPECIAL MANAGEMENT PROTECTION AND ENHANCEMENT OF THESE RUNS SHOULD BE A TOP PRIORITY BY SPECIFYING STRICT HABITAT MANAGEMENT

FOREST SERVICE RESPONSE

The specific management language you ask for is planned to appear in subbasin plans developed jointly with ODF&W and Indian tribes as prescribed by the Columbia River Power Planning Council In addition to this, the Forest is currently working on a fishery program for the Forest which will dovetail with these subbasin plans

COMMENT NO. 56: DAMAGED HABITAT SHOULD BE IDENTIFIED AND MEANS PROVIDED IN THE FINAL PLAN FOR CORRECTION OF THIS DAMAGE.

FOREST SERVICE RESPONSE:

We agree.

COMMENT NO. 57: DISCUSSIONS OF FISH AND FISH HABITAT SHOULD BE EXPANDED IN ORDER FOR US TO DETERMINE THAT IMPACTS TO FISH AS A BENEFICIAL USE ARE MINIMIZED. THE PROCESS THAT WILL BE FOLLOWED TO PROTECT FISH HABITAT MUST START WITH CONSIDERATION OF THE EXISTING CONDITION OF THE HABITAT. THE ADEQUACY OF THE STANDARDS DESIGNED TO MAINTAIN HABITAT QUALITY, AND OF THE MONITORING PROGRAM USED TO DETERMINE THAT THE STANDARDS ARE BEING ACHIEVED, RELATES DIRECTLY TO THE CURRENT STATUS OF THE FISH POPULATIONS AND THEIR HABITAT. THE FISH SECTIONS OF BOTH CHAPTERS III AND IV ARE APPROPRIATE PLACES TO SUMMARIZE MUCH OF WHAT WE SUGGEST BE INCLUDED ELSEWHERE IN THE DOCUMENTS IN TERMS OF IMPACTS FROM GRAZING, TIMBER HARVEST, AND ROADING IN RIPARIAN AREAS, AS WELL AS SEDIMENT YIELDS FROM UPSLOPE ACTIVITIES (ALSO SEE CUMULATIVE IMPACTS, BELOW)

IT IS NOTED THAT WHERE FISH HABITAT HAS DECLINED IT HAS BEEN DUE TO LIVESTOCK DAMAGE TO RIPARIAN AREAS, LOSS OF STREAM SHADE, AND INCREASED SEDIMENTATION. AREAS WHERE THIS HAS OCCURRED HAVE NOT BEEN IDENTIFIED, HOWEVER. FIGURE III-8 IS USEFUL, AND COULD BE MADE MORE SO BY INCLUSION OF SYMBOLS DENOTING GENERAL AREAS WHERE IMPACTS HAVE OCCURRED.

FOREST SERVICE RESPONSE:

More specific information on fisheries has been added to the EIS and the Plan. This includes additional detail in describing the current fish habitat and production situation, additional standards and guidelines for managing fish habitat, and additional monitoring requirements.

COMMENT NO. 58: BEAR CREEK CANYON IN THE AREA OF YOUR PLAN IS VERY NARROW AND STEEP. UNDER YOUR PLAN, IT WOULD BE IMPOSSIBLE TO MAINTAIN EXISTING WATER QUALITY AND STREAM HABITAT FOR THE EXISTING ANADROMOUS FISH PRODUCING AREA.

FOREST SERVICE RESPONSE.

We think that the standards and guidelines in the Plan will maintain water quality and fish habitat. If, during planning for individual projects in the area, it becomes apparent that harvesting in Bear Creek Canyon is not compatible with maintaining water quality, protection of water quality will have priority as is spelled out in the watershed standards and guidelines.

COMMENT NO. 59: MY NUMBER ONE CONCERN WITH THE PLAN IS ITS EMPHASIS ON TIMBER HARVEST AT THE EXPENSE OF FISH HABITAT AND FISH POPULATIONS. WHILE IN THEORY TIMBER CAN BE HARVESTED WITH MINIMAL IMPACT ON COLD WATER FISHERIES, THAT IS RARELY THE CASE. OVER THE PAST 30 YEARS I HAVE WITNESSED INEXCUSABLE DESTRUCTIVE LOGGING PRACTICES ON NATIONAL FOREST LANDS, PARTICULARLY IN THE UPPER JOHN DAY RIVER BASIN. HAD THESE LANDS NOT BEEN ABUSED IN THE PAST, PERHAPS WE WOULD NOT NEED TO BE SO PROTECTIVE OF WHAT REMAINS TODAY. BUT THE TRUTH IS THAT THE STREAMS AND FISHERIES HAVE SUFFERED ENOUGH, AND ONE MORE IOTA OF RIPARIAN DEGRADATION WOULD BE TOO MUCH.

FOREST SERVICE RESPONSE

We recognize that timber harvest has been a factor in riparian damage. Many safeguards are now being used which we believe prevent significant degradation.

COMMENT NO. 60. THE PRACTICE OF USING FOREST-WIDE AVERAGES TO DIMINISH THE APPARENT SEVERITY OF LOCAL CHANGES MAY WORK IN A NEW FRONTIER WHERE PLENTY OF UNTOUCHED WILDERNESS AND PRISTINE STREAMS EXIST TO ACT AS A BACKUP HOWEVER, IN THE WWNF THE MAJORITY OF THE STREAMS SUFFER SEVERE HABITAT PROBLEMS WHICH ACT CUMULATIVELY AND FOREST-WIDE AVERAGES NO LONGER CAN HIDE THE FACT THAT LARGE SCALE HABITAT CONSERVATION EFFORTS ARE NEEDED

FOREST SERVICE RESPONSE:

The standards and guidelines in the Land and Resource Management Plan indicate the emphasis we are placing on improvement of all streams and aquatic and riparian habitats We agree that much improvement is needed and, in particular for the anadromous fish spawning and rearing streams, projects are on-going for that improvement

COMMENT NO. 61 NORTHEAST OREGON HAS NO WILD FISH MANAGEMENT OR WILD FISH HABITAT PROGRAM WE BELIEVE A STRONG NEED EXISTS FOR SUCH A PROGRAM AND THAT IF IT ISN'T FORMULATED AND IMPLEMENTED SOON, WILD FISH WILL BE CONFINED TO "STORIES OF THE OLD DAYS "

FOREST SERVICE RESPONSE:

The Oregon Department of Fish and Wildlife is the agency primarily responsible for determining races and stocks of fish in the stream drainages of the state. We will work with the state in the maintenance of the habitat to enhance whatever populations are determined Joseph Creek subbasin of the Grande Ronde Drainage has been identified as strictly a wild fish drainage

COMMENT NO. 62: SPECIFICALLY, WE WOULD LIKE TO SEE A LARGER EMPHASIS ON FISH AND WILDLIFE, PARTICULARLY FISH THE PACIFIC NORTHWEST POWER PLANNING COUNCIL HAS DIRECTED UP TO \$800 MILLION IN RESTORATION MEASURES FOR THE REGION'S FISHERIES, AT THE EXPENSE OF POWER UTILITY RATE PAYERS. AT THE VERY SAME TIME THE FOREST SERVICE SEEMS TO BE 180 DEGREES OUT-OF-PHASE BY CONTINUING A TIMBER CUTTING PROGRAM THAT WILL FURTHER DEGRADE PRIME FISH HABITAT. TO ACHIEVE AN IMPROVED FISHERY, THERE MUST BE A REDUCTION IN PLANNED CUT AND MORE GENEROUS TREATMENT OF BUFFER ZONES

FOREST SERVICE RESPONSE

This Forest has been a cooperator with Bonneville Power Administration (they administer the funds directed by the Pacific Northwest Power Planning Council) on fish habitat improvement projects since 1983 Most of this work on this Forest has been in the Joseph Creek and Upper Grande Ronde subbasins We believe the direction in the Plan adequately protects and, in fact, provides for improvement of fish habitat and fisheries.

**RIPARIAN HABITAT
Code 450**

COMMENT NO. 1 ONE OF OUR GREATEST CONCERNS IS THE DETERIORATION OF RIPARIAN ZONES ON THE RANGE LANDS OF THE WEST. THIS IS CAUSED PRIMARILY BY OVER-GRAZING BY LIVESTOCK. THUS, WE WOULD LIKE TO SEE A DECREASE OF AUM'S ON THE WALLOWA-WHITMAN NATIONAL FOREST. IT HAS BEEN DEMONSTRATED ON THE MURDER'S CREEK-FLAGTAIL COOPERATIVE TRAVEL MANAGEMENT AREA IN THE JOHN DAY BASIN, FOR INSTANCE, THAT BY CAREFUL AND CONTROLLED MANAGEMENT PRACTICES THE RIPARIAN AREAS CAN COME BACK IN BUT A FEW SHORT YEARS THE VEGETATION AND WILDLIFE ARE RETURNING, AND THE WATER TEMPERATURE HAS DROPPED FOR THE AID OF FISHERIES AND STREAMSIDE EROSION IS BEING CHECKED. WE SUBSCRIBE TO SUCH MANAGEMENT PRACTICES IN THE SAME VEIN, WE WOULD LIKE TO SEE TIMBER HARVEST PRECLUDED AROUND WETLANDS AND MEADOWS AND ALONG STREAM BANKS FOR 100 TO 200 FEET ON BOTH SIDES OR AS MUCH AS POSSIBLE.

FOREST SERVICE RESPONSE

We have added more specific direction in the Standards and Guidelines for riparian habitat which will result in habitat improvement. We believe that limited harvest of timber in riparian zones can be accomplished, providing riparian habitat standards and guidelines are not violated.

COMMENT NO. 2 PAGE I-5, ISSUES, CONCERNS AND OPPORTUNITIES - THE FACT THAT NO ISSUES, CONCERNS, AND OPPORTUNITIES SPECIFICALLY ADDRESSING THE FOREST'S AQUATIC RESOURCES WERE IDENTIFIED IS VIEWED AS A MAJOR DEFICIENCY. AS A MINIMUM, ANADROMOUS FISH SHOULD BE RECOGNIZED AND EVALUATED AS AN ISSUE, CONCERN, AND OPPORTUNITY REPRESENTING THE FOREST'S AQUATIC ENVIRONMENT.

FOREST SERVICE RESPONSE

Although not specifically identified as a separate issue, riparian/aquatic/water quality is identified as a facet of several other issues. Anadromous fish are management indicator species to be used in monitoring implementation of the Plan. Special standards and guidelines are included in the Plan to assure that riparian values are protected.

COMMENT NO. 3 III-13 -- THE SECTION SHOULD BE EXPANDED TO DESCRIBE SOME OF THE OPPORTUNITIES THAT ARE AVAILABLE TO INCREASE RIPARIAN HABITAT THROUGH INCREASED PROTECTION MEASURES.

FOREST SERVICE RESPONSE.

Chapter III explains the types of riparian problems found on the Forest. A variety of methods for improving riparian conditions exists. These include, among other things, riparian enclosure fencing, planting trees or shrubs, structural channel rehabilitation, road repair, and road abandonment. There are several publications available which describe the benefits and opportunities of increased riparian habitat including "Wildlife Habitat in Managed Forests of the Blue Mountains" by Jack W. Thomas. Although not officially a part of this plan, these documents are resource material for project designs.

COMMENT NO. 4: ANOTHER RESOURCE I AM MOST INTERESTED IN PROTECTING IS WATER, RIPARIAN ZONES, AND FEEDER STREAMS THUS I AM CONCERNED ABOUT THE ROAD-BUILDING INCREASE. THERE ARE TOO MANY ROADS ALREADY AND UNNECESSARY NEW ROADS BEING BUILT WHERE OLD ROADS COULD HAVE SERVED JUST AS WELL I RECENTLY TRAVELLED UP THE NORTH FORK OF CATHERINE CREEK AND FOUND SEVERAL ROADS WHERE BULLDOZERS HAD DAMAGED RIPARIAN ZONES AND TWO ROADS RUNNING PARALLEL TO EACH OTHER. SPRING RUNOFF HAD TO BE TRENCHED TO DIRECT IT INTO THE CREEK WHICH WAS ALMOST COMPLETELY BLOCKED WITH A LARGE BOULDER A BULLDOZER HAD PUSHED INTO IT

FOREST SERVICE RESPONSE.

Additional roads are necessary if timber management is to occur in areas which are currently roadless. It is also necessary to build new roads when existing roads are poorly located for current logging systems or when they are damaging riparian resources. Although mistakes or errors of judgment will continue to occur, the standards and guidelines dealing with water, fisheries, and riparian habitat will certainly reduce the number of mistakes in these areas. They are intended to improve these resources.

COMMENT NO. 5: NATURAL SPRINGS SHOULD BE MAINTAINED FOR THE USE OF WILDLIFE, AND LIVESTOCK SHOULD NOT BE ALLOWED TO DEGRADE THESE VULNERABLE HABITATS.

FOREST SERVICE RESPONSE:

Additional management direction on this subject has been added to the standards and guidelines for riparian ecosystems

COMMENT NO. 6 RIPARIAN AREAS ARE DESIGNATED IN THE PROPOSED PLAN FOR PROVIDING TIMBER AND OTHER OUTPUTS, WITH THE INTENT OF ALLOWING LONG-TERM MAINTENANCE OR IMPROVEMENT OF RIPARIAN AREA QUALITY AT THE SAME TIME. IN ORDER TO SUPPORT THAT THE PROPOSED LEVELS OF THESE OTHER OUTPUTS CAN BE OBTAINED WITHOUT SERIOUSLY DAMAGING THE FUNCTIONS AND VALUES OF RIPARIAN AREAS, DISCUSSIONS DEALING WITH THEM SHOULD BE EXPANDED THE RELATIVE IMPORTANCE OF DIFFERENT RIPARIAN AREAS ON THE WWNF, THEIR EXISTING CONDITIONS, AND THE IMPACTS OF GRAZING AND TIMBER HARVESTING ACTIVITIES ON THEM SHOULD BE MORE FULLY ADDRESSED.

FOREST SERVICE RESPONSE:

Substantial information on this subject has been added

COMMENT NO. 7: THE IMPORTANCE OF RIPARIAN ZONES TO WATER QUALITY AND FISH AND WILDLIFE HABITAT QUALITY GREATLY EXCEEDS THE ACTUAL AREA OCCUPIED BY RIPARIAN VEGETATION ANY EVALUATION OF THE COST EFFECTIVENESS OF TIMBER HARVESTING OR GRAZING IN THESE AREAS SHOULD REFLECT THIS FACT IT IS ESSENTIAL TO CAREFULLY EXPLAIN HOW ACTIVITIES SUCH AS TIMBER HARVESTING AND LIVESTOCK GRAZING CAN BE MADE COMPATIBLE WITH OTHER RIPARIAN AREA RESOURCE VALUES (E G , PROTECTING AND ENHANCING WATER QUALITY AND FISH HABITAT POTENTIAL), KEEPING IN MIND THAT IT MAY NOT BE POSSIBLE TO REPLACE THESE OTHER RESOURCE VALUES ELSEWHERE ON THE FOREST

FOREST SERVICE RESPONSE

Determination will be made in the form of an environmental analysis for each project or activity planned in or adjacent to riparian zones. Such determinations, however, must be within the standards and guidelines for riparian zones or habitats which appear in the plan.

COMMENT NO. 8: IT WOULD BE USEFUL FOR THE EIS TO EVALUATE THE EFFECT ON OUTPUTS OF EXCLUDING OR SEVERELY RESTRICTING ACTIVITIES IN ALL VERSUS ONLY CERTAIN RIPARIAN AREAS. ANSWERS TO THE QUESTIONS BELOW WOULD HELP PUT THE OUTPUTS AND THE OTHER RIPARIAN VALUES INTO BETTER PERSPECTIVE.

- WHAT PERCENTAGE OF THE PROPOSED TIMBER HARVEST LEVEL WOULD COME FROM RIPARIAN AREAS? FROM THE RIPARIAN AREAS MOST IMPORTANT TO WATER QUALITY AND BENEFICIAL USES (ESPECIALLY SALMON SPAWNING/REARING AREAS)?
- WHAT PERCENTAGE OF THE PROPOSED LIVESTOCK GRAZING WOULD BE AFFECTED BY EXCLUSION FROM THESE SAME RIPARIAN AREAS?
- WHAT PERCENTAGE OF THESE RIPARIAN AREAS HAVE ALREADY BEEN OR CONTINUE TO BE ADVERSELY AFFECTED BY ROADS, GRAZING, TIMBER HARVEST, OR OTHER ACTIVITIES ?
- WHAT CAN BE DONE SHORT OF TOTAL EXCLUSION OF ACTIVITIES IN ALL RIPARIAN AREAS TO MINIMIZE IMPACTS ON THEIR FUNCTIONS AND VALUES (E.G., EXCLUSION FROM ONLY CERTAIN AREAS, REDUCTION IN INTENSITY OF USE, ETC.)?

THE INTENT IS TO SHOW THAT THE FINAL PROPOSAL FOR MANAGEMENT OF RIPARIAN AREAS IS REASONABLE BY: FIRST, DESCRIBING THEIR FUNCTIONS AND VALUES, SECOND, DESCRIBING THEIR EXISTING CONDITIONS, THIRD, EVALUATING MECHANISMS FOR MAKING ACTIVITIES COMPATIBLE WITH THEIR FUNCTIONS AND VALUES; AND FINALLY, FROM THESE, TO DEVELOP OUTPUT TARGETS AND STANDARDS AND GUIDELINES THAT ARE CLEARLY CONSISTENT WITH PROTECTION NECESSARY FOR THESE IMPORTANT AREAS.

FOREST SERVICE RESPONSE

There are 1.5 MMBF of timber scheduled annually for harvest from riparian zones. Of this, about 15 percent occurs along Class 1 streams (streams which provide habitat for a large number of fish or are used as a direct domestic water supply). Nearly all riparian areas of the forest have been impacted to some degree by grazing, roadbuilding, or timber harvest. Although exclusion of cattle from riparian areas would cause only a minor loss of forage availability (2-4%), the cost of excluding all important riparian zones from grazing (normally through fencing) would be prohibitive. However, temporarily fencing out some riparian zones and reducing the amount of grazing impact on others are tools being used to permit riparian recovery. A discussion of riparian conditions has been added to the EIS.

COMMENT NO 9: AS PROPOSED, TIMBER HARVEST AND GRAZING WOULD BE ALLOWABLE IN ESSENTIALLY ALL RIPARIAN AREAS, AS LONG AS A SHADING STANDARD WERE MAINTAINED ON A SMALL PERCENTAGE OF THOSE AREAS (AREA 18 LANDS). COMPARISON WITH ALTERNATIVE F INDICATES THAT OVER 10 TIMES MORE OF THE RIPARIAN AREAS ON THE FOREST COULD BE CONSIDERED AS WARRANTING EXTRA PROTECTION. EVEN HAD ALTERNATIVE F BEEN PROPOSED FOR IMPLEMENTATION, HOWEVER, WE WOULD NOT BE ABLE TO DETERMINE THE ADEQUACY OF THAT PROTECTION. SOME NATIONAL FORESTS HAVE

PROPOSED SIMILAR SHADING STANDARDS, PLUS MORE SPECIFIC MANAGEMENT OF LARGE WOODY DEBRIS AND OTHER COMPONENTS OF FISH HABITAT, FOR ALL STREAMS IN AT LEAST ONE SUCH CASE, COMPLETE EXCLUSION OF TIMBER HARVESTING IN RIPARIAN AREAS AROUND ANADROMOUS FISH STREAMS HAS BEEN DISCUSSED. IF THERE ARE REASONS THAT RIPARIAN AREAS ON THE WWNF DO NOT REQUIRE THE DEGREE OF PROTECTION NECESSARY IN MANY OTHER AREAS, THE REASONS SHOULD BE EXPLICITLY DISCUSSED IN THE EIS.

FOREST SERVICE RESPONSE:

Standards and guidelines for stream shade and stream temperature apply everywhere on the Forest, not just in Management Area 18. More definitive riparian objectives have been added to the management standards and guidelines.

COMMENT NO. 10. THE RIPARIAN ZONE MANAGEMENT PROPOSAL HAS BROAD FISH AND WILDLIFE OBJECTIVES THAT ARE EXPECTED TO GIVE SIGNIFICANT PROTECTION TO THE HIGHLY IMPORTANT FISH AND WILDLIFE RESOURCES THERE. (ODFW)

FOREST SERVICE RESPONSE:

Thank you for your response

COMMENT NO. 11. THE BOTTOM OF PAGE 4-22 STATES THAT "MEASURABLE OBJECTIVES" WILL BE SET FOR COVER OR BANK STABILITY PROBLEM AREAS. ONCE THE EIS DESCRIBES PROBLEM AREAS THAT CURRENTLY EXIST AS WE HAVE SUGGESTED, THE PLAN SHOULD SET SOME MEASURABLE OBJECTIVES FOR THEIR RECOVERY NOW. SIMILARLY, PAGE 4-23 STATES THAT OBJECTIVES FOR RIPARIAN AREAS NOT CURRENTLY MEETING THE OBJECTIVES A SCHEDULE FOR IMPROVEMENT, AND SPECIFIC MEASURES, WILL BE IDENTIFIED. AGAIN, WE BELIEVE THAT STANDARDS AND OBJECTIVES MUST BE OUTLINED AT THE EIS/PLAN STAGE. INCLUDING JUSTIFICATION OF EXISTING PROBLEM AREAS AND GENERAL METHODS AND TARGETS FOR IMPROVEMENT

FOREST SERVICE RESPONSE

We have added more specific direction in the standards and guidelines portion of the plan that relates to stream and riparian habitat which should satisfy this comment. In addition, environmental analysis developed for each specific project in riparian zones or areas will speak to the implementation and timing of the standards and guidelines.

COMMENT NO. 12: ALTHOUGH WE RECOGNIZE BUDGET CONSTRAINTS, WE ARE CONCERNED THAT THERE IS NO CLEAR COMMITMENT TO IMPROVEMENT OF RIPARIAN AREAS THAT DO NOT MEET OBJECTIVES. THE STATEMENT, "ALLOTMENT MANAGEMENT PLAN REVISIONS WOULD OCCUR ON A PRIORITY BASIS UNDER A SCHEDULE ESTABLISHED BY THE FOREST SUPERVISOR" (PAGE 4-23) LEAVES OPEN THE POSSIBILITY THAT ACTIVITIES WHICH HAVE ADVERSELY AFFECTED RIPARIAN AREAS AND RELATED RESOURCES COULD CONTINUE UNCHANGED INDEFINITELY IF BUDGETS CONTINUE TO SHRINK. IT IS VERY IMPORTANT THAT THE PLAN ESTABLISH MEASURABLE STANDARDS, AND THAT THERE BE A COMMITMENT THAT IF STANDARDS CANNOT BE MET BY AN ACTIVITY, THE ACTIVITY IS NOT COMPATIBLE WITH OTHER RESOURCES AND THEREFORE CANNOT OCCUR AS PROPOSED.

FOREST SERVICE RESPONSE

More definitive riparian objectives have been added to the management standards and guidelines.

COMMENT NO. 13. DEVELOP THIS MANAGEMENT AREA.

- RIPARIAN PROTECTION - MINIMAL CUTTING AND GRAZING TO PROTECT RIPARIAN AREAS.

FOREST SERVICE RESPONSE:

Protection of riparian habitat, as described in the Forest-wide management standards and guidelines, is required in all management areas.

COMMENT NO. 14. DEVELOP FOREST SPECIFIC SEPARATE STANDARDS AND GUIDELINES FOR RIPARIAN LAND AREAS THESE SHOULD BE BASED ON BETTER DEFINITION OF RIPARIAN ZONES AND QUANTITATIVE GOALS FOR THEIR CONDITION

FOREST SERVICE RESPONSE.

More definitive riparian objectives have been added to the management standards and guidelines. The riparian area definition is consistent with the Regional Guide for the Pacific Northwest Region

COMMENT NO. 15. THE STANDARDS FOR THESE VITALLY IMPORTANT AREAS NEED TO REFLECT THEIR CRITICAL ROLE IN PROVIDING FOR WATER QUALITY, AQUATIC ORGANISMS, DEPENDENT WILDLIFE AND PLANTS (MANY OF THEM SENSITIVE SPECIES), WILDLIFE AND PLANT DIVERSITY, AND RECREATION AS WRITTEN, THE "STANDARDS," ATTEMPT TO ADDRESS LITTLE MORE THAN WATER QUALITY AND BANK AND CHANNEL STABILITY.

FOREST SERVICE RESPONSE

The standards and guidelines have been changed to reflect these values.

COMMENT NO. 16. IT IS DIFFICULT TO DETERMINE PRECISELY HOW RIPARIAN AREAS ARE TO BE MANAGED FOR TIMBER, AND HOW THESE AREAS WERE MODELED IN FORPLAN "SUITABLE TIMBERLAND WITHIN SMU'S IS PART OF THE REGULATED BASE, BUT HARVESTS WILL BE AT LESS THAN FULL YIELD. ." (P.4-22), WITH A "REDUCTION OF APPROXIMATELY 40%..." (P 11-16) HOWEVER, IN APPENDIX B, THE DISCUSSION OF SELECTION HARVEST INDICATES THAT FOR SUCH AREAS, "... VOLUMES CLOSELY APPROXIMATE ESTIMATES FOR FULLY MANAGED STANDS." GIVEN THE EXCEPTIONAL VALUE OF THESE AREAS FOR A WIDE VARIETY OF NON-TIMBER RESOURCES, THE MOST PRUDENT COURSE OF ACTION WOULD BE TO TAKE THEM OUT OF THE REGULATED BASE ALTOGETHER.

FOREST SERVICE RESPONSE:

The yield tables for selection harvest (at a 30-inch diameter tree size) show a 35 percent reduction from potential yield for the ponderosa pine/Douglas-fir working group and 30 percent for the grand fir/Englemann spruce working group. If a smaller tree diameter is desired, there is still a reduction in volume, but the difference is less. Although the option of removing

riparian areas from the regulated base was considered, we believe that limited harvest can occur while protecting riparian values.

COMMENT NO. 17: PAGE 5-6, TABLE 5-1 - MONITORING SHOULD INCLUDE AN ANALYSIS OF THE SUCCESS OF THE PROPOSED RIPARIAN OBJECTIVES ACTUALLY IMPLEMENTED

FOREST SERVICE RESPONSE:

Monitoring achievement of riparian objectives is in the Fish and Wildlife section of the monitoring plan.

COMMENT NO. 18 THE DEPARTMENT RECOMMENDS RIPARIAN HABITAT BE MANAGED TO MAINTAIN OR IMPROVE WATER QUALITY AND FISH AND WILDLIFE HABITAT VALUES THOSE HABITATS ARE CRUCIAL TO FISH RESOURCES AND ARE HEAVILY USED BY WILDLIFE.

THE GOALS, STANDARDS, AND GUIDELINES ON PAGES 4-22/25 ARE EXCELLENT AND, WITH MINOR CHANGES, ARE ENDORSED BY THE DEPARTMENT THE PHRASE " TO THE EXTENT PRACTICAL" SHOULD BE REMOVED FROM PARAGRAPHS SEVEN AND NINE ON PAGE 4-23 OF THE PLAN SNAGS SHOULD BE MANAGED AT 100% OF POTENTIAL IN RIPARIAN ZONES RATHER THAN THE 60% LEVEL PROPOSED IN THE PLAN BECAUSE SNAGS IN RIPARIAN ZONES ALSO HAVE THE ADDITIONAL VALUE OF PROVIDING STRUCTURAL DIVERSITY IN STREAM CHANNELS

FOREST SERVICE RESPONSE:

The words "to the extent practical" have been deleted as suggested. We feel that maintaining snags at the 60 percent level will provide the needed wildlife habitat and supply the material necessary for stream channel structure.

COMMENT NO. 19 THE MAJOR EMPHASIS SHOULD BE PLACED ON PROTECTING EXISTING HABITAT NOT ENHANCING HABITAT AFTER YOU DEGRADE IT ALL ANADROMOUS FISH STREAMS SHOULD HAVE NO TIMBER HARVEST SCHEDULED IN THE RIPARIAN ZONE THERE SHOULD BE DRAINAGE BY DRAINAGE STANDARDS FOR ALL STREAMS TO PROTECT THEM FROM DEGRADATION FOREST-WIDE AVERAGES ARE NOT ADEQUATE

FOREST SERVICE RESPONSE:

We have added more specific direction to the standards and guidelines section of the final plan which is intended to both maintain and improve stream and riparian habitat We believe that, with adequate funding, we can both maintain and enhance these habitats.

COMMENT NO. 20 THE COMBINATION OF HIGH ELK NUMBERS AND HIGH LIVESTOCK NUMBERS CAUSE OVERUSE OF FORAGE, SOIL EROSION, AND DAMAGE TO RIPARIAN HABITAT.

FOREST SERVICE RESPONSE:

We believe that protection and enhancement of riparian habitat can occur under the projected levels of livestock and wildlife as long as adequate investment is made in range management structures Monitoring of riparian zones, to test this belief, is a part of the Monitoring Plan in Chapter 5

COMMENT NO. 21 100% SNAG LEVEL MANAGEMENT IN RIPARIAN AREAS SHOULD BE PRACTICED TO PROVIDE NEEDED INSTREAM HABITAT STRUCTURE.

FOREST SERVICE RESPONSE

We believe the 60% level specified will be sufficient

COMMENT NO. 22: NO MORE THAN 10% OF EXPOSED MINERAL SOIL SHOULD BE EXPOSED AND DISTRIBUTED PER PROJECT BASIS WITHIN 250 FEET OF ALL CLASS I, II, AND III STREAMS AND ASSOCIATED WET AREAS.

FOREST SERVICE RESPONSE.

Although a 10-percent level may be the correct criterion in some instances, we think there are many instances where this level of disturbance would not adequately protect riparian values and other instances where this criterion would be too restrictive (such as on very broad, gently-sloping floodplains). We prefer to set ground cover requirements for riparian zones on a site-specific basis

COMMENT NO. 23 A NO-CUT BUFFER STRIP OF 100 FEET WITHIN CLASS I, II, AND III STREAMS IS VITAL TO RIPARIAN INTEGRITY AS MINIMUM REQUIREMENTS. ADDITIONAL WIDTH OF BUFFER STRIPS SHOULD BE IMPLEMENTED IF SLOPES WITHIN 100 FOOT BUFFER ARE IN EXCESS OF 45 DEGREES AND, THEREFORE, PROVIDE INADEQUATE PROTECTION TO WATER QUALITY AND RIPARIAN AREA FROM EROSION AND SURFACE RUNOFF.

FOREST SERVICE RESPONSE

In some situations (such as extreme slope instability), this level of protection may be necessary. However, in most instances, some level of timber management can occur in riparian areas while still protecting riparian values

COMMENT NO. 24 NO-CUT BUFFER STRIPS OF AT LEAST 50 FEET SHOULD SURROUND ALL SPRINGS, SEEPS, BOGS, AND WETLANDS. LACK OF PROTECTION IN THESE AREAS RESULTS IN INCREASED EVAPORATION, LOWERING OF THE GROUNDWATER LEVEL, AND REDUCTION OF SUMMER AND FALL FLOW LEVELS IN NEARBY STREAMS.

FOREST SERVICE RESPONSE

Protection of springs, seeps, bogs, and wetlands is provided in the proposed plan (see standards and guidelines for riparian ecosystems). Although these standards and guidelines do not require a no-cut strip, they are intended to protect the values mentioned. Under certain conditions adequate protection may require that harvesting be avoided or delayed.

COMMENT NO. 25 A GUIDELINE IS GIVEN THAT RESOURCES DEPENDENT UPON RIPARIAN AREAS WILL BE GIVEN PREFERENTIAL CONSIDERATION. THIS WOULD BE DONE BY MEETING THE OBJECTIVES DESCRIBED IN THE 1979 REPORT OF THE RIPARIAN HABITAT SUBCOMMITTEE OF THE OREGON/WASHINGTON INTERAGENCY COMMITTEE, WHERE PRACTICAL FIRST, THE OBJECTIVES IN THIS REPORT SHOULD BE OUTLINED. SECOND, THE PHRASE "WHERE PRACTICAL" SHOULD BE DEFINED OR ELIMINATED. IF FOLLOWING THESE RECOMMENDATIONS IS NECESSARY TO PROTECT RIPARIAN DEPENDENT RESOURCES, THEY SHOULD BE STANDARDS

WHICH DETERMINE MODIFICATIONS TO OTHER ACTIVITIES THEY SHOULD NOT BE TREATED AS GUIDELINES TO BE FOLLOWED ONLY WHEN DOING SO WOULD NOT AFFECT THE OTHER ACTIVITIES.

FOREST SERVICE RESPONSE

Wording of the standards and guidelines (wildlife) has been changed to reflect these concerns

COMMENT NO. 26: WHERE ARE THE DATA (GENERAL AND DETAILED) TO SHOW THE PRESENT CONDITION OF RIPARIAN ZONES IN TERMS OF ALL THE FACTORS FOR WHICH STANDARDS AND GUIDELINES ARE ESTABLISHED (E.G., PERCENTAGE OF SHADE COVER, SPECIES COMPOSITION, SIZE CLASSES)?

FOREST SERVICE RESPONSE

Except for some of the important steelhead and salmon spawning/rearing streams, this information has not been specifically collected. We are collecting some of it as we work on specific projects or activities such as new grazing allotment environmental assessments, direct habitat improvement, or for some timber sales.

COMMENT NO. 27. THE FOREST MANAGEMENT DIRECTION CALLS FOR THE WWNF "TO MAINTAIN OR ENHANCE THE UNIQUE AND VALUABLE CHARACTER OF RIPARIAN AREAS" (PLAN 4-2). WILL RIPARIAN AREAS BE SIMPLY MAINTAINED OR WILL THEY BE ENHANCED? IF SIMPLE MAINTENANCE IS ADEQUATE, THIS WOULD MEAN THAT THEY ARE ALREADY IN THE DESIRED STATE. WHAT IS THE PRESENT STATE OF RIPARIAN ZONES? AT THE LEAST, SUMMARIES BY SUB-BASIN COULD BE GIVEN. SUMMARIES BY STREAM REACH WOULD BE MORE USEFUL. IF WE HAVE NO IDEA WHAT THE CONDITIONS ARE NOW, WE CANNOT EVALUATE POTENTIAL FOR FUTURE DEGRADATION IN RELATION TO TIMBER HARVEST, GRAZING, AND MINING.

SOME DETAILED EVALUATION OF RIPARIAN CONDITIONS SHOULD BE PRESENTED IN THE FEIS. IF DATA ARE NOT AVAILABLE AT ALL, HOW WILL INTERIM MANAGEMENT BE CONDUCTED SO THAT CONDITIONS WILL BE AT LEAST MAINTAINED?

FOREST SERVICE RESPONSE

The Forest data base for riparian areas is not complete. For much of the Forest, we do not have the information available to quantify riparian conditions by sub-basin or by stream. We plan to obtain such information as will be indicated in the information needs section of Chapter 2 of this plan. Data for riparian areas are normally gathered at the time that an activity is planned such as a rehabilitation project, range allotment plan, or timber sale plan.

COMMENT NO. 28 WHAT ARE ALL THE S & G'S FOR RIPARIAN ZONE MANAGEMENT? A CONCISE LISTING OF THESE SHOULD BE PRESENTED SO THAT SEARCHING THROUGHOUT THE PLAN IS NOT NECESSARY. THIS COMMENT APPLIES TO ALL TYPES OF MANAGEMENT.

FOREST SERVICE RESPONSE

Because numerous activities can affect riparian areas and the standards and guidelines for the various activities on the Forest are broken into categories, it was not possible to place all of the direction for managing riparian areas in one place.

COMMENT NO. 29 WHAT IS THE AVERAGE ROTATION TIME FOR RIPARIAN ZONES OUTSIDE WILDERNESS AREAS? SINCE HARVESTING IN THE RIPARIAN ZONE HAS POTENTIAL FOR REDUCING STREAM SHADE AND FILLING IN SPAWNING GRAVEL WITH SEDIMENT, EACH FOREST WILL PROVIDE FOR MMR'S ON A COORDINATED BASIS (DEIS IV-39) WHAT DOES THIS IMPLY? WILL WILDERNESS AREAS ON ONE FOREST BE USED TO CREATE HIGHER AVERAGE PERCENTAGE SHADE TO AREAS HEAVILY CUT DOWNSTREAM?

FOREST SERVICE RESPONSE

We intend that most riparian areas will be managed under a selection harvest schedule. Although selection harvest does not have a specific rotation period, it will be necessary to retain a component of the stands for 120-150 years to provide 21-inch and larger snags. The statement on page IV-39 of the DEIS is discussing the coordination that occurred among the National Forests in northeast Oregon in identifying the MMR's. Stream shade in wilderness will not be used to permit a higher level of harvest in nonwilderness areas.

COMMENT NO. 30. THE RIPARIAN ZONE WILL BE 60 TO 120 FEET WIDE DEPENDING ON THE STREAM (DEIS). DOES THIS REFER TO WIDTH ON EACH SIDE OF THE CHANNEL?

FOREST SERVICE RESPONSE:

The statement should have read 60-160 feet. The widths are the total for both sides of the stream. Where actual riparian zones are wider or narrower than these averages, management activities will reflect the site-specific situation.

COMMENT NO. 31: IN THE RIPARIAN ZONE, SNAGS WILL BE MAINTAINED AT 60% IN ALL FOREST AREAS (PLAN 4-40). IF 40% OF THE RIPARIAN ZONE IS CUT, HOW CAN THESE SNAG LEVELS BE MAINTAINED?

FOREST SERVICE RESPONSE

Most riparian areas will be managed under selection harvest techniques. This will provide for uneven-aged stands and snags of a variety of sizes. If needed, trees may be intentionally killed (girdled) to provide snags of the desired sizes.

COMMENT NO. 32. HOW ARE ALL THESE VARIED DESCRIPTIONS OF SNAG LEVELS RECONCILED AND WHAT EFFECT WILL THIS HAVE ON WILDLIFE AND INPUT RATES OF LARGE WOOD TO STREAM CHANNELS?

WHAT ARE PRESENT SNAG LEVELS IN RIPARIAN ZONES? ARE THEY NEAR OPTIMUM FOR CAVITY NESTERS?

FOREST SERVICE RESPONSE.

Existing snag or wildlife tree (standing or down) density levels are unknown except for only a small portion of the commercial forestland. We do know, however, that for many areas we are likely at or below the levels required by the plan. We only recently developed a Forest "Dead, Woody Material Management Program." This program emphasizes more wildlife tree inventory, signing, and protection from fuelwood harvest. Riparian zones will certainly be a high priority for wildlife tree management.

COMMENT NO. 33 HOW WILL FUELWOOD GATHERING BE PREVENTED IN RIPARIAN CORRIDORS (INCLUDING THE CHANNEL ITSELF)?

FOREST SERVICE RESPONSE:

Either by individual wildlife tree signing or by closure of larger areas to fuelwood gathering Enforcement, of course, must go along with this.

COMMENT NO. 34: RIPARIAN GUIDELINES (PLAN 4-22) INDICATE THAT STREAM TEMPERATURE CAN BE INCREASED ON CLASS III STREAMS TO THE EXTENT THAT WATER QUALITY GOALS DOWNSTREAM CAN BE MET. IF THE MAJORITY OF STREAMS ON THE FOREST ARE CLASS III AND THESE STREAMS HAVE THE LOWEST STANDARDS, HOW CAN ANY INCREASE IN TEMPERATURE BE CONSIDERED, GIVEN THE FACT THAT SUMMER STREAM TEMPERATURES IN LOWER REACHES OF MOST ANADROMOUS STREAMS OFTEN REACH CRITICAL LEVELS FROM IRRIGATION WITHDRAWAL?

FOREST SERVICE RESPONSE:

Class III streams comprise about 10 percent of all streams on the Forest and about 40 percent of total miles of streams which are either perennial (flow year-long) or contain significant populations of fish. It is often necessary to limit or prevent temperature increases in Class III streams to protect downstream values.

COMMENT NO. 35: RIPARIAN HABITAT MANAGEMENT SHOULD BE THE NUMBER 1 PRIORITY FOR THE WILDLIFE PROGRAM. MUCH OF THE MONEY COULD/SHOULD COME FROM RANGE IMPROVEMENT BUDGET.

FOREST SERVICE RESPONSE:

We agree.

COMMENT NO. 36 RIPARIAN ZONES -- THE RIPARIAN ZONE CONSTRAINT ON THE 20,000 ACRES AS MODELED IN FORPLAN IS NOT JUSTIFIED ANYWHERE IN THE DEIS. THERE IS NO EVIDENCE THAT MAINTAINING MATURE AND OVER MATURE CONIFERS IS REQUIRED TO MAINTAIN STREAM SHADE OR CURRENT WATER TEMPERATURES. MUCH RECENT RESEARCH EVIDENCE SHOWS THAT BROADLEAF TREE AND BRUSH SPECIES ARE FAR SUPERIOR FOR RIPARIAN PROTECTION.

WE RECOMMEND THAT THE WALLOWA-WHITMAN BASE THEIR RIPARIAN RESTRICTIONS ON THE MOST CURRENT RESEARCH DATA. IN THOSE AREAS WHERE ALTERNATIVE VEGETATION IS AVAILABLE, MATURE/OVERMATURE TIMBER SHOULD BE AVAILABLE FOR HARVEST.

FOREST SERVICE RESPONSE:

It is correct that broad-leaved plants provide high-quality stream shade and can protect stream temperatures. The stream channel stability provided by large-diameter fallen trees, however, is not provided where trees are replaced by brush.

COMMENT NO. 37 RIPARIAN, WETLANDS AND MEADOWS, AND ASSOCIATED EDGES SHOULD RECEIVE MUCH MORE PROTECTIVE MANAGEMENT AS SUGGESTED BY ONRC'S MM'S AND ALT.

MANY AREAS ARE IN POOR SHAPE AND NEED FULL REHABILITATION AS SOON AS POSSIBLE. SUCH EMPHASIS ON THESE SPECIAL AREAS DOES NOT COME OUT STRONGLY IN THE DP. EXCELLENT CONDITIONS IN RIPARIAN, WETLAND AND MEADOWS WOULD IMPROVE WATER, FISH, WILDLIFE, AND RECREATION RESOURCES GREATLY

FOREST SERVICE RESPONSE:

We agree that there are numerous riparian areas on the Forest needing protection or rehabilitation. We think that the standards and guidelines, including changes made in the final plan, provide for these needs.

COMMENT NO. 38: THERE ARE MANY OTHER MANAGEMENT AREAS THAT COULD BE INCORPORATED INTO THE WALLOWA-WHITMAN PLAN, INCLUDING SPECIFIC PROTECTION AND REHABILITATION FOR RIPARIAN AND WET MEADOW AREAS. I HAVE HIKEED AND GROUSE HUNTED ALONG MANY SEVERELY ERODED STREAMS AND IN DYING ASPEN GROVES BEAT OUT BY GRAZING. I AM DISTURBED TO SEE THE CONTINUED DEGRADATION. SPECIAL IMPROVEMENT AREAS MUST BE DEVELOPED AND FOLLOWED TO IMPROVE STREAMS, MEADOWS, ETC.

FOREST SERVICE RESPONSE

We believe that direction in the plan will provide for the improvement of riparian zones, including those damaged by excessive grazing.

COMMENT NO. 39. RIPARIAN AREAS AND OLD-GROWTH HABITAT AREAS SHOULD BE KEPT FREE OF LIVESTOCK USE TO THE GREATEST EXTENT POSSIBLE. RIPARIAN AREAS ARE EXTREMELY SENSITIVE TO DEGRADATION BY LIVESTOCK, AND STRINGENT REGULATION OF GRAZING IN THESE AREAS IS IMPLIED BY NFMA. MANAGEMENT GUIDELINES FOR RANGE IN RIPARIAN AREAS IN THE DRAFT PLAN ARE QUITE VAGUE. EVALUATION OF LIVESTOCK USE IN RIPARIAN AREAS SHOULD NOT BE A "COST/BENEFIT" ANALYSIS, BUT SHOULD BE BASED SOLELY ON MAINTAINING THE FULL BIOLOGICAL VIGOR OF SUCH COMMUNITIES. IT SHOULD BE FOREST POLICY TO AVOID GRAZING IN THESE CRITICAL WILDLIFE AND PLANT HABITATS.

AS MENTIONED ABOVE, LIVESTOCK USE OF RIPARIAN VEGETATION SHOULD BE SEVERELY RESTRICTED AND KEPT AT A FAR LOWER LEVEL THAN THAT PROPOSED IN THE DRAFT RIPARIAN PRESCRIPTIONS. WILDLIFE SHOULD NOT HAVE TO COMPETE WITH LIVESTOCK IN THIS MOST IMPORTANT HABITAT TYPE FOR WILDLIFE.

FOREST SERVICE RESPONSE.

We agree with your comments regarding the importance of riparian and have strengthened the direction for their management and improvement, particularly as it relates to livestock grazing. However, we do not agree that all livestock grazing should be removed from these areas. We believe there are ways of maintaining and/or improving these riparian zones while maintaining some level of domestic livestock grazing in this zone. This level of grazing will be significantly less than in the past.

COMMENT NO. 40 YOUR GLIB "OF COURSE" ATTITUDE ABOUT STREAM PROTECTION FOREST WIDE DOESN'T TAKE YOUR PROPOSED ROAD CONSTRUCTION IN ASHY SOILS AND/OR GRANITIC SOILS INTO ACCOUNT VERY WELL. BETTER ROAD STANDARDS OF DITCHING, CULVERTS, AND GRAVELLING WOULD HELP ACHIEVE THAT END, YET I SEE POOR ROAD CONSTRUCTION THROUGHOUT THE FOREST, PRESUMABLY TO REDUCE COSTS. THE RESULT-

ING SILTATION OF STREAMS AND EROSION FROM THESE ROADS CONSIDERABLY REDUCES STREAM QUALITY THROUGHOUT THE FORESTS, OR MAYBE IT'S JUST THE COWS.

FOREST SERVICE RESPONSE

We do need to deal with problems associated with road building near streams, particularly where we encounter highly erodible soils. Road standards have been reduced in past years, but we have tried not to lower standards too much in sensitive areas. As you mention, erosion protection with gravel surfacing, surface cross-drain, ditches, and other methods are essential to the protection of streamside zones, and we will continue to use such measures.

COMMENT NO. 41: PAGE IV-42 PLEASE DETAIL WHAT THE MEASURES ARE THAT WILL PROTECT STREAM CORRIDORS AND RIPARIAN AREAS THAT ARE MENTIONED IN THE FIRST PARAGRAPH

FOREST SERVICE RESPONSE

These measures are found in Chapter 4 of the Forest Plan (Standards and Guidelines)

COMMENT NO. 42: PLEASE EXPLAIN WHAT TYPE OF COST AND BENEFIT ANALYSIS WILL BE DONE ON RIPARIAN IMPROVEMENT AND PROTECTION PROJECTS.

FOREST SERVICE RESPONSE:

We typically will evaluate the following for at least a 10-year period

- Dollar benefits associated with increased fish numbers and size, increased forage volume, and administration of livestock and grazing plans.
- Costs associated with construction and maintenance of fences and stream habitat enhancement structures, reduction in livestock numbers (rancher cost), and administration of livestock and grazing plans
- Non-monetary benefits of raised water table -- high/low flows, wildlife, including "non-catchable" aquatic species and diversity, ground-nesting bird nest production, aesthetic improvements, stream channel stability and water quality improvement, and increased WFUD's or pounds of fish.

COMMENT NO. 43 IN MA-18 "RANGES WILL BE MANAGED TO PROTECT AND IMPROVE RIPARIAN VEGETATION AND FISH HABITAT" HOW WILL THIS BE DONE IN DETAIL? HOW WILL CATTLE BE KEPT OUT OF STREAM CHANNELS? WHAT IS THE NATURAL STATE OF STREAM BANKS FOR DIFFERENT STREAM CLASSES WITHOUT GRAZING IMPACTS? WHAT STANDARDS WILL BE APPLIED TO BANK DEGRADATION?

FOREST SERVICE RESPONSE:

The Forest Plan, and MA-18, set overall direction for grazing in riparian zones. The specific methods and timeframes for accomplishing this will be developed in allotment management plans. In the case of MA-18, all within the North Fork John Day Drainage, we have either inactive grazing allotments or current allotment management plans to keep cattle, or elk, or

deer, entirely out of stream channels We will, however, restrict any potential for long-term damage by their presence

COMMENT NO. 44: RIPARIAN HABITAT WILL BE MANAGED CONSISTENT WITH FSM 2500 AND 2600 (PLAN 4-40) WHAT DOES THIS MEAN? "WHERE PRACTICAL," THE MANAGEMENT OBJECTIVES FOR RIPARIAN ZONES OUTLINED BY THE INTERAGENCY COMMITTEE WILL BE FOLLOWED (PLAN 4-40)? WHAT ARE THESE OBJECTIVES, WHO SITS ON THIS COMMITTEE, AND WHY WILL THE OBJECTIVES BE ONLY ADHERED TO WHEN PRACTICAL? WHAT IS THE DEFINITION OF PRACTICAL - (CONVENIENT)?

TO WHAT EXTENT WILL RULES FOR RIPARIAN MANAGEMENT BE MADE ON A "CASE-BY-CASE BASIS" (PLAN 4-23) TO PROTECT CHANNEL STABILITY AND WATER QUALITY? RIPARIAN GUIDELINES IN GENERAL NEED TO BE MUCH MORE EXPLICITLY DEFINED. QUALIFIED STATEMENTS SHOULD BE MADE CONCRETE FOR EXAMPLE, "TO THE EXTENT PRACTICAL, ROADS WILL NOT BE CONSTRUCTED THROUGH THE LENGTH OF RIPARIAN AREAS." ALSO "USE OF HEAVY EQUIPMENT WITHIN RIPARIAN ECOSYSTEMS WILL BE AVOIDED TO THE EXTENT PRACTICAL." WITHOUT SPECIFYING EXCEPTIONS CLEARLY, PRACTICALITY SIMPLY EQUATES TO EXPEDIENCY.

FOREST SERVICE RESPONSE:

The words "where practical" and "to the extent practical" have been removed from the text. More specific standards and guidelines have been added, although in most situations, they will need to be tailored to the characteristics of the specific riparian area.

COMMENT NO. 45 WATERSHED: STREAM MANAGEMENT UNITS SHOULD INCLUDE 100 FOOT BUFFER ZONES ON EACH SIDE OF STREAMCOURSES WITH ALL VEGETATION RETAINED FOR SOIL STABILIZATION, SHADE, AND FUTURE IN-STREAM HABITAT WITHIN THESE BUFFER ZONES NO GRAZING, OFF ROAD MOTORIZED USE, OR PESTICIDE APPLICATION SHOULD BE ALLOWED. ROADS SHOULD NOT BE BUILT WITHIN THESE ZONES EXCEPT TO CROSS THE STREAMCOURSES THESE UNDISTURBED BUFFER ZONES WOULD SERVE TO MEET SOME OF THE FOREST'S NEED FOR OLD GROWTH AND SNAGS AS WELL AS PROVIDING AESTHETIC VALUES

FOREST SERVICE RESPONSE:

We believe that adequate stream protection can be provided without completely excluding riparian areas from management activity.

COMMENT NO. 46 SCHEDULED TIMBER HARVEST ACTIVITIES OF ANY KIND ARE NOT APPROPRIATE IN RIPARIAN ZONES CLEARCUTTING AND CANOPY REMOVAL HARVESTS ARE PARTICULARLY OBJECTIONABLE AND DESTRUCTIVE TO THE PRIMARY VALUES OF RIPARIAN ZONES. MAINTENANCE OF THE FULL RANGE OF STRUCTURAL AND SPECIES DIVERSITY IN RIPARIAN FORESTS IS ESSENTIAL TO THE PRESERVATION OF QUALITY HABITATS AND A FULL RANGE OF ASSOCIATED WILDLIFE SPECIES. MANY BIRD SPECIES ARE DEPENDENT ON THE UPPER STORIES OF COMPLEX RIPARIAN FOREST COMMUNITIES. DEDICATED OLD GROWTH RIPARIAN FORESTS SHOULD BE ESTABLISHED THROUGHOUT THE FOREST

FOREST SERVICE RESPONSE:

We believe that adequate stream protection can be provided without completely excluding riparian areas from management activity. For example, in some cases removal of some tree

shade will enhance growth of understory trees and brush and increase wildlife habitat and species diversity

COMMENT NO. 47: BUFFER STRIPS SHOULD BE WIDENED SIGNIFICANTLY, AND ENFORCEMENT OF TIMBER HARVEST REGULATIONS NEAR BUFFER STRIPS SHOULD BE STRICTLY ENFORCED. FAR TOO OFTEN BUFFER STRIPS ARE PROTECTIONS OF THE RIPARIAN ZONE ON PAPER ONLY, WITH SEVERE ABUSES OCCURRING THROUGH SLOPPY OR NEGLIGENT TIMBER HARVEST METHODS AND POOR OR LAX INSPECTION NO TIMBER UNITS SHOULD BE LAID OUT THAT WOULD RESULT IN TREES FALLING INTO AND, THUS, DESTROYING BUFFER ZONES.

FOREST SERVICE RESPONSE:

Thank you for your comment.

COMMENT NO. 48 I BELIEVE IN PROTECTING RIPARIAN ZONES AND SEE NO PROBLEM WITH THE OLD-GROWTH CONCEPT, BUT I FEEL MANY OF THE ZONES COULD SERVE THE SAME PURPOSE

FOREST SERVICE RESPONSE

Where possible, designated old-growth patches were placed in riparian areas

COMMENT NO. 49: THE PLAN SHOULD NOT ALLOW FOR ANY MAJOR LOGGING ALONG THE MANY IMPORTANT STREAMS AND RIVERS IN THE AREA AND THEY SHOULD BE MAINTAINED IN THEIR PURE CLEAN STATE SO THAT OREGON'S FISH HABITAT IS NOT FURTHER ERODED BY POOR LAND MANAGEMENT

FOREST SERVICE RESPONSE:

We believe that adequate stream protection can be provided without completely excluding riparian areas from management activity

COMMENT NO. 50: ALL MANAGEMENT GUIDELINES FOR RIPARIAN ZONES SHOULD BE FOREST-WIDE, INCLUDING THOSE FOR GRAZING. THE PROPOSAL TO ESTABLISH REGULATIONS FOR EACH ALLOTMENT SHOULD ONLY OCCUR IN THE FRAMEWORK OF STRINGENT FOREST-WIDE RESTRICTIONS ON GRAZING IN RIPARIAN ZONES

FOREST SERVICE RESPONSE:

Guidelines for riparian zones are Forest-wide. Within each riparian zone and each grazing allotment, specific direction will be developed, which complies with the Forest Plan direction, and which will result in either maintenance of a good condition or the improvement to a good condition riparian zone

COMMENT NO. 51: THE GOALS AND STANDARDS ON PAGES 4-40/42 OF THE PLAN NEED TO BE CLARIFIED AND STRENGTHENED

THE SECOND PARAGRAPH ON PAGE 4-41 SAYS "...WHERE EVEN-AGED SILVICULTURE WILL MEET RIPARIAN AREA OBJECTIVES, ITS APPLICATION IS ACCEPTABLE" EVEN-AGED

SILVICULTURE IS NOT COMPATIBLE WITH FISH AND WILDLIFE IN RIPARIAN ZONES. THE NEED FOR STREAMSIDE SHADE HAS BEEN WELL DOCUMENTED IN NORTHEAST OREGON AS HAS THE NEED FOR INSTREAM WOODY STRUCTURE PROVIDED BY TREES FALLING INTO THE STREAM FROM THE RIPARIAN ZONE. THE DEPARTMENT RECOMMENDS THAT ANY TIMBER HARVEST IN RIPARIAN ZONES BE DESIGNED ONLY TO BENEFIT THE RESOURCES INHERENT IN RIPARIAN ZONES. IN OUR OPINION, THIS PRECLUDES EVEN-AGED SILVICULTURE IN RIPARIAN ZONES.

FOREST SERVICE RESPONSE:

There has been some strengthening of the standards and guidelines as you have suggested. However, we disagree that even-aged silviculture is unacceptable anywhere in a riparian zone. We believe that the guidelines are adequately specific for the location and extent of riparian zone timber management. Actual timber harvest will be designed to have an overall beneficial or improvement effect on the zone.

COMMENT NO. 52: I REQUEST THAT THE FOREST PLAN GIVE SPECIAL CONSIDERATION TO ANY MINING THAT MIGHT EVENTUALLY OCCUR ON FOREST SERVICE LANDS ALONG PINE CREEK FROM CARSON TO CORNUCOPIA. THIS FIVE MILE STREAM REACH IS THE ONLY SECTION ON ALL OF PINE CREEK'S COURSE THAT IS SIGNIFICANTLY FORESTED AND AT THE SAME TIME IN THE MOUNTAINOUS, RECREATIONAL AREA OF THE WALLOWA-WHITMAN NATIONAL FOREST. HOWEVER, BECAUSE OF THE PRESENCE OF GOLD AND THE INTEREST OF MINING COMPANIES IT NOW APPEARS THAT EXISTING STREAMSIDE VEGETATION MAY BE REMOVED FROM THE ENTIRE FIVE MILE-LONG CARSON-TO-CORNUCOPIA STRETCH, INCLUDING THE RELATIVELY SMALL STRETCHES OF NATIONAL FOREST ALONG IT.

FOREST SERVICE RESPONSE:

We will work closely with miners who may operate on National Forest land to reduce environmental impacts and see that placer mine areas are restored.

**THREATENED AND ENDANGERED SPECIES
Code 460**

COMMENT NO. 1 THE DEIS AND PLRMP MAKE NUMEROUS REFERENCES TO FSM 2670 AND FSM 1920. THE INCLUSION OF THESE DOCUMENTS WITHIN THE DEIS, ITS APPENDICES, OR PLRMP WOULD HAVE FACILITATED REVIEW OF THE FOREST PLAN'S IMPACTS ON THREATENED AND ENDANGERED SPECIES. HOWEVER, IT APPEARS THAT THE DEIS AND PLRMP CONTAIN ADEQUATE PROVISIONS FOR CONSULTATION WITH THE FISH AND WILDLIFE SERVICE (FWS) IN ACCORDANCE WITH SECTION 7(A)(2) OF THE ENDANGERED SPECIES ACT OF 1973, AS AMENDED (ESA), IF A DETERMINATION IS MADE DURING PROJECT DESIGN AND ANALYSIS THAT AN ACTION MAY AFFECT A LISTED SPECIES.

FOREST SERVICE RESPONSE

The numbers refer to Forest Service manuals for wildlife management and land management planning. Including them within the planning documents would have added a great deal of material that would not be of interest to most reviewers. It is readily available upon request.

COMMENT NO. 2: THE REINTRODUCTION OF EXTIRPATED SPECIES SHOULD BE EFFECTED INTO SUITABLE HABITAT.

FOREST SERVICE RESPONSE

We do participate with the Fish and Wildlife Service in the development and implementation of recovery plans for T&E plant and animal species, including extirpated species.

COMMENT NO. 3: THE FOLLOWING IS A LIST OF SOME INCIDENTAL SIGHTINGS OF PLANT SPECIES OF SPECIAL CONCERN MADE DURING A FIELD TRIP TO THE EAGLE CAP WILDERNESS IN EARLY JULY 1984.

STATE LISTED SENSITIVE SPECIES:

1. CASTILLEJA RUBIDA -8/14/84-FAIRLY COMMON ON UPPER SLOPES ON NORTHEAST SIDE OF MATTERHORN. THIS IS THE ONLY SPOT THIS SPECIES WAS SEEN, THOUGH I HAVE A REPORT FROM ANOTHER OBSERVER OF A POPULATION ON THE EAST SIDE OF JOSEPH MOUNTAIN.

INVENTORY NEEDED LIST (I):

- 1 CASTILLEJA GLANDALIFERA - SMALL POPULATION ALONG GRAVEL MAINTENANCE ROAD AT THE ANTHONY LAKES SKI SLOPE. 8/11/84
2. DRYAS OCTOPETALA - SMALL POPULATION, N.E FLANK OF THE MATTERHORN, 8/14/84
3. HALSEA ALGIDA - SINGLE PLANT IN GRANITIC SAND AT BACK OF RIDGE WALL W OF JEWETT LAKE. 8/12/84
4. POLEMONIUM VISCOSUM - SMALL POPULATION IN ROCK CREVICE ALONG RIDGE TOP ON NORTH SIDE OF PETE'S POINT 8/12/84

STATUS INSUFFICIENTLY KNOWN (2).

1. CASTILLEJA FRATERNA - PLANTS UNCOMMON AND SCATTERED LOCALLY IN CONSOLIDATED TALUS ON N E RIDGE SLOPE ARM FROM PETE'S POINT AND ON LOWER SLOPES OF NORTH-FACING RIDGE RUNNING EAST FROM TENDERFOOT PASS

I HOPE THESE OBSERVATIONS WILL HELP AUGMENT YOUR RARE SPECIES FILES FOR THE EAGLE CAP.

FOREST SERVICE RESPONSE:

Thank you very much. We maintain a record of sightings at the Supervisor's Office as well as at the Oregon Natural Heritage Data Base in Portland. We will double check your sightings with known populations. If your sightings are different, we will ask you to complete key portions of a sighting form for inclusion of your sighting into the records.

COMMENT NO. 4. THE DEIS AND PLRMP MAKE NO CLEAR STATEMENT AS TO WHICH ACTIONS MAY OR MAY NOT AFFECT LISTED THREATENED AND ENDANGERED SPECIES. IN ADDITION, CONSERVATION MEASURES IDENTIFIED WITHIN THE DEIS AND PLRMP DO NOT PROVIDE SUFFICIENT INFORMATION (I.E. STANDARDS AND GUIDELINES FOR THE MANAGEMENT OF BALD EAGLES) TO BE ABLE TO ENTER INTO FORMAL CONSULTATION AT THIS TIME.

FOREST SERVICE RESPONSE:

At the time we prepared the standards and guidelines for threatened, endangered, and sensitive species (page 4-28) portion of the Draft Plan, we believed that the general restrictive language relating to these species would be adequate. We have since decided to include more specific language relating to existing and potential status of the species population and probable management restrictions to maintain or enhance such populations.

COMMENT NO. 5. THE FWS ENCOURAGES THE WALLOWA-WHITMAN NATIONAL FOREST'S (FOREST) EFFORTS TO DEVELOP AND IMPLEMENT PLANS WHICH INCORPORATE ELEMENTS OF RECOVERY PLANS AND BEST AVAILABLE TECHNIQUES FOR SPECIES CONSERVATION. SHOULD THE FOREST DETERMINE AN ACTION MAY AFFECT A LISTED SPECIES, IT IS REQUIRED TO INITIATE CONSULTATION WITH FWS.

FOREST SERVICE RESPONSE:

True, in past practices we have determined that the majority of our activities have not jeopardized our sensitive species. When a listed plant has come under potential threat from a project, the planner has consulted with the Forest T&E Officer who has, in turn, communicated with FWS on Federally-listed species. There have been no formal consultations with the following two exceptions - *Mirabilis macfarlanei* and *Lomatium greenmannii*.

COMMENT NO. 6. PAGE 5-2 AND 5-5 - THE MONITORING PLAN FOR THREATENED AND ENDANGERED SPECIES SHOULD BE MORE SPECIFIC. THE BALD EAGLE, PEREGRINE FALCON, AND MACFARLANE'S FOUR O'CLOCK SHOULD BE ADDRESSED SEPARATELY WITH SEPARATE OBJECTIVES FOR EACH. THE FWS'S RECOVERY PLANS PROVIDE A STEPDOWN OUTLINE WHICH MAY BE USED TO IDENTIFY SPECIFIC OBJECTIVES.

THE FWS ENCOURAGES THE FOREST'S EFFORTS TO SURVEY AND MONITOR FEDERAL CANDIDATE AND SENSITIVE SPECIES. THE MONITORING PLAN SHOULD BE EXPANDED TO INDICATE SPECIFIC OBJECTIVES FOR FEDERAL CANDIDATES AND OTHER SENSITIVE SPECIES.

FOREST SERVICE RESPONSE.

We need specificity with regard to monitoring certain listed plant species. These monitoring plans will be drawn up as part of a long-range T&E program planning venture this year. We do not believe they should be part of the DEIS or the LMP, however. The recovery plan for *Mirabilis macfarlanei* is also too specific for this planning hierarchy.

COMMENT NO. 7. OUR PRIORITIES HAVE GOTTEN MIXED UP; WE WILL GIVE A PAIR OF SPOTTED OWLS MILLIONS OF DOLLARS WORTH OF RESOURCE AND AT THE SAME TIME TURN OUR BACK ON THE NECESSITIES OF LIFE FOR OUR YOUNG EMERGING FAMILIES OF THE FUTURE. IF WE TOOK ALL THE VALUE IN PROPOSED WILDERNESS AREAS AND WILDLIFE HABITAT AND GAVE THAT SAME VALUE TO THE ECONOMIC SYSTEM, THE EFFECT ON SOCIETY WOULD BE SO DRAMATIC IN THAT MILLIONS OF COMMON EVERYDAY FAMILIES WOULD BENEFIT. WE WOULD CREATE OR SAVE MILLIONS OF JOBS, AND WE WOULD PROVIDE HEALTH AND SHELTER FOR MILLIONS OF FAMILIES.

FOREST SERVICE RESPONSE.

Thank you for your comment.

COMMENT NO. 8. THREATENED, ENDANGERED, AND SENSITIVE SPECIES. IN ADDITION TO PROTECTING AND MANAGING HABITAT FOR THESE CLASSIFICATIONS OF ANIMALS AND PLANTS, WE RECOMMEND THAT THE FOREST SERVICE COOPERATE WITH THE U.S. FISH AND WILDLIFE SERVICE AND THE OREGON DEPARTMENT OF FISH AND WILDLIFE TO RESTORE LOCALLY EXTINCT SPECIES, SUCH AS THE GRIZZLY BEAR, WOLF, AND BISON TO THEIR FORMER RANGES. THESE SPECIES WOULD PROVIDE A HEIGHTENED FEELING OF WILDERNESS, FILL ECOLOGICAL NICHES, AND SOMEDAY PROVIDE RARE HUNTING EXPERIENCES.

FOREST SERVICE RESPONSE

We will fully cooperate with both agencies in restoring populations for species identified in recovery plans. The Wallowa-Whitman National Forest has not been identified as a part of the recovery plan for these three species.

COMMENT NO. 9. IF LOCATION OR EXISTENCE OF T AND E SPECIES IS UNKNOWN DUE TO LACK OF SURVEYS, HOW CAN PLANNING ENSURE THEIR EXISTENCE?

FOREST SERVICE RESPONSE.

Surveys for threatened, endangered, and sensitive species are planned and conducted prior to any activity that could disturb the species or their habitat. If the species is found, measures will be implemented to protect and mitigate the species and its habitat. For some species, surveys will be conducted prior to any planned activity (such as some of the birds and mammals).

COMMENT NO. 10 IMPACTS FROM GRAZING MAY BE THE LARGEST SOURCE OF THREAT TO SENSITIVE AND ENDANGERED PLANTS IS IT ANY WONDER THAT THESE PLANTS SEEM TO BE FOUND ONLY IN ROCKY AREAS DIFFICULT FOR CATTLE TO TRAMPLE?

FOREST SERVICE RESPONSE:

Grazing may be the primary source of damage to plants and their habitats. However, we still see plants occupying their historical habitats when overgrazing occurs, though their numbers may be reduced. Many of the plants listed are enhanced by disturbance rather than imperiled.

COMMENT NO. 11 THREATENED AND ENDANGERED SPECIES LISTED PURSUANT TO THE ACT SHOULD BE ADDRESSED SEPARATELY IN THE PLAN FROM ADMINISTRATIVELY DESIGNATED "INDICATOR" OR "SENSITIVE" SPECIES WHOSE CLASSIFICATION QUITE POSSIBLY MAY HAVE NOTHING TO DO WITH CONTINUED SURVIVAL OF THESE MORE COMMON SPECIES

FOREST SERVICE RESPONSE

The term "sensitive" denotes those species that are rare, threatened, endangered, or which bear our watching or sensitivity. The threatened or endangered species listed pursuant to the act are included unless we have deleted them through proper channels with the US Fish and Wildlife Service and State organizational groups.

COMMENT NO. 12: IT WOULD BE HELPFUL FOR REVIEW PURPOSES IF THE FOREST SERVICE SENSITIVE SPECIES WERE LISTED IN THE DRAFT EIS FOREST PLAN APPENDICES

FOREST SERVICE RESPONSE

That list is available at the National Forest Headquarters.

COMMENT NO. 13: THE WALLOWA-WHITMAN NATIONAL FOREST PLAN PROVIDES A GOOD BASIS FOR THE PROTECTION OF RARE PLANT RESOURCES IN THE STANDARDS AND GUIDELINES SECTION CHAPTER 4. THE DIRECTION GIVEN IN THIS SECTION WILL REDUCE THE LIKELIHOOD THAT A SENSITIVE SPECIES WILL BE INADVERTENTLY LOST DUE TO FOREST MANAGEMENT ACTIONS. THE ONLY ADDITION TO THIS DIRECTIVE THAT WE WOULD LIKE TO SEE INCLUDED IS THAT A BOTANICAL SURVEY WOULD ALWAYS BE CONDUCTED IN PROJECT AREAS, NOT JUST WHEN THERE IS AN INDICATION THAT A SPECIES OF CONCERN MAY BE LOCATED IN THE PROJECT AREA. BOTANICAL SURVEYS NOT ONLY EXTEND OUR KNOWLEDGE OF RARE SPECIES RANGES, BUT ALSO PROVIDE VALUABLE INFORMATION ON PLANT COMMUNITIES AND OCCASIONALLY LEAD TO THE DISCOVERY OF PREVIOUSLY UNDESCRIBED SPECIES OR SPECIES NOT SUSPECTED FROM THE AREA. BECAUSE OF THE GREAT NUMBER OF RARE PLANT SPECIES LOCATED ON THE WALLOWA-WHITMAN NATIONAL FOREST, THE NATURE CONSERVANCY BELIEVES THAT THE FOREST HAS THE RESPONSIBILITY TO CONDUCT INTENSIVE SURVEYS FOR SEVERAL SPECIES THAT OCCUR IN THE ELKHORN MOUNTAINS ROADLESS AREA AND THE EAGLE CAP AND HELLS CANYON WILDERNESS AREAS. THESE SPECIES INCLUDE:

ASTRAGALUS ROBBINSII VAR ALPINIFORMIS
CASTILLEJA FRATERNA
CASTILLEJA RUBIDA
ERIGERON CHRYSOPSIDIS VAR BREVIFOLIUS
ERIOGONUM SCOPULORUM

LEPTODACTYLON HAZELAE
 LESQUERELLA KINGIL SUBSP. DIVERSIFOLIA
 LOMATIUM ERYTHROCARPUM
 LOMATIUM GREENMANII
 LOMATIUM OREGANUM
 LOMATIUM ROLLINSII
 MIMULUS HYMENOPHYLLUS

TWO OF THE ABOVE SPECIES, ASTRAGALUS ROBBINSII VAR ALPINIFORMIS AND ERIOGONUM SCOPULORUN, HAVE NOT BEEN SIGHTED FOR A NUMBER OF YEARS AND THUS NEED IMMEDIATE SURVEYS TO DETERMINE THEIR EXISTENCE LOMATIUM GREENMANII IS THREATENED BY EXCESSIVE RECREATIONAL USE IN THE EAGLE CAPS AND LOMATIUM ERYTHROCARPUM IS POTENTIALLY THREATENED BY THE MOUNTAIN GOATS INTRODUCED TO THE ELKHORNS.

THE PLANTS ON THIS LIST ARE FOR THE MOST PART LISTED AS THREATENED OR ENDANGERED THROUGHOUT THEIR RANGE BY THE OREGON NATURAL HERITAGE DATA BASE. ALL OF THE SPECIES ON THIS LIST ALSO OCCUR ON THE USDA FOREST SERVICE REGION 6 SENSITIVE PLANT LIST (REVISED FEBRUARY, 1960). SURVEYS WILL ASSIST THE U.S. FISH AND WILDLIFE SERVICE IN MAKING DETERMINATIONS ABOUT THE STATUS OF THESE SPECIES. THE SURVEYS WILL ALSO PROVIDE INFORMATION ON THE CURRENT AND POTENTIAL THREATS TO THE SPECIES AND WHAT MAY BE DONE TO REDUCE OR ELIMINATE THESE THREATS. WE WOULD LIKE TO RECOMMEND THAT THE MONITORING OF T AND E SPECIES BE INCLUDED IN THE MANAGEMENT AREA 4--WILDERNESS (P 4-56, FOREST PLAN) AS THREATS FROM RECREATIONAL USE ARE APPARENT. ALSO THE LIMITS OF ACCEPTABLE CHANGE (LAC) FOR T AND E SPECIES NEEDS TO BE INCLUDED IN THE MONITORING PLAN FOR THE EAGLE CAPS (APPENDIX B)

FOREST SERVICE RESPONSE

We would like to be able to survey all our landscape for threatened, endangered, and sensitive species. Unfortunately, funding is not available for this level of inventory and it is necessary to prioritize our work. There are a great number of sensitive species endemic to northeast Oregon and the Wallowa-Whitman National Forest and we, consequently, receive a disproportionately large share of the inventory funding available. It is still necessary, however, to concentrate our efforts in areas where management activities pose the greatest risk.

Our list of species may differ from that of the Nature Conservancy as to prioritization. However, several of the species listed in the response have received special emphasis in our inventory activities.

We agree with the importance of monitoring threatened, endangered and sensitive species. We believe that the Forest Plan Monitoring Plan (Chapter 5) provides the framework for the type of monitoring you have suggested.

COMMENT NO. 14 IN ADDITION TO CONDUCTING SURVEYS FOR PLANT SPECIES ON THE FOREST SERVICE SENSITIVE LIST IT MAY BE NECESSARY IN SOME CASES TO PREPARE SPECIES MANAGEMENT GUIDES. A SPECIES MANAGEMENT GUIDE IS A PLANNING DOCUMENT THAT IS DEVELOPED IN CONJUNCTION WITH FIELD SURVEYS FOR A PARTICULAR SPECIES THAT IS THREATENED AND IN NEED OF IMMEDIATE ACTION. A GUIDE CAN DEFINE SPECIFIC MANAGEMENT DIRECTION FOR A SPECIES, SET UP A MONITORING PROGRAM FOR THE PLANT AT SEVERAL POPULATIONS, AND IN GENERAL, PROPOSE A STRATEGY FOR THE CONTINUED PRESERVATION OF THE SPECIES. ON THE WALLOWA-WHITMAN NATIONAL FOREST SEVERAL SPECIES COULD BENEFIT FROM SUCH A TREATMENT. THESE INCLUDE CASTILLEJA

FRATERNA , ERIGERON CHRYSOPSIS VAR BREVIFOLLUS, LOMATIUM ERYTHROCARPUM, AND LOMATIUM GREENMANII DEVELOPMENT OF SUCH MANAGEMENT GUIDES CAN TAKE THE PLACE OF FEDERAL LISTING OF SPECIES, THUS KEEPING THE PROTECTION OF THE SPECIES PRIMARILY THE RESPONSIBILITY OF THE FOREST SERVICE AND ALLOWING FOR GREATER FLEXIBILITY IN MANAGING FOR IT.

FOREST SERVICE RESPONSE:

We agree

COMMENT NO. 15 3 ANALYSIS OF THE IMPACTS OF THE PROPOSED GRAZING LEVELS (AND OTHER LAND DISTURBING ACTIVITIES) ON NATIVE PLANT COMMUNITIES AND ON SENSITIVE PLANTS, IN PARTICULAR, IS HIGHLY INADEQUATE. DEIS P IV-40 STATES THAT: "NO ADVERSE EFFECT IS ANTICIPATED IN ANY ALTERNATIVE ON ANY THREATENED OR ENDANGERED PLANT SPECIES." YET NOWHERE DOES THE PLAN INDICATE PRECISELY HOW THIS HAS BEEN DETERMINED NOR DOES IT OUTLINE A CLEAR PROGRAM FOR IDENTIFICATION AND MITIGATION OF POTENTIAL IMPACTS TO SENSITIVE SPECIES. NFMA REGULATIONS REQUIRE FOREST SERVICE PLANS TO "PRESERVE AND ENHANCE THE DIVERSITY OF PLANT AND ANIMAL COMMUNITIES .", YET MANY OF THE PRESCRIPTIONS IN THE DRAFT PLAN, INCLUDING THOSE COVERING TIMBER HARVEST, GRAZING AND ORV ACTIVITIES, WILL HAVE EXACTLY THE OPPOSITE EFFECTS. IT IS INCUMBENT UPON THE FOREST SERVICE TO PROVIDE (THERE IS PRESENTLY NONE) GOOD DOCUMENTATION TO JUSTIFY THE ASSUMPTION THAT MANAGEMENT ACTIVITIES WILL NOT ADVERSELY AFFECT NATIVE PLANT COMMUNITIES AND SENSITIVE PLANT SPECIES

FOREST SERVICE RESPONSE:

In a general statement, it is appropriate to say that our management will have no adverse effects on listed sensitive plant populations We will modify our plans on a project-by-project basis as we encounter sensitive plants.

COMMENT NO. 16 6. DRAFT PLAN P 4-47 STATES. "NATURAL GRASSLANDS AND MEADOWS WILL BE RECOGNIZED PRIMARILY FOR THE FORAGE VALUE AND HABITAT THEY PROVIDE." WHAT DOES THIS MEAN? BECAUSE THESE AREAS ARE ALSO AMONG THOSE MOST SENSITIVE TO PLANT COMMUNITY DISRUPTION BY GRAZING, IT IS ALL THE MORE IMPORTANT THAT GRAZING LEVELS BE REDUCED ON THESE LANDS, NOT INCREASED. THESE LANDS HAVE FOR TOO LONG BORNE THE BRUNT OF LIVESTOCK GRAZING PRESSURES

FOREST SERVICE RESPONSE:

Wildlife and domestic stock are part of our multiple use ethic. Grasslands and meadows do provide the majority of their food intake and prime habitat for many species of animals. Grazing levels will be set and monitored to assure that overgrazing does not degrade these lands We are living today with effects of past overgrazing, and in some areas, the effects of recent overgrazing Many of our primary rangelands exhibit an upward trend in vegetative condition and habitat improvement.

COMMENT NO. 17: WHILE THE DEIS (P. III-70) INDICATES AN ADMIRABLE CONCERN AND A GOOD BEGINNING POLICY TOWARDS THE PROTECTION OF LISTED SENSITIVE PLANT SPECIES, A MUCH MORE THOROUGH KNOWLEDGE OF THE STATUS AND DISTRIBUTION OF THESE SPECIES ON THE FOREST IS ESSENTIAL TO THEIR PROPER MANAGEMENT. APPENDIX B, P. 16 INDICATES THAT, WITH ONE EXCEPTION, THERE "HAS BEEN NO CONCERTED EFFORT TO

LOCATE AND CLASSIFY* LISTED SPECIES IN THE EAGLE CAP WILDERNESS WHY IS THIS SO? IF YOU ARE TO PROPERLY MANAGE FOR THE RETENTION OF THESE SPECIES, YOU NEED GOOD INFORMATION ON THEIR OCCURRENCE FOREST-WIDE THIS CENSUSING SHOULD BE A MANAGEMENT PRIORITY. CASTILLEJA RUBIDA, A LISTED SENSITIVE SPECIES THAT OCCURS ONLY IN THE EAGLE CAP, IS NOT EVEN MENTIONED IN THE ABOVE ASSESSMENT. IN ADDITION, A THOROUGH FIELD CENSUS SHOULD BE PREPARED BY COMPETENT BOTANISTS FOR ALL PROJECT AREAS PRIOR TO PROJECT APPROVAL THIS IS THE ONLY MANNER IN WHICH IT CAN REASONABLY BE ASSURED THAT SENSITIVE PLANT SPECIES WILL NOT BE ADVERSELY AFFECTED BY THE PROJECT IN QUESTION.

FOREST SERVICE RESPONSE.

See response to Comment No. 13

COMMENT NO. 18: APPENDIX G, PAGE G-14, TABLE 20 - REGARDING MACFARLANE'S FOUR O'CLOCK, WE ENCOURAGE THE FOREST'S EFFORTS TO MONITOR EXISTING COLONIES AND INCLUDE APPROPRIATE MANAGEMENT DIRECTIONS FOR MONITORING

FOREST SERVICE RESPONSE.

This will be part of a multi-year monitoring plan.

COMMENT NO. 19: I ALSO TAKE EXCEPTION TO YOUR STATEMENT THAT THERE IS ONLY ONE SP OF ENDANGERED PLANT ON THE FOREST OUTSIDE THE WILDERNESS. I KNOW OF OTHER SPP THAT OCCUR HERE OR THAT HAVE UNDETERMINED STATUS IN NE OREGON. HAS AN EXTENSIVE AND INTENSIVE SURVEY EVER BEEN DONE FOREST-WIDE BY A QUALIFIED BOTANIST? THE NATIVE PLANT SOCIETY & OREGON NATURAL HERITAGE MIGHT HELP YOU

FOREST SERVICE RESPONSE

By federal regulation, there currently is only one plant species listed as endangered on the Willowa-Whitman This is *Mirabilis macfarlanei* which occurs in the canyonlands at low elevations. The status of plants is determined by State and Federal agencies with input from members of the Native Plant Society, Oregon Natural Heritage, and other qualified botanist through a system which leaves the Forest Service principally in the mode of administering to the determined status. Survey is predicated on funding We need more funding in order to more fully survey our lands for sensitive species

COMMENT NO. 20. AS PROJECTS ARE PLANNED, A CHECK IS MADE FOR SENSITIVE PLANTS IF ANY ARE FOUND, A BIOLOGICAL EVALUATION (BE) IS NECESSARY (PLAN 2-23) HOW OFTEN ARE THESE DONE?

FOREST SERVICE RESPONSE

Biological evaluations are very common

COMMENT NO. 21: SURVEYING FOR T AND E PLANTS WILL BE DONE EVERY FIVE YEARS (PLAN 5-5). WHAT IS KNOWN ABOUT PRESENT DENSITIES OF SENSITIVE PLANTS?

FOREST SERVICE RESPONSE:

The present dispersion and population sizes are known for many species but not all. Additional surveys will be completed as funding permits.

COMMENT NO. 22 FEDERALLY LISTED AND FOREST SERVICE SENSITIVE LISTED ANIMAL SPECIES ALSO OCCUR ON THE WALLOWA-WHITMAN NATIONAL FOREST AND FALL UNDER THE SAME STANDARD AND GUIDELINES AS DO LISTED PLANT SPECIES. AGAIN, THE STANDARDS ARE FAIRLY COMPREHENSIVE AND WILL GREATLY REDUCE THE LIKELIHOOD THAT A SPECIES WILL BE EXTIRPATED DUE TO SITE SPECIFIC FOREST MANAGEMENT ACTIVITIES ONE BASIC CONCERN WE HAVE FOR SENSITIVE-LIST ANIMAL SPECIES IS THE EFFECT OF SHORT ROTATION PERIOD FORESTRY, SPECIFIED FOR MANAGEMENT AREA 1 IN THE FOREST PLAN, ON CAVITY NESTERS AND OTHER SPECIES DEPENDENT ON LARGE SNAGS AND LARGE, DOWNED LOGS. ADJUSTMENTS IN ROTATION SCHEDULES IS NEEDED TO NOT FURTHER IMPACT THESE SPECIES.

THERE ARE SEVERAL ADDITIONAL ANIMAL SPECIES THAT THE OREGON NATURAL HERITAGE DATA BASE IS TRACKING THAT ARE EITHER KNOWN TO OCCUR ON THE WALLOWA-WHITMAN NATIONAL FOREST OR ARE SUSPECTED TO OCCUR THERE WHILE THESE SPECIES MAY NOT BE ON THE FOREST SERVICE SENSITIVE ANIMAL LIST THEY ARE STILL IN NEED OF MONITORING AND DESERVE ATTENTION AT THE FOREST LEVEL THESE SPECIES INCLUDE

BULL TROUT
FISHER
FLAMMULATED OWL
GOSHAWK
GREAT GRAY OWL
LEWIS' WOODPECKER
PILEATED WOODPECKER
REDBAND TROUT
SANDHILL CRANE
THREE-TOED WOODPECKER
WALLOWA GRAY-CROWNED ROSY FINCH
WHITEHEADED WOODPECKER
YELLOW WARBLER

FIVE OF THESE SPECIES ARE LISTED AS MANAGEMENT INDICATOR SPECIES FOR THE WALLOWA-WHITMAN NATIONAL FOREST (GOSHAWK, PILEATED WOODPECKER, THREE-TOED WOODPECKER, WHITEHEADED WOODPECKER, YELLOW WARBLER) AND THREE SPECIES ARE ON THE OREGON SENSITIVE ANIMAL LIST COMPILED BY THE U S FISH AND WILDLIFE SERVICE (GREAT GRAY OWL, LEWIS' WOODPECKER, YELLOW WARBLER) IN ADDITION, TWO OF THESE SPECIES ARE CONSIDERED BY THE U S FISH AND WILDLIFE SERVICE AS CANDIDATE SPECIES FOR FEDERAL LISTING, BULL TROUT AND REDBAND TROUT

FOREST SERVICE RESPONSE:

As the Forest Plan is implemented, and management of timber intensifies in Management Area 1 lands, habitat for the flammulated owl, goshawk, and the woodpeckers indicated will most certainly decrease from the existing situation. However, some high quality habitat for them will still exist in riparian zones and old-growth areas. As for the bull trout and redband trout, we will follow the advice of the Oregon Department of Fish and Wildlife once classification problems are resolved.

Great grey owl, fisher, and Wallowa grey-crowned rosy finch habitats are not expected to be affected. Any greater sandhill crane nesting habitat found on the Forest will be protected.

Most of the above comments are more specifically addressed in the Final Forest Plan. The list of indicator species for the Wallowa-Whitman has been revised to indicate only the following: Goshawk, Primary cavity excavator, Pileated woodpecker, Pine martin, Rocky Mountain Elk, Steelhead and Resident trout.

COMMENT NO. 23: ANY ELEMENTS OF THE DRAFT PLAN THAT COULD HAVE A NEGATIVE EFFECT ON THE PEREGRINE FALCON, WOLVERINE, OR ANY OTHER THREATENED OR ENDANGERED SPECIES MUST BE CHANGED TO INSURE THE RESTORATION OF THESE POPULATIONS.

FOREST SERVICE RESPONSE:

We agree. The final Forest Plan contains more specific language dealing with the protection and maintenance of habitat for these individual species.

COMMENT NO. 24: INFORMAL CONSULTATIONS WITH THE FWS OVER THE LAST YEAR HAVE INCLUDED A REVIEW OF BALD EAGLE MANAGEMENT PLAN FOR UNITY RESERVOIR (1-7-86-1-2) AND EVALUATION OF WINTER ROOSTING HABITAT ON GORHAM BUTTE (1-7-86-1-160). DURING THE COURSE OF THESE CONSULTATIONS, THE NEED FOR ADDITIONAL STUDIES TO IDENTIFY EXISTING AND POTENTIAL HABITAT USE PATTERNS, AND FEASIBLE MANAGEMENT TECHNIQUES FOR HABITAT ENHANCEMENT WERE IDENTIFIED AND ACKNOWLEDGED. THESE ARE MONITORING NEEDS WHICH PROVIDE BASIC INFORMATION VALUABLE TO THE FOREST FOR AVOIDING CONFLICTS WITH THREATENED AND ENDANGERED SPECIES. THESE MONITORING NEEDS SHOULD BE ADDRESSED IN MORE SPECIFIC DETAIL IN THE PLRMP.

FOREST SERVICE RESPONSE:

We agree and more specific detail has been provided in the Final Plan.

COMMENT NO. 25: PEREGRINE FALCON RECOVERY EFFORTS IN THE PACIFIC NORTHWEST ARE STILL ONLY BEGINNING TO GET UNDERWAY. THE FOREST SHOULD BE AWARE OF THE NEED TO COORDINATE AND COOPERATE WITH FEDERAL, STATE, AND PRIVATE ORGANIZATIONS INVOLVED IN THESE RECOVERY EFFORTS. IN ADDITION, THERE WILL BE A NEED TO MONITOR HISTORIC EYRIES WITHIN FOREST BOUNDARIES. THESE ARE TWO MANAGEMENT DIRECTIONS WHICH SHOULD BE CLEARLY IDENTIFIED IN THE DEIS AND PLRMP. THE IMPORTANCE AND MAGNITUDE OF THE MONITORING WILL LIKELY INCREASE OVER THE NEXT 10 YEARS. WE WOULD ENCOURAGE THE FOREST TO DEFINE ADDITIONAL MANAGEMENT DIRECTIONS TO PROMOTE THE CONSERVATION OF THE PEREGRINE FALCON.

FOREST SERVICE RESPONSE:

We agree and more specific detail is provided in the Final Plan.

COMMENT NO. 26: THE DEPARTMENT SUPPORTS THE PLAN PROPOSAL TO PROTECT HABITAT FOR THREATENED AND ENDANGERED SPECIES. THE FOREST HAS THE BEST POTENTIAL HABITAT IN THE REGION FOR PROVIDING PEREGRINE FALCON AND BALD EAGLE NEST SITES. THE WALLOWA-WHITMAN FOREST NEEDS TO IDENTIFY THOSE POTENTIAL SITES AND DEVELOP A MANAGEMENT PLAN THAT PROTECTS THESE SITES IN COMPLIANCE WITH THE

BALD EAGLE AND PEREGRINE FALCON RECOVERY PLANS ODFW FIELD BIOLOGISTS WILL ADDRESS THIS NEED JOINTLY WITH USDA FS STAFF BEFORE THE FINAL IS PREPARED

FOREST SERVICE RESPONSE:

We agree and more specific detail is provided in the Final Plan.

**LIVESTOCK GRAZING
Code 500**

COMMENT NO. 1: THE FOREST SUPERVISOR'S POLICY WHICH CHANGED TWO YEARS AGO, ALLOWING RANCHERS FROM OUTSIDE THE LOCAL AREA TO HAVE WALLOWA-WHITMAN GRAZING PERMITS (IF THEY HAD SOME LOCAL HEADQUARTERS) WAS NOT FAIR TO LOCAL RANCHERS. RANCHERS FROM NEVADA AND IDAHO COME IN AND TAKE LOCAL GRAZING PERMITS.

FOREST SERVICE RESPONSE

The primary reason for adopting the minimal qualifying property requirements was to free up time and money we had been spending evaluating permittee's lands so that it could be used on allotment management. We canvassed our grazing permittees and the County Cattleman's Associations in regard to this change and received less than three percent response. There were no strong objections.

COMMENT NO. 2: I DO NOT BELIEVE THAT THERE SHOULD BE LIVESTOCK GRAZING ON NATIONAL FOREST LANDS. THIS IS MOSTLY BECAUSE THE U.S.F.S. DOES NOT CLEAN UP AFTER THE DESTRUCTION CAUSED BY CATTLE. WILDLIFE IS USUALLY NOT CONFINED TO AN AREA AND THEREFORE DOES NOT WIPE OUT LARGE PORTIONS OF THE PLANT FLORA AND FAUNA BY OVERGRAZING. THE SAME GOES FOR STREAMS AND RIPARIAN ZONES. YOU MENTION CHANGES OR MITIGATION MEASURES THAT COULD OVERCOME GRAZING PROBLEMS. COMMIT YOURSELVES SPECIFICALLY. LIST YOUR SOLUTIONS. MY INPUT IS FOR A SIGNIFICANT DECREASE IN LIVESTOCK PRODUCTION UNTIL THE DESTRUCTION TO WILDLIFE IS REPAIRED.

FOREST SERVICE RESPONSE:

Within the Forest Plan are policy statements and direction that riparian objectives be an integral part of allotment management plans. Riparian values, fisheries as well as terrestrial wildlife values, and watershed values are all integral resource considerations that temper grazing management functions. In a recent Forest project, all grazing allotments were assessed and priority planning projects identified. The Priority One category was identified as those allotments that exhibit basic resource damage and have riparian areas in less-than-satisfactory condition. Solutions to grazing problems must be developed on a site-specific basis. Typically they involve stricter control of domestic livestock to meet multi-faceted resource objectives.

COMMENT NO. 3: INCREASED GRAZING PROPOSED FOR THE WALLOWA-WHITMAN NATIONAL FOREST IS ABSOLUTELY NOT NECESSARY AND SHOULD BE CURTAILED. WE ARE 'FED UP' WITH THIS SPECIAL INTEREST GROUP'S ABUSES AT THE EXPENSE OF EVERYBODY ELSE.

FOREST SERVICE RESPONSE.

Livestock grazing is a long-established legitimate use of the National Forest, as are timber production, wildlife management, recreation, and watershed use. Livestock grazing converts a public resource (herbage) into products useable by people. The permittees pay for the forage they use just as other users pay for resources from the forests. We agree that no user should abuse the land, but would need to know the nature of the abuse to which you refer.

before we could respond Who is and who is not a special interest seems to be a matter of personal perspective

In recognition of new Forest Service utilization standards, the FEIS preferred alternative no longer calls for increases in livestock grazing

COMMENT NO. 4 IF YOU WERE TO ELIMINATE CATTLE GRAZING COMPLETELY ON NATIONAL FOREST LAND, THE RANCHERS WOULD STILL HAVE AN ADEQUATE AMOUNT OF PRIVATE LAND ON WHICH TO GRAZE THEIR ANIMALS, AND THE RESULT SHOULD NOT CREATE ANY PARTICULAR PROBLEM FOR MOST RANCHERS.

FOREST SERVICE RESPONSE:

For many range permittees, National Forest grazing constitutes an important part of their operation To eliminate their permitted grazing would be a serious blow to their business

COMMENT NO. 5 3 INCREASED LIVESTOCK GRAZING IS JUSTIFIED BY A VAGUE REFERENCE TO A NATIONAL DEMAND FOR MORE RED MEAT. BUT THE FACT IS, PER CAPITA BEEF CONSUMPTION PEAKED IN 1976 AT 94.4 POUNDS AND HAS DECLINED DRASTICALLY EVER SINCE (E.G., 77 POUNDS IN 1982). TODAY, BECAUSE OF CONCERNS FOR HEALTH, FITNESS, AND FEAR OF TRIPLE BYPASS OPERATIONS, CONSUMERS ARE SHUNNING BEEF IN INCREASING NUMBERS AND DEMAND IS AT AN ALL-TIME LOW AND DROPPING. GIVEN THESE FACTS, WHERE DO YOUR PLANNERS DISCERN A NATIONAL MANDATE FOR INCREASED RED MEAT CONSUMPTION OR FOR A 12 PERCENT INCREASE IN LIVESTOCK GRAZING ON THE WALLOWA-WHITMAN.

FOREST SERVICE RESPONSE:

The DEIS called for an increase in Forest livestock use in response to the targets assigned the Forest pursuant to the Forest and Rangeland Renewable Resources Planning Act (RPA). Due to changes in range utilization standards, no increase in use is now projected.

COMMENT NO. 6 LIVESTOCK CAUSE PROBLEMS IN RIPARIAN ZONES--WHY INCREASE LEVELS ?

FOREST SERVICE RESPONSE.

Grazing will not be increased at the expense of damage to riparian zones

COMMENT NO. 7. I ALSO FEEL THE GRAZING PERMITS SHOULD BE REDUCED, NOT INCREASED! IF THE AREA WEREN'T OVERGRAZED, POSSIBLY THE ELK WOULD NOT HAVE TO GO DOWN IN SUCH LARGE NUMBERS TO FEED ON FARMERS' HAY STACKS

FOREST SERVICE RESPONSE

The "farmers' hay stacks" are typically in winter range areas. Most of the federal grazing permits are for summer range areas

The increase projected in some alternatives would be realized by filling vacant allotments, through increased investments in range improvements, and through application of improved grazing systems

COMMENT NO. 8 DEIS P. III-34 LISTS A NUMBER OF ALLOTMENTS WHERE THE RANGE CONDITIONS ARE "LESS-THAN-SATISFACTORY." (1) WHAT DOES THIS MEAN? (2) HOW WILL YOU MITIGATE THESE POOR CONDITIONS? (3) HOW WILL YOU ASSURE THAT THEY ARE NOT REPEATED? (4) HOW WILL YOU BE ABLE TO REDUCE GRAZING LEVELS IN THESE AREAS WHILE INCREASING GRAZING FOREST-WIDE BY 12% AND AT THE SAME TIME NOT CAUSE SUBSTANTIAL DEGRADATIONS ELSEWHERE? (5) HOW WILL YOU ALTER YOUR RANGE PRACTICES AND MONITORING PROGRAM TO ASSURE THAT THESE CONDITIONS DO NOT OCCUR AGAIN? THERE ARE NO CLEAR ANSWERS TO THESE QUESTIONS IN THE DRAFT DOCUMENTS

FOREST SERVICE RESPONSE.

Response to No 1 The term "less-than-satisfactory", is a part of the following sentence "However, in some areas, grazing use continues to exceed capacity, resulting in less-than-satisfactory range conditions " There are varied reasons for the "less than satisfactory" title placed upon these allotments. They all generally relate to grazing use that continues to exceed capacity However, capacities are not only based upon available, usable forage Other considerations are compliance with utilization standards, which takes into account other resource values such as riparian, soils, water quality, watershed, and fisheries.

(2) Mitigation is sometimes approached by modifying the grazing permit If the system of management is found to be faulty and the problem is noncompliance with the terms of the permit, then the management plan is revised. Depending upon the site-specific problems, there are a variety of actions available Appendix A of the Forest Plan lists some specific actions needed Others will be identified through Allotment Management Plans

(3) The Forest Supervisor has the latitude to suspend and/or cancel the grazing permit

(4) The projected increases were not within allotments that presently exhibit resource problems and are in less-than-satisfactory condition In fact, approximately 75% of the projected increase was to occur by filling presently vacant allotments However, the increase in livestock numbers was not proposed in the final Forest Plan.

(5) The standards and guidelines and the monitoring plan reflect an increased commitment to correct grazing problems.

COMMENT NO. 9 THE PLAN TO INCREASE GRAZING BY 11% IS AGAIN ONE WE STRONGLY OPPOSE, THE FOREST IS OVER-GRAZED NOW AND RESULTS IN LOSS OF WILDLIFE, A PRECIOUS COMMODITY, AND MUCH TOO MUCH OVERUSE OF THE WATERSHEDS TO THE FURTHER DETERIORATION OF THE STREAMS, RIVERS AND ANADROMOUS FISHERIES. THERE IS MUCH MUCH MORE TO BE SAID RELATING TO THE OVER-GRAZING, IT IS A PRIVILEGE TO USE THE NATIONAL FORESTS FOR THIS PURPOSE AND I REALLY OBJECT TO THIS USE UNLESS THERE WAS AN ABUNDANCE OF FEED AND HABITAT FOR THE WILDLIFE AND THIS SIMPLY IS NOT TRUE

FOREST SERVICE RESPONSE

The projected AUM increase is not in the final plan. It is projected that current numbers can be maintained in the near future

Your concerns for wildlife, watersheds, and anadromous fisheries are similar to Forest objectives. These resource considerations are to be incorporated in all range allotment planning The Forest has identified and prioritized allotments upon which to focus planning efforts with the limited dollars available Those allotments with basic resource damage and riparian areas in less-than-satisfactory condition are "top priority" areas of work

COMMENT NO. 10: GRAZING RELATED ISSUES ONE OF THE MOST OBJECTIONABLE AND UNACCEPTABLE PORTIONS OF THE DRAFT DOCUMENTS HAS TO DO WITH THE INTENSE BIAS IN THE PROPOSED MANAGEMENT DIRECTION TOWARDS INCREASING LIVESTOCK GRAZING ON THE FOREST, OFTEN TO THE DETRIMENT OF OTHER RESOURCE VALUES THE WNPS BELIEVES THAT THE EXCESSIVELY HIGH LEVELS OF DOMESTIC LIVESTOCK GRAZING PROPOSED BY THE DRAFT DOCUMENTS, REPRESENTING AN INCREASE OF 11% OVER THE ALREADY HIGH LEVELS, AMOUNTS TO TURNING LARGE SEGMENTS OF THE FOREST INTO LIVESTOCK RANCHES FOR THE BENEFIT OF A FEW INDIVIDUALS, WHILE DEGRADING A WIDE ARRAY OF OTHER RECREATIONAL AND NATURAL RESOURCES WE BELIEVE THAT GRAZING OF PUBLIC LANDS SHOULD NEVER EXCEED LOW LEVELS AND SHOULD BE SECONDARY TO THE NEEDS OF NATIVE WILDLIFE AND PLANT COMMUNITIES THROUGHOUT THE FOREST. THERE IS NO EXCUSE FOR ANY NATIONAL FOREST LANDS, WHICH ARE PUBLIC PROPERTY AND UPON WHICH A LARGE NUMBER OF NATIVE PLANTS AND ANIMALS DEPEND FOR THEIR SURVIVAL, TO BE IN ANY CONDITION OTHER THAN EXCELLENT

FOREST SERVICE RESPONSE

See response to following comment

COMMENT NO. 11: 10 WE BELIEVE THAT THE DRAFT DOCUMENTS CLEARLY INDICATE THE NEED FOR A SUBSTANTIAL REDUCTION IN THE LEVEL OF GRAZING ON THE FOREST. THE PROPOSED INCREASE OF 12% OVER THE CURRENT LEVEL IS TOTALLY UNJUSTIFIED AND UNACCEPTABLE. BY YOUR OWN ADMISSION, MANY ALLOTMENTS ARE ALREADY GRAZED BEYOND CAPACITY AND ARE IN POOR CONDITION FURTHERMORE, DEIS P III-34 INDICATES THAT ACTUAL AUM UTILIZATION IN RECENT YEARS IS FAR BELOW THE LEVELS PRESENTLY AUTHORIZED. THE ONLY JUSTIFICATION FOR THE PROPOSED INCREASE IS THAT THE LOCAL LIVESTOCK INDUSTRY HAS EXPRESSED A "DESIRE" TO INCREASE GRAZING ON THE FOREST THIS SLAVISH DEVOTION TO THE WISHES OF A PRIVATE INTEREST GROUP IS WITHOUT FOUNDATION AND MUST BE ENDED. THE PRIMARY MISSION OF OUR NATIONAL FORESTS IS TO MEET A VARIETY OF RESOURCE DEMANDS, WHILE MAINTAINING THE FULL HEALTH AND DIVERSITY OF THE THE NATURAL COMMUNITIES FOUND ON THE FOREST. WE URGE YOU TO SHOW A PROPER RESPECT FOR THIS MISSION BY SUBSTANTIALLY REDUCING AND REGULATING THE USE OF LIVESTOCK ON THE WALLOWA-WHITMAN.

FOREST SERVICE RESPONSE.

One of the objectives of the National Forest System is "... to contribute to and promote stability of family ranches and farms in areas where there are National Forest System lands." Another objective is " to improve or maintain the environmental quality of ranges by managing livestock grazing in harmony with needs of associated resources and their uses "

The projected increases in AUM's were to have been realized largely by filling vacant allotments (75%) The remaining (25%) was projected to come from investments in range improvements. The final plan allows recent use levels to be maintained in the near future

COMMENT NO. 12 AS YOU STATED IN THE DEIS, LIVESTOCK HAVE A VERY TEMPORARY EFFECT ON THE ENVIRONMENT I WOULD LIKE TO SEE LIVESTOCK AT ITS HIGHEST POSSIBLE LEVEL, ALTHOUGH I WOULD LIKE TO SEE A LIMIT TO THE USE OF LIVESTOCK IN THE FEW ELK WINTERING RANGES ON THE FOREST.

FOREST SERVICE RESPONSE:

A view shared by others

COMMENT NO. 13. THE OVERGRAZING PERMITTED ON OUR NATIONAL FOREST AND BUREAU OF LAND MANAGEMENT LANDS IS SCANDALOUS. THERE CERTAINLY SHOULD BE NO INCREASE IN GRAZING ON ALREADY OVERGRAZED LAND. WE SHOULD TAKE ADVANTAGE OF THESE TIMES OF FALLING DEMAND FOR BEEF TO RESTORE OVERGRAZED LANDS TO THEIR NATURAL VITALITY BY REDUCING RATHER THAN INCREASING GRAZING.

FOREST SERVICE RESPONSE:

See Response Comment No. 5.

COMMENT NO. 14. THERE IS LITTLE INFORMATION DESCRIBING WHERE THE ALLOTMENTS ARE, THE RANGE CONDITIONS, PROPOSED RANGE IMPROVEMENTS, OR THE PROCEDURES TO ADJUST GRAZING IF NEEDS ARE INDICATED THROUGH MONITORING. THERE IS LITTLE CONFLICT FOR FORAGE BETWEEN LIVESTOCK AND BIG GAME ON THE WALLOWA-WHITMAN, GIVEN THE EXISTING LEVELS OF GRAZING. IF HIGHER THAN EXISTING NUMBERS OF LIVESTOCK GRAZING ARE PLANNED, THE DEPARTMENT RECOMMENDS THE INCREASES BE DIRECTED TOWARD MANAGEMENT AREA 1 AREAS RATHER THAN TOWARD BIG GAME WINTER RANGES.

FOREST SERVICE RESPONSE:

Increases in domestic livestock will be permitted only where it is determined, through a site-specific analysis, that such an action is appropriate. Availability of forage for wildlife will be a major consideration during these analyses. We agree that providing forage for wildlife on winter ranges is particularly important.

COMMENT NO. 15. GRAZING SHOULD BE INCREASED TO YOUR SUGGESTED LEVEL OF 207,000 AUM'S. YOUR STEWARDSHIP HAS BENEFITED ALL PARTIES CONCERNED HERE, THE PROGRAM SHOULD BE CONTINUED. IT IS A VIABLE PORTION OF THE MULTIPLE USE FOREST.

FOREST SERVICE RESPONSE.

Changes in range utilization standards will result in a continuation of recent levels of livestock grazing for the first decade.

COMMENT NO. 16. GIVEN THAT THE LIVESTOCK INDUSTRY ON PUBLIC LAND CONTRIBUTES ALMOST NOTHING (<2% OF TOTAL BEEF PRODUCTION IN THE U S) AND TAKES IN THE FORM OF SUBSIDIZING MONIES AND NATURAL RESOURCES, ENDLESSLY FROM OTHER PUBLIC LAND-USERS, INCLUDING ME, I BELIEVE THAT A REDUCTION AND EVENTUALLY ELIMINATION OF LIVESTOCK FROM THE WALLOWA-WHITMAN N F IS FAIR AND NECESSARY.

FOREST SERVICE RESPONSE

The grazing fee charge for grazing domestic livestock on National Forests is controlled and directed by the U S Congress. The USDA Forest Service does not control what the grazing fees will be.

Livestock grazing is a long established legitimate use of the National Forest, as are timber, wildlife, recreation, and watershed. It uses a public resource (herbage) – converting it to products usable by people. The permittees pay for the forage they use just as other users pay for resources from the forest.

COMMENT NO. 17. WHEN IS THE FOREST SERVICE GOING TO STOP AND DO SOMETHING ABOUT THE TRASHED OUT SPRINGS, THE PATHETIC, TRAMPLED RIPARIAN ZONES AND ERODING STREAMBANKS? FOR EXAMPLE, TAKE A LOOK AT SOME OF THE TRIBUTARIES TO THE NORTH FORK BURNT RIVER. THE DAMAGE IS LONG TERM AND STARTED LONG AGO. SOMEWHERE ALONG THE WAY, THERE HAS GOT TO BE SOME RESPONSIBILITY TAKEN TO STOP THE DEGRADATION AND INSTEAD START SHOWING FOREST-WIDE IMPROVEMENT OF RANGE AND RIPARIAN AREAS THROUGH A REDUCTION OF LIVESTOCK GRAZING. THE WALLOWA-WHITMAN FOREST PLAN IS THE LOGICAL STARTING POINT.

FOREST SERVICE RESPONSE.

The concerns you have expressed are valid. Riparian and wetland areas are high priority areas of management within the Wallowa-Whitman National Forest. The Forest has been identifying, and will continue to note poor condition areas and take the appropriate action to re-establish satisfactory riparian conditions. This is being done through grazing permit administration and allotment management planning. Riparian areas, fisheries, water quality, and terrestrial wildlife habitat needs are major considerations in these two areas of range management.

The Forest Plan carries on this emphasis. To some degree, the rate at which improvement work can be completed is affected by funding. However, the top priority areas continue to be those that exhibit basic resource damage and have riparian areas in less-than-satisfactory condition.

COMMENT NO. 18: THIS [COMPARISON OF BENCHMARK OUTPUTS WITH ALTERNATIVE OUTPUTS] INDICATES THAT TIMBER HARVEST ACTS AS A CONSTRAINT ON LIVESTOCK PRODUCTION. AS MUCH AS 20 MAUM LESS LIVESTOCK CAN BE GRAZED UNDER A MAXIMUM TIMBER EMPHASIS.

GIVEN THE CONSTRAINTS OUTLINED FROM BENCHMARKS, ALTERNATIVE B-DEPARTURE, ATTEMPTS TO OPTIMIZE TIMBER AND LIVESTOCK. THERE IS AN APPARENT MEAN TIMBER OUTPUT OF 190 MMBF/YEAR FOR THE FIRST DECADE AND A MEAN GRAZING COMPONENT OF 227 MAUM/YEAR. HOW CAN ALTERNATIVE B-DEPARTURE MAXIMIZE BOTH TIMBER AND LIVESTOCK UNDER MMR'S WITHOUT EITHER OUTPUT BEING CONSTRAINED BY THE OTHER AS ILLUSTRATED IN THE BENCHMARK ANALYSIS. UNLESS THERE IS A TYPOGRAPHICAL ERROR INVOLVED HERE, THERE APPEARS TO BE SOME POTENTIAL INACCURACY IN CALCULATIONS FOR ALTERNATIVE B-DEPARTURE AND POSSIBLY OTHER ALTERNATIVES.

FOREST SERVICE RESPONSE.

As modeled, and within the range of alternatives, there is not a conflict between grazing and timber production since forage production tends to increase with intensive timber management. Were Alternative B-departure implemented, there would undoubtedly be a need for increased coordination to temporarily protect new tree plantations from livestock.

COMMENT NO. 19. I ALSO DON'T FEEL WE SHOULD BE INCREASING AUM'S IN RANGE WITHOUT A SIGNIFICANT INCREASE IN FUNDING TO MANAGE THE PROGRAM. I THINK WE ARE OVEREXTENDED IN RANGE MGMT AT PRESENT.

FOREST SERVICE RESPONSE:

The proposed budget for the selected alternative includes a large increase in funding -- sufficient for range management. We agree that in recent years funding has been insufficient

COMMENT NO. 20 . THE DEIS HAS AN INADEQUATE RANGE OF ALTERNATIVE GRAZING PROGRAMS. IN ADDITION TO THE CONSPICUOUS ABSENCE OF A NO-GRAZING ALTERNATIVE, EVERY ALTERNATIVE SAVE TWO, PROPOSES TO MAINTAIN OR INCREASE GRAZING, WITH THE LARGEST REDUCTION BEING 14 PERCENT . THE FOREST SERVICE WOULD BE WELL-ADVISED TO REMEMBER THE LESSONS OF RARE II AND RECOGNIZE THAT GRAZING CATTLE ON PUBLIC LANDS IS NOT A GOD-GIVEN RIGHT, BUT REQUIRES A "HARD LOOK "

FOREST SERVICE RESPONSE:

Regulations require a range of reasonable alternatives. In our situation, there appeared to be no reason to develop an alternative that eliminated grazing, just as we did not believe it reasonable to show an alternative which would double current grazing levels. We agree that grazing, like any other consumptive use of the National Forest, must be based on careful scrutiny.

COMMENT NO. 21: THERE APPEARS TO BE AN INCONSISTENCY THAT NEEDS CLARIFICATION REGARDING FORAGE ALLOCATION. PAGE 3-5 OF THE PROPOSED PLAN SAYS "ALLOCATION OF FORAGE TO BIG GAME WILL PROVIDE APPROXIMATELY 100% OF BIG GAME OBJECTIVE LEVELS ." PAGE 4-46 OF THE SAME DOCUMENT SAYS THERE IS ". NO NEED TO ALLOCATE FORAGE BETWEEN BIG GAME AND LIVESTOCK."

FOREST SERVICE RESPONSE:

We have clarified this statement in the final document. Our intent is to point out that with the recommended grazing levels, there will be sufficient forage to meet deer and elk needs.

COMMENT NO. 22: 1. THE LOCATIONS OF LANDS DESIGNATED TO MANAGEMENT AS LIVESTOCK GRAZING ALLOTMENTS ARE NOT IDENTIFIED ON THE ALTERNATIVE MAPS NOR ANYWHERE ELSE IN THE DRAFT DOCUMENTS. THIS IS A MAJOR PROBLEM IN DETERMINING WHICH LANDS ARE TO BE MANAGED INTENSIVELY FOR LIVESTOCK AND IN ASSESSING THE ENVIRONMENTAL IMPACTS THAT MAY OCCUR ON THESE SPECIFIC LANDS. THE FINAL PLAN SHOULD CLEARLY IDENTIFY SUCH LANDS, INCLUDING AN INDICATION OF SUITABLE AND NON-SUITABLE PORTIONS OF EACH ALLOTMENT. WITHOUT THIS INFORMATION, THE ADEQUACY OF THE DEIS CANNOT BE PROPERLY EVALUATED.

FOREST SERVICE RESPONSE:

We disagree that such detailed information would be necessary for proper evaluations of the DEIS, although we recognize that a few persons would like to have such information. The plan shows a level of livestock grazing that will be possible to achieve for the Forest as a whole. Individual allotment planning will be the key to whether this level is actually achieved. Because range suitability is affected so much by tree stand density, it is constantly changing. We do not maintain a Forest-wide suitability map, but this information is available in allotment management plans.

COMMENT NO. 23. 5 THE DOCUMENTS ADMIT TO AN INABILITY TO MEET INCREASED DEMANDS FOR VARIOUS TYPES OF RECREATION, ESPECIALLY HUNTING. YET, I FOUND A BIASED WILLINGNESS TO MEET THE NEEDS OF 144 GRAZING PERMITTEES, BUT A CALLOUSED CONCERN FOR HUNTERS, FISHERMEN, PICNICKERS, HIKERS, AND OTHER RECREATIONISTS WHO MUST NUMBER IN THE 10'S OF THOUSANDS

FOREST SERVICE RESPONSE

As indicated in the documents, it is expected that surplus recreation capacity will exist, over the next 50 years, for most classes of recreation. Semiprimitive recreational opportunities require a generally roadless condition. Since roadlessness often conflicts with timber harvest, it was necessary, through this planning process, to determine how much roadless area to retain for recreation purposes and how much to develop. We believe that the proposed alternative represents a reasonable compromise on this issue. We do not think that our proposal represents a bias toward grazing permittees or a callousness toward other Forest users.

COMMENT NO. 24 I COULD CITE OTHER SPECIFICS, BUT THE PROBLEM IS REALLY ONE OF JUSTIFYING GRAZING PROGRAMS AND GRAZING INCREASES WITH VAGUE LANGUAGE THAT IS DEVOID OF SPECIFIC, CONCRETE PROPOSALS AND ACTIONS FOR INCREASING FORAGE OR CARRYING CAPACITY. WITH THE NATION TURNING TO A SERVICE AND HIGH-TECH ECONOMY, THE ROMANTIC ERA OF THE COWBOY IS WANING FAST. YET THE PLAN REEKS OF AN 1870 MENTALITY, AND AS SUCH, IS TOTALLY UNCONVINCING

FOREST SERVICE RESPONSE:

The purpose of the Forest Plan is to provide broad management direction under which specific, detailed proposals can be made in the future. It is not practical to make detailed proposals until detailed project-level analyses have been completed.

COMMENT NO. 25 AUM'S HAVE CHANGED DUE TO LARGER CALVES.

FOREST SERVICE RESPONSE:

Although there may be a trend toward larger calves, we are not sure that this is significantly affecting forage production. The final determinant of how long livestock are allowed to graze is forage utilization. If the forage is consumed sooner, due to large livestock or any other reason, the livestock are removed from the range earlier.

COMMENT NO. 26: WE ARE PARTICULARLY DISPLEASED IN THE WAY IN WHICH THE FEW REMAINING SHREDS OF RECREATIONAL LANDS ARE BEING SACRIFICED TO COWS AND TIMBER

FOREST SERVICE RESPONSE

We recognize that there are some popular, undeveloped recreation sites where there are livestock conflicts. Public comment about such areas helps us to prioritize corrective measures.

COMMENT NO. 27: USING THE TIMBER GROUND FOR LIVESTOCK PASTURE IS ALSO HEALTHY FOR THE FOREST AS THEY HELP KEEP DOWN THE UNDER GROWTH

FOREST SERVICE RESPONSE.

We agree that livestock can help control plant growth under the forest canopy

COMMENT NO. 28. TO INCREASE WILDLIFE, ALL COMMERCIAL LIVESTOCK GRAZING ON THE FOREST SHOULD BE ELIMINATED.

FOREST SERVICE RESPONSE:

Thank you for your opinion. We do not, however, believe such action would significantly benefit wildlife

COMMENT NO. 29: RECOMMENDATION BETTER RANGE MANAGEMENT PRACTICES, ESPECIALLY ON CRITICAL WINTER RANGE AND KEY SUMMER RANGES FOR BIG GAME.

FOREST SERVICE RESPONSE:

Recent funding levels in range management have been below the levels we have requested. We are focusing our attention on problem allotments and resource emphasis areas, such as riparian zones and anadromous fishing resources. Critical winter ranges and key summer ranges for big game still remain a focal point for management.

COMMENT NO. 30: GRAZING BY DOMESTIC LIVESTOCK, PRIMARILY CATTLE, IS INADEQUATELY ADDRESSED IN THE FOREST PLAN. ALTERNATIVE "C" INCREASES GRAZING BY OVER 11% AT A TIME WHEN BEEF CONSUMPTION IS IN SHARP DECLINE FOR HEALTH AND OTHER REASONS

THE MANAGEMENT PLAN ITSELF RECOGNIZES THE PROBLEM OF CATTLE GRAZING IN STREAM RIPARIAN ZONES ON THE FOREST. HUNDREDS AND PERHAPS THOUSANDS OF MILES OF STREAM BOTTOMS ON THE FOREST ARE CURRENTLY IN A DEGRADED AND ERODING CONDITION DUE TO CATTLE GRAZING

FOREST SERVICE RESPONSE

The 11 percent increase in grazing was projected to come from filling vacant allotments (75%), and investing in range improvements (25%), on those allotments where potential increases exist and where the integrity of other resource values/objectives will be maintained. However, the final plan does not show an 11 percent increase.

COMMENT NO. 31: ONLY 144 PERMITTEES GRAZE THE WWNF FOR WHICH THE PUBLIC RECEIVES \$133,000+ DOLLARS. WWNF PROBABLY EXPENDS MORE THAN THAT AMOUNT ON A FEW, INSIGNIFICANT STREAM REHABILITATION PROJECTS, NOT TO MENTION OTHER TAXPAYER SUBSIDIZED MANAGEMENT FOR THE LIVESTOCK INDUSTRY. EVEN THE BLM INCLUDES A "NO GRAZING" OPTION IN MANY OF THEIR EIS'S, AND BALANCING THE FEDERAL BUDGET IS A PRIMARY GOAL OF THE REAGAN ADMINISTRATION.

FOREST SERVICE RESPONSE:

The grazing fee is established by the U. S Congress. Even though the current grazing fee is less than \$2.00 per animal unit month, the established willingness-to-pay value used in the economic analysis is \$7.47 per animal month. At \$7.47 per animal unit month the benefits of the program compare favorably with its costs

Riparian resource values and objectives are paramount in present management direction and play a significant role in current range management prescriptions. Mitigation and enhancement efforts are occurring throughout the Forest on several grazing allotments. Allotments that presently exhibit damage to basic resources or which have riparian areas in less than satisfactory condition have top priority in receiving attention

COMMENT NO. 32: IF, INDEED, ANY INCREASE IN FORAGE EXISTS IT SHOULD BE USED TO REMOVE CATTLE FROM THE STREAM BOTTOMS AND NOT TO INCREASE THE NUMBER OF CATTLE ON THE FOREST.

IN MY OPINION THE MANAGEMENT PLAN SHOULD STIPULATE SIGNIFICANT REDUCTIONS IN CATTLE GRAZING OR ELIMINATE GRAZING ALTOGETHER UNTIL RIPARIAN ZONES CAN BE PROTECTED

FOREST SERVICE RESPONSE:

Riparian conditions within grazing allotments are of paramount concern. Indeed, in some areas the Forest has excluded grazing within riparian zones with the stipulation that when favorable conditions are restored, the management situation will be reevaluated to update prescriptions.

COMMENT NO. 33. ALTERNATIVE "C", PROPOSED MANAGEMENT PLAN: IF THE GOALS FOR MANAGEMENT AREAS 15 (OLD GROWTH) AND 18 (FISHERIES & GAME) ARE TO BE MET, THE EXCLUSION OF LIVESTOCK FROM THESE AREAS IS ESSENTIAL. DOMESTIC LIVESTOCK ARE NOT PART OF OLD GROWTH ECOSYSTEMS, AND GRAZING SEVERELY IMPACTS ANADROMOUS FISHERIES.

FOREST SERVICE RESPONSE

Old-growth timber ecosystems typically do not provide a forage resource that could be available for domestic livestock use.

If in the Area 18 area, where anadromous fisheries is the primary emphasis, grazing of domestic livestock is an obstacle or in conflict with obtaining and maintaining the objectives, then it will be short lived as an acceptable use

COMMENT NO. 34: MANAGEMENT PRESCRIPTIONS FOR LIVESTOCK GRAZING (DRAFT PLAN P 4-46) ARE UNACCEPTABLY VAGUE AND MUCH TOO BRIEF AND NON-DETAILED. THE PUBLIC CANNOT AT ALL ADEQUATELY ASSESS THE EFFECTS OF THE PROPOSED GRAZING PROGRAM WITHOUT MUCH MORE INFORMATION

FOREST SERVICE RESPONSE

In response to this comment and others, additional detail has been included in the Final Plan.

COMMENT NO. 35. THE OVERALL MONITORING OF THE RANGE PROGRAM ALSO APPEARS TO BE INADEQUATE MUCH MORE SPECIFIC AND RESTRICTIVE CONSTRAINTS MUST BE IMPOSED ON LIVESTOCK GRAZING ON FOREST LANDS TO ASSURE THAT ABUSE OF THESE LANDS DOES NOT OCCUR

FOREST SERVICE RESPONSE.

The Monitoring Plan (Chapter 5 of the Forest Plan) is intended to provide general monitoring guidelines. Detailed monitoring plans for the range program will be tiered to that plan

COMMENT NO. 36. RANGE IMPROVEMENT PROJECTS SHOULD ATTEMPT TO REESTABLISH NATIVE GRASS COMMUNITIES, RATHER THAN USING ALIEN SPECIES THE EXTREMELY DESTRUCTIVE PRACTICE OF CHAINING SHOULD NOT BE A MANAGEMENT TOOL ON PUBLIC LANDS.

FOREST SERVICE RESPONSE

We are unaware of any proposal for chaining on the Wallowa-Whitman National Forest.

We assume your comment about "alien species" refers to plant species not indigenous to the local sites. The use of exotic species in range revegetation and erosion control seeding is a standard practice throughout the nation. Where practical and economically feasible, the use of native vegetation for reseeding is the preferred route

COMMENT NO. 37: I'M A RANCHER AND HAVE RAISED THOUSANDS OF CATTLE IN THIS COUNTRY, AND THE LAND WILL SUPPORT THOSE ANIMALS. THE LAND WILL SUPPORT THE STOCK BY UTILIZING THE GUIDELINES THAT WE HAVE ALWAYS LIVED BY. THE ONLY TIME IT WON'T SUPPORT THE STOCK IS WHEN YOU CLOSE OFF, BECAUSE OF PRESERVATIONIST'S PRESSURE, WHICH HAS NOTHING TO DO WITH THE EFFECTS OF CATTLE GRAZING ON THE LANDS. THE PRESSURE IS POLITICAL AND OFTEN TIMES IT IS NOT HOME-GROWN THOUGHT

FOREST SERVICE RESPONSE

Thank you for your opinion.

COMMENT NO. 38: AS A BOY MAKING MY FIRST TRIP INTO THE EAGLE CAP WILDERNESS, I WAS SHOCKED AT HOW UGLY AND BARREN SOME OF THE HIGH RIDGES LOOKED, AND EVEN MORE SHOCKED WHEN MY GRANDFATHER TOLD ME HOW THOSE RIDGES, ONCE GREEN WITH VEGETATION, HAD BEEN MADE BARREN BY THE GRAZING OF SHEEP

FOREST SERVICE RESPONSE:

There was heavy use of the Wallowa Mountains by sheep in the late 1800's and early 1900's. Grazing is now more carefully regulated and the evidence of past grazing abuses are much less obvious

COMMENT NO. 39: THE CONFEDERATED TRIBES RECOGNIZE THE NEED FOR A PROPER LIVESTOCK GRAZING PROGRAM ON THE WALLOWA-WHITMAN NATIONAL FOREST THAT WILL NOT DESTROY OR CAUSE DETERIORATION TO THE SENSITIVE ECOSYSTEMS OF THE FOREST IT IS IMPERATIVE THAT FISHERIES AND WILDLIFE VALUES BE PRIORITIZED WHEN LIVESTOCK GRAZING PRACTICES NEGATIVELY IMPACT THEM IN AREAS WHERE GRAZING IS A LIMITING FACTOR TO ACHIEVEMENT OF 80% OF NATURALLY OCCURRING SHADE CANOPY, POTENTIAL FENCING SHOULD BE UTILIZED WITH OTHER INNOVATIVE TECHNIQUES TO RESTORE AND MAINTAIN HIGH QUALITY RIPARIAN AREAS. FENCING OF BOTH STREAMBANKS AND EXCLUSION OF LIVESTOCK SHOULD TAKE PLACE TO INSURE THE RIPARIAN AREA QUALITY. USE OF FERTILIZER SHOULD BE ENCOURAGED TO ENHANCE VEGETATION GROWTH TIMES AND WILL SUBSEQUENTLY BENEFIT BOTH RIPARIAN HABITAT AND LIVESTOCK GRAZING FENCES SHOULD BE DESIGNED TO ALLOW LIVESTOCK ACCESS TO WATERING AREAS WITHOUT DEGRADATION TO THE HABITAT. STREAM CROSSING FOR LIVESTOCK AND BIG GAME SHOULD BE CONSIDERED. STREAMS HAVING HIGH RUNOFF OR WINTER ICE FLOWS SHOULD RECEIVE APPROPRIATE CONSIDERATION FOR FENCING DISTANCE FROM THE BANK

FOREST SERVICE RESPONSE.

Thank you for your comments and recommendations. They will be carefully considered in project level planning

COMMENT NO. 40: WHENEVER A NEGATIVE IMPACT ON ELK AND OTHER BIG GAME OCCURS DUE TO LIVESTOCK GRAZING, RESTRAINTS UPON LIVESTOCK GRAZING SHOULD BE IMPLEMENTED

FOREST SERVICE RESPONSE:

We agree, as long as big game are within agreed-upon objective levels.

COMMENT NO. 41 I FEEL IT IS TIME TO STOP SUBSIDIZING AN INDUSTRY (CATTLE AND SHEEP) AT THE EXPENSE OF OUR PUBLIC LANDS! MANY ACRES OF THE WALLOWA-WHITMAN ECOSYSTEM ARE BEST SUITED TO GRAZING, BUT WE SHOULD BE GRAZING ELK, DEER, BIGHORN SHEEP, ANTELOPE, AND MOUNTAIN GOATS! THE INCOME PRODUCED FROM HUNTING AND RECREATIONAL INTERESTS WOULD SURPLUS THE REVENUE GENERATED BY THE RANCHERS AND CORPORATIONS THAT PRESENTLY BENEFIT FROM THIS OUT-MODED AND "ANTIQUE" SEPTEM AS LEAST WE SHOULD RECEIVE A FAIR PRICE FOR THE GRAZING IT IS UNBELIEVABLE THAT SO FEW PEOPLE CAN KEEP SUCH A TRUSTY TO OUR PUBLIC LANDS IN FORCE IN THE LATE 1980'S

FOREST SERVICE RESPONSE

The grazing fees charged for domestic livestock permitted on National Forest lands are formulated pursuant to an act of the U S. Congress.

COMMENT NO. 42: I AM OPPOSED TO ANY INCREASE IN DOMESTIC LIVESTOCK GRAZING ON THE FOREST AS A FORMER GRADUATE STUDENT SEEKING A HYDROLOGY PROJECT ON THE WWNF, I WAS APPALLED AT THE LACK OF RANGE DATA AVAILABLE ON THE ENTIRE UNION/LA GRANDE DISTRICT, THERE WAS ONE SUB-WATERSHED WITH SOME ONGOING RANGE UTILIZATION DATA. THIS DATA WAS BARELY ADEQUATE TO EVALUATE RANGE CONDITIONS OR RANGE TRENDS. AUM INCREASES MUST BE BASED ON SITE-SPECIFIC DATA, OF WHICH YOU HAVE NONE

FOREST SERVICE RESPONSE:

Any allotment-specific increases in permitted AUM's will primarily come from filling vacant allotments and by investing in range improvements on those allotments capable of providing more forage, while maintaining the integrity of other resource values and objectives. If sufficient data is not available, it will have to be obtained.

COMMENT NO. 43: GRAZING SHOULD BE ABOLISHED IN PUBLIC FORESTS SINCE IT HAS AN ADVERSE IMPACT ON CLEAN WATER, RIPARIAN ZONES, AND PLANT ECOLOGY. GRAZING FEES ON PUBLIC LANDS ARE RIDICULOUSLY LOW; THEY BENEFIT AN ELITE FEW AND ARE UNFAIR TO NON-PERMITTEES AND PRIVATE PASTURE OWNERS. I AM PAID \$8.50 PER AUM; THE PUBLIC LANDS ARE VALUED AT ONLY \$1.37. UNFAIR COMPETITION AGAIN.

FOREST SERVICE RESPONSE:

Domestic livestock grazing can have an adverse impact on water, riparian zones, and plant communities if not properly managed. It is the policy and mission of the Forest Service to maintain the forage resource in a satisfactory or better condition as well as stop any existing basic resource damage and maintain other resource values and objectives.

The grazing fees on public lands are formulated pursuant to an act of Congress.

COMMENT NO. 44: GRAZING RESOURCE: -- FORAGE SHOULD BE SUPPLIED TO MEET THE ANTICIPATED DEMAND FOR LIVESTOCK GRAZING. THE LEVEL OF 207,000 AUM'S APPEARS TO BE ADEQUATE.

FOREST SERVICE RESPONSE:

Thank you for your comment.

COMMENT NO. 45: THE NATIONAL FOREST PLAN HAS FAILED TO IDENTIFY THE LOCATION OF THOSE GRAZING ALLOTMENTS THAT CONTRIBUTE TO THE 40,000 AUM DIFFERENCE BETWEEN "RECENT LEVELS" AND "CURRENT DIRECTION" AND THE 20,000 AUM DIFFERENCE BETWEEN "CURRENT DIRECTION" AND THE PREFERRED ALTERNATIVE LEVELS. KNOWING WHERE THOSE INCREASES IN GRAZING USAGE OCCUR BY MANAGEMENT AREA ARE ESSENTIAL TO DETERMINE THE IMPACT THAT THE ADDITIONAL GRAZING USE MIGHT HAVE ON TIMBER PRODUCTION, WILDLIFE MANAGEMENT, AND SEDIMENT PRODUCTION.

FOREST SERVICE RESPONSE:

"Current direction" and "recent levels" are the same -- 186,000 AUM's. Allotment-respective changes are based on conditions on individual allotments and do not, in general, correspond with management area boundaries. Information on which allotments are expected to increase is available at the Forest Supervisor's Office in Baker City, Oregon.

COMMENT NO. 46: WHEN DEER AND ELK MANAGEMENT OBJECTIVES WERE ADOPTED SIX YEARS AGO, THE WALLOWA-WHITMAN NATIONAL FOREST AND ODFW INFORMALLY AGREED THAT INCREASES IN FORAGE ON THE FOREST WOULD BE EVENLY ALLOCATED BETWEEN BIG GAME AND LIVESTOCK. AT THE TIME, THE FISH AND WILDLIFE COMMISSION ALSO CALLED FOR

A BALANCED FORAGE ALLOCATION BETWEEN BIG GAME AND LIVESTOCK. THIS NEEDS TO BE RECOGNIZED AND IMPLEMENTED IN THE FINAL PLAN.

FOREST SERVICE RESPONSE

We can recall some discussion with the Oregon Department of Fish and Wildlife regarding allocation of forage supplies to wild ungulates and domestic livestock, however, it was not formalized in any direction or plan. It is largely a moot issue because we intend to provide forage for the prescribed numbers of deer and elk for each management unit as determined by the Oregon Fish and Wildlife Commission in December 1981. In addition, the proposed management plan indicates that conflicts between big game and livestock will be resolved in favor of big game, as long as big game populations are within the management objective level.

COMMENT NO. 47. THE EIS DOES NOT MENTION ANYTHING ABOUT BELOW-COST GRAZING ALLOTMENTS. WHAT EFFECT WOULD ELIMINATING SOME OR ALL BELOW-COST ALLOTMENTS HAVE ON THE LOCAL ENVIRONMENT AND ECONOMY? WE FEEL THERE SHOULD BE MORE DISCUSSION ON THIS IMPORTANT ISSUE

FOREST SERVICE RESPONSE

Grazing fees are established by the U S Congress

Presently a system exists, Range Project Effectiveness Analysis, by which an economic analysis of allotments is conducted. The AUM value is \$7.47/AUM. This analysis is conducted on a site-specific allotment project basis. If an allotment project alternative displays an unfavorable benefit/cost ratio, then that fact is considered. However, two other analyses also are done -- one for environmental quality, the other for social well-being. All of these analyses are taken into account.

Eliminating some or all below-cost allotments would reduce permitted grazing use greatly. Forage resources are available that could be substituted for this material though at higher out-of-pocket expense. Because of the higher cost of alternative forage supplies it is likely that some permittees would either reduce their operations or halt them altogether.

COMMENT NO. 48: DEVELOP THIS MANAGEMENT AREA - MEADOW AND WETLAND PROTECTION - MINIMAL CUTTING TO PROTECT THESE AREAS AND EDGES

FOREST SERVICE RESPONSE:

Forest Plan standards and guidelines usually result in a low level of timber harvest in wetlands and riparian areas.

COMMENT NO. 49 PLEASE REVIEW GRAZING MANAGEMENT SECTIONS IN THE ONRC ALT. ONRC RECOMMENDS THAT CURRENTLY VACANT ALLOTMENTS BE TERMINATED, WILDLIFE FORAGE ALLOCATIONS BE SIGNIFICANTLY INCREASED, AND SPECIFICALLY WINTER RANGE WILDLIFE FORAGE BE INCREASED DRAMATICALLY. ONRC BELIEVES DOMESTIC LIVESTOCK GRAZING DECREASES WILL BE MORE THAN OFFSET BY GAINS IN OTHER RESOURCES AND RESULTANT FUTURE ECONOMIC ACTIVELY DEPENDENT ON THOSE RESOURCES. ONRC RECOMMENDS THAT DECREASES IN DOMESTIC LIVESTOCK BE GRADUALLY INSTITUTED OVER 10 YEARS TO MODERATE IMPACTS ON THE GRAZING INDUSTRY. VARIOUS RIPARIAN AND ASPEN STAND REHABILITATION PROJECTS ARE COMMENDED AND RECOMMENDED FOR EXPANSION.

FOREST SERVICE RESPONSE

Thank you for your recommendations and comments, all of which were considered in arriving at the final decision

COMMENT NO. 50: NO ADDITIONAL FENCING SHOULD BE ALLOWED. INSTEAD, PRESENT FENCES SHOULD BE REMOVED WHEN THEY NEED EXTENSIVE REPAIR.

FOREST SERVICE RESPONSE.

Fences are a practical means of controlling and distributing cattle. As long as grazing is one of the "multiple-uses" of the Forest, fences are likely to be used

COMMENT NO. 51: STANDARDS AND GUIDELINES**LIVESTOCK GRAZING - CHANGES INCLUDE**

PARAGRAPH 3 - ALLOTMENTS WILL BE MANAGED TO ACHIEVE A MIX OF RANGE CONDITIONS INCLUDING AT LEAST 20% IN EXCELLENT CONDITION AND 20% IN GOOD CONDITION WITH OVERALL CONDITION OBJECTIVE BEING SATISFACTORY

ALSO ADD - LIVESTOCK WILL BE MANAGED TO ENHANCE RIPARIAN VEGETATION WITH EMPHASIS ON ESTABLISHING WOODY SPECIES IN RIPARIAN ZONES WHERE POSSIBLE AND APPROPRIATE. ALL NEW WATER DEVELOPMENTS MUST BE PLACED AT LEAST 100 FT FROM RIPARIAN AREAS.

FOREST SERVICE RESPONSE

The Draft Forest Plan does have specific language in the wildlife standards and guidelines that reflect your suggestion. Range management planning and permit administration are presently directed to incorporate riparian zone fisheries as well as other resource objectives as an equal partner to be accommodated by allotment management projects

COMMENT NO. 52. THE PLAN (C-15) STATES THAT "WITHIN FUNDING LIMITATIONS, ALLOTMENTS WILL BE CLOSELY AND CONSISTENTLY MONITORED " DESPITE THE FACT THAT GRAZING REPRESENTS A MASSIVE SUBSIDY TO A FEW LOCAL RANCHERS, COSTING THE U.S. TREASURY CONSIDERABLY MORE THAN IT GENERATES IN RANGE RECEIPTS, THERE SHOULD BE NO FINANCIAL EXCUSE GIVEN FOR NOT BEING ABLE TO CLOSELY MONITOR GRAZING. IF IT IS CONSIDERED TO BE IN THE INTEREST OF THE ECONOMY TO SUBSIDIZE THE WELFARE OF A FEW RANCHES, IT SHOULD BE EQUALLY IN THE INTEREST OF A MUCH MORE VAST PUBLIC TO ENSURE THE HEALTH OF THE AQUATIC RESOURCES.

FOREST SERVICE RESPONSE:

Presently, riparian areas and fisheries resources are of primary consideration within the range management program on the Wallowa-Whitman National Forest.

Funding for rangeland management occurs on an annual basis and expenditures are directed by the Congress of the United States. However, on the Wallowa-Whitman National Forest, priorities have been established whereby those allotments that are incurring basic resource

damage, or which have riparian areas in less than satisfactory condition, are the top priority for expenditure of available dollars

COMMENT NO. 53 DESPITE THE MASSIVE GEOGRAPHIC SCALE THAT GRAZING ENJOYS ON FEDERAL LAND (PRIMARILY IN WESTERN STATES), LESS THAN 2% OF THE NATION'S BEEF IS PRODUCED ON THESE LANDS. IN EXCHANGE, WE GET GENERAL ENVIRONMENTAL DEGRADATION AFFECTING FISH AND WILDLIFE PRODUCTION, WATER QUALITY, SOIL STABILITY, AS WELL AS TREE SEEDLING SURVIVAL. THE WWNF PLAN EXEMPLIFIES THIS COMMON BIAS IN FAVOR OF LIVESTOCK. NEARLY THE ENTIRE FOREST IS EXPOSED TO THIS TYPE OF DEGRADATION, YET ONLY 1.5% (60,000 ACRES) OF THE FOREST IS MANAGED WITH AN ANADROMOUS FISHERIES EMPHASIS

FOREST SERVICE RESPONSE.

All lands within the Wallowa-Whitman National Forest on which anadromous fish and habitat occur are managed to maintain and enhance riparian and fishery resources

COMMENT NO. 54 THE DEIS COMPARES THE PREFERRED ALTERNATIVE C WITH OTHER ALTERNATIVES. RANGE PLANNING IN ALTERNATIVE F WILL REDUCE OR ELIMINATE GRAZING ON RANGE ALLOTMENTS WHERE SOIL OR RESOURCE DAMAGE ARE OCCURRING (DEIS II-54). WHY IS THIS PLAN NOT ENDORSED IN ALL ALTERNATIVES?

FOREST SERVICE RESPONSE

In the other alternatives, the resource damage would be corrected through increased investments in range improvements.

COMMENT NO. 55. ANOTHER STRANGE BIAS TOWARD CATTLE APPEARS IN THE DESCRIPTION OF THE COMPETITION AMONG DEER, ELK, AND CATTLE. WHEN EVALUATING THE IMPACT OF CATTLE ON ELK IT IS CLAIMED THAT "THERE APPARENTLY WAS SUFFICIENT FORAGE FOR DEER, ELK, AND LIVESTOCK ON ALL GAME MANAGEMENT UNITS" (PLAN 4-46). WHAT DEGREE OF EVALUATION IS INVOLVED IN STATING THAT THERE IS NO "APPARENT" COMPETITION? IS FORAGE QUALITY OR CHANGE IN QUALITY SEASONALLY EVALUATED?

FOREST SERVICE RESPONSE:

Our statement is based mostly on random observation by a number of Forest Officers over a wide area of the Forest. An intensive evaluation to determine the presence or absence of conflict and its degree would be costly and probably more appropriately the subject of research. In fact, this is one of the objectives of the Starkey Experimental Forest Research Project

Our observations of use by big-game animals on ranges where domestic cattle or sheep are absent is that annual utilization of grasses or forbs rarely exceeds 30 percent. Where total animal utilization is excessive, it is generally the result of improper distribution of livestock. The Forest Plan calls for resolving these problems through adjustments in either livestock movement, control, or numbers.

COMMENT NO. 56: WHEN DESCRIBING THE EFFECT OF WILDLIFE ON LIVESTOCK, THERE IS A POSITIVE STATEMENT THAT "ELK AND DEER COMPETE WITH LIVESTOCK FOR SIMILAR FORAGE"

(DEIS IV-42). WHY IS POSITIVE COMPETITION BY LIVESTOCK ON ELK NOT GIVEN EQUAL WEIGHT?

FOREST SERVICE RESPONSE:

There is a similar discussion in Chapter IV of the EIS entitled "The Effects of Livestock Grazing on Wildlife" where positive effects are recognized

COMMENT NO. 57. IT IS CLAIMED THAT WILDLIFE HAVE AN ADVANTAGE OF USING THE RANGE EARLIER THAN LIVESTOCK AND USING IT AT THE SAME TIME. IT IS DEFINITELY NOT AN ADVANTAGE FOR WILDLIFE TO USE IT AT THE SAME TIME AND USING IT EARLIER MAY BE NO GREAT ADVANTAGE IF THE FORAGE WAS SEVERELY OVERGRAZED THE PREVIOUS SUMMER.

FOREST SERVICE RESPONSE

We agree.

COMMENT NO. 58. THE PLAN (4-46) STATES "THERE APPEARED TO BE NO NEED TO DETERMINE A FORAGE ALLOCATION BETWEEN THE TWO CLASSES OF LIVESTOCK" (PLAN 4-46). IN THIS STATEMENT, DEER, ELK, AND CATTLE SHOULD NOT ALL BE TERMED LIVESTOCK THIS TERM IS RESTRICTED FOR FARM ANIMALS. THE "APPARENT" LACK OF COMPETITION IS A TOPIC GREATLY IN NEED OF STUDY. WHAT STUDIES ARE BEING PLANNED?

FOREST SERVICE RESPONSE

Currently, a study is underway on the Starkey Experimental Forest and Range within the Wallowa-Whitman National Forest. One of the primary questions of the research is to explore forage competition and overlapping dietary occurrence between deer, elk, and cattle.

COMMENT NO. 59: THE FOREST SERVICE SHOULD ALSO MAKE SURE THE COWS ARE "OUT" WHEN THE GRAZING PERIOD IS OVER. AND WHERE ARE OUR RANGE RIDERS OF 30 YRS. AGO? THEY WERE THERE TO MAKE SURE THE GRASS WASN'T EATEN DOWN TOO SHORT FOR OUR WILDLIFE.

FOREST SERVICE RESPONSE:

We agree with your comment that "the Forest Service should also make sure the cows are 'out' when the grazing period is over " Also see response to the following comment

COMMENT NO. 60. YOU DO NOT EVEN PATROL THE HERDS THERE ARE USUALLY MORE COWS RELEASED THAN PERMITTED AND THEY STAY ON WAY PAST THE ALLOTTED TIME - WHY? 1. BECAUSE THE RATE IS TO DAMN CHEAP 2 BECAUSE YOU PEOPLE DON'T CARE 3 AND EVEN IF YOU DID CARE AND DID CATCH THEM WHAT THE HELL CAN YOU FINE THEM. MY THOUGHTS AND MANY PEOPLE I HAVE TALKED WITH, FELT YOU PEOPLE WERE BOUGHT OFF WHEN YOU DID NOT GET FAIR MARKET VALUE FROM THE GRASS THAT BELONGS TO THE PEOPLE OF THE U.S , NOT THE CATTLEMENS ASSOCIATION

FOREST SERVICE RESPONSE

We are constantly monitoring use and compliance to the terms and conditions of the term *grazing permits*. Where we find violations, the permittee is made aware of the situation and directed to take corrective actions. All excess use is charged to the permittee at a substantially higher rate than the normal grazing fees.

Present funding levels for the range management program are low. Your concern that there is excess use on the Forest that we do not catch is no doubt a reality. When and where we locate violations, we take warranted action. You can greatly assist our efforts in gaining compliance by informing your nearest District Ranger of violations.

COMMENT NO. 61: WHEN I TRAVEL IN THE FOREST ONE THING THAT I NOTICE OVER AND OVER AGAIN IS EXTREME OVER GRAZING. UP BEHIND BOTH MT. EMILY AND MT. HARRIS ARE OVER GRAZED. ANY LITTLE TRICKLE OR DAMP DRAW IS USUALLY MANGLED BY CATTLE. THE GRASS AND WILDFLOWERS ARE EATEN INTO THE GROUND. I SUGGEST REDUCING CATTLE GRAZING AND DEVELOPING A PLAN TO MANAGE ANY THAT IS ALLOWED.

FOREST SERVICE RESPONSE:

Thank you for your recommendation. The District Ranger has investigated the area, and where the problem occurs in the National Forest, corrective action will be taken.

COMMENT NO. 62: WE SUGGEST THE PLAN DISPLAY LOCATIONS (MAPS) OF FOREST ALLOTMENTS, AVAILABLE AUM'S FOR EACH, CLASS OF LIVESTOCK, RANGE CONDITION AND TREND, AND CURRENT USE PATTERNS.

FOREST SERVICE RESPONSE:

Although the information is not in the Plan, it is available at the Forest Supervisor's Office in Baker City.

COMMENT NO. 63: BASED ON MY EXTENSIVE TIME AND EXPERIENCE ON 1000'S OF WALLOWA-WHITMAN NF LANDS (AS ELSEWHERE IN THE WEST) THAT HAVE BEEN TRASHED BY CATTLE AND SHEEP, I SEE THE ELIMINATION OF GRAZING ON RANGES WHERE SOIL OR OTHER RESOURCE DAMAGE IS OCCURRING AS ABSOLUTELY NECESSARY. EVIDENTLY, BASED ON GRAZING LEVELS PROPOSED IN ALTERNATIVE E, F, AND H, A REDUCTION IN GRAZING IS MANAGEABLE.

FOREST SERVICE RESPONSE

Thank you for your opinion.

COMMENT NO. 64: THE PLAN IS NOTABLY DEFICIENT IN IDENTIFYING IN DETAIL (OR IN GENERAL) THE CONDITION OF THE GRAZING ALLOTMENTS AT PRESENT OR IN PAST YEARS. (1) HOW DOES THE WWNF ESTABLISH ANY TRENDS IN RANGE CONDITIONS UNDER SUCH CIRCUMSTANCES? (2) HOW CAN APPROPRIATE STOCKING LEVELS BE DETERMINED WITHOUT THIS ANALYSIS? (3) DOES THE FOREST HAVE SUFFICIENT DATA TO ALLOW UNDERSTANDING OF YEARLY VARIATIONS IN RANGE FORAGE BECAUSE OF CYCLES OF PRECIPITATION AMOUNT? A DROUGHT YEAR LEADING TO REDUCED FORAGE WHICH IS THEN GRAZED AT HIGH

LEVELS WILL CAUSE ENHANCED RANGE DAMAGE TO SOILS, STREAMS, SENSITIVE PLANTS, AND ELK HERDS WHICH COMPETE WITH CATTLE FOR LIMITED FOOD (4) WHAT PLANS EXIST FOR EARLY WARNING OF SUCH CONDITIONS SO THAT RAPID MODIFICATIONS CAN BE MADE IN AUM'S?

FOREST SERVICE RESPONSE:

The Wallowa-Whitman National Forest utilizes Regionally established long-term analysis and monitoring techniques to establish base line carrying capacity estimates. These capacities are refined and validated, by allotment, as a result of experienced use by the prescribed livestock operation under the prescribed grazing system during the prescribed season. This information and field data are located at the respective Ranger District and can be accessed there. Summaries of allotment data are compiled in allotment management plans. As the plans are updated and/or refined, a document titled Analysis of the Management Situation is developed. This document, when developed, will incorporate and update all pertinent resource data and display the current management situation.

When true drought situations are anticipated for any given year, it becomes a Forest or Regional concern. These situations can usually be predicted by mid-winter and validated prior to spring turn-on. Forests usually initiate actions to develop strategies for the upcoming season. Potential problems are anticipated and alternative courses of action are displayed for possible actions as needed. The Soil Conservation Service and National Oceanic and Atmospheric Administration monitor snowpacks and disseminate information to public and private sectors.

COMMENT NO. 65: RANGE USE IS SET NEARLY AT ITS MAXIMUM BENCHMARK (207 VERSUS 227 MAUM) UNDER THE PREFERRED ALTERNATIVE. GRAZING PROVIDES ONLY ABOUT 100 JOBS ON THE WWNF (DEIS IV-22). RECREATION ACCOUNTS FOR APPROXIMATELY 1,060 JOBS NOW AND IS PROJECTED TO BE 1,820 BY YEAR 2030 (DEIS IV-11). CONSIDERING THE PREPONDERANCE OF ECONOMIC BENEFIT WHICH COULD BE DERIVED THROUGH RECREATION FROM AN EVEN HEALTHIER ENVIRONMENT THAN PROJECTED BY ALTERNATIVE C, AND THE FACT THAT RANGE USE IS NEARLY AT THE MAXIMUM UNDER MMR'S, WHAT IS THE RATIONALE FOR ALLOWING CONTINUED RANGE ABUSE?

FOREST SERVICE RESPONSE:

There is no intent to "allow continued range abuse." Livestock grazing is one of the uses for which the National Forest is to be managed.

COMMENT NO. 66: THE PLAN CALLS FOR "DEVELOPING THE RANGE RESOURCE TO ITS HIGHEST EFFICIENTLY ATTAINABLE LEVEL" (PLAN 4-3). THIS IS EXPECTED TO BE POSSIBLE THROUGH INCREASED INVESTMENT IN RANGE IMPROVEMENT AND APPLICATION OF IMPROVED GRAZING SYSTEMS. WHAT CONSTITUTES AN "EFFICIENTLY ATTAINABLE LEVEL?" IS THIS LEVEL BASED ON ADMINISTRATIVE CONSIDERATIONS OR THE ABILITY OF RANGE TO PRODUCE FORAGE?

FOREST SERVICE RESPONSE:

There are many other factors beyond forage production potential that are considered when increases are proposed. Generally, vegetation management objectives must also accommodate other resource values such as fisheries, riparian, water quality, terrestrial wildlife, and soils.

COMMENT NO. 67 UNDER MA-10, FORAGE PRODUCTION IS EMPHASIZED (PLAN 4-77). THE GOAL IS TO PROVIDE MAXIMUM FORAGE PRODUCTION WITH RANGES MAINTAINED IN SATISFACTORY CONDITION IF MA-10 IS THE PLAN WITH AN IDEAL SET OF RANGE CONDITIONS FOR BEEF PRODUCTION, WHAT IDEA GUIDES THE ALLOTMENT MANAGEMENT UNDER OTHER AREAS? DOES HIGH BEEF PRODUCTION OCCUR UNDER GOOD FORAGE PRODUCTION CONDITIONS OR ON RANGE THAT IS HEAVILY STOCKED WITH CATTLE? HOW CAN MAXIMUM FORAGE PRODUCTION BE GENERATED UNDER ANYTHING LESS THAN EXCELLENT CONDITIONS ?

FOREST SERVICE RESPONSE

Management areas provide the multiple-use direction for managing specific areas of land called management areas. Each management area is described in terms: (1) a description which defines management objectives and specifies resource priorities, (2) direction, and (3) planning assumptions.

Management Area 10 places priority for the development of the grasslands to their maximum forage production potential for the sites within the designated area. When other uses conflict with maximum forage production, the forage production priority will guide the decisionmaker. Lands within Management Area 10 aren't necessarily the highest production potential sites on the Wallowa-Whitman National Forest. Favorable weight gains of livestock usually are maintained a short time beyond when the forage resources display declines in vigor, production, and less than satisfactory condition

COMMENT NO. 68: THE PRACTICE OF CALCULATING RANGE OUTPUT IN TERMS OF MAUM SEEMS TO CONCEAL AN ECOLOGICAL PROBLEM. WE ONLY KNOW HOW MANY ANIMALS ARE GRAZING ON THE RANGE AND NOT WHETHER ANY GROWTH OCCURS. THIS FEATURE SEEMS TO UNDERLIE THE APPARENT LACK OF CONNECTION BETWEEN FORAGE PRODUCTION AND CATTLE PRODUCTION. SUMMER OVERGRAZING BY CATTLE CAN BE COMPENSATED FOR DURING WINTER BY FEEDING IN CORRALS AT THE RANCH. ELK MAY NOT HAVE THE SAME LUXURY WHEN THEIR RANGE IS OVERGRAZED BY CATTLE

FOREST SERVICE RESPONSE.

We agree with your comment on calculating range outputs. Presently, on a national level, output categories are being explored to provide a truer reflection of management effects in accomplishing the vegetation management mission of the Forest Service.

COMMENT NO. 69: RANGE PERMITS SHOULD BE BID UPON INDIVIDUALLY. I PAY \$7.50 PER AUM AND MY NEIGHBORS PAY \$1.35 PER AUM ON NATIONAL FOREST LAND. LIKEWISE IT IS MISLEADING TO INDICATE A POSITIVE COST/BENEFIT RATIO TO CATTLE GRAZING BASED ON A VALUE OF \$7.47 PER AUM WHEN CATTLEMEN RESIST PAYING EVEN THE CURRENT \$1.35 PER AUM. THEREFORE, INCREASED GRAZING DOES NOT LEAD TO HIGHER NET PRESENT VALUES.

FOREST SERVICE RESPONSE

Grazing fees are established by Congress. Economic efficiency information uses willingness-to-pay values. We use the same standard for other values, such as recreation, which normally collects little or no fees

COMMENT NO. 70: LIVESTOCK GRAZING. UNLESS GRAZING FEES ARE RAISED SUBSTANTIALLY, AN OPTION NOT AVAILABLE THROUGH THIS FOREST PLANNING PROCESS, IT

IS NOT POSSIBLE TO INCREASE LIVESTOCK USE AND ACHIEVE A NON-SUBSIDIZED (VIA TAXES, OTHER-THAN-RANGE FUNDS, ETC) THUS ECONOMICALLY EFFICIENT LEVEL OF RANGE MANAGEMENT AS YOU CLAIM ALTERNATIVE C WILL PROVIDE

FOREST SERVICE RESPONSE.

It is true that our analysis is based on willingness to pay and not on actual current fees

COMMENT NO. 71: 6 THE SLIGHT-OF-HAND ACKNOWLEDGEMENT THAT PROBLEM ALLOTMENTS EXIST SHOULD BE REPLACED WITH A CLEAR AND CONCISE RESOLVE TO GET LIVESTOCK OUT OF STEEP, FRAGILE CANYONS.

FOREST SERVICE RESPONSE:

Standards and guidelines for range management (Forest Plan Chapter 4) have been strengthened. Site specific information for any particular allotment or area is readily available at respective Ranger Districts and/or the Forest Supervisor's Office

COMMENT NO. 72: CONCERN THAT ONLY RANCHERS QUALIFY FOR ALLOTMENTS.

FOREST SERVICE RESPONSE:

Presently, general eligibility requirements are as follows: (1) any U S citizen, (b) any alien who has filed a naturalization petition, (c) any legal entity (U S citizens must own at least 80% of the capital stock of corporations or partnerships). Qualification requirements are that an applicant must own base property and livestock.

COMMENT NO. 73: I ASK THAT WWNF RETIRE ANY GRAZING ALLOTMENT NOT USED FOR 5 CONSECUTIVE YEARS, AND THAT FORAGE BE ALLOCATED TO BIG GAME PRODUCTION

FOREST SERVICE RESPONSE:

Big game would certainly be a consideration in any reallocation of forage.

COMMENT NO. 74: WHAT PERCENTAGE OF THE TOTAL RANGE INVESTMENT BUDGET IS CONTRIBUTED BY THE RANCHING COMMUNITY IN TERMS OF MATERIALS OR LABOR?

FOREST SERVICE RESPONSE:

Permittee cooperation in constructing range improvements financed from the two rangeland improvement funds (Protection and Maintenance and Rangeland Betterment Funds), is 50 percent participation

The maintenance of structural improvements is solely the responsibility of the permit holder, and maintenance is a part of the terms and conditions of the term grazing permit

COMMENT NO. 75: ONE AREA OF PARTICULAR CONCERN TO ME UNDER ALL OF THE ALTERNATIVES IS THE SUBJECT OF GRAZING I HAVE SEEN SUMMERS IN THE EAGLE CAP WILDERNESS WHEN THE SHEEP HAVE CONSUMED SO MUCH OF THE FORAGE THAT THERE IS HARDLY ANY

LEFT TO GRAZE PACK HORSES. IT SEEMS INCONSISTENT TO ME THAT WE SET ASIDE AREAS AS WILDERNESS AND THEN LET LIVESTOCK OVERGRAZE TO THE POINT OF RUINATION. I WOULD LIKE TO SEE LIVESTOCK GRAZING IN WILDERNESS AREAS ELIMINATED COMPLETELY. AS FAR AS GRAZING IN OTHER PARTS OF THE FOREST IS CONCERNED, I BELIEVE THAT THESE AREAS SHOULD BE MANAGED FOR THE FORAGE POTENTIAL FOR WILDLIFE FIRST. IF THERE IS ANY AVAILABLE FORAGE AFTER THE WILDLIFE NEEDS ARE CONSIDERED, THEN IT COULD BE SOLD AT THE SAME AUM RATE AS RANCHERS PAY FOR FORAGE FROM PRIVATE LAND IN THE AREA.

FOREST SERVICE RESPONSE.

Forage needs for wild ungulates are a standard consideration on all grazing allotments. The *Forest Plan* directs emphasis for wildlife on recognized winter ranges and provides direction that if a conflict arises between domestic and wild ungulates for forage, that it will be decided in favor of the wild ungulates, provided game populations are within agreed-upon objective levels. Please see our response to Comment No 76 below

The grazing fees are established by the U S Congress.

COMMENT NO. 76 GRAZING SHOULD BE QUICKLY PHASED OUT GRAZING SHOULD BE IMMEDIATELY STOPPED IN THE EXISTING ROADLESS AND WILDERNESS AREAS AND ALONG ALL RIPARIAN ZONES. CONTAMINATION OF STREAMS IN THE WOODS (EVEN IN THE WILDERNESS AREAS) IS ALREADY NEAR EPIDEMIC PROPORTIONS BECAUSE OF LIVESTOCK

FOREST SERVICE RESPONSE:

Contamination of streams in the woods by domestic livestock is not recognized as being "already near epidemic proportion" as you have indicated. Although livestock do contribute to stream pollution, wildlife are also a factor. Surface water should not be considered safe to drink, regardless of the presence or absence of domestic livestock, unless treated.

Section 4(d)(4)(2) of the Wilderness Act states that grazing in wilderness areas, if established prior to designation of the areas as wilderness," shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture." To clarify any lingering doubts, the committee stressed that there would be no curtailment of grazing permits or privileges in an area simply because it is designated as a wilderness. As stated in the Forest Service Regulations (36 CFR 293.7), grazing in wilderness areas ordinarily will be controlled under the general regulations governing grazing of livestock on National Forests. This includes the establishment of normal range allotments and allotment management plans. Within the goals of the Forest Plan, livestock grazing in Wilderness will continue to be a management tool available to meet range vegetation management objectives.

COMMENT NO. 77 RANGE IMPROVEMENTS WILL BE MANAGED AS DESCRIBED IN FSM 2320 (PLAN 4-57) REFERENCES TO GENERALLY UNAVAILABLE DOCUMENTS ARE OF LITTLE USE IN DESCRIBING FOREST PLANS. GRAZING MAY OCCUR IN WILDERNESS WHERE ESTABLISHED PRIOR TO THE WILDERNESS ACT (PLAN 4-57), WHAT AREAS ARE THESE AND WHICH EXCLUDE GRAZING?

FOREST SERVICE RESPONSE.

There are 19 allotments totally or partially within the wilderness areas that exist in the Wallowa-Whitman National Forest. Of these, presently one has been removed as a grazing allotment. There are three others that presently have proposals to exclude grazing from them.

The following is a list of allotments previously maintained:

District	Allotment Name	Wilderness
Unity	Bullrun	Monument Rock
Hells Canyon NRA	Lone Pine	Hells Canyon Wilderness
	Canyon	Hells Canyon Wilderness
	Temperance-Snake	Hells Canyon Wilderness
	Sheep Creek	Hells Canyon Wilderness
	Saddle Creek	Hells Canyon Wilderness
	Himmelwright	Hells Canyon Wilderness
	Snake River	Hells Canyon Wilderness
Eagle Cap R D	Duck Creek (part)	Eagle Cap Wilderness
	Nebo	Eagle Cap Wilderness
	Boulder Creek (part)	Eagle Cap Wilderness
	Eagle Valley (part)	Eagle Cap Wilderness
	Minam River	Eagle Cap Wilderness
	Pole Creek (part)	Eagle Cap Wilderness
	Catherine Creek (part)	Eagle Cap Wilderness
	Mill Creek (part)	Eagle Cap Wilderness
	Minam A (closed)	Eagle Cap Wilderness
	Standley-Huckleberry	Eagle Cap Wilderness
	Wild Sheep	Eagle Cap Wilderness

COMMENT NO. 78 I SUPPORT THE COMMUNITY STABILITY ALTERNATIVE, BUT I FEEL THAT IT, AND ALL OF THE FOREST SERVICE ALTERNATIVES, PROVIDE FOR TOO MUCH CATTLE GRAZING. BOTH THE FOREST SERVICE AND BOISE CASCADE CORP., THE OTHER BIG LAND OWNER IN THIS AREA, ARE OVERGRAZING OUR FORESTS. IT IS DEPLETING THE FORAGE FOR WILD GAME, AND IT SURE SPOILS A PICNIC OR OUTING

FOREST SERVICE RESPONSE:

Whether or not an area is overgrazed, we recognize there is a conflict between livestock use of an area and certain recreational uses. When the conflicts become serious, corrective action must be taken, and this often means reducing or eliminating grazing from a recreational area.

COMMENT NO. 79. I FEEL THAT CATTLE OVERGRAZING IS PARTIALLY RESPONSIBLE FOR OUR EXTREME WINTER KILL OF GAME ANIMALS

FOREST SERVICE RESPONSE.

Although it may be a factor, we do not believe overgrazing of National Forest land contributed significantly.

COMMENT NO. 80 INCREASING THE GRAZING MAKES NO SENSE. RIPARIAN ZONES AND WATER QUALITY WILL SUFFER AS THEY ALWAYS DO WHEN 1,000 LB COWS BREAK DOWN THE BANKS OF THE CREEKS, DEFECATE IN THE WATER, ETC , CAUSING LOSS OF THE LAST GOOD FISHERY IN E ORE

FOREST SERVICE RESPONSE

We recognize the types of impacts you have spoken to and where those problems exist, correcting measures are being taken.

However, the projected increases will typically not be on allotments that exhibit resource problems. In fact, 75 percent of the projected increase should be realized by filling vacant allotments *The remaining 25 percent of the increase will occur on those allotments where the potential exists and the limiting factor is investments into range improvements be they structural or nonstructural.*

Decreases and increases are effected on various ranges. In the first decade of plan implementation, the net change is expected to be zero.

COMMENT NO. 81: THE ELK MANAGEMENT IN THESE AREAS SEEMS TO BE BACKWARDS WHERE CATTLE ARE CONCERNED. FOR YEARS WE HAVE SEEN HUNDREDS OF DEER AND ELK MOVE OFF THE STATE LAND (BLM), NEXT TO OURS, AND ONTO OUR LAND IN THE SPRING. THEY DO NOT LIKE THE OLD GROWTH OF GRASS LEFT WHERE THERE WAS NO OR HARDLY ANY CATTLE GRAZING ALLOWED THEY GO FOR THE GRASS GROWING WHERE IT WAS GRAZED OFF BY OUR CATTLE!! THIS IS NO EXAGGERATION IF THE STATE AND FEDERAL LANDS ARE EMP-TIED OF GRAZING BY OVERGROWTH OF OLD FEED THE GAME WILL MOVE ONTO PRIVATE LANDS EVEN MORE ALSO IT PRESENTS SUCH A FIRE HAZARD WHEN FEED IS NOT GRAZED OFF

FOREST SERVICE RESPONSE:

Thank you for your observations. We agree that elk will often seek out succulent new grass where the previous year's dead grass is not present.

COMMENT NO. 82. THESE CATTLEMEN AND FARMERS SHOULD REMEMBER THAT IF THEY LET THEIR COWS EAT THE ELK & DEER OUT OF THEIR NATURAL HOME, IT STANDS TO REASON THEY WILL COME TO THEIR FIELDS & HAYSTACKS FOR FOOD.

FOREST SERVICE RESPONSE

Thank you for your comment

COMMENT NO. 83: IN THE ENVIRONMENTAL CONSEQUENCES SECTION OF THE DEIS, THE DISCUSSION OF THE EFFECTS OF GRAZING ON OTHER RESOURCES IS EXTREMELY SCANTY AND INADEQUATE. THE EFFECTS ON NATIVE PLANT COMMUNITIES IS NOT EVEN MENTIONED, YET MANY NEGATIVE EFFECTS HAVE BEEN DOCUMENTED, INCLUDING ALTERATION OF NATIVE COMMUNITY STRUCTURE, ELIMINATION OF VULNERABLE SPECIES, INTRODUCTION OF EXOTIC INVASIVE WEED SPECIES THAT OUTCOMPETE NATIVE SPECIES, DESTRUCTION OF THE VITAL MOSS-LICHEN SOIL COVER LAYER, AND LOSS OF SOIL SUBSTRATES BY INCREASED EROSION. NONE OF THESE EFFECTS ARE MENTIONED NOR IS THERE ANY MENTION OF HOW EFFECTS ON NATIVE VEGETATION WILL BE MONITORED OR MITIGATED, OTHER THAN THE

EXTREMELY VAGUE RANGE CONDITION MONITORING PROGRAM, WHICH HAS BEEN HISTORICALLY INADEQUATE, CONSIDERING THE POOR CONDITIONS OF MUCH OF THE RANGE LANDS ON THE FOREST HOW, THEN, ARE WE TO EVALUATE THE EFFECTS OF THE PROPOSED SUBSTANTIAL INCREASE IN THE FOREST'S GRAZING PROGRAM ON THE STABILITY AND DIVERSITY OF NATIVE PLANT COMMUNITIES? HOW, ALSO, ARE WE TO ACCEPT THE CLAIM THAT THERE WILL BE NO NEGATIVE EFFECTS ON SENSITIVE SPECIES.

FOREST SERVICE RESPONSE

Native plant communities are being managed "Negative effects" must be defined to clarify what conditions you consider should be the objective of public rangeland. On the Wallowa-Whitman National Forest there is no program for seeding exotic plant species in an effort to alter native plant communities and eliminate vulnerable plant species

The Forest is directed to speak to potential impacts upon threatened and endangered plant species for every project proposed. This is done on a site-specific basis.

COMMENT NO. 84 INCREASED GRAZING LEVELS WOULD ALSO RESULT IN NEGATIVE EFFECTS ON WATER QUALITY IN THE FOREST'S STREAMS BY INCREASING SEDIMENTATION AND POPULATIONS OF HARMFUL MICROORGANISMS FECAL COLIFORM LEVELS WOULD INCREASE SUBSTANTIALLY. WHILE THIS IMPACT WOULD LIKELY BE LOCALIZED, DEIS P IV-23 STATES: "SUCH EFFECTS ARE VIRTUALLY UNAVOIDABLE...." THIS IS UNACCEPTABLE OUR STREAMS AND RIVERS MUST BE PROTECTED BY A POSITIVE FEEDBACK MECHANISM THAT WILL RESTRICT LIVESTOCK GRAZING TO LEVELS THAT WILL ASSURE THAT THEY ARE NOT FOULED BY ANIMAL EXCREMENT

FOREST SERVICE RESPONSE

We cannot agree that preventing all contamination of surface water by livestock is feasible if livestock grazing is to continue. Reducing livestock-caused sedimentation to negligible levels is feasible and we intend to do so.

COMMENT NO. 85: IN GENERAL, THE CONFLICT BETWEEN LIVESTOCK GRAZING ON THE FOREST AND RECREATIONAL HIKING IS MINIMIZED AND GLOSSED OVER IN THE DEIS MANY PEOPLE FIND LIVESTOCK ON THE FOREST TO BE BOTH AESTHETICALLY OFFENSIVE AND DESTRUCTIVE TO A VARIETY OF NATURAL RESOURCE VALUES

FOREST SERVICE RESPONSE

A discussion of the effects you describe has been added to the EIS

COMMENT NO. 86: IN ADDITION TO THE THREAT OF SHEEP DISEASE BEING PASSED TO BIGHORNS, CATTLE CAN TRANSMIT BRUCELLOSIS AND BLUETONGUE TO DEER. FORAGE COMPETITION, ESPECIALLY IN WINTER, IS NOT ADEQUATELY ADDRESSED. HOW WILL ALLOTMENTS BE MODIFIED OR REDUCED TO AVOID DISEASE CONTAMINATION OF WILDLIFE SPECIES?

FOREST SERVICE RESPONSE.

The Oregon Department of Agriculture is the primary agency administering laws and regulations dealing with diseases of domestic livestock Our policy is to cooperate with that agency.

COMMENT NO. 87: I WAS NOT HAPPY TO SEE THE DEGRADATION OF THE STREAMS ETC. DUE TO SEVERE OVERGRAZING OF LIVESTOCK THE TOTAL AUM'S SHOULD CONTINUE TO DECREASE TO BETTER REFLECT THE LOWER CONSUMPTION OF RED MEAT NATION WIDE.

FOREST SERVICE RESPONSE:

Riparian habitat and fisheries resource objectives are being incorporated into allotment management plans and are of paramount concern

COMMENT NO. 88: PAGE IV-23 - IN VIEW OF THE DISCUSSION CONCERNING ADVERSE IMPACTS OF LIVESTOCK GRAZING ON MEADOWS, RIPARIAN HABITAT, ALONG CREEKS, STREAMBANKS, ETC , THE RESOLUTION OF THESE IMPACTS SHOULD BE FULLY CONSIDERED AND DESCRIBED IN VIEW OF THEIR RELATIONSHIP TO EXECUTIVE ORDERS 11990 'WETLANDS' AND 11988 'FLOODPLAINS.'

FOREST SERVICE RESPONSE:

The standards and guidelines for wetlands and floodplains provide direction for correcting, avoiding, or mitigating these impacts. Resolution of specific grazing problem areas cannot be fully explored in a programmatic EIS such as this. Methods and alternatives for correcting these problems will be analyzed during site-specific allotment management planning

COMMENT NO. 89. PAGE IV-24, EFFECTS OF LIVESTOCK GRAZING ON WILDLIFE - THE FWS DISAGREES WITH THE STATEMENT THAT 'LIVESTOCK GRAZING RESULTS IN FEW CONFLICTS WITH MOST WILDLIFE SPECIES... .' (EMPHASIS ADDED) IMPACTS OF LIVESTOCK GRAZING ARE IDENTIFIED ON PAGE IV-23 OF THE DEIS AND IN A REFERENCE TO THOMAS ET AL (1979) WHICH STATES THAT

WILDLIFE USE RIPARIAN ZONES MORE THAN ANY OTHER TYPE OF HABITAT OF THE 378 TERRESTRIAL SPECIES KNOWN TO OCCUR IN THE BLUE MOUNTAINS, 285 ARE EITHER DIRECTLY DEPENDENT ON RIPARIAN ZONES OR USE THEM MORE THAN OTHER HABITATS. VERTEBRATES THAT EITHER FEED IN WATER OR REPRODUCE IN WATER ARE TOTALLY DEPENDENT ON RIPARIAN AND ADJACENT UPLAND ZONES IN SHORT, RIPARIAN ZONES ARE THE MOST CRITICAL WILDLIFE HABITATS IN THE BLUE MOUNTAINS

THE FWS BELIEVES THAT LIVESTOCK GRAZING ADVERSELY IMPACTS MOST SPECIES OF WILDLIFE ON THE FOREST AND RECOMMENDS THIS SECTION OF THE DEIS BE CHANGED TO REFLECT AND FULLY DISCUSS THESE IMPACTS. HABITAT DEGRADATION OF RIPARIAN AND AQUATIC SYSTEMS IS OF PARTICULAR CONCERN.

FOREST SERVICE RESPONSE

We have revised this section of the EIS to more completely reflect the effects of livestock grazing in riparian zones and their dependent wildlife

COMMENT NO. 90 STREAMSIDE DAMAGE TO SOILS, VEGETATION, AND WATER QUALITY IS ALSO MENTIONED AS OCCURRING, WITHOUT IDENTIFYING SPECIFIC PROBLEM AREAS OTHER THAN TO NOTE THAT STEEP CANYON AREAS ARE 'PARTICULAR PROBLEMS '

THE FINAL EIS SHOULD IDENTIFY THE AREAS WHERE GRAZING-RELATED WATER QUALITY OR OTHER RIPARIAN AREA PROBLEMS EXIST. FOR THE PORTIONS OF THESE AREAS THAT SUPPORT ANADROMOUS FISH HABITAT OR OTHER HIGHLY SENSITIVE BENEFICIAL USES, THE FINAL EIS SHOULD SPECIFICALLY EVALUATE WHETHER STEPS (STRUCTURAL OR NON-STRUCTURAL) CAN BE TAKEN TO REDUCE THE RISK OF DAMAGE TO ACCEPTABLE LEVELS. DOMESTIC WATER SUPPLY WATERSHEDS AND ANADROMOUS FISH HABITAT SHOULD BE MANAGED FOR PARTICULARLY LOW LEVELS OF IMPACT. FOR ANADROMOUS FISH, 90 PERCENT OF THE SMOLT HABITAT CAPABILITY INDEX MAY BE APPROPRIATE. WHERE IT IS CONCLUDED THAT IMPACTS TO BENEFICIAL USES WOULD BE UNAVOIDABLE, AS APPEARS TO BE THE CASE IN STEEP CANYON AREAS AT PRESENT, GRAZING SHOULD BE CONSIDERED AN INCOMPATIBLE USE AND LIVESTOCK SHOULD BE EXCLUDED

INCLUDED IN THIS EVALUATION SHOULD BE ESTIMATES OF THE AMOUNT OF LAND THAT WOULD BE UNAVAILABLE FOR GRAZING SHOULD STEEP CANYONS (OR OTHER IDENTIFIED SIGNIFICANT CONFLICT AREAS) BE EXCLUDED. THE POTENTIAL IMPACTS TO THE LOCAL AND REGIONAL ECONOMIES SHOULD ALSO BE ESTIMATED

EVEN APPARENTLY LARGE REDUCTIONS IN PERMITTABLE AUM'S MAY NOT SERIOUSLY AFFECT THOSE ECONOMIES, CONSIDERING THE W-WNF PROVIDES ONLY 8 PERCENT OF THE AREA'S OVERALL FORAGE (DEIS PAGE I-10).

FOREST SERVICE RESPONSE

Problem grazing areas are discussed in Chapter III of the EIS and Chapter 2 of the Proposed Plan. In addition, an inventory of watershed restoration needs, many of which are grazing-related, is kept at the National Forest Headquarters, and is available for public review. This list includes a preliminary assessment of the structural or nonstructural restoration needs.

Alternative levels of grazing are evaluated in the EIS. All of the alternatives are intended to correct existing grazing problems, but different methods are used. Various levels of range structural investment (to improve livestock distribution across the range) are evaluated. In Alternatives E and F, livestock would be substantially reduced or removed on allotments with soil and water resource damage. The effects of these alternatives, expressed in terms of jobs and personal income, are displayed in the EIS.

COMMENT NO. 91: CONSIDERING THE SIGNIFICANCE OF GRAZING ON THE W-WNF AND THE POTENTIAL FOR ADVERSE IMPACTS, THIS SECTION IS NOT SUFFICIENT. PLEASE REFER TO OUR COMMENT UNDER GRAZING, ABOVE. IN PARTICULAR, DEFERRING OBJECTIVES AND STANDARDS AND GUIDELINES PRIMARILY TO PROJECT LEVEL PLANNING IS INAPPROPRIATE. CERTAINLY, NEEDS AND MEASURES THAT ARE HIGHLY SITE-SPECIFIC CANNOT BE IDENTIFIED HERE, BUT THE BLANKETING DIRECTION (STANDARDS AND GUIDELINES) UNDER WHICH ALL ALLOTMENTS WILL BE MANAGED IN THE FUTURE SHOULD BE PRESENTED IN THE FINAL PLAN.

FOREST SERVICE RESPONSE

Standards and guidelines have been changed as suggested.

COMMENT NO. 92: IDEALLY, RIPARIAN AREAS WOULD RECEIVE SEPARATE CONSIDERATION IN THE MONITORING PLAN, AS THEY SHOULD IN THE STANDARDS AND GUIDELINES SECTION.

FOREST SERVICE RESPONSE.

Riparian area management has been given greater emphasis in the monitoring plan and standards and guidelines of the final documents

COMMENT NO. 93. LIVESTOCK GRAZING. PLANNING ON THE PROJECT LEVEL SHOULD PREVENT LIVESTOCK FROM ENTERING STREAMSIDE MANAGEMENT UNITS AND CONGREGATING IN RIPARIAN ZONES CAREFUL MONITORING OF RANGE CONDITIONS SHOULD BE DONE TO DETECT ANY OVERGRAZING AND SUBSEQUENT SOIL EROSION AND WATER QUALITY DECLINE. ANY SUCH DECLINE SHOULD BE IMMEDIATELY CORRECTED BY REMOVING STOCK FROM THE AREA.

FOREST SERVICE RESPONSE

We agree that these concerns need to be addressed

COMMENT NO. 94. SO FAR AS GRAZING IS CONCERNED, THE USFS DOES SUCH A POOR JOB AT MANAGING THIS PROBLEM THAT I DO NOT THINK THAT GRAZING SHOULD BE ALLOWED IN NATIONAL FORESTS. THIS IS SAID BECAUSE OVERGRAZING, STREAM DAMAGE, RIPARIAN HABITAT DESTRUCTION, AND STREAM SEDIMENTATION ARE ALL TOO COMMON THEY SHOULD BE THE RARE EXCEPTION INSTEAD OF THE RULE

FOREST SERVICE RESPONSE:

Thank you for your comments We agree that the problems you mention should be the exception, and intend that they will be.

COMMENT NO. 95: (PAGE II-20) MITIGATION MEASURES: AGAIN YOU FAIL TO SPECIFICALLY LIST MITIGATION MEASURES. I WENT TO YOUR REFERENCES AND FOUND NEARLY ZERO AS AN EXAMPLE, LIST EXACTLY WHAT YOU WOULD DO TO AVOID EROSION AND STREAM SEDIMENTATION ON A STEEP SLOPE, OR WHAT SPECIFICALLY WILL YOU DO TO PREVENT CATTLE DAMAGE TO STREAMS AN RIPARIAN ZONES? BE SPECIFIC! ALL THAT I HAVE SEEN HERE ARE VAGUE DESCRIPTIONS OF WHAT YOU MIGHT DO, BUT HAVEN'T, FOR MITIGATION

FOREST SERVICE RESPONSE:

If unacceptable soil erosion and stream sedimentation are imminent if a project is implemented, then the project as proposed will not be approved or allowed to occur

The Draft Forest Plan, as you have indicated, does not provide nor does it direct specific types of adverse actions in the event of the violation and damaging effects upon other resource values and/or objectives by a given project.

However, in the case of domestic livestock, there are many directive statements within the livestock sections as well as concurrent direction in other sections (fisheries, riparian, watershed) that spotlight management objectives that will be accommodated.

The intent is to paint a picture of management's expectations and direct that if/where on-the-ground management is not in-line that it get in line. The specific mitigation to be taken as appropriate cases arise will be handled on a site-specific basis On some grazing allotments, permitted numbers have been reduced by as much as 50 percent On other allotments,

proposals exist to eliminate grazing, on other areas creeks have been fenced to exclude domestic livestock, these are a few examples of mitigation measures that may be taken

COMMENT NO. 96. IS A PUBLIC CONCERNED WITH DAMAGE TO STREAMS AND RIPARIAN ZONES TO BE CONTENT WITH THE IDEA THAT GRAZING ON THE WWNF WAS TWICE AS GREAT 50 YEARS AGO THAN TODAY? SEVERE DAMAGE HAS BEEN DONE TO OUR NATIONAL RANGELAND IN THE PAST THAT HAS NOT YET BEEN REVERSED. ARE WE TO FEEL COMFORTABLE WITH THE IDEA THAT A HIGHER USE IS PERMITTED THAN WILL ACTUALLY OCCUR BECAUSE OF MARKET FACTORS? THE FOREST SHOULD NOT RELY ON MARKET TRENDS TO ARRIVE AT A PROPER ECOLOGICAL CHOICE.

FOREST SERVICE RESPONSE.

As a concerned public, you should not be satisfied with damage to streams and riparian zones. The Wallowa-Whitman National Forest is aware of existing problems and has developed management direction, policy, and planning priorities to concentrate efforts to correct existing ills. There exist grazing allotments where reductions in use have either been initiated or permits cancelled. There are areas where domestic livestock use in riparian areas have been excluded by fencing. In all new and revised allotment management plans the values and objectives of riparian areas, fisheries, water quality as well as other resources are incorporated and an integral part of grazing area prescriptions.

COMMENT NO. 97. WHAT DATA SHOW THE BENEFITS OF IMPROVED GRAZING SYSTEMS IN GENERAL OR IN PARTICULAR ON LAND SIMILAR TO THE WWNF? IF ANY SUCH STUDIES CAN BE CITED, HOW DO REAL LIFE CONDITIONS COMPARE WITH THE HIGHLY CONTROLLED TEST SITUATIONS? SALT BLOCKS AND WATERING TROUGHS DO LITTLE TO KEEP CATTLE SEEKING SHADE OUT OF STREAMS IN THE SUMMER. REST AND ROTATION ARE OFTEN CITED BY FORESTS AS GRAZING SYSTEMS. WHEN ONE ALLOTMENT IS GRAZED DOWN HOW FAST DOES IT RECOVER AND WHAT QUALITATIVE CHANGES HAVE TAKEN PLACE? THE WWNF ADMITS THAT THERE ARE NO DATA ON RECOVERY TIMES FROM COMPACTION OF SOILS IF CATTLE ARE REMOVED. IF SOILS PRODUCTIVITY IS OF CONCERN, WHY ARE SUCH STUDIES NOT PLANNED? IT IS OFTEN SHOWN ON SMALL TEST PLOTS THAT RANGE VEGETATION DENSITY RECOVERS DRAMATICALLY WITHIN THREE TO SEVEN YEARS AFTER FENCING. IF IMPROVED GRAZING SYSTEMS WORK SO WELL WHY IS IT SO DIFFICULT TO DEMONSTRATE IT? IN THE LIGHT OF LITTLE DATA ON PRESENT CONDITION OF RANGE, WEAK MONITORING, AND MAINTENANCE OF PRESENT CONDITIONS OR IMPROVING "TRENDS" OVER THE DECADES, RANGE MANAGEMENT PLANS APPEAR TO BE A SYSTEM IN WHICH RANGE STATUS CANNOT BE ASSESSED AND IMPROVEMENT OR DECLINE CANNOT BE CONFIRMED. THE SYSTEM IS SIMPLY A SMOKE-SCREEN TO ALLOW "LAISSEZFAIRE" AD INFINITUM. UNDER THESE CONDITIONS MANAGEMENT IS DIRECTED BY THE RANCHERS AND THE ECONOMY AT LARGE RATHER THAN THE RESOURCE EXPERTS.

FOREST SERVICE RESPONSE:

Available research indicates that carefully controlled grazing can be used to improve rangelands. Domestic livestock grazing on the Wallowa-Whitman would be considered harvesting the surplus of a renewable forage resource to help support the local economy

The recovery time for a grazing allotment would depend on a number of things such as degree of past livestock use, plant community types, soil depth, and class. These are the types of questions we would try to answer in an individual allotment management plan, not the Forest

Plan For riparian plant communities, we are experiencing fairly complete recovery after about 10 years of no livestock use

The problems with management of the forage resources are complex. Language in the Forest Plan is intended to begin action on the ground that will result in the improvement of the vegetation resource.

COMMENT NO. 98. UNDER MA-9 (DISPERSED RECREATION/NATIVE VEGETATION) THE EMPHASIS IS ON ENHANCING NATIVE VEGETATION BY NON-STRUCTURAL MEANS (PLAN 4-76). GRAZING IS ALLOWED IN THIS MANAGEMENT SCENARIO. HOW CAN NATIVE VEGETATION BE ENHANCED UNDER ALLOTMENT PLANNING, LET ALONE USING NON-STRUCTURAL MEANS TO ACCOMPLISH THIS?

FOREST SERVICE RESPONSE:

Many of the more palatable species of native vegetation will respond in vigor and density to a limited amount of removal of their annual growth. The intent here is to gain that response through careful allotment planning and administration.

COMMENT NO. 99. CHESNIMNUS AND CROW CREEKS, WHICH COMBINE TO FORM JOSEPH CREEK AND CATHERINE CREEK AMONG OTHERS, ARE LISTED AS HAVING HAD RANGE DEGRADATION NEEDING CORRECTION (DEIS III-34), 65). THESE ARE IMPORTANT ANADROMOUS STREAMS WHICH ARE NOT INCLUDED IN THE MA-18 (ANADROMOUS AREA). WHAT PLANS ARE THERE IN ALTERNATIVE C FOR REALLY CORRECTING RANGE CONDITIONS IN THESE DRAINAGES? WILL AUM'S BE REDUCED AT ALL HERE? WHY NOT ELIMINATE GRAZING FOR SEVERAL YEARS AT LEAST UNTIL THERE IS SUFFICIENT RECOVERY?

FOREST SERVICE RESPONSE.

Within Alternative C the statement is made. "However, problem areas persist and some 15 allotments are recognized as having need for improvement measures or grazing adjustments." Riparian habitat, fisheries, and water quality are some of the primary problems within this grazing area. The basic planning and Forest direction is to assess the existing situation and specify measures to remedy problems or conflicts with other resources on a site-specific basis. One of the alternatives usually is elimination of domestic livestock grazing either on a temporary or permanent basis.

Presently, several segments of Chesnimnus Creek are planned to be fenced to exclude domestic livestock use on a temporary basis. Also, the existing grazing prescription is under evaluation and is scheduled for update and refinement in 1988.

Crow Creek is predominately under private ownership. Only a minor portion of the stream is under federal ownership and control. A recent survey has been conducted and results are being compiled.

**RESEARCH NATURAL AREAS (RNA'S)
Code 650**

COMMENT NO. 1: WE COMMEND THE FOREST SERVICE FOR PROPOSING 13 ADDITIONAL RNA'S EVEN THOUGH THE FOREST SERVICE HAS BEEN UNABLE TO DO ADEQUATE MANAGEMENT ON THE EXISTING ONES AND NEEDED RESEARCH HAS NOT BEEN ACCOMPLISHED GENERALLY IN A NUMBER OF THE RNA'S IN REGION 6, AN UNDERSTORY HAS DEVELOPED TO THE POINT THAT IT IS ALMOST IMPENETRABLE, MAINLY DUE TO THE SUPPRESSION OF FIRE FOR MANY YEARS. IN CASES OF THIS KIND, WE WOULD BE SUPPORTIVE OF FIRES AS A MANAGEMENT TOOL. THE LACK OF PRESCRIBED BURNING IS NEITHER GOOD FOR THE SCENIC QUALITY, WILDLIFE OR A HEALTHY TIMBER STAND. THIS STATEMENT ON FIRE APPLIES TO ALL AREAS OF THE FOREST

FOREST SERVICE RESPONSE.

We agree with your concern that we have not adequately dealt with the role of fire in our National Forest landscape as well as in RNA's. We are evolving from a "protectionist" posture to a "prescription" posture with fire. All RNA's will be provided with management plans after establishment. The Indian Creek RNA (established) does not have a management plan, but one will be developed at the time we devise plans for the proposals. We intend to actively promote RNA's to the research communities for greater use. The RNA's, however, are also good management benchmarks without special research activities.

COMMENT NO. 2: MANAGEMENT 12--IT IS TOO BAD ONLY 14 RNA'S COULD BE SUPPORTED BY THE FOREST SERVICE. ELEVEN ARE IN WILDERNESS, ONE IN BACK COUNTRY AND TWO BY ROADS. WE SUPPORT MORE RNA'S THAN SUGGESTED BY THE FOREST SERVICE. CASTLE RIDGE RNA WAS RECOMMENDED BY SCIENTISTS FOR THREE TIMES THE ACRES. MR. OARD CUT IT BACK THREE-FOURTHS. CONSIDER ENLARGING IT FOR A START. THERE IS ONE CYCLONE WIRE ENCLOSURE ON THE LOWER MINAM RIVER THAT THE FOREST SERVICE NEEDS TO REMEMBER. WE NEED A LAW THAT ONE ENCLOSURE HAS TO BE ON EVERY SECTION OF ALL PUBLIC LANDS. WE OBJECT TO THE ALLOWING OF DOMESTIC GRAZING ON ANY RNA OR ENCLOSURE.

FOREST SERVICE RESPONSE.

The number of RNA's (19 in final plan) is established by the locations of vegetative "cells" which can be incorporated to complete a full accounting of the vegetation in a particular physiographic province. We are attempting to complete the filling of all cell needs with RNA proposals. We do not believe there is a need to enlarge Indian Creek RNA. We are familiar with all enclosures on the Forest and strive to maintain them for their use to us. An enclosure on every section of public lands would be too costly and without reasonable concern for resource use. We share your concern about grazing of enclosures or RNA's. We plan to limit grazing by domestic stock in such areas.

COMMENT NO. 3. I WOULD STRONGLY ENCOURAGE YOU TO INCREASE THE NUMBER OF RESEARCH NATURAL AREAS, NOT ALL NECESSARY BIG, SAY 40 TO 120 ACRES+ AND PERHAPS IF APPROPRIATE GIVE THEM A COMPARISON OR RELIC AREA DESIGNATION. THIS IS IMPORTANT FOR SOME OF THE CONCEPTS FRED HALL AND OTHERS ARE DEVELOPING, TRAINING FOR EMPLOYEES, GOAL ORIENTATION AND STUDY

FOREST SERVICE RESPONSE

Certainly relic areas have been sought in the inventory for RNA establishment. Our increase in the number of RNA's is based on need. We will consider adding RNA's as "cells" are derived that need to be filled with a protecting RNA. These RNA's are excellent for training our employees in successional dynamics.

COMMENT NO. 4: WE ARE VERY DISAPPOINTED WITH THE MANAGEMENT STANDARDS AND GUIDELINES FOR THE RNA'S THAT ARE LISTED ON PAGE 4-81 THRU 4-83 OF THE DRAFT FOREST PLAN. WE STRONGLY OBJECT TO A NUMBER OF ASPECTS IN THESE GUIDELINES AND URGE YOU TO SUBSTANTIALLY REVISE THEM IN THE FINAL PLAN. SEVERAL ARE IN CLEAR VIOLATION OF THE FOREST SERVICE MANUAL (FSM) REGULATIONS ON RNA'S (REVISION OF 12/85). OUR OBJECTIONS TO THE PROPOSED RNA MANAGEMENT GUIDELINES ARE LISTED BELOW:

- 1 OUR STRONGEST OBJECTION IS TO THE USE OF LIVESTOCK GRAZING ON MANY OF THE PROPOSED RNA'S. WE BELIEVE THAT GRAZING OF THESE AREAS WOULD BE CONTRARY TO BOTH THE LETTER AND THE INTENT OF FOREST SERVICE MANUAL GUIDELINES FOR RNA'S. SEC. 4063.34, WHICH ADDRESSED VEGETATION MANAGEMENT, CLEARLY OUTLINES THE CONDITIONS UNDER WHICH GRAZING MAY BE USED ON RNA'S:

"THE STATION DIRECTOR, WITH THE CONCURRENCE OF THE FOREST SUPERVISOR, MAY AUTHORIZE MANAGEMENT PRACTICES THAT ARE NECESSARY TO PRESERVE THE VEGETATION FOR WHICH THE RESEARCH NATURAL AREA WAS CREATED. THESE PRACTICES MAY INCLUDE GRAZING, CONTROL OF EXCESSIVE ANIMAL POPULATIONS, OR PRESCRIBED BURNING. .. USE ONLY TRIED AND RELIABLE TECHNIQUES AND THEN ONLY WHERE THE VEGETATIVE TYPES WOULD BE LOST WITHOUT MANAGEMENT. THE CRITERION HERE IS THAT MANAGEMENT PRACTICES MUST PROVIDE A CLOSER APPROXIMATION OF THE NATURALLY OCCURRING VEGETATION AND THE NATURAL PROCESSES GOVERNING THE VEGETATION THAN WOULD BE POSSIBLE WITHOUT MANAGEMENT. UNLESS THE MANAGER IS CERTAIN THAT THE MANAGEMENT PRACTICE WILL MEET THIS CRITERION, DO NOTHING (EMPHASIS ADDED)

THE KEY PROVISION THAT LIVESTOCK GRAZING MAY BE USED TO MAINTAIN A VEGETATIVE COMMUNITY FOR WHICH A GIVEN RNA IS CREATED IS CLEARLY DESIGNED ONLY FOR THOSE COMMUNITIES THAT HAVE BEEN "PRE-ADAPTED" TO THE TRAMPLING AND CROPPING OF LARGE, HERD-TYPE ANIMALS SUCH AS BISON. SUCH ANIMALS HAVE NOT OCCURRED IN THE PACIFIC NORTHWEST WITHIN THE EVOLUTIONARY TIMEFRAME OF THE EXISTING NATIVE PLANT COMMUNITIES. THERE IS NO NATURAL ECOLOGICAL EQUIVALENT TO THE SYSTEMATIC, DESTRUCTIVE GRAZING PATTERNS OF SHEEP AND CATTLE IN OUR REGION. MOREOVER, THERE IS ABUNDANT EVIDENCE THAT DOMESTIC LIVESTOCK ARE HIGHLY DESTRUCTIVE TO NATIVE VEGETATIVE COMMUNITIES -- THROUGH TRAMPLING, UPROOTING, INTRODUCTION OF EXOTIC INVASIVE WEED SPECIES, AND SUBSTANTIAL ALTERATION OF COMMUNITY STRUCTURE AND COMPOSITION. (E.G. MACK, R N 1983 INVADERS AT HOME ON THE RANGE. NAT. HIST. 93(2) 40-47.) WHILE GRAZING CAN BE EFFECTIVE IN FORESTALLING THE SUCCESSION OF CONIFERS INTO PARTICULAR MEADOW/GRASSLAND COMMUNITIES, THIS RESULT CAN ALSO BE OBTAINED BY PRESCRIBED BURNING, A PERMITTED AND APPROPRIATE ACTIVITY THAT IS FAR LESS DESTRUCTIVE TO THE NATIVE PLANT COMMUNITY THAN IS GRAZING. CLEARLY, THERE IS NO SCIENTIFIC OR MANAGEMENT JUSTIFICATION FOR LIVESTOCK GRAZING ON NORTHWEST RNA'S.

THE DRAFT FOREST PLAN WOULD ALLOW GRAZING TO CONTINUE ON MANY OF THE PROPOSED RNA'S OR WOULD ALLOW THEIR USE AS LIVESTOCK DRIVEWAYS. WE STRONGLY OBJECT TO ANY GRAZING OF LIVESTOCK ON RNA'S AND URGE YOU TO CANCEL OR RELOCATE

ANY ALLOTMENTS CURRENTLY EXISTING WITHIN THESE AREAS AT THE EARLIEST POSSIBLE TIME. WE BELIEVE THAT IT IS IMPOSSIBLE FOR LIVESTOCK GRAZING TO BE "CONSISTENT WITH THE OBJECTIVES" OF ANY OF THE RNA'S ON THE WALLOWA-WHITMAN. THESE AREAS ARE PROPOSED TO PROTECT NATIVE VEGETATIVE COMMUNITIES THAT ARE PARTICULARLY SENSITIVE TO A WIDE RANGE OF ECOLOGICAL CHANGES BROUGHT ABOUT BY LIVESTOCK GRAZING, ESPECIALLY THE DISPLACEMENT OF NATIVE GRASSES BY INVASIVE, ALIEN GRASS SPECIES. UNIQUE AQUATIC ECOSYSTEMS WOULD ALSO BE DEGRADED BY LIVESTOCK. ONE CANNOT AT THE SAME TIME UTILIZE AN RNA AS A BASELINE CONTROL FOR MONITORING MANAGEMENT PRACTICES ELSEWHERE, WHILE AT THE SAME TIME CONDUCTING THE SAME MANAGEMENT ACTIVITY ON THE RNA.

THE USE OF RNA'S AS LIVESTOCK "DRIVEWAYS" SHOULD ALSO BE PROHIBITED. OBSERVATIONS INDICATE THAT THIS PRACTICE LEADS TO LOCALIZED BUT SUBSTANTIAL HABITAT DEGRADATION. NO MONITORING OF THESE EFFECTS SEEMS TO BE TAKING PLACE, AND WE COULD FIND NO EVALUATION OF THE EFFECTS OF LIVESTOCK GRAZING OR DRIVEWAY TRAMPLING ON PRIMARY RNA VALUES IN THE DRAFT DOCUMENTS. WE URGE YOU TO IMMEDIATELY HALT THE PRACTICE OF USING RNA'S AS LIVESTOCK DRIVEWAYS FOR THE SAME REASONS THAT GRAZING SHOULD NOT BE ALLOWED ON RNA'S. THIS SHOULD APPLY TO BOTH PROPOSED AND ESTABLISHED RNA'S.

ANY AND ALL EXISTING GRAZING SUPPORT STRUCTURES ON THE PROPOSED RNA'S SHOULD BE DISMANTLED, AND NONE SHOULD BE ALLOWED IN THE FUTURE. SUCH STRUCTURES ARE CLEARLY PROHIBITED IN FSM 4063 21.6. "BUILDINGS ARE NOT PERMITTED." INDEED, EVEN TEMPORARY PHYSICAL STRUCTURES ARE ALLOWED ONLY UNDER VERY SPECIFIC AND RESTRICTIVE GUIDELINES (SEC. 4063 31), NONE OF WHICH RELATED TO LIVESTOCK SUPPORT FACILITIES.

FOREST SERVICE RESPONSE

We agree that natural processes should be permitted to control the successional trend of vegetation in RNA's. As managers of RNA's, we will seek to eliminate those forces which put the natural succession in jeopardy. In some mesic grasslands, fire and grazing have helped perpetuate a grassland and thwart a shrubland development. If native animals or periodic fire are not able to continue with promotion of a thrifty, vigorous grassland, then we should look to either prescribed fire or domestic ungulates for help in this regard. Basically, it would be best for all RNA's to be managed under a grazing control which would be based on maintaining native plant species composition at desired levels and reducing the alien populations. We receive the bunchgrass "cells" in the RNA assemblage in varying conditions based on past overgrazing or the lack of it. Therefore, we are generally in a posture of needing to rectify and improve the vegetative state through more selective grazing or periodic burning to enhance many plant communities.

Livestock driveways may not be permitted in RNA's. If trails are pre-existing, then we may have to accept them as corridors for the passage of man and his animals. We will, however, control this passage.

COMMENT NO. 5: WE ARE APPALLED BY BOTH THE CONTENT OF AND THE ATTITUDE EXPRESSED IN THE NARRATIVE DESCRIPTIONS OF THE PRNA'S ON APPENDIX PAGES H-6 TO H-7. IN GENERAL, THE DESCRIPTIONS IMPLY AN EXTREMELY LOW PRIORITY FOR THE ESTABLISHMENT OF RNA'S AND A POOR GRASP OF THE NEED TO PROTECT INTACT NATURAL COMMUNITIES. IT WOULD SEEM THAT THE PREFERRED METHOD FOR MITIGATING ANY RESOURCE CONFLICTS IN THE ESTABLISHMENT OF RNA'S IS SIMPLY TO CUT OUT THE SECTIONS IN QUESTION FROM THE PROPOSED ACREAGE. THIS IS CLEARLY UNACCEPTABLE. THE

ESTABLISHMENT OF A VIABLE SYSTEM OF RNA'S IS A REGION 6 PRIORITY, AND THE WALLOWA-WHITMAN WILL BE NEGLIGENT IN THIS TASK IF IT DELETES IMPORTANT ACREAGES FROM PRNA'S SIMPLY SO AS NOT TO HAVE TO INCONVENIENCE A FEW LIVESTOCK RANCHERS, WHOSE ALLOTMENTS COULD EASILY BE REDEFINED TO NOT INCLUDE THE PRNA'S

FOREST SERVICE RESPONSE:

This section deals with the commodity-based attributes of each RNA. This establishes the timber, grazing, recreational opportunity availability within each PRNA. It was designed to emphasize the potential conflicts if these should come to be established RNA's. It in no way expresses sentimentality for any non-RNA usage of the land and associated resources. This is dealt with in the varying array of alternatives.

COMMENT NO. 6: LIVESTOCK GRAZING IS ALSO IN DIRECT CONFLICT WITH THE RNA PLANNING ASSUMPTION LISTED ON P 4-82 OF THE DRAFT PLAN: "WATERSHED CONDITION AND WATER QUALITY AND QUANTITY WILL APPROXIMATE PRISTINE CONDITIONS." YET P IV-23 OF THE DEIS LISTS NUMEROUS SOIL, WATER, AND RIPARIAN RESOURCES WHICH ARE SUBSTANTIALLY DEGRADED BY LIVESTOCK ACTIVITY. AMONG THESE ARE OVERUSE OF FORAGE, SOIL EROSION DAMAGE TO STREAMBANKS, SEDIMENTATION OF FISH SPAWNING AREAS, REDUCTION OF STREAM SHADE COVER, SOIL COMPACTION, AND CONTAMINATION OF STREAMS, LAKES, PONDS, AND SPRINGS BY ANIMAL FECES. THE DEIS FURTHER STATES THAT THE LATTER EFFECT IS "VIRTUALLY UNAVOIDABLE" IF A SITE IS TO BE GRAZED. ARE THESE CONDITIONS PRISTINE? WE THINK NOT. HOW WILL YOU MONITOR AND MITIGATE SUCH EFFECTS ON THE WATER QUALITY OF THE RNA'S? NO INFORMATION IS GIVEN.

FOREST SERVICE RESPONSE

We believe that the low level of domestic livestock grazing likely to occur in RNA's will not result in water quality noticeably different from pristine.

COMMENT NO. 7: WE WOULD LIKE TO ADD THE FOLLOWING AREA SPECIFIC MANAGEMENT RECOMMENDATIONS AND COMMENTS ABOUT THE NARRATIVE DESCRIPTION SECTION

INDIAN CREEK. THIS ESTABLISHED RNA IS, APPARENTLY, STILL BEING GRAZED BY SHEEP. THIS PRACTICE SHOULD BE ENDED AND THE SHEEP MOVED ELSEWHERE AS SOON AS POSSIBLE.

LIGHTNING CREEK. PRESENT SHEEP ALLOTMENTS OF 80 AUM'S SHOULD BE RELOCATED OR CANCELLED. THIS AREA IS PROPOSED TO PROTECT THREE NATIVE GRASS/SEDGE COMMUNITIES THAT WOULD CLEARLY BE PUT IN JEOPARDY BY CONTINUED SHEEP GRAZING. ALL GRAZING SHOULD BE STOPPED THERE AS SOON AS POSSIBLE TO PROTECT ITS PRIMARY RESOURCES PENDING FINAL RNA APPROVAL.

PLEASANT VALLEY. THIS CRITICALLY IMPORTANT AREA WOULD PRESERVE ELEVEN SEPARATE HABITAT CELLS, AND IT IS VITAL TO PRESERVE THESE RESOURCES IN AS UNDISTURBED STATE AS POSSIBLE. AGAIN, SEVERAL NATIVE GRASS COMMUNITIES ARE FOUND HERE THAT REQUIRE TOTAL PROTECTION FROM THE CURRENT SHEEP GRAZING OF 120 AUMS. APPENDIX H STATES THAT: "A STOCK DRIVEWAY THROUGH THE AREA WOULD BE NECESSARY." THIS IS NONSENSE. GRAZING ALLOTMENTS MUST BE REDRAWN TO ENTIRELY EXCLUDE LIVESTOCK FROM THIS AREA. TO DO OTHERWISE WOULD BE AN ABROGATION OF PROPER MANAGEMENT TECHNIQUES FOR PRESERVING RNA RESOURCES.

IN ADDITION, ALL GRAZING SHOULD BE HALTED IMMEDIATELY, PENDING A FINAL DESIGNATION DECISION ON THIS AREA. ELK USE OF THE RANGE RESOURCES SHOULD BE REGULATED ONLY IF ABOVE AND OUT OF BALANCE WITH THEIR NATURAL POPULATION NUMBERS AND IS DEGRADING THE NATIVE PLANT COMMUNITIES. ELK MUST NOT BE USED AS SCAPEGOATS TO MASK THE EFFECTS OF LIVESTOCK GRAZING.

FOREST SERVICE RESPONSE:

Management plans for all established RNA's will be drawn up with involvement from the Pacific Northwest Forest and Range Experiment Station. The grazing issue will be addressed.

The condition of the grass-sedge communities is based on a compatible use by grazing animals. Sheep are not contributing to a decline in grass-sedge composition. When established, a management plan will determine the domestic grazing use of the area.

Two "vital" trails cross the Pleasant Valley watershed. It would be impractical to eliminate these trails from the RNA; therefore, we intend to remove the "trailway" as a corridor and restrict usage by recreational stock, elimination of administrative stock, and control of use by the grazing permittee. The management plan may require that no domestic grazing be permitted because of the utilization level by elk or for other reasons.

COMMENT NO. 8 BILL'S CREEK. THE LIVESTOCK AND HIKING TRAIL THROUGH THIS AREA SHOULD BE RELOCATED TO MINIMIZE RESOURCE DEGRADATION ON THE PRNA. DUE TO THE SMALL SIZE OF THIS AREA, TRAIL RELOCATION SHOULD NOT BE A BIG PROBLEM.

FOREST SERVICE RESPONSE

It will be necessary to address this issue in the establishment of the area and in the management plan. We will reroute this trail if feasible.

COMMENT NO. 9: ALUM BEDS. THE BOUNDARIES OF THIS UNIQUE AREA SHOULD NOT BE MODIFIED. IF RIVERBANK CONFLICTS WITH RECREATIONISTS ARISE, THE AREA SHOULD BE FENCED AND POSTED, A PRACTICE AUTHORIZED IN FSM REGULATIONS (4063 3 6) ON RNA'S. FURTHER, REDUCING THE ACREAGE OF THIS AREA TO ALLOW LIVESTOCK TO CONTINUE TO USE THE TRAIL THROUGH THE AREA IS ALSO UNACCEPTABLE. THE LIVESTOCK SHOULD BE REROUTED. THE ACTIONS MENTIONED IN APPENDIX H WOULD SIGNIFICANTLY REDUCE THE VALUE OF THIS AREA AS AN RNA.

FOREST SERVICE RESPONSE.

If we need to, we can fence and post this area since the western boundary will be in the Wild and Scenic Corridor. We foresee no significant livestock conflict. Alum Beds RNA will incorporate the greenbush rim, sumac boulder field, and Willow Creek, not just the outcrop.

COMMENT NO. 10: LITTLE GRANITE. THIS AREA IS PRESENTLY UNGRAZED AND SHOULD REMAIN SO, REGARDLESS OF THE NUMBER OF "POTENTIAL AUM'S". IN ADDITION, THE PRESENT SUBSTANTIAL RECREATION USES OF THIS AREA SHOULD BE CAREFULLY MONITORED TO ASSESS THE EFFECTS ON THE PRIMARY RNA VALUES. IF SIGNIFICANT DETERIORATION IS OCCURRING FROM RECREATIONAL USES, SUCH USES SHOULD BE EFFECTIVELY RESTRICTED.

FOREST SERVICE RESPONSE

Grazing is not planned. The recreational uses of the subalpine lakes and adjacent lands are not currently very impacting to the vegetation, soils, or lacustrine and riparian zones. The management plan will address "monitoring" and will seek to moderate recreational uses to the extent it is practical.

COMMENT NO. 11 BONER FLAT. APPENDIX P.8 STATES: "GRAZING CONFLICTS COULD BE GREATLY REDUCED IF NORTHERN HALF OF THE AREA WERE REMOVED FROM CONSIDERATION." THIS REMARKABLY ABSURD AND INSULTINGLY INAPPROPRIATE STATEMENT SHOWS AN UTTER DISREGARD FOR THE IMPORTANCE OF THE RNA SYSTEM AND FOR THE CONCEPT OF PRESERVATION OF NATIVE BIOTIC COMMUNITIES IT MAKES FAR MORE SENSE TO MOVE THE LIVESTOCK COMPLETELY OFF THE ENTIRE ACREAGE, AS WOULD BE INDICATED BY ANY MANAGEMENT PLAN THAT ADEQUATELY PROTECTED RNA RESOURCES.

FOREST SERVICE RESPONSE

If Boner Flat is accepted as an RNA, the issue of sheep grazing will be resolved through the management plan. Meeting RNA objectives will have priority over livestock grazing

COMMENT NO. 12 JOSEPH MOUNTAIN. THE ALPINE MAT COMMUNITIES PROTECTED BY THIS PRNA ARE EXTREMELY FRAGILE, AND THE RECREATIONAL USE OF STOCK ANIMALS SHOULD BE PROHIBITED HERE. THE LISTED SENSITIVE PLANT SPECIES *CASTILLEJA RUBIDA* OCCURS IN THIS COMMUNITY ON MOUNT JOSEPH

FOREST SERVICE RESPONSE:

Recreational stock use will be prohibited The communities are too fragile.

COMMENT NO. 13. DUCK LAKE. WE SUPPORT CLOSURE OF THE CAMPING AREA AND PROHIBITION OF OVERNIGHT CAMPING ANYWHERE ON THIS PRNA OTHER TYPES OF RECREATIONAL USE SHOULD BE CLOSELY MONITORED AND RESTRICTED, AS NECESSARY. ONCE AGAIN, WE OBJECT TO ANY PLAN TO ALTER THE BORDERS OF THIS AREA TO ACCOMMODATE SHEEP GRAZING OR TO PROVIDE A LIVESTOCK DRIVEWAY THROUGH THE AREA SUCH PROPOSALS INDICATE A POOR SENSE OF PRIORITIES. SHEEP CAN BE MOVED TO ANY NUMBER OF ALTERNATE SITES OR ELIMINATED ALTOGETHER, BUT A UNIQUE NATURAL COMMUNITY ASSOCIATION, OF WHICH THERE ARE FIVE ON THIS PRNA, CANNOT BE MOVED OR REPLACED ONCE IT HAS BEEN DEGRADED BY LIVESTOCK AND THE CONCURRENT INTRODUCTION OF INVASIVE WEED SPECIES. THE AQUATIC CELLS ON THIS AREA ARE ALSO VULNERABLE TO POLLUTION FROM THE EXCREMENT OF GRAZING LIVESTOCK.

FOREST SERVICE RESPONSE

We believe that through boundary adjustments, and management of recreational and grazing activities, conflicts with the proposed RNA can be mitigated

COMMENT NO. 14: VANCE KNOLL WE SUPPORT ELIMINATION OF LIVESTOCK GRAZING ON THIS PARCEL AND THE PROPOSED PURCHASE OF THE PRIVATE INHOLDING THAT WOULD BE DESIRABLE TO COMPLETE PROTECTION FOR THIS RARE SET OF NATIVE GRASS ASSOCIATIONS .

FOREST SERVICE RESPONSE:

We intend to fence this RNA to eliminate grazing and we will seek to purchase or exchange for the inholding.

COMMENT NO. 15: GOVERNMENT DRAW. THIS IS AN IMPORTANT SCIENTIFIC RESEARCH SITE AND SHOULD RECEIVE PROTECTION AS AN RNA FOR THE FULL 200 ACRES THAT ARE PROPOSED IN THE DRAFT DOCUMENTS.

FOREST SERVICE RESPONSE:

We agree

COMMENT NO. 16: GLACIER LAKE. THIS PRNA AND THE SURROUNDING AREA SHOULD BE THOROUGHLY CENSUSED FOR THE PRESENCE OF *CASTILLEJA FRATERNA*, A VERY RARE ENDEMIC OF SUCH HABITATS (DWARF WILLOW ASSOCIATIONS ON CONSOLIDATED SCREE) IN THE WALLOWA MOUNTAINS THIS SPECIES IS ON THE LIST OF POTENTIAL SENSITIVE SPECIES THAT IS IN NEED OF FURTHER STUDY OUR EXPERIENCE WITH THIS SPECIES WOULD INDICATE THAT IT SHOULD BE PLACED ON THE SENSITIVE LIST

FOREST SERVICE RESPONSE.

Castilleja fraterna is an important plant currently listed on the Wallowa-Whitman sensitive plant list. It is, however, not in any peril from man or his creatures. It may be removed from the listing based on 1987 field surveys

COMMENT NO. 17 WE FEEL COMPELLED TO QUOTE THE FOREST SERVICE MANUAL PROTECTION AND MANAGEMENT GUIDELINES FOR RNA'S (4063 3.3) "PERMIT LIVESTOCK GRAZING ONLY WHERE IT IS ESSENTIAL TO MAINTAIN A SPECIFIC VEGETATIVE TYPE " ONE CANNOT HAVE MORE UNEQUIVOCAL INSTRUCTIONS THAN THAT!

FOREST SERVICE RESPONSE:

Your understanding of the manual direction is correct. We will seek to follow that direction through our management planning on a case-by-case basis after establishment

COMMENT NO. 18: 2. WE OBJECT TO THE PROPOSED GUIDELINES IN THE DRAFT PLAN CONCERNING RECREATIONAL USES OF RNA'S. DYRNESS, C T , ET AL (1975, RESEARCH NATURAL AREA NEEDS IN THE PACIFIC NORTHWEST. USDA FOR SER. PAC. N W. FOREST AND RANGE EXP. STN., GEN TECH. REP VPNW-38) STATES. "RECREATION IS NOT A RECOGNIZED USE OF RNA'S" IN ADDITION, FSM 4063 21.4 STATES: "PROHIBIT ALL FORMS OF RECREATIONAL USE IF SUCH USE THREATENS RESEARCH OR EDUCATIONAL VALUES." CLOSURE AND FENCING ARE ALLOWED TO PROTECT NATURAL VALUES FROM HUMAN DEGRADATION RECREATIONAL USE SHOULD ONLY BE TOLERATED AT A VERY LOW LEVEL AND IN FORMS THAT ARE "NONMANIPULATIVE" AND NOT DESTRUCTIVE. THE DRAFT PLAN WOULD ALLOW "RECREATION OPPORTUNITIES SIMILAR TO THE MANAGEMENT AREAS SURROUNDING THEM" (P.4-82). THIS IS FAR TOO VAGUE AND UNREGULATED HOW WILL THIS SITUATION BE MONITORED? NO INFORMATION IS GIVEN. IF THE SURROUNDING AREA PERMITS ORV USE, DO YOU PROPOSE TO ALLOW THIS DESTRUCTIVE ACTIVITY TO CONTINUE? NO INFORMATION IS

PROVIDED THE WNPS BELIEVES THAT ALL FORMS OF MOTORIZED RECREATION, ESPECIALLY ORV'S AND INCLUDING SNOW MACHINES, SHOULD BE SPECIFICALLY PROHIBITED ON RNA'S

IN GENERAL, RECREATIONAL ACTIVITIES THAT CAUSE ANY AMOUNT OF RESOURCE DEGRADATION ARE NOT APPROPRIATE IN RNA'S. CAMPING SHOULD BE SPECIFICALLY DISCOURAGED AND OPEN FIRES PROHIBITED TO PREVENT VEGETATIVE DESTRUCTION. THE COLLECTION OF NATIVE PLANTS AND THEIR SEEDS AND PARTS WITHOUT A SCIENTIFICALLY BASED COLLECTION PERMIT SHOULD BE SPECIFICALLY PROHIBITED.

FOREST SERVICE RESPONSE:

Recreational pursuits likely to damage the resources of the RNA's will be prohibited. Motorized vehicles will be banned since motorcycles, snow machines, and ORV's are considered to be highly destructive to understory plants and soils. Camping will be discouraged, though some "low-intensity" campsites may be designated for infrequent hunting, backpacking, and researchers using the remote RNA's in the Hells Canyons and subalpine wildernesses.

COMMENT NO. 19: THE DRAFT PLAN COULD ALLOW HUNTING, FISHING AND TRAPPING TO CONTINUE ON RNA'S. WE OBJECT TO THESE ACTIVITIES ON RNA'S AND WOULD POINT OUT THAT, WHILE THEY ARE NOT SPECIFICALLY ADDRESSED IN THE FSM, THEIR USE WOULD SEEM TO BE IN DIRECT CONTRADICTION TO BOTH RNA STANDARDS (SEC 4063.3.1: "THE PRIME CONSIDERATION IN MANAGING RNA'S IS THE MAINTENANCE OF UNMODIFIED CONDITIONS AND NATURAL PROCESSES") AND OBJECTIVES (SEC. 4063.02.8. "MONITOR EFFECTS OF RESOURCE MANAGEMENT TECHNIQUES AND PRACTICES"). HUNTING, FISHING, AND TRAPPING MOST CERTAINLY MODIFY NATURAL CONDITIONS AND AFFECT COMMUNITY STRUCTURES. AS SUCH, THEY ARE OBVIOUSLY INAPPROPRIATE IN RNA'S. THERE IS NO DATA PRESENTED IN THE DRAFT PLAN JUSTIFYING THE CONTINUED USE OF THESE ACTIVITIES ON RNA'S, NOR ARE THEIR POTENTIAL EFFECTS ON THE PRIMARY RNA RESOURCE VALUES DOCUMENTED. FOR INSTANCE, SEVERAL OF THE PRNA'S WOULD PRESERVE VARIOUS AQUATIC HABITAT CELLS. FISHING AND TRAPPING COULD NOT BUT HAVE SIGNIFICANT ADVERSE EFFECTS ON THESE ELEMENTS.

FOREST SERVICE RESPONSE:

Hunting and fishing could continue. It will be nearly impossible to prohibit fishing at Duck Lake and enforce it. We anticipate construction of board walks across the sphagnum mat to help protect it from fishermen. We need to control some wildlife populations through hunting. The Oregon Department of Fish and Wildlife can be part of our management team to monitor wildlife populations. Trapping would be disallowed except by a researcher under permit.

COMMENT NO. 20 IN SUMMARY, WE SUPPORT YOUR PROPOSALS FOR 13 NEW RNA'S BUT URGE YOU TO REVISE THE MANAGEMENT GUIDELINES FOR RNA'S LISTED IN THE DRAFT PLAN. SOME OF THESE GUIDELINES ARE CONTRADICTORY, NOT IN ACCORDANCE WITH FSM GUIDELINES, AND DESTRUCTIVE TO THE BASIC NATURAL COMMUNITIES THE AREAS ARE SUPPOSED TO PRESERVE UNALTERED. THE BOTTOM LINE IS THAT THE DRAFT PLAN PRESENTS NO DATA OR RATIONALE TO JUSTIFY MANIPULATIVE, EXPLOITATIVE USES OF RNA'S, SUCH AS GRAZING AND HUNTING, THAT SO OBVIOUSLY CONFLICT WITH FSM OBJECTIVES. WHEN THE FSM (SEC 4063.02) STATES THAT RNA'S SHOULD "PROTECT AGAINST SERIOUS ENVIRONMENTAL DISRUPTIONS . . . SERVE AS BASELINE AREAS FOR MEASURING LONG-TERM ENVIRONMENTAL CHANGES . . . SERVE AS CONTROL AREAS FOR MANIPULATIVE RESEARCH . . . MONITOR EFFECTS OF RESOURCE MANAGEMENT TECHNIQUES AND PRACTICES" THE FOREST SERVICE SHOULD BE ABLE TO OFFER COMPELLING REASONS IF THESE OBJECTIVES ARE NOT TO BE

FOLLOWED. AN RNA CANNOT SERVE AS A MONITORING CONTROL AREA FOR EVALUATING MANAGEMENT ACTIVITIES ELSEWHERE IF THE SAME ACTIVITIES ARE BEING CONDUCTED ON THE RNA ITSELF.

THE WASHINGTON NATIVE PLANT SOCIETY URGES YOU TO ABIDE BY YOUR OWN RNA GOAL STATEMENT (DRAFT PLAN, P. 4-81) "ACTIVITIES IN RNA'S ARE LIMITED TO RESEARCH, STUDY, OBSERVATIONS MONITORING, AND KINDS OF EDUCATIONAL ACTIVITIES THAT ARE NONDESTRUCTIVE AND NONMANIPULATIVE." LIVESTOCK GRAZING AND CONSUMPTIVE RECREATIONAL USES ARE CONSPICUOUSLY ABSENT FROM THIS LIST

FOREST SERVICE RESPONSE

Grazing is a key activity in northeast Oregon National Forests. Usually with RNA's, the issues center around removal of timber products from a timber resource base. However, many of the proposed RNA's are located in bunchgrass-dominated landscapes where historical allotment usage is threatened by the establishment of a new administrative unit. We will be working both internally and externally to develop a support for these areas and a trust that grazing plans will be respected. Obviously, we need to have standing biomass of nonforest vegetation to allow a researcher to investigate these plant communities. If we are to maintain or enhance these communities, it will be necessary to actively monitor use by ungulates and take control measures. We will seek to eliminate overgrazing and to consider all ungulates as tools for our use to maintain vigorous vegetation. The use of domestic stock should ideally be eliminated, reduced to levels approximating the natural grazing pressure at the next level, and only used to seventy if we were to approve a research endeavor that permitted heavy grazing intensities on a parcel of the RNA.

COMMENT NO. 21: PAGE 4-81, MANAGEMENT AREA 12 - THE BLM PROPOSES TO DESIGNATE RIPARIAN AREAS ADJACENT TO THREE STREAMS THAT TRAVERSE BLM LAND ADJOINING NATIONAL FOREST LANDS AS RESEARCH NATURAL AREAS TO FILL LOW ALTITUDE RIPARIAN CELL NEEDS FOR THE OREGON NATURAL HERITAGE DATA BASE. INVESTIGATIONS MAY BE NEEDED TO DETERMINE IF THESE CELL NEEDS ARE ALSO MET ON ADJOINING NATIONAL FOREST LANDS. THE STREAMS (CLOVER CREEK, BALM CREEK, AND SAWMILL CREEK) ORIGINATE ON NATIONAL FOREST LANDS NORTH OF KEATING, OREGON, AND FLOW TO THE POWDER RIVER. MANAGEMENT FOR TIMBER PRODUCTION IN THESE STREAMS' WATERSHEDS MAY NEED COORDINATION WITH THE BLM TO AVOID DAMAGE TO THE PROPOSED RNA'S (TIMBER SALE 88-612 IS IN THIS AREA.)

FOREST SERVICE RESPONSE

We will work with the BLM to resolve this question.

COMMENT NO. 22: WE FULLY SUPPORT THE ESTABLISHMENT OF THE THIRTEEN RESEARCH NATURAL AREAS (RNA'S) PROPOSED IN THE PREFERRED ALTERNATIVE OF THE WALLOWA-WHITMAN NATIONAL FOREST PLAN. IN ADDITION, WE ENCOURAGE THE FOREST TO CONTINUE SEARCHING FOR SUITABLE SITES FOR THE UNFILLED NATURAL AREA CELLS THAT ARE DESCRIBED FOR THE OCHOCO, BLUE, AND WALLOWA PROVINCE IN THE OREGON NATURAL HERITAGE PLAN (1981). THE UNFILLED TERRESTRIAL CELL NEEDS ARE LISTED IN APPENDIX H OF THE DRAFT EIS. THE UNFILLED AQUATIC CELL NEEDS FOR THE PROVINCE, LISTED BELOW, ARE ALSO IN NEED OF ATTENTION AND SHOULD ALSO BE MENTIONED IN APPENDIX H FOR COMPLETENESS

1. FIRST TO THIRD ORDER STREAM SYSTEM ORIGINATING IN WESTERN JUNIPER ZONE, INCLUDING INTERMITTENT STREAMS
- 4 FIRST TO THIRD ORDER STREAM SYSTEM ORIGINATING IN GRAND FIR ZONE, IF POSSIBLE WITH WATERFALL/PLUNGE POOL AREA.
- 10 MID TO HIGH ELEVATION VERNAL POND
14. SEDGE AND RUSH FEN COMPLEX
- 15 WILLOW CARR
- 18 COLD SPRINGS

FOREST SERVICE RESPONSE:

Thank you for noting the aquatic omission. These will be added along with an update of terrestrial cell needs based on projected riparian classifications for the Blue, Wallowa, and Seven Devils Mountains and adjoining lands. As a result, additional RNA proposals will be forthcoming to help fill our cells with RNA proposals.

COMMENT NO. 23 THE NATURAL HERITAGE ADVISORY COUNCIL'S CONCERNS OF NATURAL AREA CELLS HAVE BEEN ADDRESSED IN THE PLAN AND, WHILE THE SPECIFIC PLANTS ARE NOT LISTED, WE BELIEVE THE PLAN IS GOOD.

FOREST SERVICE RESPONSE:

Thank you.

COMMENT NO. 24: WE STRONGLY ENDORSE THE WALLOWA-WHITMAN NATIONAL FOREST'S PROPOSAL FOR 13 NEW RESEARCH NATURAL AREAS. ALL OF THESE AREAS WILL BE EXCELLENT ADDITIONS TO THE REGIONAL RNA SYSTEM AND WILL PROVIDE REPRESENTATION FOR A NUMBER OF ECOLOGICAL COMMUNITY CELLS THAT WOULD OTHERWISE REMAIN UNREPRESENTED AND FOR WHICH ALTERNATIVE AREAS WOULD BE PARTICULARLY DIFFICULT TO LOCATE.

FOREST SERVICE RESPONSE.

Thank you.

COMMENT NO. 25. WE URGE YOU TO CONTINUE THE IDENTIFICATION PROCESS FOR LOCATION OF POTENTIAL UNFILLED CELLS ON THE WALLOWA-WHITMAN, PARTICULARLY TO ADDRESS THE LARGE NUMBER OF UNFILLED CELLS IN THE BLUE MOUNTAINS SECTOR, AS INDICATED IN APPENDIX H (P. 3). WE ARE CONCERNED THAT NO SUCH AREAS HAVE BEEN IDENTIFIED IN THE BLUE MOUNTAINS AND URGE YOU TO ATTEMPT TO LOCATE AND FORMALLY PROPOSE SUCH AREAS AS SOON AS POSSIBLE - PREFERABLY BY THE TIME THE FINAL FOREST PLAN IS ISSUED. A STRONG AND COMPLETE RNA SYSTEM IS OF IMMENSE VALUE TO THE SCIENTIFIC AND EDUCATIONAL COMMUNITIES AND IS ESSENTIAL FOR A PROPERLY CONDUCTED MANAGEMENT ACTIVITY MONITORING PROGRAM BY THE FOREST SERVICE. THE WNPS IS ALSO CONCERNED THAT YOU HAVE NOT INCLUDED THE TWO AREAS MENTIONED IN FOOTNOTE 1 ON P H-1 FOR FORMAL RNA DESIGNATION. THE REPRESENTATION OF TUFTED HAIRGRASS AND HACKBERRY CELLS WOULD BE IMPORTANT ADDITIONS TO THE RNA SYSTEM.

FOREST SERVICE RESPONSE.

Bill's Creek RNA is formally proposed for filling the netleaf hackberry and sand dropseed cells and Cougar Meadow RNA is proposed to fill aspen and tufted hairgrass cells. The new unfilled cell listing includes new cells based on the Wallowa-Snake plant association classification published in 1987. It also deals more comprehensively with the Blue Mountain vegetation. We will propose additional areas as opportunities are identified.

TIMBER RESOURCE IN GENERAL
Code 700

COMMENT NO. 1 I AM CONCERNED THAT ROTATION AGE ON ALL STRATEGIES WAS BASED ON SHORT TERM ECONOMIC GAINS (I E. PRESENT NET WORTH). I DO NOT FEEL THE ROTATION AGE OF 95% OF CMAI WAS CONSIDERED THE BEST FOR THE MOST OVER THE LONG TERM (NFMA). INSTEAD IT CONSIDERS THE BEST FOR NOW SHIFTING HIGH COSTS AND LOWER VALUED TIMBER TO THE FUTURE

HAS LONG TERM PRODUCTIVITY OF LANDS WHERE SHORT ROTATIONS ARE PREDICTED BEEN CONSIDERED? NUTRIENT CYCLING ... SOIL ORGANISMS . INSECT INTERACTIONS (I E , ANTS AND BUDWORM). THERE ARE A LOT OF UNKNOWNNS, ESPECIALLY ON "EAST SIDE" FORESTS, WHERE MANAGEMENT TO DATE HAS BEEN HEAVILY SLANTED TO OLD GROWTH REMOVAL THESE UNKNOWNNS OR RISKS SHOULD BE SOMEHOW INCORPORATED INTO YIELD CALCULATIONS MUCH LIKE BUSINESS INCORPORATES RISK PROJECTIONS INTO A BUSINESS DECISION

FOREST SERVICE RESPONSE:

We recognize that "shifting high costs and lower valued timber to the future" does not have a pleasant ring to it, but it is reflective of sound economic thought. The following simplified example reflects our understanding.

If we need stone for a building project, we will normally use stone from a nearby quarry first, leaving more distant stone for future projects.

We don't really know whether anyone in the future will ever need the convenient stone. We could pass it up--thinking we were going to help out posterity--only to discover later that posterity never needed or wanted it Times change, technology changes, needs change, wants change, aspirations change. Just who is it that we should save the convenient material for? Will they even want it?

We should also reflect on the fact that anytime we fail to operate as efficiently as possible we degrade our existing lifestyle and that of our posterity Paying \$100 for a patio that would cost only \$90--if done with convenient materials--makes no sense

Many share your views regarding minimum rotation ages of 0.95 CMAI and many dispute them. It all seems to boil down to one's individual views of what the timber market will be like when these stands come to a merchantable status It is true that harvesting at 0.95 CMAI will provide more wood fiber than will longer rotations

As more information becomes available on the unknownns you mention, we will adjust management accordingly. This particular plan can be in effect no more than 15 years and, even while it is in effect, may be amended

COMMENT NO. 2: AS THE SHIFT OF TIMBER PRODUCTION CONTINUES TO MOVE AWAY FROM THE SOUTHERN STATES AND CANADA OVER THE NEXT 10 TO 20 YEARS, IT IS ESSENTIAL THAT PUBLIC LANDS, IN LATER YEARS, BE IN A POSITION TO PROVIDE CRITICAL SUPPLIES TO ALLOW THIS REGION TO REGAIN MARKETS (DOMESTIC AND INTERNATIONAL) WHILE ALL FINAL NUMBERS ARE NOT IN, PLANNING FOR THIS LONG-TERM TREND BACK TO THE NORTHWEST FOR

TIMBER SUPPLY AND MARKET SHARE MUST BE RECOGNIZED AND DEALT WITH IN THIS PLANNING PROCESS

FOREST SERVICE RESPONSE

As the writer recognizes, the final numbers are not in Forest Plans will be revised every 10-15 years This will permit them to be updated in accord with Regional trends and changing national needs

COMMENT NO. 3: A TRACT OF WILD LAND THAT STILL RETAINS BIOLOGICAL INTEGRITY IS A RARITY THESE DAYS WE HAVE REPEATEDLY SUBJECTED THE LAND TO HUMAN SHORT-RANGE GOALS AND IN THE PROCESS WE HAVE EXACTED, IN MOST INSTANCES, A TERRIBLE PRICE. CITIZENS ARE CONCERNED THAT MULTIPLE USE, AS PRESENTLY PRACTICED IN THE UNITED STATES BY THE FOREST SERVICE, IS FUNCTIONING PRIMARILY TO MAXIMIZE THE AMOUNT OF BOARD FEET AVAILABLE TO THE LUMBER INDUSTRY RATHER THAN BRING INTO BALANCE THE DIVERSE VALUES THAT MAKE DEMANDS ON THE NATIONAL FORESTS. IT IS FRUSTRATING TO REALIZE THAT THE AGENCIES THAT THE PUBLIC ENTRUSTS WITH INFORMED MANAGEMENT AND CAREFUL RESOURCE USE ARE EXPLOITING, AT AN ALARMING RATE, THE VERY FORESTS THEY OVERSEE.

FOREST SERVICE RESPONSE

We recognize that this concern exists It is true that in this plan there are extensive areas where timber production is emphasized But in these areas, there are overriding constraints to protect water quality, riparian habitat, cultural resources, the soil resource, and scenic qualities as viewed from important travelways There are also dispersion-of-created-opening constraints to offer some degree of protection for wildlife as well as water quality and recreation variety. An aggressive road management plan is included In addition, there are over 38,000 acres of mostly productive forestland allocated to old-growth retention These areas are scattered throughout the timber management areas. Assuming Management Areas 1, 3, and 18 are considered by the reader to be maximizing timber (a debatable point), there is approximately nearly half of the Forest where timber production is not emphasized at all

COMMENT NO. 4. IF A CHANGE IS SEEN OVER TO SMALLER TREES, IN THE FUTURE WHY PUT IT OFF UNTIL THE END? START NOW

FOREST SERVICE RESPONSE:

The change has been occurring for many years now, and continues For example, utilization of trees for sawtimber has improved from including nothing smaller than 11 inch diameter logs in the 1950's to 7 inch diameter logs today We have successfully marketed trees with requirements for top diameters of 4 inches

COMMENT NO. 5: REDUCTIONS IN THE AMOUNT OF OLD-GROWTH TIMBER AVAILABLE FOR HARVEST WILL HAVE AN IMPACT ON OREGON'S EXPORTS WOOD PRODUCTS MANUFACTURED FROM OLD-GROWTH TIMBER ARE A PRIMARY EXPORT TO JAPAN.

FOREST SERVICE RESPONSE

We agree although there has been some emphasis on producing export quality wood from managed stands

COMMENT NO. 6: (SUSTAINED YIELD LOGGING IS A MUST IN ANY ALTERNATIVE. A DEFERRED PROGRAM IS NOT NEEDED WE NEED TO BRING TO AN END THE PHILOSOPHY OF CUT THE BEST & LEAVE THE REST. THE MANY ACRES OF OVERSTOCKED GRAND FIR ATTEST TO THAT POSITION. REGARDLESS OF WHAT THE LOCAL MILL OWNERS SAY, GRAND FIR NEEDS A SIGNIFICANT ALLOCATION INCREASE. CONTINUED EMPHASIS IS NEEDED ON MANAGEMENT OBJECTIVES TOWARD CLEANING UP LOW PRODUCING STANDS - ENCOURAGING GROWTH RATES OF HIGHER VALUE DOUGLAS-FIR & PONDEROSA PINE THIS REQUIRES A SIGNIFICANT REALLOCATION OF FUNDS FROM NEW ROADS ETC. TOWARDS THINNING & PRECOMMERCIAL SALVAGE LOGGING OF GRAND FIR STANDS AND DOG-EARED PINE THICKETS. ALSO CONTINUED ENCOURAGEMENT IS NEEDED FOR THE USE OF THINNED TREES FOR SMALL DIMENSIONAL LUMBER, PARTICLE BOARD, ENERGY (NORTH POWDER PLANT), AND FIREWOOD.

FOREST SERVICE RESPONSE:

The new plan gives greater emphasis to harvest in the grand fir type and improved growth rates in all species. We will continue to encourage better utilization of all material, recognizing that our degree of success depends a great deal on market conditions.

COMMENT NO. 7 WHEN THE BUG EPIDEMIC WAS IN FULL SWING, I HEARD THAT THE BIG PONDEROSA WAS SOLD FOR AS LITTLE AS \$5 PER THOUSAND. SINCE THIS INVOLVED NO ROAD CONSTRUCTION COSTS, IT COULD ONLY BE CLASSIFIED AS A VERY GOOD DEAL FOR TIMBER COMPANIES.

FOREST SERVICE RESPONSE

Dead and dying timber which requires immediate removal will often appraise at minimum rates. This results from accelerated harvest requirements with high logging costs and also high risk to the purchaser that the material may not be merchantable by the time it reaches the sawmill. If a sale is thought to be highly profitable, the rate paid for the timber is raised far above appraised rates in the competitive bidding procedure.

COMMENT NO. 8. MORE REMOVAL OF THE DEAD AND DYING TREES WILL HELP CONTROL THE DISEASE AND BUGS IN THE TREES REMAINING. CUTTING OF WOOD FOR PERSONAL USE ALSO HELPS.

FOREST SERVICE RESPONSE:

We agree that tree salvage can be an important factor in controlling some insects.

COMMENT NO. 9: HAVE PROFESSIONAL FULL-TIME TIMBER PERSONNEL MARKING AND LAYING THE TIMBER SALES OUT.

FOREST SERVICE RESPONSE:

Professional foresters and experienced full-time technicians are responsible for timber sale layout. We have recently begun contracting with professional forestry consultants for timber marking and cruising. If this approach is successful and cost effective, it will be expanded.

COMMENT NO. 10. MAKE ECONOMICAL CUTS, DON'T FORCE RETURN CUTS EVERY TEN YEARS. EXAMPLE: BAKER DISTRICT; INDIAN CREEK, FINISH, PINE DISTRICT; BACKSIGHT,

LA GRANDE DISTRICT; VELVET CREEK, WATERMELON. THESE SALES WILL PROBABLY BE MARKED AND RELOGGED ALMOST IMMEDIATELY AFTER CLOSING IF THE ONES NOT SOLD SELL THIS MAKES ADMINISTRATION AND LOGGING TWICE AS EXPENSIVE AND PROLONGS STAND TREATMENT; CONSEQUENTLY, THE NEXT ENTRY

FOREST SERVICE RESPONSE.

An emphasis on even-aged timber management will result in more economical regeneration on cutting methods. Those that argue for unevenaged management must contend with frequent entries to accomplish distribution. Your comment seems to support evenaged silvicultural methods.

COMMENT NO. 11: DON'T GET CARRIED AWAY WITH CLEAR-CUTTING AND BURNING IN MY OPINION, THIS WORKS GREAT IN DECADENT WF STANDS BUT IS SLOPPING OVER INTO PINE STANDS ON AREAS THAT HAVE ADVANCED REPRODUCTION THAT COULD BE THINNED THIS ALSO CAUSES LOSS OF TIMBER DUE TO ADVERSE PUBLIC REACTION. AN EXAMPLE OF THIS IS UNIT #2 OF THE GORHAM BUTTE TIMBER SALE. I FEEL IF THIS UNIT COULD HAVE BEEN AN OVERSTORY REMOVAL THE EAGLE ROOST PROBLEM WOULD HAVE NEVER SURFACED AND I FEEL THAT AESTHETICS RATHER THAN ROOST TREES WAS THE PROBLEM.

FOREST SERVICE RESPONSE

Clear-cutting is only one cutting method the silviculturists may consider. When a stand contains healthy advanced reproduction, other harvest methods will be selected. Unit No 2 of the Gorham Butte Timber Sale is an overstory removal unit that has been individually tree marked for cutting According to the eagle study, it is the unit most likely to contain roost trees

COMMENT NO. 12: I WANT BETTER UTILIZATION OF OUR RENEWABLE RESOURCES - BLOW-DOWNS, INSECT KILL, ETC.

FOREST SERVICE RESPONSE:

All Forest Plan alternatives attempt to capture anticipated mortality from the available and suitable commercial forestland There are also plans to salvage in much of the unregulated acres of the Forest Some salvage will be foregone where management areas do not permit timber harvest.

COMMENT NO. 13: ONCE A PLAN IS ADOPTED, IT IS EXTREMELY IMPORTANT THAT PERSONNEL IMPLEMENTING THE PLAN UNDERSTAND THE EFFECT THEIR DECISIONS ARE HAVING UPON THE SCHOOLS AND THE LOCAL COMMUNITY IT HAS COME TO OUR ATTENTION THAT SOME TIMBER SALES ARE INITIALLY GOING UN-SOLD, THEN RE-BID, ETC ARE THESE TIMBER SALES PRICED REASONABLY SO MILLS CAN PARTICIPATE IN THE BIDDING PROCESS ON A PROFITABLE BASIS? IT WOULD APPEAR THAT WITH CURRENT TECHNOLOGY AND TRAINED STAFF, MORE ACCURATE VALUES SHOULD BE PLACED SO AS TO ENSURE SALES AND REDUCE THE INEFFECTIVENESS OF REPEATING THE PROCESS.

FOREST SERVICE RESPONSE.

Federal law requires that all National Forest timber to be sold be appraised prior to sell The timber cannot be sold for less than the appraised price The appraisal process is standardized throughout the Pacific Northwest Region and occasionally results in an appraised price higher

than purchasers are willing to pay under existing markets. The timber is sometimes reoffered when market conditions improve. Occasionally a sale will not attract any bidders because of some harvest stipulation or restriction that purchasers consider uneconomical. As a result, the sale may be reexamined and some other way of meeting the objective is found. Then a change is made and the sale reoffered.

COMMENT NO. 14 A PET PEEVE OF MINE IS THAT THE LEAVE TREES ARE SOMETIMES MARKED IN TIMBER SALES RESULTING IN A GLARING INSULT TO THE INTEGRITY OF THE FOREST AFTER HARVESTING (I DON'T HAVE ANY PROBLEMS WITH US REMOVING SOME OF THE TREES FROM THE FOREST FOR OUR USE, BUT I DO NOT LIKE US TO CARELESSLY DEGRADE THE FOREST CHARACTER IN THE PROCESS). I BELIEVE THAT IT SHOULD BE USFS POLICY TO ONLY MARK THE TAKE TREES.

FOREST SERVICE RESPONSE:

It is sometimes much more cost effective to mark leave trees than to mark cut trees. With certain types of cutting, the timber markers can more readily visualize what the remaining stand will be if they mark leave trees rather than cut trees. We recommend that the marks be placed on the backside of the tree when adjacent to travelways. We have not received many comments from the public regarding paint marks on trees.

COMMENT NO. 15 CONSIDERABLE YEARLY VARIATION IN TIMBER PRICES IS ACKNOWLEDGED (DEIS-III -22), BUT OVER THE LONG TERM IT IS EXPECTED THAT TIMBER WHICH SELLS FOR \$100/MBF WILL BE WORTH \$164/MBF IN 50 YEARS. THIS IS THE ONLY FACTOR WHICH MIGHT MAKE MANY PRESENTLY UNECONOMICAL HARVESTS POSSIBLE. IF IT MIGHT BE ANTICIPATED THAT TIMBER PRICES WOULD NOT RISE TO THE LEVEL EXPECTED, HOW WOULD THIS AFFECT THE ANALYSIS? AT WHAT POINT WOULD THE WWNF INCUR NET LOSSES FOR THE U. S. TREASURY? DOES THE WWNF PRESENTLY GENERATE A POSITIVE CASH FLOW FOR THE U. S. TREASURY CONSIDERING LOGGING RECEIPTS, ROADING, ADMINISTRATION, ENGINEERING, AND MITIGATION COSTS? IF NOT, AT WHAT POINT IN THE FUTURE WILL A POSITIVE FLOW OCCUR, GIVEN THAT ROAD INVESTMENTS HAVE ALREADY BEEN MADE? HOW DO PRICE TRENDS DETERMINE THE LENGTH OF TIMBER FOR THIS TO OCCUR? HAVE MITIGATION COSTS BEEN ASSUMED TO RISE AT A RATE SIMILAR TO THE INCREASE IN TIMBER PRICES?

FOREST SERVICE RESPONSE:

We share your concerns as to the possible effects if real price projections used in the analysis were not to occur. To address those concerns, we conducted sensitivity tests to see what would happen if we had no real price increases or even higher real price increases. Real price increase of 0, 1, or 2 percent per annum all result in the same amount of Forest land being managed for timber production (see Benchmark Analysis, Appendix B).

The Forest is expected to generate a negative cash flow in Decade 1 of Forest Plan implementation.

It is only in the far distant future (about 60 years) that we would expect the Forest to generate a positive cash flow. In the DEIS presentation of cash flow, all Forest outputs and activities are included—even though much use of the Forest is made without payment (as with most recreation), or at rates reduced from what the marketplace would indicate (as with livestock grazing).

Because real price increases affect the receipts portion of a cash-flow analysis, the use of real price increases in the analysis does affect the length of time it takes for the Forest to achieve a positive cash flow

Mitigation costs have been assumed to change in proportion to the overall level of price changes in the economy

COMMENT NO. 16 TIMBER INTERESTS SHOULD NOT BE ALLOWED TO DAMAGE THE VIABILITY AND BALANCE OF OUR FORESTS. EMPHASIS NEEDS TO BE PLACED ON MAKING MAXIMUM USE OF ALL TREE SPECIES. CONSIDERABLY MORE THOUGHT NEEDS TO BE GIVEN AS TO THE EFFECT OLD GROWTH TREES HAVE ON THE TOTAL HEALTH OF THE FOREST.

FOREST SERVICE RESPONSE:

We agree with your comments.

COMMENT NO. 17 ALTERNATIVE B MAINTAINS THE BEST EVEN FLOW TIMBER PRODUCTION, BUT STILL ALLOWS FOR OTHER AMENITIES TO BE PROTECTED

FOREST SERVICE RESPONSE:

Thank you for your views.

COMMENT NO. 18: MANAGE 950,000 ACRES OF SUITABLE TIMBER LAND FOR FULL TIMBER YIELD, RATHER THAN THE 151,200 ACRES AS IN THE FOREST SERVICE PREFERRED ALTERNATIVE.

FOREST SERVICE RESPONSE:

Thank you for your recommendation. This approach was considered

COMMENT NO. 19 ALTERNATIVE B-DEPARTURE - (DEIS PAGES II-33-37) THE DEPARTMENT OF FORESTRY APPRECIATES THAT THE WALLOWA-WHITMAN ATTEMPTS TO PROVIDE AN ALTERNATIVE WHICH MEETS THE FORESTRY PROGRAM FOR OREGON (FPFO) TIMBER HARVEST TARGETS HOWEVER, THE DEIS STATES THESE TARGETS ARE MET ONLY THROUGH A SIGNIFICANT LOSS OF PRESENT NET VALUE (PNV) IT IS APPARENT FROM TABLE II-A THAT THE LOSS OF 407,300 ACRES (30%) OF THE COMMERCIAL FOREST LAND BETWEEN 1980 AND THE FORMULATION OF ALTERNATIVE B-DEPARTURE IS ONE OBVIOUS REASON FOR THIS OUTCOME. THE HIGH MANAGEMENT AND LOGGING COSTS USED BY THE FOREST AS WELL AS THE LACK OF A DECADAL HARVEST CHANGE CONSTRAINT HAVE ALSO CONTRIBUTED TO THIS POOR ECONOMIC PERFORMANCE THEREFORE, THE DEPARTMENT CANNOT SUPPORT ALTERNATIVE B-DEPARTURE BASED ON THE INFORMATION PRESENTED IN THE DEIS.

SINCE ALTERNATIVE B AND B-DEPARTURE HAVE THE SAME LAND ALLOCATIONS AND SINCE ALTERNATIVE B HAS THE SECOND HIGHEST PNV OF ANY ALTERNATIVE, OPPORTUNITIES EXIST TO IMPROVE ALTERNATIVE B-DEPARTURE FROM THE TEXT AND DISCUSSION WITH FOREST PLANNERS, IT APPEARS THAT SHORTENED ROTATION LENGTHS AND THE HARVESTING OF ADDITIONAL BELOW-COST STANDS DID NOT CONTRIBUTE TO A LOSS OF PNV. IF THIS IS TRUE, THEN WE RECOMMEND RETAINING THESE CHARACTERISTICS OF THE ALTERNATIVE

THE DEIS STATES THAT ALTERNATIVE B-DEPARTURE CANNOT BE IMPLEMENTED WITHOUT VIOLATING NFMA SINCE IT UTILIZES SHORTENED ROTATIONS. HOWEVER, CFR PART 219.16(a)(2)(iii) ALLOWS EXCEPTIONS TO THIS REGULATION IF " OVERALL MULTIPLE-USE OBJECTIVES WOULD BE BETTER ATTAINED." THE DEIS SHOULD NOTE THIS FLEXIBILITY IN THE REGULATIONS AND CONSIDER ALTERNATIVE B-DEPARTURE AS A VIABLE, LEGALLY IMPLEMENTABLE ALTERNATIVE

WE DO NOT SUPPORT THE FOREST'S OMISSION OF A DECADAL HARVEST CHANGE CONSTRAINT FROM THE MODEL AND THE RESULTING HARVEST FALLDOWN IN DECADE SIX DEPICTED IN FIGURE II-1. A 10 PERCENT DECADAL HARVEST CHANGE CONSTRAINT, ALONG WITH A HARVEST FLOOR EQUAL TO THE ALTERNATIVE B FIRST DECADE HARVEST OF 45.7 MMCF IS RECOMMENDED FOR THIS DEPARTURE ALTERNATIVE. THE PONDEROSA PINE AND DOUGLAS-FIR COMPONENTS OF THE ALTERNATIVE B-DEPARTURE FIRST DECADE TIMBER HARVEST SHOULD BE MAINTAINED AT LEVELS PROVIDED BY THE EXISTING TIMBER MANAGEMENT PLAN. ALSO, LONG SPAN CABLE AND HELICOPTER LOGGED ACRES SHOULD NOT BE SUBSTITUTED FOR TRACTOR LOGGED ACRES, AS WAS DONE WITH THE EXISTING ALTERNATIVE B-DEPARTURE. WE BELIEVE THESE REVISIONS, ALONG WITH THE USE OF MORE REALISTIC MANAGEMENT COSTS, WOULD GENERATE AN ALTERNATIVE WHICH MORE CLOSELY MEETS THE FORESTRY PROGRAM OBJECTIVES, OF WHICH HARVEST LEVELS ARE ONLY ONE MEASURE. ADDITIONAL FORPLAN RUNS SHOULD BE MADE TO MORE PRECISELY DETERMINE THE OUTPUTS AND ECONOMIC PERFORMANCE OF A RECRAFTED ALTERNATIVE B-DEPARTURE.

FOREST SERVICE RESPONSE

We agree that the cited NFMA regulation is subject to interpretation. It does say that such exceptions may be evaluated. Regardless, we do not believe that we can justify Alternative B-departure on the basis of it better meeting overall multiple use objectives. Negative response from the public to departure alternatives in general would seem to verify our point. This alternative was not supported by Governor Goldschmidt.

COMMENT NO. 20. THE ACCELERATED RATES OF TIMBER HARVEST THESE PAST DECADES ON PRIVATE LANDS ARE DEPLETING THEIR SUPPLY OF TIMBER, AND THE WOODS PRODUCTS INDUSTRIES ARE EYEING OUR PUBLIC LANDS FOR THE LARGE, OLD GROWTH TIMBER THAT IS THE MOST PROFITABLE AND SUITABLE FOR THEIR MILLS. THEY HAVE NOT PRACTICED SUSTAINED YIELD CUTTING--MORE OF THE CUT-OUT AND GET OUT HISTORY BEING REPEATED

FOREST SERVICE RESPONSE:

While some forest products companies practice a sustained yield philosophy on their privately owned lands, others are more susceptible to short term profit motives. Most of our local industry owns little timberland and have been highly dependent on National Forest timber for their raw material supply

COMMENT NO. 21: THE FOREST SERVICE HAS FANTASIES CONCERNING THE ECONOMICALLY DESIRABLE PRODUCTS OF THE FUTURE. IT HAS FANTASIES CONCERNING THE PRODUCTIVITY OF THE LAND SUBJECTED TO DEPLETION FOREST PRACTICES. WITHIN THE CONTEXT OF THESE FANTASIES, THE REALITIES OF THE INVENTORY AND LEGAL CONSTRAINTS, THE PREFERRED ALTERNATIVE MAY BE AS GOOD AS ANY

FOREST SERVICE RESPONSE

Thank you for your views

COMMENT NO. 22: I AM VERY CONCERNED ABOUT THE DRAFT FOREST MANAGEMENT PLAN FOR THE WALLOWA-WHITMAN FOREST I AM NOT ANTI-LOGGING, BUT I FEEL THE PLANS OF ROAD-BUILDING AND LOGGING CONTAINED THEREIN ARE THE WORST OF POSSIBLE USES FOR THE WALLOWA-WHITMAN.

FOREST SERVICE RESPONSE:

Thank you for your views

COMMENT NO. 23: SPECIFICALLY, WE DO NOT BELIEVE THE FOREST SHOULD BE MANAGED FOR THE NEEDS OF A VOCAL FEW WHO WOULD LOCK UP MUCH LAND, LET TIMBER GO TO WASTE, AND DISREGARD THE POTENTIAL RESOURCES OF THE FOREST FOR A VARIETY OF TYPES OF RECREATION, AND WILDLIFE DEVELOPMENT.

FOREST SERVICE RESPONSE:

Thank you for your opinion.

COMMENT NO. 24. MY OPINION IS THAT GOD PUT THE TIMBER ON THIS EARTH FOR OUR USE. HE MADE EVERYTHING TO REPLENISH ITSELF WHEN ONE TREE IS CUT MORE WILL GROW IN ITS PLACE

FOREST SERVICE RESPONSE

Thank you for your opinion

COMMENT NO. 25. ALL THIS IN ORDER TO PRODUCE MORE TIMBER. IT IS TIME TO SAY STOP TO EXCESSIVE RESOURCE EXPLOITATION! THE WALLOWA-WHITMAN CAN BE A FOREST THAT SAYS NO, WE WILL NOT BE A TIMBER COLONY FOR AN OVER-CONSUMPTIVE WORLD WE WILL NOT GIVE UP THE BEAUTY, THE FISH, THE WILDLIFE SO THAT THE WORLD CAN HAVE EVERYTHING IT WANTS*

FOREST SERVICE RESPONSE.

Thank you for your views.

COMMENT NO. 26 IT DOESN'T MAKE SENSE TO LET A RENEWABLE RESOURCE GO TO WASTE, ROT, AND DIE AND THEN HAVE A FIRE IN ALL OF IT AND BURN IT DOWN ANYWAY WE HAVE HAD TWO FIRES ON NRA AND WILDERNESS ALREADY THIS YEAR AND NO ONE GETS ANY USE OUT OF IT THEN. NOT EVEN THE SO CALLED WILDERNESS ADVOCATES

FOREST SERVICE RESPONSE

Fires do not necessarily damage the wilderness resource However, we respect your opinion which many people share

COMMENT NO. 27: I HAVE CAMPED AND BACKPACKED NUMEROUS TIMES IN THIS FOREST AND I CONSIDER IT ONE OF THE BEST RECREATIONAL AREAS IN THE NORTHWEST. YOU MUST NOT CUT BACK ON TRAILS AND WILDLIFE HABITAT AS THE LOGGING INDUSTRY HAS ALREADY MADE A JOKE OF THE MULTIPLE USE CONCEPT IN THIS FOREST. THE PLAN THAT IS ADOPTED SHOULD RECOGNIZE THAT OVER-CUTTING HAS OCCURRED.

FOREST SERVICE RESPONSE:

We share your perception that this Forest is one of the best recreational areas in the northwest. All of the alternatives for the Forest Plan provide consideration for the recreation and wildlife resources. Past timber activities on the Forest were based on sustained yield using the assumptions that were then applicable to the size of the resource base. Recognizing those assumptions, over-cutting has not occurred. The assumptions have changed due to laws reflecting new public priorities and new knowledge about the capability of the Forest. The timber outputs in the Forest Plan alternatives reflect that change.

COMMENT NO. 28 PUTTING MORE TIMBER INTO INACTIVE USE IS A WASTE OF OUR NATURAL RESOURCES. IN ORDER TO GET THE BEST YIELD OFF OF ANY PIECE OF GROUND, IT HAS TO BE SELECTIVELY HARVESTED IN SOME WAY. THE BIG PROBLEM WITH BUG KILL HAPPENS BECAUSE THE LODGEPOLE HAS BEEN NEGLECTED AND THE BUG JUST WENT WILD.

FOREST SERVICE RESPONSE:

Some uses of our natural resources preclude timber harvesting. This is not a waste to those members of the public who participate in that use. Lodgepole pine stands were neglected because there was no market for this small material and many of the stands were inaccessible making management difficult and expensive. Lodgepole pine stands that we are presently regenerating will be managed to provide health to withstand insect populations.

COMMENT NO. 29: TREES ARE NOT LIKE STONE STATUES AND STAY THE SAME--THEY MATURE AND DIE--AND WHEN THEY ARE MATURE THEY NEED CUTTING AND THINNING--WE SHOULD GET THE MOST WE CAN OUT OF THE FOREST--LUMBER, FIREWOOD, ETC., AND THE MOST THAT WILL HELP THE MAJORITY OF THE PEOPLE--NOT JUST THE TOURISTS AND ENVIRONMENTALISTS. I DEPLORE THE IDEA OF BURNING PORTIONS OF THE FOREST--I HAVE SEEN GOOD GROWING TREES DESTROYED--EXAMPLE UP NEAR THE FRY CREEK RANGER STATION--IT IS A CRIMINAL WASTEFULNESS TO LOCK UP THE NATIONAL FORESTS FOR TOURISTS AND ENVIRONMENTALISTS--THE TREES SHOULD BE USED AS THEY MATURE.

FOREST SERVICE RESPONSE:

Thank you for your views.

COMMENT NO. 30 THE ACREAGE DEDICATED TO TIMBER MANAGEMENT IS FAR TOO LOW. THROUGH IMPROVED METHODS AND TECHNOLOGY, OUR FARMERS CAN FEED US AND ONE FOURTH OF THE REST OF THE WORLD, ON A SHRINKING LAND BASE, NO LESS. I AM SHOCKED THAT THE BIGGEST ORGANIZATION OF PROFESSIONAL FORESTERS IN THE WORLD WOULD SUGGEST A REDUCED HARVEST OF TIMBER THROUGH LESS THAN FULL MANAGEMENT OF AVAILABLE TIMBER LANDS.

FOREST SERVICE RESPONSE:

The Forest is to be managed for a variety of resources including timber. Considering that there is some degree of incompatibility between the resources, our challenge is to find the proper mix. Public comments such as yours help us to arrive at the acceptable multiple use combinations.

COMMENT NO. 31: WE HAVE READ THE WALLOWA-WHITMAN DRAFT PLAN AND FEEL THAT IT IS STRONGLY BIASED TOWARD TIMBER MANAGEMENT. WE FEEL THAT MUCH MORE EMPHASIS NEEDS TO BE PLACED ON FISHERIES, WILDLIFE, AND DISPERSED RECREATION.

FOREST SERVICE RESPONSE

Thank you for your view.

COMMENT NO. 32: INCREASE EMPHASIS ON TIMBER SALE ADMINISTRATION. INCREASE NUMBER OF FSR'S TO 1 FSR PER 5 MMBF ANNUAL HARVEST.

FOREST SERVICE RESPONSE:

Our present emphasis is on increasing the quality of timber sale administration. If quantity becomes a limiting factor in obtaining good results, we will press for necessary funding to meet the need.

COMMENT NO. 33: OUR FORESTS NEED TO BE MANAGED AND MAINTAINED. YOU KNOW THAT THIS INCLUDES THE HEALTHY LOGGING OF OLD GROWTH TO PREVENT DISEASE AND FIRE AND TO ENCOURAGE NEW GROWTH AND ANIMAL HABITAT. THE REGENERATIVE CAPABILITY OF OUR FORESTS HAS BEEN MISINTERPRETED. WE CAN CUT MUCH MORE THAN YOU WANT US TO CUT.

FOREST SERVICE RESPONSE

We agree that management and maintenance can perpetuate a healthy forest. A percentage of the forest, however, should be kept in old growth or managed for old growth condition to provide biological and ecological diversity which also affects the health of the forest. This is made even more important by the fact that the commercial forest will be harvested before it reaches an overmature or old growth condition. We think this is sufficient reason to suffer some reduction in total productivity.

COMMENT NO. 34: ALL THE PLANS SHOULD ALLOW FOR ONLY THE AMOUNT OF CUT DURING EACH PLANNING PERIOD THAT WILL BE REPLACED IN EQUIVALENT OR SAME SIZE IN THAT PLANNING PERIOD. THE ALLOWABLE CUT SHOULD THEN BE MODIFIED TO REFLECT THE ACTUAL AMOUNT OF TIMBER THAT COULD BE EXTRACTED UNDER SUCH A HARVEST CONSTRAINT. PRESENT INVENTORY WOULD SUPPLY THE CUSHION IN CASE OF EMERGENCIES WHEN THIS TYPE OF TIMBER IS NEEDED FOR NATIONAL BEST INTEREST AND SECURITY. IT IS ESSENTIAL FOR ALL WHO USE THE FOREST TO UNDERSTAND THAT THE FOREST IS A BASIC PROVIDER OF RESOURCES WHICH, IF PROPERLY MANAGED, AND CARED FOR WILL CONTINUE TO SUPPLY MAN'S NEEDS.

FOREST SERVICE RESPONSE.

Your proposal describes exactly what is expected to occur in a managed forest. The existing condition is that many stands of trees are in a mature or overmature state. You suggest that the excess of old growth volume be allocated to provide a cushion to meet future national needs. An argument can also be made for converting these stands to meet current demand, thus increasing their productivity in anticipation of future needs.

COMMENT NO. 35 I WOULD LIKE TO SEE GREATER INVESTMENTS IN INTENSIVE TIMBER MANAGEMENT ON FEWER ACRES.

FOREST SERVICE RESPONSE:

This is approximately what would occur with Alternative E.

COMMENT NO. 36. APPARENTLY, THE FOREST SERVICE DP PHILOSOPHY IS TO MANAGE MOST OF THE AVAILABLE, PRODUCTIVE FOREST LAND AS TREE FARMS. ONLY CONGRESSIONALLY DESIGNATED AREAS WILL NOT GENERALLY RECEIVE INTENSIVE TIMBER MANAGEMENT (ITM). SMALL ALLOCATIONS ARE MADE FOR OLD GROWTH AND SOME FOREST LANDS IN BACKCOUNTRY, BUT IT SEEMS THAT 85-90 PERCENT OF THE COMMERCIAL FOREST LAND AVAILABLE FOR ALLOCATION IS DESIGNATED FOR SOME FORM OF ITM.

FOREST SERVICE RESPONSE:

The amount of land allocated to the various management areas is shown in Chapter 4 of the Forest Plan and on the preferred alternative map.

COMMENT NO. 37: THE PLAN CAN BE GREATLY IMPROVED WHILE STILL PROVIDING A STABLE TIMBER ECONOMY AND ENCOURAGING A DIVERSIFIED TOURISM AND RECREATION INDUSTRY.

FOREST SERVICE RESPONSE:

We believe the Plan accomplishes this combination of uses.

COMMENT NO. 38: DEVELOP THIS MANAGEMENT AREA: -- QUALITY PONDEROSA PINE ITM - EXTENDED 250 YEAR ROTATION FOR QUALITY TIMBER PRODUCTS

- UNEVEN AGE ITM - PROVIDE A MORE DIVERSE FOREST ECOSYSTEM.

FOREST SERVICE RESPONSE:

Such an area could be developed with recognition that there would be a significant decrease in timber production.

COMMENT NO. 39: I AM CONCERNED THAT THE PREFERRED ALTERNATIVE, ALTHOUGH IT DOES DECREASE THE ALLOWABLE TIMBER HARVEST BY 10%, HAS NOT ESTABLISHED HOW MUCH TIMBER CAN BE REMOVED WITHOUT DAMAGING THE FOREST'S ABILITY FOR SELF-RENEWAL THROUGH A NATURAL CYCLE OF GROWTH AND DECAY PROVIDING NECESSARY NUTRIENTS TO MAINTAIN SOIL FERTILITY.

FOREST SERVICE RESPONSE

As research information becomes available, we can adjust management accordingly. For example, we can leave more woody material on harvest units if it is shown that it is needed for soil fertility.

COMMENT NO. 40 I URGE YOU TO ADOPT A MORE MODERATE VIEW & PLAN. PUT LESS EMPHASIS ON TIMBER HARVESTING, OR AS I CALL IT "MINING", AND MORE EMPHASIS ON RECREATIONAL USES

FOREST SERVICE RESPONSE.

The Draft EIS contains a wide range of alternatives, some of which are more or less oriented toward commodity production. We assume your statement means that you favor the more amenity oriented alternatives.

COMMENT NO. 41 TOO MUCH EMPHASIS IS GIVEN TO LOGGING, AND NOT ENOUGH TO ENVIRONMENTAL AND RECREATIONAL CONCERNS STREAM AND WATERSHED PROTECTION IS PITIFULLY WEAK OR NON-EXISTENT.

FOREST SERVICE RESPONSE

We believe the Standards and Guidelines for protecting streams and watersheds (Plan, Chapter 4) will be sufficient

COMMENT NO. 42 RECOMMENDATION: BETTER CLEANUP PRACTICES AND CONTROL OF LOGGING PRACTICES ON TIMBER SALES

FOREST SERVICE RESPONSE:

The Forest is constantly striving to improve control of logging practices on timber sales. We have developed a process to certify the competence of our timber sale administrators and now permit only certified individuals to be in charge of timber sale administration. Cleanup of timber sales is a requirement, but must be balanced against the need to leave forest litter and downed, woody material for ecological purposes and nutrient recycling

COMMENT NO. 43 HARVEST MANAGEMENT OF TIMBER FROM HIGH ELEVATION AND SLOW GROWTH AREAS, OR WHERE SENSITIVE SOILS AND WATERSHEDS EXIST, SHOULD BE PRIORITIZED FOR MAINTENANCE OF THESE AREAS FOR FISH AND WILDLIFE HABITAT AREAS AS OPPOSED TO LOW BENEFIT/COST TIMBER SALES. FIGURES WERE PRESENTED IN THE D.E.I.S. THAT ESTIMATED BOARD FEET HARVESTED/ALTERNATIVE, HOWEVER, ADDITIONAL INFORMATION SHOULD INCLUDE THE NUMBER OF ACRES HARVESTED AND TREATED/DECADE TO PROVIDE A BETTER PICTURE OF FOREST-WIDE CUMULATIVE IMPACTS

FOREST SERVICE RESPONSE:

Many of the sensitive, high elevation areas that were not in wilderness were placed in Area 6 in the preferred alternative and others. The acres treated by various vegetation practices for the first decade are shown in Appendix E of the Forest Plan

COMMENT NO. 44 MA 1 (ITM) IS MUCH TOO ORIENTED TOWARDS TIMBER PRODUCTION TO BE TRUE MULTIPLE USE. WE UNDERSTAND MA 1 ACHIEVES 94 PERCENT OF MAXIMUM TREE FARM TIMBER PRODUCTION. WE URGE THAT MORE MULTIPLE USE CONSIDERATIONS BE MADE AND MA 1 BE MODIFIED TO ACHIEVE ONLY 80 PERCENT OF MAXIMUM TIMBER YIELDS.

FOREST SERVICE RESPONSE.

The modification suggested would perhaps result in Management Area 1 becoming Management Area 3. A problem with such an approach is that it would take many more acres in Area 3 to achieve the desired timber output levels, making it necessary to reduce other more amenity oriented management areas.

COMMENT NO. 45: WE DO NOT INTEND THAT THE FOREST BE MISMANAGED, BUT WE DO FEEL THAT GREAT LAND REMOVALS FOR THE SUSPECT BENEFIT OF OTHERS, ANIMALS INCLUDED, ARE NOT TRUE MULTIPLE USES OF THE FOREST

FOREST SERVICE RESPONSE:

There are many views on this subject

COMMENT NO. 46: LOGGING UNDER MULTIPLE USE MUST BE CONDUCTED SUCH THAT FOUR TREES ARE PLANTED FOR EVERY ONE HARVESTED THIS SHOULD BE A TOP PRIORITY FOR THIS FOREST PLAN THIS WOULD PREVENT UNNECESSARY AND UNDUE DEGRADATION OF PUBLIC LANDS

FOREST SERVICE RESPONSE.

We intend that harvested areas will be reforested

COMMENT NO. 47: TIMBER MANAGEMENT IN ALTERNATIVE C IS MORE RESPONSIBLE THAN IN PLANS A & B.

FOREST SERVICE RESPONSE.

Thank you for your comments

COMMENT NO. 48: PROVIDING ONLY 75 TREES/ACRE WOULD CERTAINLY REDUCE THE RISK OF OVER-ACCUMULATION OF FUELS. MANAGEMENT SUPPRESSION OF FIRE LEADS TO ACCUMULATION OF FUELS. MANAGEMENT SUPPRESSION OF FIRE LEADS TO EVENTUAL DECADENCE IN LODGEPOLE STANDS AND REINFORCEMENT OF THE MYTH THAT A FOREST CANNOT SURVIVE UNLESS IT IS MANAGED.

FOREST SERVICE RESPONSE.

We do not necessarily subscribe to the myth you suggest. The forest will always survive in some form. We can influence the character of the forest.

COMMENT NO. 49: THE PHILOSOPHY GUIDING THE RECREATION OF FUTURE STANDS SEEMS TO BE HEAVILY WEIGHTED TOWARD A TIMBER HARVEST MODE UNDER ALL ALTERNATIVES IT

IS PROJECTED THAT THE AGE CLASS DISTRIBUTION WILL "RIGHT" ITSELF (APPENDIX G-20) THIS ALONE DOES NOT APPEAR TO PRESENT A BROAD RANGE OF ALTERNATIVES AND GIVES THE IMPRESSION THAT THERE IS SOMETHING WRONG WITH OLD GROWTH WHICH CAN ONLY BE REMEDIED BY MANAGEMENT. THERE IS A DECIDED OVERTONE THAT DECADENT STANDS MUST BE REPLACED BY VIGOROUS GROWTH TO PROMOTE STAND STRUCTURE AND SPECIES COMPOSITION THAT MINIMIZES SERIOUS RISK OF DAMAGE BY INSECTS, DISEASE, FIRE, AND MAMMALS.

FOREST SERVICE RESPONSE.

The discussion on diversity (Appendix G) is only intended to show that over time there will be more diversity due to greater variety of stand age class distribution. Any overtones were not intended.

COMMENT NO. 50: IN THE EVENT OF DISEASE, FIRE OR CATASTROPHIC WINDFALL ON TIMBER STANDS, WOULD ALL THIS MATERIAL BE COUNTED AS UNREGULATED HARVEST? IS THERE A DEFINED CEILING ON UNREGULATED HARVEST?

FOREST SERVICE RESPONSE:

If the timber comes from lands which are not part of the regulated base, it would be counted as unregulated harvest. There is a limit to how much material could be salvaged.

COMMENT NO. 51. IF THE WWNF COMPARES TOTAL RECEIPTS VS TOTAL COSTS (COSTS BEING SALE PREPARATION AND ADMINISTRATION, REFORESTATION, APPROPRIATED ROAD FUNDS, PURCHASER ROAD CREDITS, AND ENGINEERING SUPPORT) FOR ITS TIMBER PROGRAM, CAN IT BE SHOWN THAT TIMBER REALLY PAYS ITS WAY IN THE FOREST OR IS IT A FINANCIAL DRAIN TO THE U. S. TREASURY AS IT IS IN 9 OF THE 10 IDAHO NATIONAL FORESTS (JAVORKA 1986)

FOREST SERVICE RESPONSE.

Relying on information recently developed for the Timber Sale Program Information Reporting System (TSPIRS) and our own analyses as presented in the DEIS, Appendices, and Proposed Plan, the timber program is sometimes profitable and sometimes is not. As shown in Chapter III of the DEIS (Timber), costs exceeded receipts about half of the time from 1979 through 1984.

COMMENT NO. 52: ALTERNATIVE D WILL ALLOW PRIVATE TIMBER LANDS THAT HAVE BEEN OVER HARVESTED TO HAVE 30 YEARS GROWTH AND BROUGHT TO A MANAGED CONDITION.

FOREST SERVICE RESPONSE

Thank you for your opinion.

COMMENT NO. 53: WE NEED TO LET THE MARKET PRICE OF LAND AND TREES DETERMINE THE AMOUNT TO CUT

FOREST SERVICE RESPONSE:

The price system and marketplace do ultimately determine the demand for forest products and, therefore, the trees to be cut. However, if that demand were to exceed the productive capability of the Forest, it would not be good stewardship to permit short-term consumption in the face of increasing future demand.

COMMENT NO. 54: PLEASE WAKE UP TO THE FACT THAT WE HAVE A NATURAL RESOURCE THAT IS NOT BEING PROPERLY MANAGED. ALL YOU HAVE TO DO IS GET OUT AND DRIVE ANY FOREST SERVICE ROAD IN THE WALLOWA-WHITMAN AND YOU WILL SEE OVER-MATURE TREES AND BUG INFESTED TREES DYING. LETS CUT THOSE TREES AND TURN THEM INTO JOBS AND TAX DOLLARS

FOREST SERVICE RESPONSE.

The rate at which we cut those trees, and which of them, is one of the questions this plan is intended to resolve.

COMMENT NO. 55 | FAVOR A HIGHER LEVEL OF CUTTING, A DEFINITE PLAN FOR REFORESTATION (WHICH I DID NOT SEE IN YOUR IMPACT STATEMENT), AND THE USE OF GENETIC STRAIN TO IMPROVE FORESTS IN THE FUTURE.

FOREST SERVICE RESPONSE

The amount of reforestation is shown in Appendix E of the Forest Plan. Genetic improvement is also included. Seed from superior trees will be used to provide new trees for planting.

COMMENT NO. 56 DISEASED AND UNECONOMICAL (OLD GROWTH) TIMBER SHOULD NOT BE "PRESERVED" IN THE NAME OF WILDERNESS. ACCESS TO "MY" (OUR NATIONAL FOREST) IS VERY IMPORTANT TO ME. "MANAGEMENT" DOES NOT MEAN CONFINEMENT OR DENIAL. IT MEANS "SUPERVISING, JUDICIOUSLY TO ACCOMPLISH AN END. SAVE OUR FOREST BY MANAGING, NOT CONFINEMENT AND RESTRICTION.

FOREST SERVICE RESPONSE.

Thank you for your view.

COMMENT NO. 57: I HAVE SEEN AREAS IN THE WW NATIONAL FOREST THAT ARE NOT CLOSE TO WILDERNESS AREAS AND THAT HAVE BEEN LOGGED WHICH COULD PRODUCE MORE TIMBER IF PROPERLY THINNED. THOSE POTENTIAL GOOD GROWTH AREAS ARE TOTALLY NEGLECTED. MANPOWER TO HELP THIN, THUS INCREASING TIMBER PRODUCTION COULD COME FROM PHYSICALLY ABLE WELFARE RECIPIENTS AND PRISON INMATES SERVING TIME FOR NONVIOLENT CRIMES. THESE PEOPLE COULD WORK TO OFFSET THE SUPPORT THEY ARE GIVEN BY TAXPAYERS DOLLARS

FOREST SERVICE RESPONSE

Thank you for your opinion.

COMMENT NO. 58 MANY YEARS AGO I OBSERVED THOUSANDS, IF NOT HUNDREDS OF THOUSANDS, OF BOARD FEET OF PRIME PONDEROSA PINE DYING ON THE STUMP OR ALREADY ON THE GROUND DECAYING FROM THE LACK OF PROPER EQUIPMENT TO GET TO IT THERE IS NO EXCUSE FOR THAT NOW. WE HAVE THE TECHNOLOGY AND EQUIPMENT NOW TO PREVENT THIS WASTE

FOREST SERVICE RESPONSE:

We agree that lack of technology is no longer a serious deterrent to timber management

COMMENT NO. 59 I WOULD ALSO LIKE TO SEE STRICT PROVISIONS IN LOGGING CONTRACTS TO PROVIDE FOR SLASH REMOVAL, PLACING WATER-BARS, & TIMELY SEEDING OF NATIVE GRASSES TO ALL DISTURBED GROUND THE TORN UP, TWISTED, WEED CHOKED DISASTER AREAS LEFT AFTER LOGGING OPERATIONS IS A DISGRACE TO OUR WHOLE SYSTEM. A LASTING MOCKERY OF THE MANAGEMENT PRACTICE FOR OUR PRICELESS RESOURCES!

FOREST SERVICE RESPONSE

Timber sale contracts contain strict provisions for slash removal, placing erosion control structures and seeding disturbed areas. In some cases, these provisions are purposely omitted from contracts. An example would be when seeding with grasses would cause competition that would choke out newly established tree seedlings. As in any business, some loggers are more adept at their profession and carry out careful, sensitive operations. Others fall short of these standards.

COMMENT NO. 60 I THINK THE FORESTS SHOULD BE MANAGED FOR MULTIPLE USE - THE TREES IN THE FOREST ARE A CROP - A RENEWABLE RESOURCE IT SHOULD BE HARVESTED ACCORDINGLY. TAKE OUT THE OLD TREES - PLANT NEW ONES I DON'T THINK IT SHOULD BE OVER HARVESTED, BUT ALL AREAS - INCLUDING THOSE IN WILDERNESS AREAS SHOULD BE "FARMED" FOR THE ULTIMATE BENEFIT OF ALL PEOPLE

FOREST SERVICE RESPONSE

Your views are shared by many - and, of course, many would disagree

COMMENT NO. 61 THERE IS NO REASON TO LEAVE SO MUCH SLASH IN THE WOODS. AT LEAST CHIP IT AND BLOW IT BACK INTO THE FOREST IF YOU ARE NOT GOING TO LOG IT. WITH A BETTER SLASH PROGRAM WE WILL HAVE A HEALTHIER FOREST, BETTER RANGE FOR CATTLE AND GAME, BETTER FIRE PREVENTION, EASE OF BUG PREVENTION, MORE JOBS WILL BE CREATED, AND YOUR MULTIPLE USE FOREST WILL BE BENEFITED BY MORE PEOPLE USING IT TO ITS POTENTIAL

FOREST SERVICE RESPONSE

Decisions on slash reduction are made on a project specific basis following an analysis of management objectives for each specific harvest unit. In some cases, management objectives

will dictate complete removal of the slash. In other situations, only minimal slash treatment measures are prescribed. All of the benefits you describe are considered when establishing slash treatment prescriptions

COMMENT NO. 62: THOSE THAT ARE PROTESTING THE USE OF THIS LAND AND DO NOT NEED IT FOR THEIR MEAL TICKET SHOULD TAKE INTO CONSIDERATION THE MANY THINGS IN THEIR OWN HOUSEHOLD THAT ARE THERE BECAUSE OF TIMBER AND THE MANPOWER IT TAKES TO RECYCLE IT INTO THE VARIOUS PRODUCTS.

FOREST SERVICE RESPONSE.

Thank you for your view

COMMENT NO. 63 THE U.S. FOREST SERVICE HAS BEEN ONE OF THE ONLY AGENCIES OF THE FEDERAL GOVERNMENT TO SHOW A PROFIT FOR OPERATION UNDER THE PRESENT ECONOMIC CONDITIONS, SUCH SUCCESS SHOULD WARRANT EXPANSION. TIMBER SALES ARE OBVIOUSLY THE MAIN SOURCE OF INCOME FOR THE FOREST. YET THERE APPEARS TO BE CONCERN FOR OVERHARVESTING THIS FOREST. THERE IS AN INCREASED DEMAND FOR WOOD PRODUCTS IN THIS REGION. I BELIEVE THE BEST WAY TO MEET THE CURRENT ECONOMIC DEMANDS SHOULD COME THROUGH MORE INTENSIVE FOREST MANAGEMENT AIMED AT INCREASING TIMBER YIELDS AND DECREASING LOSSES THROUGH INSECT INFESTATIONS AND FIRE. THIS BASICALLY CALLS FOR A MORE LABOR INTENSIVE APPROACH WHICH MAY REQUIRE INCREASING CHARGES FOR TIMBER SALES TO LOCAL MILLS IN EXCHANGE FOR INCREASING TIMBER SALES. TRADITIONALLY, YIELDS PER ACRE IN ALL AREAS OF AGRICULTURE HAVE STEADILY INCREASED IN RESPONSE TO ECONOMIC DEMANDS IN THIS COUNTRY. THE FOREST PRODUCTION ON PUBLIC LANDS HAS LAGGED BEHIND, PRIMARILY BECAUSE OF LACK OF INTENSIVE MANAGEMENT.

FOREST SERVICE RESPONSE.

Unlike private lands, the National Forests are, by law, managed for a variety of resources. The lack of intensive management for timber production is often due to measures to protect or enhance other resources.

COMMENT NO. 64. I HAVE BEEN LOOKING OVER THE MATERIAL, PUT OUT BY THE TIMBER INDUSTRY, CALLED THE "COMMUNITY STABILITY ALTERNATIVE". THERE APPEARS TO BE A NUMBER OF OMISSIONS IN THE PRESENTATION OF THE ALTERNATIVE TO THE PUBLIC. AS YOU ARE AWARE, BUT THE PUBLIC MAY NOT BE, THERE ARE MORE THAN 7% OF THE FOREST LANDS AVAILABLE FOR LOGGING.

FOREST SERVICE RESPONSE.

The flier states that "the Wallowa-Whitman only manages 7 percent of the forest for full timber yield." Seven percent is the amount of land which we anticipate will be planted and precommercially thinned and harvested. This amounts to 151,000 acres which is approximately 7 percent of the total acreage of the Wallowa-Whitman. There are many more acres in which harvesting will occur, but where we intend to rely on natural seeding. Over 800,000 acres are intended for timber management. This amounts to about 80 percent of the forested acres that are available for timber harvest (nonwilderness, etc.). The remaining 20 percent are unsuitable for timber harvest due to regeneration difficulty, etc.

COMMENT NO. 65 STANDARDS AND GUIDELINES

TIMBER MANAGEMENT -

1. INCLUDE THE FOLLOWING STATEMENT ON PAGES 4-44 AFTER EXCEPTION D; 4-46 AFTER EXCEPTION H

THE INTENT IS THAT THESE EXCEPTIONS ARE UNCOMMON AND WILL BE EVALUATED ON A CASE BY CASE BASIS

- 2 CHANGE "SHOULD NORMALLY" TO "WILL" ON THE SECOND LINE OF THE SECOND PARAGRAPH ON PAGE 4-44

FOREST SERVICE RESPONSE

Exception D is taken directly from the Regional Guide for the Pacific Northwest Region (May, 1984) and is direction to all Forests in the Region. It was determined through a separate Regional environmental study and EIS To change it would be complicated However, we do not believe the qualifying statement is necessary With the possible exception of some large lodgepole clearcuts, the use of this exception (to create openings larger than 40 acres) will indeed be uncommon.

We disagree with qualifying Exception H Due to a high number of unsuited lands dispersed throughout the commercial forest, it will frequently be necessary to construct roads across them.

It is our intent to accomplish necessary precommercial thinning prior to stems reaching two inches in diameter But there will undoubtedly be instances when that is not achievable due to factors such as lack of funding or contracting defaults We prefer not to adopt the inflexible wording you suggest.

COMMENT NO. 66: A PROGRAM EMPHASIZING ECONOMIC EFFICIENCY WHILE MAINTAINING A TIMBER HARVEST PHILOSOPHY OR GET IN, HARVEST AND THEM LEAVE IT ALONE (SIMILAR TO ALT H) IS PREFERABLE

FOREST SERVICE RESPONSE:

Thank you for your view.

COMMENT NO. 67: UNFORTUNATELY, THE WALLOWA-WHITMAN NATIONAL FOREST RECOMMENDS REDUCING TIMBER SALE LEVELS IT APPEARS THAT THIS REDUCTION HAS BEEN BASED ON THE INCORRECT ASSUMPTION THAT TIMBER MANAGEMENT AND OTHER RESOURCE USES ARE INCOMPATIBLE SINCE THE DEIS SHOWS CLEARLY THAT NONTIMBER RESOURCES VARY ONLY SLIGHTLY WHEN TIMBER SALE LEVELS ARE RADICALLY INCREASED OR DECREASED, IT IS NOT LOGICAL TO PROPOSE FURTHER DECLINES IN TIMBER SUPPLY

FOREST SERVICE RESPONSE

It is true that some non-timber resources apparently vary by relatively small amounts within the range of alternatives we have displayed However, some are more significantly affected in ways that are difficult to quantify Landscape appearance, hunting quality, impact of elk on private lands, and risk of erosion are examples

COMMENT NO. 68: DERIVATION OF MANUFACTURED PRODUCT SELLING VALUE - (APPENDIX, PAGES B-80, 81) THIS MEASURE OF FINAL DEMAND FOR WALLOWA-WHITMAN TIMBER MAY NOT BE ACCURATE AS PRESENTED. BID PRICES, LOGGING COSTS, MANUFACTURING COSTS, AND REMANUFACTURING MULTIPLIERS DIFFER BY SPECIES HOWEVER, THESE DIFFERENCES ARE NOT CONSIDERED. SINCE SPECIES COMPOSITION WILL VARY BY ALTERNATIVE, SPECIES-SPECIFIC SELLING VALUES SHOULD BE USED RATHER THAN AN AVERAGE

FOREST SERVICE RESPONSE:

Different species do generate different manufactured product selling values. However, there is little difference in the labor content or personal income derived locally from different species of sawlogs.

Accordingly, the jobs and personal income coefficients are still representative. The analysis did differentiate between sawtimber and roundwood--raw materials which are logged, hauled, and milled differently.

COMMENT NO. 69: MILL CAPACITY - (LRMP, PAGES 2-38) TABLE 2-15 LISTS THE INSTALLED MILL CAPACITY OF BAKER, UNION, AND WALLOWA COUNTIES AS 250 MMBF PER YEAR BASED ON HOWARD'S 1982 REPORT. MORE RECENT INFORMATION PROVIDED TO US BY BOISE CASCADE CORPORATION STATES THAT MILL CAPACITY IS 377 MMBF PER YEAR. THE WALLOWA-WHITMAN SHOULD REVIEW THE INSTALLED MILL CAPACITY ESTIMATE AND REVISE IT AS NEEDED TO REFLECT THE EXISTING SITUATION.

FOREST SERVICE RESPONSE

The figures presented in the Proposed Plan, p. 2-38, are estimates of demand for timber from the Wallowa-Whitman--not estimates of mill capacity. The Wallowa-Whitman traditionally has provided about half the saw material processed locally. We have expanded the narrative accompanying the table to make clear the salient feature of the supply-demand analysis--namely, that there is no lack of demand for the Forest's offerings.

COMMENT NO. 70 POTENTIAL YIELD COMPARISON - NO DISCUSSION IN THE TEXT COMPARES THE HARVEST LEVELS OF THE PROPOSED ALTERNATIVES WITH THE EXISTING TIMBER MANAGEMENT PLAN POTENTIAL OF 45 34 MMCF PER YEAR (182.8 MMBF PER YEAR). SINCE THE FOREST IS RECOMMENDING A PREFERRED ALTERNATIVE WITH AN ALLOWABLE SALE QUANTITY THAT IS 38 PERCENT LOWER THAN THE EXISTING PLAN'S POTENTIAL YIELD, A THOROUGH DOCUMENTATION OF THE REASONS FOR AND THE EFFECTS OF THIS DECLINE SHOULD BE INCLUDED IN THE DEIS. BY FAILING TO EVEN MENTION THE EXISTING POTENTIAL YIELD, THE FOREST HAS FAILED TO MEET ITS LEGAL REQUIREMENTS FOR FULL PUBLIC DISCLOSURE OF THE PLANNING PROCESS.

FOREST SERVICE RESPONSE:

Potential yield comparisons are provided in the Supplement to the DEIS and the FEIS.

COMMENT NO. 71 (INTENSIVE TIMBER MANAGEMENT) FUEL LOADING TREATMENT AND SLASH DISPOSAL SHOULD EMPHASIZE ALLOWING DOWN LOGS TO REMAIN FOR USE BY WILDLIFE AND FOR NUTRIENT CYCLING.

FOREST SERVICE RESPONSE

We agree. The amount of material left will be determined on a case-by-case basis in project level analysis.

COMMENT NO. 72: IS THERE A DECLINE IN VALUE OF THE LOG DUE SIMPLY TO ITS MUCH SMALLER SIZE AND WAS THIS ENTERED IN ECONOMIC CALCULATIONS?

FOREST SERVICE RESPONSE

Yes.

COMMENT NO. 73: NEED A SPECIFIC ALTERNATIVE OUTLINING RECYCLING AS AN ALTERNATIVE TO A PERCENTAGE OF TREE CUTTING.

FOREST SERVICE RESPONSE

Each alternative makes certain assumptions regarding the demand for forest products. If technology changes, such as an increase in wood fiber recycling, demand may change. The plan is flexible enough to permit adjustments when major changes in assumptions occur. *Recycling may be an alternative, but since it is market dependent, we would not be in a position to implement such an alternative simply because we found it desirable*

COMMENT NO. 74: PLEASE DO NOT CONTINUE TO SEND OUR RESOURCE OUT OF OUR COUNTRY FOR PROCESSING IF THERE IS A SPECIES OR TYPE OF TIMBER THAT CANNOT BE PROCESSED LOCALLY, EXCHANGE LOAD FOR LOAD FOR SOMETHING WE CAN DO LOCALLY. PLEASE DO NOT STRIP OUR BEAUTIFUL COUNTY TO SELL LOGS TO FOREIGN COUNTRIES

FOREST SERVICE RESPONSE.

Logs from National Forest System lands west of the 100th meridian cannot be exported outside the United States. All merchantable logs from these National Forests must receive primary manufacture in United States mills. This is contained in the Code of Federal Regulations, Chapter II, Title 36, paragraph 223.162

COMMENT NO. 75: DISREGARD BIG BUSINESS PRESSURE AND DO WHAT IS BEST FOR US IF OUR LOGS WERE PROCESSED ENTIRELY LOCALLY OUR ECONOMY WOULD BE STABLE AND IT WOULDN'T BE NECESSARY TO INCREASE THE CUT.

FOREST SERVICE RESPONSE:

Thank you for your views

COMMENT NO. 76: THERE IS ALREADY ENOUGH AREA AVAILABLE TO KEEP OUR MILLS OPEN FOR MANY YEARS IF MANAGED PROPERLY.

FOREST SERVICE RESPONSE:

The number of acres suitable and available for management of the timber resource on the Wallowa-Whitman Forest has been reduced by slightly over 200,000 acres in the last 25 years. We agree that the remaining acres are sufficient to provide a stable supply of raw material to local industry if they are properly and intensively managed

COMMENT NO. 77: SINCE FORESTS ARE OUR NATION'S MOST CONSISTENT RENEWABLE RESOURCE, I FEEL SURE YOU AGREE THAT TIMBER MANAGEMENT IS MOST IMPORTANT. COMPANIES WHOSE EMPLOYEES DEPEND ON THIS MEANS OF LIVELIHOOD. POSITIVE PROMOTION OF THE FOREST PRODUCTS INDUSTRY CAN CERTAINLY ENHANCE RELATED INDUSTRIES SUCH AS HOME BUILDING, INDUSTRIAL CONSTRUCTION, AND OTHERS.

FOREST SERVICE RESPONSE.

We are confident that the timber industry will continue to be an important part of our economy, locally and regionally, for many years. The National Forests will continue to be an important supplier of raw material

COMMENT NO. 78: WE WERE SURPRISED TO LEARN THAT IF A NO HARVEST ALTERNATIVE HAD BEEN SHOWN, AS IS CUSTOMARY TO SHOW THE FULL RANGE OF ALTERNATIVES, STANDING IN OUR FOREST ARE 600 MILLION BOARD FEET (MMBF) OF TIMBER ALREADY CONTRACTED AND SOLD ENOUGH TO KEEP MILLS RUNNING AT CURRENT LEVELS FOR THE NEXT FOUR YEARS.

FOREST SERVICE RESPONSE:

At the time the DEIS was prepared, this was true. The amount is somewhat less now, but having three years supply of timber under contract is considered normal

COMMENT NO. 79: I BELIEVE THE TIMBER INDUSTRY HAS NOT LIVED UP TO COMMITMENTS TO REFOREST AND ATTEMPT TO CREATE A SUSTAINED YIELD ATMOSPHERE AND WOULD LIKE TO CONTINUE TO REAP PROFIT AT THE EXPENSE OF THE TAXPAYER. THEY HAVE NOT DEMONSTRATED ANY SIGNIFICANT ATTEMPT ON PRIVATE LANDS TO CREATE NEW CROPS FOR FUTURE RESOURCE

FOREST SERVICE RESPONSE:

We are sure there are examples where what you say is true. But many companies have made serious commitments to providing future timber through planting and management

COMMENT NO. 80: I UNDERSTAND THAT THERE ARE PRESSURES FROM THOSE ENTITIES THAT GAIN MONETARILY FROM THE SALE OF TIMBER AND NO DOUBT THIS RESOURCE MUST BE UTILIZED - BUT UNDER CLOSE SCRUTINY. LETS NOT FORGET THE OTHER VALUES OF A FOREST - ITS A LOT MORE THAN JUST TREES

FOREST SERVICE RESPONSE

We agree.

COMMENT NO. 81: I FEEL THAT THE FOREST SHOULD INDEED BE MANAGED AS MULTIPLE USE INSTEAD OF AS THE TIMBER INDUSTRY'S PROFIT MACHINE

FOREST SERVICE RESPONSE:

We agree.

COMMENT NO. 82: IT'S A REAL SHAME THAT WE WASTE TIMBER BY ALLOWING IT TO ROT ON THE FOREST. TIMBER IS A NATURAL, RENEWABLE RESOURCE IT WILL PRODUCE LOGS FOR OUR USE FOREVER IF IT'S MANAGED RIGHT.

FOREST SERVICE RESPONSE:

We agree that timber is a renewable resource and each alternative we developed is intended to provide timber on a sustained yield basis in perpetuity. What is waste is a matter of value judgment. To many people, leaving a tree to provide a home for a snag-dependent bird species would not be considered a waste.

COMMENT NO. 83. TIMBER CUTTING AND MILLING IS PART OF OUR HISTORY WITHOUT IT, OUR AREA WOULDN'T SURVIVE I DON'T THINK THE SECOND GROWTH STANDS OF TIMBER ARE UGLY.

FOREST SERVICE RESPONSE

The timber industry is certainly a part of our local history and we intend to see that timber from the National Forest continues to contribute to this part of the economy We agree that the second growth stands can be attractive.

COMMENT NO. 84. IT IS BECOMING MORE AND MORE APPARENT THAT A "REST-ROTATION" APPROACH, SIMILAR TO THAT USED BY GRAZIERS, OR "CROP-ROTATION" PRACTICED BY MOST FARMERS, IS APPROPRIATE IN FOREST ECOSYSTEMS AS WELL, IF WE TRULY WANT TO SUSTAIN FORESTS INDEFINITELY WE WOULD LIKE TO SEE A FOREST ROTATION PROGRAM SIMILAR TO THAT DESCRIBED BY MASER EVALUATED AND GIVEN SERIOUS CONSIDERATION FOR THE WALLOWA-WHITMAN.

FOREST SERVICE RESPONSE:

As the implications and applicability of Mr Maser's work becomes better understood, these findings will be incorporated into the Forest Service planning process

COMMENT NO. 85: I WOULD LIKE TO SEE A FOREST OPENED UP WHERE A "DRAINAGE" IS LOGGED (AS MATURE) OVER A PERIOD OF SAY 10 YRS YOU GO IN, MAKE ROADS, HARVEST TIMBER EACH YEAR, THEN WHEN YOU'VE CUT THE TIMBER, DESTROY ALL ROADS AND GET OUT THIS MANNER, GAME CAN COME BACK IN FOR 60-80 YEARS. WITH LITTLE HUMAN INTERFERENCE.

FOREST SERVICE RESPONSE:

In most cases, watershed protection and dispersion-of-created-opening constraints prevents our harvesting a drainage in less than 30 years. But even with this schedule, we are likely to have extensive areas, perhaps entire drainages, where there will be no harvesting for 40 to 50 years.

COMMENT NO. 86 SUFFICIENT CLEAR-CUTS SHOULD BE SCHEDULED IN A PERMANENT ROTATION TO PROVIDE ELK WITH PERPETUAL DAILY COMMUTES FROM SECURE COVER TO GREEN FORAGE AND WATER DURING SPRING, SUMMER, AND FALL.

FOREST SERVICE RESPONSE:

We believe dispersion-of-created-opening constraints will provide such a conditions

COMMENT NO. 87 LOGGING METHODS SHOULD BE REVIEWED AND ALTERNATE METHODS LOOKED AT TO POSSIBLY KEEP ROAD CONSTRUCTION COSTS DOWN. POSSIBLY NOT BUILDING ROADS BUT SKIDDING LOGS TO A RIVER & FLOATING THEM TO THE SAWMILL SITES (OR OTHER METHODS) SHOULD ENCOURAGE STREAM FLOW DEVELOPMENT.

FOREST SERVICE RESPONSE:

The environmental analyses for timber sales includes examining various logging methods and providing the minimum, most cost-effective road systems. Cable systems or helicopter logging, which require few roads, are also considered. There would be many environmental and technical problems with using local streams for log rafting. This practice has been virtually eliminated in the United States because of adverse effects on stream channels and fish spawning beds.

COMMENT NO. 88 SPREAD THE SALES OUT OVER A LARGER AREA. DON'T PUT ALL THE LOGGERS IN ONE AREA LIKE LAKE FORK WHERE THERE ARE 9-6 SALES OPERATING AT ONE TIME THAT LOOKS BAD TO THE PUBLIC.

FOREST SERVICE RESPONSE:

Part of the reason for concentrating harvesting operations has been our inability to enter roadless areas. With implementation of the Forest Plan, this problem will be alleviated over time.

COMMENT NO. 89: ON POLE CREEK, WHICH USED TO HAVE A BEAUTIFUL PINE STAND, ALL THAT IS THERE NOW IS ROADS. AS FAR AS I KNOW, THE PART OF THE SALE THAT REALLY NEEDED TO BE CUT BECAUSE OF STUNTED AND DISEASED TREES IS STILL STANDING. I ASSUME THE LOGGING CONTRACTOR GOT OUT OF THAT PART OF THE SALE. THIS WAS AN EXAMPLE OF GOING AFTER THE PONDEROSA AND TO HELL WITH THE FIR, THE PART THAT NEEDED CUTTING

FOREST SERVICE RESPONSE:

The Pole Creek Timber Sale was stage logged by the purchaser. Ponderosa pine was removed in the first stage. The purchaser has since returned and removed the Douglas-fir and

associated species in a second stage Some units on the Pole Creek Timber Sale were returned to the government under the Federal Timber Contract Payment Modification Act of 1984 These units are to be reoffered as part of the North Wind Timber Sale in 1989.

COMMENT NO. 90: IF YOU WOULD INVENTORY PAST SALES, YOU WILL FIND THAT PRESENT PRACTICES HIGH GRADE PINE AND DOUGLAS-FIR AND LEAVE BEHIND SCARRED WHITE FIR THAT WILL BE INFECTED WITH CONK IN A SHORT TIME YOU ARE TURNING THE WALLOWA-WHITMAN INTO A OVER ROADED CULL PATCH.

FOREST SERVICE RESPONSE:

We recognize that past attempts at individual tree selection have created situations where the remaining stands are highly infected. The silvicultural prescriptions that we are currently using result in relatively disease free stands

COMMENT NO. 91: STOP ANY TREND TOWARD CLEAR-CUTS, SHELTER BELTS, IN HARVESTING OREGON TIMBER.

FOREST SERVICE RESPONSE

These are silvicultural tools we need to use if we are to achieve the predicted timber harvest levels.

COMMENT NO. 92: OUR WATERSHEDS SHOULD BE PROTECTED SELECTIVE HARVEST, MINIMIZING DISTURBANCE AND CLEAN LOGGING OPERATION WILL BENEFIT

FOREST SERVICE RESPONSE.

In certain instances, selective harvesting may be preferred A disadvantage of such an approach is that it is necessary to enter a watershed more frequently when selective harvest methods are employed

COMMENT NO. 93 BY SELECTIVELY LOGGING THE OLD GROWTH YOU WILL HELP THE GROWTH OF THE SMALLER TREES AND ALSO MAKE IT POSSIBLE FOR GRASS TO GROW FOR BIG GAME.

FOREST SERVICE RESPONSE

We agree. The same is true of several other silvicultural techniques

COMMENT NO. 94 NOW THE FOREST SERVICE IS MARKING TREES THAT WON'T MAKE AN 8 FOOT LOG, NOT MARKING OLD FLAT TOP TREES, JUST A FEW, & MARKING YOUNG HEALTHY TREES SOME NEED THINNING, BUT NOT ALL

FOREST SERVICE RESPONSE:

Some small trees are marked for cutting A small tree is not necessarily a young, healthy tree. Small trees are often intermediate or suppressed trees that are the same age as the largest trees in the stand These small, old trees will not respond to thinning The faller must cut down

these trees if they are marked to be taken from the stand, but they are not required to remove the logs if they do not meet the merchantability specifications in the timber sale contract

COMMENT NO. 95 I WISH WE COULD DO MORE HARVESTING OF SMALL TREES (THE ONES THAT BECOME THE POLE THICKETS) SO WE DON'T END UP WITH THE TANGLED UP MESSSES THAT YOU HAVE CAN'T EVEN CRAWL THROUGH HOW ABOUT PORTABLE CHIPPERS TO SAW-DUST SOME OF IT?

FOREST SERVICE RESPONSE:

We are constantly looking for new markets that will utilize small diameter trees from stagnated pole thickets. We have been successful in converting many of these stands in the past ten years. We believe the way to avoid this situation is to practice stocking control throughout the life of timber stands so that overstocked conditions are not permitted to develop

COMMENT NO. 96: I DON'T BELIEVE IN THIS CLEARCUT LOGGING I WAS TAUGHT IN SCHOOL OVER 55 YEARS AGO, THAT TO ROB THE SOIL OF ITS TREES, GRASS, OR WHATSOEVER WAS GROWING ON IT AT THE TIME, LEFT IT OPEN TO EROSION THEN NOTHING GREW.

THEY SHOULD LEAVE ROWS OF TREES TO BUFFET THE WIND AND THE RAIN AND ALSO LEAVE THE WASTE ON THE GROUND FOR FERTILIZER INSTEAD OF BURNING IT OR BUCKING IT UP IN A PILE.

FOREST SERVICE RESPONSE:

We seed grasses on disturbed areas to prevent erosion and plant new trees in clearcut openings. We recognize the importance of leaving dead and down material on the forest floor for nutrient recycling. A close look at some of our recent prescribed burns will show that a great deal of woody debris is left on top of the ground after the burn is completed.

COMMENT NO. 97 IN THE ELKHORNS, BAKER & LA GRANDE WATERSHEDS, AND OTHER SENSITIVE AREAS, THERE SHOULD BE NO LOGGING, AND ESPECIALLY NO CLEARCUTTING

FOREST SERVICE RESPONSE:

Harvesting operations in these sensitive areas will be performed in such a manner as to ensure protection of the watershed values

COMMENT NO. 98 ONE ITEM THAT I NOTICE MYSELF THAT DOESN'T SEEM TO BE A FAVORITE OF THE PUBLIC OR ANY SPECIAL INTEREST GROUPS, IS THAT OF CLEAN-UP IT COSTS THREE TIMES AS MUCH TO CLEAN UP DECKS OR TIMBER SALE AREAS, AS IT DOES TO PAY THE FINE FOR NOT PROPERLY CLEANING THEM UP, THEN OBVIOUSLY, IN THE INTEREST OF GOOD BUSINESS MANAGEMENT, YOU LEAVE IT AND PAY THE FINE HOWEVER, IF THE FINE ASSESSED FOR NOT CLEANING UP WAS, SAY, TEN TIMES THE COST OF CLEANING IT UP, WELL, WE'D PROBABLY BE SEEING A WHOLE LOT MORE CLEAN-UP, WOULDN'T WE?

FOREST SERVICE RESPONSE

The Forest Service does not impose fines for failure to do clean up work. Such a failure is considered a breach of the timber sale contract. If the timber sale purchaser fails to remedy

such a breach, the Forest Service will use the performance bond to do the work or file suit for damages

COMMENT NO. 99 WE'RE SURE YOU ARE AWARE OF THE RECENT REVIEWS OF THE APPRAISAL PROCEDURES IN EVALUATING POTENTIAL HELICOPTER SALES BY THE HELICOPTER LOGGERS ASSOCIATION AND THE REGIONAL OFFICE THAT HAVE RESULTED IN CHANGES THAT SUBSTANTIALLY LOWER COSTS.

COLUMBIA HELICOPTERS, INC., AS A MEMBER OF THE HELICOPTER LOGGERS ASSOCIATION THAT HAS LOGGED WELL OVER ONE BILLION BOARD FEET OF TIMBER, MUCH OF IT IN SENSITIVE ENVIRONMENTAL AREAS, STRONGLY URGES YOU AND YOUR STAFF TO BE SURE THAT FULL UTILIZATION OF THE CAPABILITIES OF THE HELICOPTER SYSTEM HAS BEEN CONSIDERED IN THE PREPARATION OF YOUR MANAGEMENT PLAN FULL UTILIZATION OF THE HELICOPTER'S FLEXIBILITY IN AREAS OF UNSTABLE SOILS, VISUAL CONSTRAINTS, SENSITIVE STREAMS, HIGH RECREATION, AND WILDLIFE MANAGEMENT CAN BE INSTRUMENTAL IN FIRING UP A CONSTANTLY ERODING TIMBER BASE

TIMBER HARVESTS CAN BE MAXIMIZED AND STILL MAINTAIN THE ESTHETIC VALUES WE ALL WANT IN OUR NATIONAL FORESTS.

FOREST SERVICE RESPONSE

We agree that helicopter yarding has an important place in the harvesting and management of the Wallowa-Whitman National Forest Helicopter yarding played a very big part in the successful fire salvage effort during early 1987 and is being analyzed as an important forest management tool to be used for our ongoing spruce bark beetle salvage effort We anticipate that helicopters will continue to play a significant role in our management areas during the plan period

COMMENT NO. 100: I HAVE BEEN AN INVENTORY FORESTER IN NORTHEAST OREGON FOR THE PAST 20 YEARS. DURING THAT PERIOD OF TIME THE MANAGEMENT OF FORESTLAND IN THIS AREA HAS UNDERGONE A TREMENDOUS SHIFT FROM SELECTIVE HARVEST TO REGENERATION CUTS SUCH AS SEED TREE CUTS AND CLEARCUTS THE RESULTS OF THE SHIFT IN MANAGEMENT PHILOSOPHY IS APPALLING YOU ARE CUTTING TOO MANY TREES THE EXTRA TREES ARE WORTH FAR LESS TO MILLS THAN THE BIGGER TREECUT USING SELECTIVE CUTTING. THIS DRIVES DOWN STUMPAGE PAYMENTS TO THE FOREST SERVICE, PAYMENTS TO THE COUNTIES, AND GENERATES FAR MORE DEFICIT SALES THAN NECESSARY. REGENERATION CUTS ARE RUNNING YOUR SILVICULTURE COSTS SKY HIGH THIS TYPE OF CUTTING IS OPENING THE FOREST UP IN SUCH A WAY AS TO HEAT UP THE FOREST, THUS CAUSING A CONSIDERABLE INCREASE IN THE INSECT POPULATIONS

FOREST SERVICE RESPONSE.

Unfortunately, much of the selective cutting, as practiced in northeast Oregon for many years, has been a type of exploitation cutting that harvests only certain species above a certain size and of high value. It has been synonymous with highgrading a stand This type of cutting practice leads to a shift in composition to more shade tolerant and low value species such as grand fir It also perpetuates diseases such as dwarfmistletoe and root rots which in turn increase stand susceptibility to bark beetles We recognize that there is a place for selective harvest to meet other resource objectives. We intend to use a blend of silvicultural systems including clear-cut, seed tree, shelterwood, and selection cuttings to produce a healthy forest where timber production is a goal.

COMMENT NO. 101: WHEN YOU DO SELECTIVE CUTTING YOU MOST OFTEN CUT IT FROM BELOW. BY CUTTING FOUR 12 INCH TREES INSTEAD OF ONE 24 INCH TREE YOU CUT TOO MUCH CROWN FOR THE VOLUME OF WOOD YOU GET THIS REDUCES THE HIDING AND THERMAL COVER FOR WILDLIFE THE GROWTH RATE OF THE FOUR 12 INCH TREES IS USUALLY FAR BETTER THAN THE GROWTH RATE OF THE SINGLE 24 INCH TREE. THUS, YOU LOWER THE GROWTH OF THE FOREST AS A WHOLE, FIRST BY INCREASING INSECT MORTALITY, AND SECOND BY CUTTING YOUR FASTEST GROWING TREES AND LEAVING THE SLOW GROWERS ALL OF THESE PROBLEMS LEAVE YOU WITH NOBODY WHO IS SATISFIED WITH THE MANAGEMENT OF YOUR FOREST

FOREST SERVICE RESPONSE:

See previous response. Selective cutting is more often a cutting from above. The situation you describe sounds more like a commercial thinning. A commercial thinning is prescribed in more or less even-aged stands with minor variation in diameters. The smaller size trees in this stand type are usually the suppressed or intermediate trees and also the slowest growing. Therefore, these are the ones marked to remove. The leave trees for future growth are the larger diameter, faster growing dominant trees. These types stands normally do not qualify for hiding cover and a reduction of the small diameter trees will have no effect on the quality of hiding cover. Thermal cover could be reduced through harvest, but can recover more quickly since the largest crowned trees are left

COMMENT NO. 102: I RECOGNIZE THAT DEPARTURES FROM HARVESTING AT SUSTAINED YIELD LEVELS ARE SOMETIMES NECESSARY IN THE MANAGEMENT OF CERTAIN PROBLEMS, SUCH AS WHEN PINE BEETLE EPIDEMIC AFFECTS SOME STANDS OF LODGEPOLE PINES. HOWEVER, I STRONGLY URGE THAT THE DECISION TO CLEARCUT LARGE STANDS OF LODGEPOLE PINE NOT BE UNDERTAKEN LIGHTLY. LODGEPOLE NEED NOT BE REMOVED ONLY IF IT IS "NEAR" AFFECTED TREES. "NEARNESS" IS A SUBJECTIVE TERM, AND SHOULD NOT BE USED AS AN EXCUSE FOR THE WHOLESALE REMOVAL OF ECONOMICALLY LESS DESIRABLE TREES.

FOREST SERVICE RESPONSE:

Where timber production is the objective, harvest treatments must have a silvicultural prescription that recognizes the stand condition as it relates to the potential for future management. Mature lodgepole stands, where the majority of the standing merchantable inventory has been killed by mountain pine beetle, can most efficiently be treated by clearcutting. The few live trees that are in this stand type are usually mature, but suppressed and should be removed if merchantable or be slashed if not. These small live trees are often physiologically old and beyond any period of rapid growth and are not efficient to retain for part of the next stand.

COMMENT NO. 103: CLEARCUTTING AS THE MAJOR FORM OF TIMBER HARVESTING MIGHT MAKE IT DIFFICULT TO MAINTAIN SPECIES DIVERSITY AT ITS CURRENT LEVEL. THERE SHOULD BE AT LEAST SOME DISCUSSION OF ALTERNATIVE LOGGING SYSTEMS AND THEIR RELATIVE COSTS.

FOREST SERVICE RESPONSE

A variety of silvicultural techniques are intended to be used with evenaged methods predominating. See individual management areas in Chapter 4 of the Forest Plan

COMMENT NO. 104: DISEASE AND INSECT DAMAGED STANDS OF TIMBER SHOULD BE MANAGED SENSITIVELY, BUT PRIMARY EMPHASIS SHOULD BE PLACED UPON FISH AND WILDLIFE VALUES IN THESE AREAS RATHER THAN EXCEED ANY SINGLE CUTTING UNIT OF 40 ACRES IN SIZE FOR LARGE BLOCKS OF THESE DAMAGED STANDS, A MOSAIC CUT PLAN OVER LONGER PERIODS OF TIME WITH EMPHASIS ON REGENERATION SHOULD BE UTILIZED. INNOVATIVE METHODOLOGY SHOULD BE UTILIZED TO MANAGE THESE LARGE STANDS TO RETAIN AND ENHANCE OPTIMUM ECOLOGICAL DIVERSITY FOR FISH AND WILDLIFE

FOREST SERVICE RESPONSE:

We believe the dispersion of cutting units required in Management Areas 1, 3, and 18 will result in the mosaic you describe.

COMMENT NO. 105. SHELTERWOODS VS. SELECTIVE HARVEST. CONVENTIONAL TERMINOLOGY MAKES A CLEAR DISTINCTION BETWEEN SHELTERWOOD HARVEST AND SELECTION CUTTING, AND THIS CONVENTION IS CORRECTLY FOLLOWED THROUGHOUT MOST OF THE DOCUMENTS (I.E., TABLE III-3A, APPENDIX B) HOWEVER, ON P. 4-79, SHELTERWOOD HARVEST IS INCLUDED AS A FORM OF SELECTIVE HARVEST WE SUGGEST THAT YOU MAKE THIS SECTION CONSISTENT WITH THE REST OF THE DOCUMENTS

FOREST SERVICE RESPONSE:

A Secretary of Agriculture 1984 decision recognized shelterwood harvest as a form of selective for the Hells Canyon National Recreation Area.

COMMENT NO. 106: MY GREATEST CONCERN FOCUSES ON MANAGEMENT AREA ONE, THE MANAGEMENT EMPHASIS ON WOOD FIBER PRODUCTION. I FEEL THE EVEN-AGED MANAGEMENT APPROACH WHICH THE FOREST HAS TAKEN CREATES MANY ENVIRONMENTAL AND SOCIAL CONFLICTS, AS WELL AS SOME ECONOMIC PROBLEMS INSTEAD, UNEVEN-AGED MANAGEMENT ON AN INDIVIDUAL TREE OR GROUP SELECTION BASIS IN MOST AREAS WOULD PROVIDE THE FOLLOWING:

1. POSITIVE VISUAL QUALITIES, CAREFUL SELECTIVE HARVEST WOULD GIVE THE FOREST A "WOODED" APPEARANCE ON AN ONGOING BASIS, IMPROVING SENTIMENT TOWARD FOREST MANAGEMENT
2. AN IMPROVED GROWTH RATE DURING THE CONVERSION OF THE FOREST TO MANAGED STANDS; CURRENT CLEARCUTTING TECHNIQUES IN MULTI-AGED STANDS, HAVE CAUSED GROWTH LOSSES BECAUSE POLE-SIZE TREES AND SAPLINGS ARE FELLED AND BURNED DURING SITE PREPARATION PROCEDURES GROWTH BY THESE SMALLER TREES IS FOREGONE.
3. REDUCED SILVICULTURAL INVESTMENT COSTS, CURRENT EVEN-AGED TECHNIQUES RELY ON HIGH "PER-ACRE" COSTS FOR WHIP-FALLING, BURNING, SEEDING, PLANTING, TREE-IMPROVEMENT WORK WHEN MULTIPLE SILVICULTURAL OPERATIONS OCCUR ON THE SAME AREA, THE BENEFIT-COST RATIO INEVITABLY IS REDUCED HIGH K-V FUND REQUESTS IN TIMBER SALE APPRAISALS, PUSH PROFITABLE SALES INTO THE DEFICIT STATUS
4. IMPROVED WILDLIFE HABITAT, ESPECIALLY FOR BIG-GAME; REQUIREMENTS FOR THERMAL COVER CAN BE MET OVER A MULTITUDE OF ACRES. AGAIN CLEARCUTTING MAY

MAKE IT DIFFICULT TO FULFILL THE BIOLOGICAL NEEDS OF THE ANIMALS WITHOUT RESTRICTING HARVEST ACRES.

5. REDUCED POTENTIAL STREAM SEDIMENTATION, SELECTIVE HARVEST IN RIPARIAN ZONES, AND ADJOINING WATERSHEDS WOULD LESSEN POTENTIAL EROSION GIVEN CAREFUL TIMING AND LAYOUT OF SKIDTRAILS AND ROADS. GRANTED, CLEARCUTTING METHODS MAY BE NECESSARY TO DEAL WITH OVERMATURE DECADENT STANDS, OR ROOT-ROT INFECTED AREAS, BUT MOST STANDS SHOULD BE VIEWED WITH NATURAL REGENERATION AS A FOCUS OF HARVEST, ENCOURAGING PIONEER SPECIES WHEN POSSIBLE, AND MAXIMIZING GROWTH RATES WITH MINIMUM INVESTMENT.

FOREST SERVICE RESPONSE:

The Wallowa-Whitman National Forest plans to use a variety of silvicultural systems that will achieve either even-aged or uneven-aged conditions based on the overall goals and objectives of the Forest Plan. Appendix B, in the DEIS Appendices, lists criteria that will be used in selecting the appropriate silvicultural system. The system and treatment methods selected will be documented in a silvicultural prescription and will be based on stand and site conditions, silvicultural characteristics of the species present and desired, and the management objectives of the site.

COMMENT NO. 107: INCENTIVES SHOULD BE BUILT IN FOR ALTERNATE LOGGING SYSTEMS THAT ARE LESS DESTRUCTIVE, E.G., HORSE, HELICOPTER AND BALLOON METHODS. CLEARCUTTING SHOULD NOT BE USED. WHERE LOGGING OCCURS WIDE BUFFERS SHOULD BE LEFT NEAR PUBLIC ROADS, RIPARIAN ZONES, AND NESTING AREAS.

FOREST SERVICE RESPONSE:

Each timber sale project proposal is analyzed in accordance with the National Environmental Policy Act procedures. The items you suggest are considered along with project costs, potential returns to the Federal Treasury, and impacts upon other resource values.

COMMENT NO. 108: ALL AREAS SURROUNDING CURRENT ROADLESS AREAS SHOULD BE THE VERY LAST LOGGED.

FOREST SERVICE RESPONSE:

Such an approach would add a great deal of complexity to timber sale scheduling, and result in a reduced harvest level.

COMMENT NO. 109: CONFINE CLEARCUT UNITS TO TRUE FIR STANDS AND LODGEPOLE STANDS ONLY. ELIMINATE THE USE OF CLEARCUTS LIKE THE ONE ON WALLOWA VALLEY NEAR BUCKHORN.

FOREST SERVICE RESPONSE:

No one treatment method is best for a generalized stand condition. Clearcutting will be prescribed only after a stand examination and analysis and a treatment decision based on the existing stand condition, silvical characteristics of the species to manage, and the management objectives of the site.

COMMENT NO. 110: FROM THE ANALYSIS OF THE PLANNING DOCUMENTS, IT APPEARS THAT THE PROPOSED PLAN AND DEIS ON THE WALLOWA-WHITMAN WILL SCHEDULE HARVESTING OF THE PONDEROSA PINE VOLUME LARGELY WITH REGENERATION TYPE CUTTING METHODS. THIS EVEN-AGED APPROACH MAY BE SOUND MANAGEMENT FOR THE WALLOWA-WHITMAN ON A LONG TERM BASIS, HOWEVER, A SHORT TERM SELECTIVE APPROACH FOR THE FIRST ENTRY WOULD BE BETTER UNTIL THE FOREST CAN BE BROUGHT UNDER MANAGED CONDITIONS THIS WOULD ENABLE THE FOREST SERVICE TO.

- A. COVER THE FOREST AREA MORE RAPIDLY, THUS REDUCING MORTALITY FROM THE OLDER AGE CLASSES, PROVIDE SILVICULTURAL BENEFITS IN THE FORM OF STOCKING CONTROL, AID IN CONTROLLING INSECT AND DISEASE EPIDEMICS.
- B. ALLOW PONDEROSA PINE HARVEST AT THE 48 MILLION BOARD FEET/YEAR LEVEL THIS WOULD BE A DEPARTURE FROM HARVESTING ALL SPECIES IN RELATION TO THEIR CURRENT PERCENTAGE OF THE STANDING INVENTORY. BASED ON THE INVENTORY FIGURES PROVIDED BY THE FOREST SERVICE, THIS WOULD ALLOW PONDEROSA PINE TO BE HARVESTED AT THE 48 MMBF/YEAR LEVEL FOR THE NEXT 40-50 YEARS. AFTER THAT, THE PINE WOULD BE REDUCED IN ACCORDANCE WITH ITS PERCENTAGE OF THE STANDING INVENTORY OR LESS IF IT IS NECESSARY TO MAKE UP FOR THE 50 YEAR DEPARTURE
- C. SELL HIGHER VALUE PONDEROSA PINE, THIS WILL:
 - 1. PAY FOR ROADS.
 - 2. MAINTAIN COUNTY RECEIPTS.
 - 3. PROVIDE GREATER REVENUES TO THE GOVERNMENT THROUGH HIGHER STUMPAGE PAYMENTS.
 - 4. MAINTAIN ECONOMIC STABILITY IN OUR TIMBER DEPENDENT COMMUNITIES

WE RECOMMEND THAT THE WALLOWA-WHITMAN RECONSIDER THE PONDEROSA PINE ALLOWABLE SALES QUANTITY VERY CAREFULLY REDUCTIONS IN THE SALES OF THIS SPECIES WILL HAVE MORE OF A DRAMATIC DESTABILIZING EFFECT ON LOCAL COMMUNITIES THAN ANY OTHER ISSUE IN THE WALLOWA-WHITMAN PLAN AND DEIS.

FOREST SERVICE RESPONSE

Most of the Forest has been entered once or more and usually using some form of selective harvest Roads are largely in place We can continue to concentrate in areas where ponderosa pine is more prevalent, and thus keep the harvest level of the species relatively high But we believe we must now do the complete timber management job when we re-enter stands To do otherwise, such as picking out the ponderosa pine in preference to other species, would in effect be high-grading the stands and reduce the long term capability of the land to produce wood fiber

COMMENT NO. 111: THE DEIS ASSUMES 80-88% (DEIS, TABLE II-3a) OF THE ACREAGE WILL BE SELECTED FOR EVEN-AGED MANAGEMENT. WHILE THIS MAY BE A VALID LONG-TERM REGIME, A SHORT TERM UNEVEN-AGED MANAGEMENT ALTERNATIVE SHOULD HAVE BEEN DEVELOPED

FOREST SERVICE RESPONSE.

Selective harvest is well suited to ponderosa pine stands. The Wallowa-Whitman is primarily mixed conifer and lodgepole pine With the exception of Area 11 where selective harvest is

required by law, riparian habitat and sensitive landscapes, even-aged methods are assumed
See discussion in Chapter IV of the FEIS and Appendix B

COMMENT NO. 112: TIMBER MANAGEMENT: THE NATIONAL FOREST MANAGEMENT ACT REQUIRES THAT CLEARCUTTING ONLY BE USED WHERE IT IS DETERMINED TO BE THE OPTIMUM METHOD OF TIMBER HARVESTING. IN LIGHT OF THIS, AND IN RECOGNITION OF VISUAL QUALITY OBJECTIVES; QUESTIONABLY EFFECTIVE PLANTINGS AND NATURAL REGENERATION ON MANY SITES AFTER EVEN-AGED HARVESTS, AND GREATER VULNERABILITY OF EVEN AGED HARVESTS TO INSECT AND DISEASE, AS WELL AS THEIR INFERIOR POTENTIAL FOR WILDLIFE HABITAT DUE TO LOW VERTICAL DIVERSITY, SELECTION CUTTING SHOULD BE EMPHASIZED AS A PREFERRED HARVEST TECHNIQUE. ECONOMIC ANALYSES FOR TIMBER HARVEST TYPES SHOULD INCLUDE VISUAL VALUES AND STAND DIVERSITY, AND AT LEAST ONE ALTERNATIVE SHOULD BE DEVELOPED USING SELECTION CUTTING EXCLUSIVELY.

FOREST SERVICE RESPONSE:

Our rationale for harvesting methods is documented in Appendix B. We intend to rely primarily on evenaged methods but uneven aged methods are available for use where they can be determined to be optimal in project analysis.

COMMENT NO. 113: PAGE IV-30) "TIMBER HARVEST METHODS":
PARAGRAPH 3. I WOULD LIKE TO SEE THE RESEARCH DATA THAT SHOWS THIS CONCLUSION OR AT LEAST REFERENCES TO THE POINT MADE ABOUT CLEARCUTTING BEING THE MOST EFFECTIVE HARVEST METHOD

FOREST SERVICE ALTERNATIVE:

See Appendix B for discussion of even-aged and uneven-aged management. Clearcutting will be used only where analysis shows that it is clearly preferable to other cutting methods for achieving management objectives.

COMMENT NO. 114 ALTHOUGH WE HAVE NOT EXAMINED THE DRAFT PLAN CLOSELY FROM A LEGAL STANDPOINT TO DATE, ONE POTENTIAL WEAKNESS EXISTS WHICH COULD MAKE THE PLAN VULNERABLE TO SUCCESSFUL APPEAL AND/OR LITIGATION. THE DEIS STATES THAT TIMBER "ON MOST OF THE COMMERCIAL FORESTLAND WILL BE MANAGED UTILIZING EVEN-AGED HARVEST METHODS" (DEIS IV-30) NEVERTHELESS, THE DEIS DOES NOT INCLUDE A CLEAR DISCUSSION OF WHY EVEN-AGED MANAGEMENT, ESPECIALLY CLEARCUTTING, IS THE "OPTIMUM" HARVEST METHOD ON THE FOREST AS REQUIRED BY NFMA. A BRIEF DISCUSSION OF SILVICULTURAL SYSTEMS IS BURIED IN APPENDIX B. THE MAIN BODY OF THE DEIS MAKES ONLY PASSING REFERENCES TO THE ISSUE AND DOES NOT EXPLAIN AT ALL (AS FAR AS WE CAN TELL) WHY THE FOREST BELIEVES CLEARCUTTING IS NECESSARY. THE FINAL EIS MUST INCLUDE A COMPLETE, UNBIASED DISCUSSION OF CLEARCUTTING, ITS ADVANTAGES AND DISADVANTAGES, AND THE REASONS WHY THE FOREST PROPOSES TO USE IT TO THE EXTENT PLANNED.

FOREST SERVICE ALTERNATIVE:

We believe the discussion in Appendix B is concise, but covers the subject. The species composition, disease problems, expense of harvesting, the even-aged nature of the stands in the natural state, and a timber production objective combine to indicate that even-aged

methods are preferable for the Wallowa-Whitman. Additional information has been added to Chapter IV and Appendix B of the FEIS

The plan is consistent with the discussion of even-aged and uneven-aged in the Regional guidelines to which this plan is tiered.

COMMENT NO. 115: HARVEST CUTTING METHODS (APPENDIX, PAGE B-29) - THE DEPARTMENT OF FORESTRY SUPPORTS THE FLEXIBLE, SITE-SPECIFIC APPROACH TO THE SELECTION OF HARVEST CUTTING METHODS AS REQUIRED BY THE REGIONAL GUIDE THE WALLOWA-WHITMAN IS ENCOURAGED TO MAINTAIN THIS FLEXIBILITY IN THE FOREST PLAN. WHEN DETERMINING THE HARVEST CUTTING METHOD, ECONOMIC BENEFITS TO THE FOREST AND THE TIMBER PURCHASER SHOULD BE CONSIDERED TO MAINTAIN TIMBER YIELD IN THOSE AREAS WHERE CLEARCUTTING IS LIMITED OR PROHIBITED TO ACCOMMODATE OTHER RESOURCE USES. THE FOREST SHOULD WORK TO IMPROVE KNOWLEDGE OF UNEVEN-AGED MANAGEMENT APPLICATIONS IN EASTSIDE FORESTS THROUGH SILVICULTURAL RESEARCH, YIELD TABLES, AND ECONOMIC ANALYSIS.

FOREST SERVICE RESPONSE.

We agree with these recommendations.

COMMENT NO. 116: HAVE YOU PLANNED FOR THINNING THE VAST ACRES OF LODGEPOLE PINE THAT HAVE FOLLOWED THE PINE BEETLE EPIDEMIC? IT SEEMS WE ARE BEHIND NOW

FOREST SERVICE RESPONSE:

Yes, these regenerated lodgepole pine stands are planned for thinning and are presently being thinned. The impression that there are many unthinned stands may result from our holding these stands to approximately 6 to 10 feet in height to assure identification of dominant and codominant trees and to reduce the effects of competition from ingrowth

COMMENT NO. 117: IF IT WAS NOT FOR ALL THESE THINNING PROJECTS, WE WOULD NOT HAVE ALL OF THE ROAD CLOSURES BECAUSE IF YOU WOULDN'T GO AND TAKE A WHOLE MOUNTAIN SIDE, THE DEER AND ELK WOULD HAVE A PLACE TO HIDE AND CALVE AND FAWN.

FOREST SERVICE RESPONSE

Harvest units are 40 acres or less in size Projects for thinning in larger areas require an analysis of wildlife habitat prior to design

COMMENT NO. 118 THE TIMBER SHOULD BE HARVESTED TO MAINTAIN IT FOR THE FUTURE AND PRESENT GENERATIONS THE MATURE TREES SHOULD BE HARVESTED AND THE SECOND GROWTH THINNED FOR BETTER GROWTH AND HEALTHIER TREES THAT WILL RESIST BUG INFESTATIONS

FOREST SERVICE RESPONSE:

We agree that many acres will need to be managed generally in such a manner if the Forest is to provide the predicted levels of timber

COMMENT NO. 119: WE ALSO RECOMMEND A REDUCTION IN THE AMOUNT OF THINNING IN STANDS WITHIN AREA 1 THIS WOULD RESULT IN AN INCREASE IN COVER STANDS INTERSPERSED THROUGHOUT THE AREA AND HAVE ONLY LOW TO MODERATE EFFECTS ON TIMBER OUTPUTS AN INCREASE IN REFORESTATION EFFORTS ON THESE LANDS COULD POTENTIALY BRING ON COVER STANDS FASTER WHILE AT THE SAME TIME, PROVIDE MORE EMPLOYMENT TO REFORESTATION CREWS.

FOREST SERVICE RESPONSE:

Area 1 is intended to keep trees growing rapidly Therefore, precommercial thinning is essential for any stands where growth is being slowed due to overstocking. Planting will be done where natural seeding is not sufficient.

COMMENT NO. 120: THE FOREST SERVICE IS CHARGED BY LAW TO HARVEST TIMBER ON A SUSTAINED YIELD BASIS. THE SO-CALLED COMMUNITY STABILITY ALTERNATIVE PROPOSED BY THE TIMBER INDUSTRY FOOLISHLY IGNORES THIS FUNDAMENTAL PRINCIPLE OF WISE FORESTRY, SO THAT THE NEXT GENERATION OF INDUSTRY EMPLOYEES WILL PAY FOR THE SHORT SIGHTEDNESS OF TODAY'S.

FOREST SERVICE RESPONSE.

The "Community Stability" alternative has been refined to ensure that it is possible to implement on a sustained yield basis.

COMMENT NO. 121. PRE-COMMERCIAL THINNING IS THE ONLY INTENSIVE SILVICULTURAL PRACTICE USED ON THE WWNF. THE BASE LEVEL PRODUCTION FOR THE FOREST IS 212 MMCF. WITH PRE-COMMERCIAL THINNING, THE EXPECTED PRODUCTION IS 283 (PLAN-E-19) THE 71 MMCF EXTRA PRODUCTION REPRESENTS A 33% INCREASE IN THE BASE DUE TO THE PRE-COMMERCIAL THINNING ALONE IS THIS GREAT A RELEASE FACTOR SUPPORTED BY ANY SCIENTIFIC STUDIES ON THE FOREST SUCH AS IN THE STARKEY FOREST?

FOREST SERVICE RESPONSE

Precommercial thinning is only one of several intensive silvicultural practices used on this Forest as shown in Appendix B, Development of FORPLAN Prescriptions The volume difference between base and intensive level is based on our approved managed yield tables developed from experienced Forest and research data. Differences between thinned and unthinned regimes have been reported at 26 percent to 42 percent in ponderosa pine in Financial Precommercial Thinning Guides for Northwest Ponderosa Pine Stands by Sasaman, et al , Res Paper PNW-226 and from 24 percent to 31 percent in Douglas-fir in Effects of Thinning on Yield of Douglas-Fir by Reukema and Bruce, Gan Tech Report PNW-58.

COMMENT NO. 122 WILL THE WWNF REALLY BE ABLE TO FINANCE THE LEVEL OF PRECOMMERCIAL THINNING PLANNED?

FOREST SERVICE RESPONSE:

Most of the funds for thinning are expected to be made available from the sale of timber (Knutson-Vandenberg Act) We believe it is reasonable to expect these funds and others as necessary

COMMENT NO. 123 THE FOREST SERVICE PREDICTS A 10 PERCENT INCREASE DUE TO "GENETIC IMPROVEMENT " THERE IS NO EVIDENCE PROVIDED TO JUSTIFY THIS ASSUMPTION WHICH, ESPECIALLY IF CONSIDERED ADDITIVE TO THE OVERLY OPTIMISTIC PCT INCREASES, BASED ON FAULTY REASONING

FOREST SERVICE RESPONSE

We have planned for the genetic increase for areas where trees will be planted Based on experience elsewhere in the northwest, this increase, due to using seed from superior trees, is not thought to be unreasonable.

COMMENT NO. 124 30 & 40 YEARS AGO, LOGGING WAS GOOD & CLEAN & WITHOUT THE MESS YOU SEE TODAY, WE NEVER LEFT ANY LOGS IN THE WOODS. IF WE DID WE GOT THEM ON PAY TRIPLE SCALE NOW DAYS JUST WALK THROUGH WOODS THAT HAS BEEN LOGGED YOU WILL FIND MANY LOGS LEFT. THAT IS A WASTE.

FOREST SERVICE RESPONSE.

In our opinion, logging results in fewer logs left in the woods now than in past decades. Utilization standards are higher now We still bill timber purchasers for merchantable logs which are not removed

COMMENT NO. 125: YOU HAVE SUBSTITUTED APPROXIMATELY 6 MILLION FEET OF LODGE-POLE PINE, SIZE CLASS 5-4" TOP, IN THE SAWLOG COMPONENT OF THE CHARGEABLE VOLUME. BY YOUR STAFF'S ADMISSION, THE WALLOWA-WHITMAN IS THE ONLY FOREST IN REGION 6 TO CLASSIFY LODGEPOLE IN THIS CATEGORY AS A SAWLOG. I KNOW OF NO OPERATORS ON THIS FOREST WHO CAN ECONOMICALLY PROCESS A STEADY FLOW OF FOUR INCH LOGS WHATEVER ASSUMPTIONS YOU USED IN THIS CLASSIFICATION PROCEDURE ARE INVALID LODGEPOLE PINE TO A FOUR-INCH TOP SHOULD NOT BE CLASSIFIED AS SAWLOGS AND SHOULD NOT BE INCLUDED AS A PART OF THAT COMPONENT

FOREST SERVICE RESPONSE:

During the decade 1977 to 1987 following the mountain pine beetle epidemic, it was common practice to woods chip both green and dead lodgepole pine down to 5" dbh and even smaller This small diameter lodgepole pine was included as a part of the allowable sale quantity under the assumption that future chipping of small diameter logs would continue during the plan period. We did not intend to indicate that these small logs would be manufactured into lumber. We have revised the text to reflect a change for lodgepole pine utilization to 7" dbh to a 5" top diameter. The smaller diameter lodgepole pine may still be chipped or utilized for other products under the plan, however, the volumes are shown in Table E-4, which shows volumes and products in addition to the Forest allowable sale quantity

COMMENT NO. 126: ALTHOUGH ALMOST ALL ALTERNATIVES STRESS VISUAL QUALITY, I CAN'T UNDERSTAND WHY HELICOPTER LOGGING IS SO LOW IN YOUR FUTURE SALES IT DOES NOT EVEN HAVE A CATEGORY BY ITSELF, BUT IS LUMPED IN WITH SKYLINE OVER 2000' MANY OF THESE VISUAL AND WILDLIFE AREAS COULD BE LOGGED BY HELICOPTER AND KEEP THE VISUAL QUALITY AND WILDLIFE HABITAT ENHANCED ALSO MANY ROADLESS AREAS COULD BE LOGGED BY HELICOPTERS TO EXISTING ROADS WITH VERY LITTLE EFFECT AND STILL BE MAINTAINED AS ROADLESS OR SEMIPRIMITIVE AREAS.

MY NUMBER ONE PRIORITY IS LOCAL COMMUNITIES ECONOMIC STABILITY. IT SEEMS TO ME USING MORE HELICOPTER LOGGING CAN INCREASE THE AMOUNT OF TIMBER PUT UP FOR SALE AND MEET THE OBJECTIVES OF WILDLIFE, VISUAL QUALITY, WATER AND RECREATIONAL VALUES

FOREST SERVICE RESPONSE

We agree that there may be increasing opportunity for helicopter logging, especially if fuel prices cooperate. It has, in the past, usually proven to be more expensive than other means, but certainly less impacting on the soil and other resources

COMMENT NO. 127: IS 75TPA A GOOD MINIMUM STANDARD ON ALL SITES?

FOREST SERVICE RESPONSE.

Seventy-five TPA is a stocking standard for determining land suitability. Recommended stocking levels are a part of every silvicultural prescription and will be based on stand specific or generalized forest stocking guides

COMMENT NO. 128: IS YOUR PRODUCTIVITY DATA BASED ON MINIMUM OR FULL STOCKING

FOREST SERVICE RESPONSE:

It is based on full stocking

COMMENT NO. 129 YIELD TABLES APPEAR TO BE OVERLY OPTIMISTIC, FAVORING GREATER GROWTH THAN SEEMS POSSIBLE

FOREST SERVICE RESPONSE:

Managed yield tables were developed using forest stand and research data. Results were compared with current published yield tables (Appendices-DEIS, Development of Per Acre Yield Coefficients) and results appeared reasonable. Field comparison of lodgepole pine yield tables with actual growth in 1987 show our tables to be reasonable

COMMENT NO. 130. THE MANAGED TIMBER YIELD TABLES APPEAR TO OVERESTIMATE THE VOLUME GAINS EXPECTED FROM PRECOMMERCIAL THINNING (PCT) THE FOREST SERVICE JUSTIFIES THE PCT YIELD TABLES BY COMPARING THEM WITH MYERS' NORMAL YIELD TABLES. BUT, AS POINTED OUT BY MACCLEAN AND BOLSINGER, IN "ESTIMATING PRODUCTIVITY ON SITES WITH A LOW STOCKING CAPACITY," PNW-152, MYERS' YIELD TABLE IS BASED ON A SAMPLE OF PLOTS FROM WHICH WERE EXCLUDED PLOTS WITH A STAND DENSITY INDEX (SDI) LESS THAN 250. AS A RESULT, MYERS CALCULATES A NORMAL SDI OF 370. HALL, IN "PLANT COMMUNITIES OF THE BLUE MOUNTAINS", SUGGESTS THAT SUBSTANTIAL AREAS WILL NOT SUPPORT THE STOCKING LEVELS OF MYERS DUE TO MOISTURE LIMITATIONS. AND, IN FACT, O'TOULE CALCULATED FOR PONDEROSA PINE PLOTS IN THE WALLOWA VALLEY AND BURNT POWDER UNITS AN AVERAGE SDI OF 184. SIMILARLY, MIXED CONIFER PLOTS HAD AN AVERAGE SDI OF 300, LESS THAN THAT ASSUMED BY THE FOREST SERVICE. THE RESULT OF OVERESTIMATING STOCKING CAPACITY IS TO OVERESTIMATING GROWTH AND YIELD. IN ADDITION, FAILURE TO ACKNOWLEDGE THAT AVAILABLE MOISTURE LIMITS STOCKING DENSITIES CAUSES THE FOREST SERVICE TO ERRONEOUSLY CONCLUDE THAT STOCKING LEVEL

CONTROL WILL INCREASE YIELDS A COLLARY OF MOISTURE LIMITATION IS THAT NET MERCHANTABLE VOLUMES AT CMAI WITH AND WITHOUT PCT SHOULD CONVERGE THE FOREST SERVICE YIELD TABLES DO NOT

FOREST SERVICE RESPONSE:

See response to previous comment. In making comparisons between Myers' and our managed yield tables, Myers' yields were discounted using SDI as suggested by Maclean and Bolsinger

COMMENT NO. 131: ARE YOU OVERESTIMATING LODGEPOLE PINE VOLUME IN DECADES 1 AND 2 CONSIDERING LOSSES FROM THE MOUNTAIN PINE BEETLE?

FOREST SERVICE RESPONSE

We have updated lodgepole pine inventory through 1984 to account for harvest. Harvest since that time has further reduced the inventory and could result in some overestimation. The next timber inventory, scheduled for 1990, will provide information necessary to update the inventory and adjust harvest levels if necessary

COMMENT NO. 132: I AM CONCERNED ABOUT THE INVENTORY DATA USED FOR ANALYSIS IS IT ACCURATE?

FOREST SERVICE RESPONSE:

Yes, we believe it is accurate.

COMMENT NO. 133 WHO IS RIGHT? INDUSTRIES EVALUATION OF THE FOREST AND WHAT IT PRODUCES OR IS IT THE FOREST SERVICE INVENTORY RIGHT? THERE HAS BEEN SEVERAL MISTAKES FOUND IN IT.

FOREST SERVICE RESPONSE:

The inventory is within required sampling standards Therefore, is correct by definition.

COMMENT NO. 134: TIMBER INVENTORY AND STAND MAPPING THE INVENTORY SERVES AS THE FOUNDATION FOR MANY OTHER KEY PLANNING ASSUMPTIONS SUCH AS LAND SUITABLE FOR TIMBER PRODUCTION AND YIELD TABLE OUTPUTS FOR EXAMPLE, THE FIRST PHASE OF THE SUITABILITY DETERMINATION "RELIED HEAVILY ON THE WALLOWA-WHITMAN TIMBER INVENTORY" (APP E-1). WE BELIEVE THE WALLOWA-WHITMAN INVENTORY IS FLAWED AND CANNOT BE RELIED UPON FOR THE PLANNING DECISIONS CONTAINED IN THE DEIS

THE NATIONAL FOREST MANAGEMENT ACT REGULATIONS REQUIRE THAT EACH FOREST SUPERVISOR "SHALL OBTAIN AND KEEP CURRENT INVENTORY DATA APPROPRIATE FOR PLANNING".

THE INTERDISCIPLINARY TEAM SHALL "COLLECT, ASSEMBLE, AND USE DATA OF A KIND, CHARACTER, AND QUALITY, AND TO THE DETAIL APPROPRIATE FOR THE MANAGEMENT DECISIONS TO BE MADE." 36 CFR 219 12(d) THE WALLOWA-WHITMAN TIMBER INVENTORY FAILS TO COMPLY WITH THIS STANDARD.

IN DEFINING THE NATURE OF THE FOREST PLANNING PROBLEM AND IN USING FORPLAN, THE FOREST SERVICE HAS CREATED A NEED FOR MORE ACCURATE INVENTORY INFORMATION BY FOREST TYPES. HOWEVER, THE INVENTORY WAS NOT DESIGNED TO PROVIDE THIS REFINED INFORMATION TO THE DEGREE OF ACCURACY REQUIRED. THEREFORE, DETERMINING WHETHER THE INVENTORY SAMPLE HAS MET THE RELIABILITY AND PRECISION LEVEL BASED SOLELY ON TOTAL FOREST VOLUME IS NO LONGER APPROPRIATE.

TWO ERRORS HAVE ALREADY BEEN ACKNOWLEDGED BY THE WALLOWA-WHITMAN THE FIRST INVOLVED THE PLOT STRATIFICATIONS WHICH REDUCED TIMBER INVENTORY VOLUME 12%. THE SECOND WAS STAND MAPPING ERROR OF 20%. THE FIRST ERROR WAS CORRECTED BUT THE SECOND ERROR WAS IGNORED. WE BELIEVE THAT THE MAJOR ERRORS IN STAND MAPPING SHOULD BE CORRECTED BEFORE THE FINAL DEIS IS ISSUED

FIRST, THE REDUCTION IN VOLUME FOR VISIBLE AND HIDDEN DEFECT HAS BALLOONED FROM ABOUT 7% IN THE 1968 INVENTORY TO ABOUT 10% IN THE 1979 INVENTORY THE REASON FOR THIS CHANGE IS NOT EXPLAINED IN THE EIS NOR IS THERE ANY DOCUMENTATION SUPPORTING THE 20% FIGURE.

SECOND, THE PROGRAM USED TO DERIVE THE TIMBER INVENTORY ESTIMATES RELIES ON PREDICTION EQUATIONS FOR TREE HEIGHT AND DBH GROWTH. ON THE AVERAGE, THE TREE HEIGHT IS CONSISTENTLY BELOW THE TRUE HEIGHT

THIS RELATIVE ERROR SERIOUSLY UNDERSTATES THE VOLUME BECAUSE THE MATURE TREES PROVIDE THE LARGEST CONTRIBUTION TO TOTAL VOLUME THIS NOT ONLY RESULTS IN A LOWER STARTING VOLUME PER ACRE, BUT ALSO LOWERS THE GROWTH ESTIMATE BECAUSE GROWING STOCK IS UNDERESTIMATED

THIRD, PLOT SELECTION ON THE WALLOWA-WHITMAN DOES NOT FOLLOW THE CURRENTLY ESTABLISHED REGIONAL GUIDELINES IN DESIGNING NEW INVENTORIES, THE REGION HAS URGED FOREST TO ADD NEW PLOTS TO SUPPLEMENT THE OLD INVENTORY PLOTS SO THAT THE NEW INVENTORY SERVES AS AN INDEPENDENT CHECK OF THE OLD.

WE RECOMMEND THAT THE WALLOWA-WHITMAN MAINTAIN HARVEST LEVELS AT THE LAST 10 YEAR HISTORIC LEVEL (1975-1984) UNTIL A REINVENTORY IS COMPLETED AND AN ANALYSIS COMPLETED TO DETERMINE THE TRUE AVAILABLE TIMBER SUPPLY AND TIMBER PRODUCTIVE CAPABILITY OF THE FOREST. VERY FEW, IF ANY, RESOURCES WOULD BE THREATENED OR IRRETRIEVABLY LOST DURING THE LIFE OF THE PLAN IF MAJOR CHANGES IN OUTPUT LEVEL WERE POSTPONED UNTIL SUFFICIENT EVIDENCE TO JUSTIFY THEM IS OBTAINED.

FOREST SERVICE RESPONSE:

We do not believe the "inventory is flawed" or that it fails to "comply with standards" and that early concerns about the adequacy of our inventory have been explained in Appendix B, E, and L of the DEIS and supporting documents

COMMENT NO. 135: NORTHWEST PINE ASSOCIATION AND OUR MEMBER COMPANIES HAVE WORKED EXTENSIVELY WITH THE WALLOWA-WHITMAN DURING THE PLANNING PROCESS ON SEVERAL PROBLEMS INVOLVING THE FOREST'S TIMBER INVENTORY AND ITS SUITABLE LAND CLASSIFICATION PROCEDURES THE PLANNING RECORD CONTAINS EXTENSIVE DOCUMENTATION OF MEETINGS AND CORRESPONDENCE BETWEEN INDUSTRY AND THE FOREST REGARDING THESE ISSUES TO DATE, MANY OF OUR BASIC CONCERNS ON THESE ISSUES REMAIN UNRESOLVED.

RESOLUTION OF THESE PROBLEMS IS CRITICAL TO THE PRODUCTION OF AN ACCEPTABLE FINAL PLAN SINCE BOTH INVENTORY DATA AND LAND SUITABILITY CLASSIFICATIONS SERVE AS THE FOUNDATION FOR MANY OTHER KEY ASSUMPTIONS. WE HAVE RECOMMENDED IN THE PAST AND STILL BELIEVE THAT THE FOREST SHOULD MAINTAIN ITS ANNUAL TIMBER SALE PROGRAM AT LEAST AT A LEVEL EQUIVALENT TO THE PREVIOUS 10-YEAR HISTORIC PROGRAM PENDING CORRECTION OF THESE ANALYTICAL DEFICIENCIES. OUR MEMBERS' FUTURE AND THE FUTURE OF LOCAL TIMBER-DEPENDENT COMMUNITIES SHOULD NOT BALANCE ON THE KINDS OF TENUOUS DATA AND ASSUMPTIONS CURRENTLY CHARACTERISTIC OF THE FOREST'S ANALYSIS.

AGAIN, MONITORING AND RESEARCH ARE THE KEYS TO HANDLING UNCERTAINTY, INCLUDING UNCERTAIN INVENTORY DATA IN FOREST PLANS. TIMBER HARVEST LEVELS CAN ALWAYS BE REDUCED IF FURTHER ANALYSIS CLEARLY ESTABLISHES THAT THE FOREST'S PRODUCTION POTENTIAL HAS BEEN OVERESTIMATED DUE TO FAULTY INVENTORY, YIELD, AND SUITABLE LAND CLASSIFICATION. ON THE OTHER HAND, IF THE FOREST'S TIMBER SALE PROGRAM IS REDUCED PREMATURELY BASED ON FAULTY DATA, THE ADVERSE IMPACTS ON LOCAL BUSINESSES AND COMMUNITIES COULD BE TRAGIC

FOREST SERVICE RESPONSE:

Timber industry concerns regarding timber inventory data and the inventory of lands suitable for timber production have been considered. In several instances, adjustments in the data base have been made as a result of these reviews. We are confident that the existing inventories, as adjusted, are adequate for the Forest Plan decisions being made. We agree that monitoring and research will continue to be important as the Forest Plan is implemented. We feel we would be remiss, however, if we failed to base harvest levels during this planning period on the most recent data available

COMMENT NO. 136. THE TIMBER INVENTORY DID NOT LOCATE THE SUPPLEMENTAL PLOTS RANDOMLY TO ENSURE UNBIASED PLACEMENT

REGIONAL PROCEDURE REQUIRES TIMBER TYPE MAPPING TO BE DONE BEFORE THE PLOTS WERE SELECTED, HOWEVER, THE WALLOWA-WHITMAN DID THE TYPING AFTERWARD. THIS IS A FUNDAMENTAL INVENTORY ERROR BECAUSE TYPE MAPPING IS USED TO STRATIFY THE SAMPLE AREA INTO SIMILAR AREAS REDUCING THE SAMPLING ERROR BEFORE ENTERING THE FIELD TO COLLECT RESOURCE DATA

FOREST SERVICE RESPONSE

All mapping was completed prior to plot establishment. The desired stand conditions were randomly selected and the actual plot location within each stand was randomly located

COMMENT NO. 137. THE WALLOWA-WHITMAN NATIONAL FOREST PLAN IS BASED ON ITS 1979 INVENTORY OF TREES. AN UPDATED INVENTORY WILL PROBABLY BE DONE WITHIN THE NEXT THREE YEARS. THE PLAN SHOULD BE FLEXIBLE ENOUGH TO REVISE ITS HARVEST SCHEDULES DEPENDING ON THE RESULTS OF THE INVENTORY. IN ADDITION, EVERY EFFORT SHOULD BE MADE TO CONDUCT A THOROUGH INVENTORY OF THE TIMBER AVAILABLE BY SPECIES AND MATURITY ON BOTH PUBLIC AND PRIVATE LANDS. IT IS EXTREMELY DIFFICULT TO DETERMINE WHAT OREGON'S ACTUAL TOTAL SUPPLY IS AND WHETHER THE STATE HAS THE CAPABILITY FOR EXPANSION OF ITS OUTPUT. AS A RESULT, IT IS DIFFICULT TO ASSESS WHETHER PROPOSED HARVEST CHANGES ON THE WALLOWA-WHITMAN CAN BE OFFSET BY OTHER SOURCES.

FOREST SERVICE RESPONSE.

In addition to our periodic National Forest inventory, the PNW Forest and Range Experiment Station conducts periodic forest inventories on non National Forest lands and publishes the summary statistics area reports.

COMMENT NO. 138: THE CONFEDERATED TRIBES FEEL THAT EVEN-AGED MANAGEMENT ACROSS THE BOARD WILL NOT FULFILL THE MULTIPLE USE NEEDS AND BEST MANAGE ALL OF THE TYPES OF ECOSYSTEMS WITHIN THE FOREST IT IS RECOMMENDED THAT BOTH EVEN-AGED AND UNEVEN-AGED PRACTICES BE UTILIZED TO MAINTAIN A DIVERSITY OF HABITAT NECESSARY TO FISH AND WILDLIFE

FOREST SERVICE RESPONSE:

We have not excluded uneven-aged management, and will use it where applicable, especially where it protects other resource values more effectively than even-aged methods. But we expect that our predominate methods will be even-aged.

Riparian and visual foreground retention areas have been modeled as though uneven-aged management will be practiced. The flexibility remains to use the system most suited to the specific project

COMMENT NO. 139: WHERE HARVESTING DOES OCCUR THERE SHOULD BE UNEVEN AGE MULTIPLE SPECIES MANAGEMENT WITH ROTATIONS OF AT LEAST 200 YEARS OR LONGER.

FOREST SERVICE RESPONSE

This would be one approach, but we believe it would result in much lower yields of timber than would the prescriptions shown in the Plan

COMMENT NO. 140. I BELIEVE TIMBER SHOULD BE CUT AT ROTATION AGE AND NOT CULMINATION OF MEAN ANNUAL INCREMENT - THAT IS TIMBER MANAGEMENT, ANYTHING LESS IS A GIVING-IN TO THE GROUPS THAT WANT PRIVATE HUNTING PRESERVES

FOREST SERVICE RESPONSE.

Culmination of mean annual increment is one of many types of rotation NFMA (Section 6 (M)) requires stands, prior to harvest, to have generally reached the culmination of mean annual increment of growth.

COMMENT NO. 141: WOULD LIKE TO SEE AN ANALYSIS OF THE DIFFERENCE IN ROTATION AGES, I E., ENVIRONMENTAL CONSEQUENCES OF SHORT ROTATIONS.

FOREST SERVICE RESPONSE:

We do not believe differences in the environmental consequences between a short rotation of say 80 years as compared to 100 or 120 years would be significant if time, length of rotation, were the only variable Our observations from reviewing lands harvested 50 or more years ago are that in either case the ground will "heal" and natural processes (flora and fauna) will resume functioning long before the end of the second rotation We have observed instances where

soil compaction has lasted a very long time on skid trails or landings. We now have tools to mitigate this effect.

COMMENT NO. 142 80-90 YEAR ROTATIONS ALSO SEEM IMPLAUSIBLE TO ACTUALLY PRODUCE VALUABLE WOOD PRODUCTS

FOREST SERVICE RESPONSE

Yield tables predict average diameters of 14" to 16" at 80 to 90 years of age at the levels of management intensity we are planning for.

COMMENT NO. 143 WE WERE UNABLE TO FIND THE EVALUATION AND ANALYSIS OF THE EFFECT OF A SHORTENED ROTATION AGE ON THE OVERALL FOREST, NOR HOW CULMINATION OF MEAN ANNUAL INCREMENT AFFECTS VARIOUS ROTATIONS. THIS IS VERY IMPORTANT TO ALL RESOURCES AND SHOULD HAVE BEEN EVALUATED.

FOREST SERVICE RESPONSE

The discussion of timber yield tables in Appendix B to the EIS contains a table showing how management intensity and culmination of mean annual increment affect rotation age.

Shortened rotations result in smaller trees. This is significant because it reduces habitat for wildlife species needing large-diameter trees and snags, and because it changes the appearance of the forest. It also tends to result in poorer quality lumber since less knot-free wood is produced. These effects are discussed in Chapter IV of the EIS.

COMMENT NO. 144 A REST ROTATION APPROACH TO FOREST MANAGEMENT WITH ABOUT A 300 YEAR ROTATION WOULD BE A WAY TO INSURE LONG TERM HEALTH OF THE FOREST

FOREST SERVICE RESPONSE

Such an approach would provide large trees for harvest. Whether or not the forest would be healthier would depend on one's definition of health. The trees would probably be much less healthy than would trees managed on a shorter rotation. It is certain that there would be much less timber produced under a 300-year rotation than under the rotations assumed in the proposed plan.

COMMENT NO. 145 HOW LARGE WILL VARIOUS TREE SPECIES BE AT CMAI? HOW OLD WILL THEY BE AT THIS POINT? HOW MANY YEARS SOONER THAN THE CMAI POINT IS HARVEST ALLOWED?

FOREST SERVICE RESPONSE

At culmination of mean annual increment (CMAI), trees in the ponderosa pine/Douglas-fir working group (age 80) and the mixed conifer working group (age 90) are expected to average 14 to 16 inches in diameter. Trees in the lodgepole pine working group (age 60) are expected to average 11 to 12 inches in diameter. Harvest is allowed at 95% of CMAI which generally occurs ten years earlier.

COMMENT NO. 146: BECAUSE OF THE LARGE PORTION OF THE W-W ALREADY SET ASIDE (WILDERNESS 25% AND HCNRA 16%). I SUPPORT MANAGING ALL THE REMAINING FOREST FOR SOME LEVEL OF TIMBER PRODUCTION. MUCH OF THE FOREST IS IN POOR CONDITION FOR GROWING WOOD FIBER AND PROVIDING WILDLIFE OR RECREATIONAL OPPORTUNITIES THEREFORE, I URGE YOU TO HARVEST OVER-MATURE, DISEASED, AND INSECT RAVAGED TIMBER AND REPLACE IT WITH A YOUNG, HEALTHILY GROWING FOREST

FOREST SERVICE RESPONSE:

Many share this opinion

COMMENT NO. 147: WE MUST USE FOREST TO FULL POTENTIAL AND A BALANCE THIS DOES NOT INCLUDE CLEARCUTTING WHICH I CALL CTIMP FARMS

FOREST SERVICE RESPONSE:

As discussed in the planning documents (EIS Chapter IV, Appendix B), clearcutting is an important technique if the Forest is to be managed to achieve full timber production potential

COMMENT NO. 148: IN REGARD TO LOGGING IN THE PINE AND EAGLE VALLEYS, IT WOULD BE BENEFICIAL IF THE FOREST SERVICE (IF THEY ARE NOT ALREADY) WOULD CONDUCT ACCURATE ECONOMIC AND ECOLOGICAL STUDIES OF THE AREAS TO BE LOGGED, SUCH AS.

A. COST OF ROADS INTO VIRGIN AREAS.

1. ON THE ROADS MAKE A DETERMINATION REGARDING THE ROAD STANDARDS FOR
 - A. THE ECONOMICS
 - B. THE ECOLOGICAL EFFECTS

B. COMPLETE COST ANALYZATION OF LOGGING TO SEE IF IT IS:

1. FEASIBLE, ECONOMICALLY AND ECOLOGICALLY.
2. THAT IT WOULD BE BENEFICIAL TO THE PUBLIC.
3. IF IT IS A DEFICIT OPERATION, WILL THE ECOLOGICAL REASONS (IF THERE ARE ANY) TO LOG OUT-WEIGH THE MONETARY LOSSES?
4. ASSESSMENT ON THE WATERSHED OF THE AREAS LOGGED IN RELATIONSHIP TO THE VALLEY RESIDENTS WHO DEPEND UPON THE WATER FOR THEIR LIVELIHOOD

FOREST SERVICE RESPONSE:

We believe such studies are presently taking place. We encourage interested persons to visit with District Rangers on the timber sale analysis process

TIMBER HARVEST LEVELS
Code 701

COMMENT NO. 1 THE COMMUNITY STABILITY ALTERNATIVE WOULD PROVIDE THE NEEDED LEVEL OF TIMBER HARVEST AND ALSO KEEP THE FOREST HEALTHY

FOREST SERVICE RESPONSE.

This alternative would provide a relatively high level of harvest and over time would result in a high percentage of young stands of trees, which tend to be healthy.

COMMENT NO. 2 MANY RESPONDENTS WERE OPPOSED TO ALTERNATIVE C BECAUSE OF THE REDUCTION IN TIMBER HARVEST LEVELS. THEY FEAR THAT IT WOULD HAVE A SERIOUS EFFECT ON THE TIMBER INDUSTRY WHICH IN TURN WOULD RESULT IN ADVERSE LOCAL ECONOMIC EFFECTS.

FOREST SERVICE RESPONSE

There is a relationship between harvest levels and the local economy. This was illustrated in the DEIS in terms of jobs, returns to counties, and personal income. Alternative C did show reductions in these areas. Many people believed the effects would be more severe than our estimates including the Committee for Community Stability which circulated information to this effect.

COMMENT NO. 3. "I THINK THE HISTORIC LEVEL OF GREEN SAWTIMBER SOLD ON THE WALLOWA-WHITMAN SHOULD BE MAINTAINED "

FOREST SERVICE RESPONSE

Many people shared this view.

COMMENT NO. 4. "I THINK THE HISTORIC LEVEL OF GREEN SAWTIMBER SOLD ON THE WALLOWA-WHITMAN SHOULD BE INCREASED "

FOREST SERVICE RESPONSE.

Many people shared this view.

COMMENT NO. 5 "I THINK THE HISTORIC LEVEL OF GREEN SAWTIMBER SOLD ON THE WALLOWA-WHITMAN SHOULD BE REDUCED "

FOREST SERVICE RESPONSE

Many people shared this view

COMMENT NO. 6: "THESE AREAS NEED TIME TO ADJUST TO A REDUCED TIMBER CUT BECAUSE THEIR ECONOMIES ARE NOT GEARED UP TO THE BENEFIT FROM THE RECREATIONAL POTENTIAL OF THIS ALTERNATIVE YOU MUST ALLOW FOR ADDITIONAL BOARD FEET NOW AND THEN TO SCALE DOWN IN THE COMING YEARS "

FOREST SERVICE RESPONSE

To some extent we agree, but want to point out the following

1. "These areas" obtain timber from other lands as well as the Wallowa-Whitman. The allowable harvest for northeast Oregon as a whole is not being reduced.
2. The reduction in harvest from the Wallowa-Whitman is not great, especially if measured in cubic volume
3. Timber purchasers have been aware of the likelihood of somewhat reduced levels of timber from the Wallowa-Whitman for several years, as well as the likelihood of changes in species composition. They have been revamping mills to accommodate these changes

COMMENT NO. 7: "I BELIEVE THAT SHORT-TERM POLITICAL PRESSURE IS RESPONSIBLE FOR THE WALLOWA-WHITMAN'S EMPHASIS ON TIMBER. BECAUSE OF PAST OVERCUTTING, MAJOR EFFORTS WERE MADE TO KEEP THE CUT FROM FALLING DOWN AS LITTLE AS POSSIBLE. I DON'T THINK THE SHORT-TERM TIMBER JOBS AND POLITICAL AVOIDANCE OF A HEATED SITUATION IS WORTH CUTTING THIS FOREST SO HEAVILY NOW AND REDUCING FUTURE OPTIONS. I CANNOT SEE HOW THE FOREST CAN SUSTAIN ITSELF UNDER THE DEVELOPMENT ONSLAUGHT IT IS UNDERGOING. DON'T YOU FOLKS GET SICK AND TIRED OF GOING THROUGH A LANDSCAPE WHICH HAS AREAS THAT LOOK LIKE A VIET NAM B52 BOMBING RUN TOOK PLACE LAST WEEK? DON'T YOU AT LEAST NOTICE HOW MUCH MORE PREVALENT THE CUTTING UNITS ARE NOW THAN 5 OR 10 YEARS AGO? I JUST HAVE TO ASK IF YOUR GRAND INTENSIVE MANAGEMENT PLANS ARE TRULY NECESSARY? OR EVEN SUSTAINABLE?"

FOREST SERVICE RESPONSE.

We believe they are necessary if we are to achieve the predicted levels of harvest. Yes, we believe they are sustainable

COMMENT NO. 8 "THE FEDERAL GOVERNMENT'S RESOURCE PLANNING ACT (RPA) TARGETED TIMBER PRODUCTION FROM THE WALLOWA-WHITMAN NATIONAL FOREST AT 220 MMBF PER YEAR FOR 1986-1999. SINCE THIS KIND OF OVER-ESTIMATED THE NUMBER OF PRODUCTIVE ACRES, DID NOT ACCOUNT FOR THE WITHDRAWAL OF LAND FOR WILDERNESS AND EXPERIMENTAL STATIONS, AND DID NOT FUND THE REQUESTED LEVEL OF INTENSIVE MANAGEMENT, WE REALIZE THAT THIS IS AN UNREALISTIC LEVEL OF HARVEST. HOWEVER, A PROPOSAL SUCH AS ALTERNATIVE C, THAT REDUCES THE HARVEST OF MIXED SPECIES BELOW CURRENT LEVELS--WHICH ARE ALREADY WELL BELOW THE TARGETED RPA HARVEST LEVEL--SHOULD NOT BE CONSIDERED. THE FOREST SERVICE SHOULD CONSIDER REQUESTING A TEMPORARY DEPARTURE FROM NONDECLINING FLOWS TO HARVEST THE DEAD AND

DYING LODGEPOLE WHILE NOT REDUCING THE HARVEST OF OTHER SPECIES. THE FOREST SERVICE SHOULD DEVELOP A NEW ALTERNATIVE THAT WOULD AT LEAST MAINTAIN THE CURRENT AMOUNT OF HARVESTABLE TIMBER [The State] ECONOMIC DEVELOPMENT DEPARTMENT BELIEVES THAT THE WALLOWA-WHITMAN NATIONAL FOREST COULD SUPPORT HIGHER LEVELS OF TIMBER HARVEST WHILE PRESERVING ADEQUATE LAND BASE FOR ALTERNATIVE USES *

FOREST SERVICE RESPONSE

We understand the point of view of your department. Other alternatives more closely approximated your recommendation. Alternative C was selected because the Regional Forester believed it provided a more balanced approach to dealing with all of the issues than some which primarily emphasized direct economic concerns

COMMENT NO. 9 THE CONSEQUENCES OF THE DECLINE OF PONDEROSA PINE COULD NOT BE OVERSTATED. ITS VALUE IS DOUBLE AND IN SOME INSTANCES TRIPLE THE VALUE OF ITS NEAREST COMPETITOR. THE LOSS OF PONDEROSA PINE WILL SERIOUSLY ALTER THE PROFIT PICTURE FOR LOCAL MILLS, ESPECIALLY SINCE SOME OF THE LARGER FOREST PRODUCTS FIRMS HAVE OVERCUT THE PONDEROSA PINE FROM THEIR OWN HOLDINGS DURING THIS 1976-1980 BOOM. REMEMBERING THAT THIS DECLINE IS SIMILAR THROUGH MOST PROPOSED ALTERNATIVES, IT IS NOT PARTICULARLY HELPFUL IN DECIDING UPON AN ALTERNATIVE. ON THE OTHER HAND, IF ANY MANAGEMENT AREA COULD HAVE THE PONDEROSA PINE TRADE-OFFS IDENTIFIED AND ALTERED, SUCH AS DECREASING ELK HABITAT ESPECIALLY FOR WINTER RANGE, THEN THE PONDEROSA PINE PROBLEM WOULD BE MITIGATED TO A CERTAIN DEGREE. AS FAR AS DECIDING ON AN ALTERNATIVE BASED ON THE VARYING AMOUNTS OF SAWTIMBER AVAILABLE, IT SEEMS ILL-ADVISED FIRST, BECAUSE OF THE OVERWHELMING IMPORTANCE OF PONDEROSA PINE TO THE LOCAL MILLS' PROFIT PICTURE, FOCUSING SOLELY ON SAWTIMBER OFFERS LITTLE INPUT. FOR EXAMPLE, THE AMOUNT OF PONDEROSA PINE AVAILABLE FOR HARVEST IN OPTION C IS ESSENTIALLY IDENTICAL TO THE AMOUNT IN OPTION D, YET D OFFERS 6 MMBF MORE SAWTIMBER THAN C. EVEN THE DIFFERENCE BETWEEN C AND B IS SMALL GIVEN THE 15 MMBF ADDITIONAL SAWTIMBER OFFERED IN THE FIRST DECADE IN OPTION B.

THE SECOND PROBLEM WITH KEYING ON SAWTIMBER AS THE MAJOR FOCUS IS THAT IT IS DIFFICULT IF NOT IMPOSSIBLE TO ASCERTAIN A CLEAR CORRELATION BETWEEN MMBF OF SAWTIMBER AND AREA EMPLOYMENT IN THE LUMBER AND WOOD PRODUCTS INDUSTRY. AS TABLE 2 SHOWS, AREA MILLS HAVE A MAXIMUM CAPACITY OF AROUND 301 MMBF PER YEAR. YET, THE INDUSTRY HAS NOT OPERATED AT THIS CAPACITY FOR SEVERAL YEARS. IF PONDEROSA PINE IS NOT AVAILABLE IN HISTORIC AMOUNTS, WHICH SEEMS INEVITABLE, THEN IT SEEMS LIKELY THE CAPACITY WILL SHRINK AS LESS EFFICIENT PRODUCERS ARE ELIMINATED FROM THE MARKET. IN 1982, NEAR THE BOTTOM OF THE RECESSION, AREA MILLS USED 192 MMBF. SINCE THEN, WITH THE CLOSURE OF A SAWMILL SHIFT IN JULY 1984, THE AREA HAS LOST 30 MMBF CAPACITY. THIS PLACES THE AREA'S NEEDS SOMEWHERE BETWEEN 162 MMBF (WHICH WOULD PROBABLY RESULT IN ADDITIONAL MILL CLOSURES) AND 301 MMBF (WHICH WOULD PROBABLY LEAD TO NEW MILL OPENINGS). THE HIGHER SAWTIMBER OPTION (OPTION B) WOULD PROVIDE 158 MMBF PER YEAR WHILE THE PREFERRED ALTERNATIVE (OPTION C) WOULD PROVIDE 143 MMBF. ADD PRIVATE SOURCES WHICH AVERAGED 105 MMBF BETWEEN 1978 AND 1984, AND SAWTIMBER AVAILABILITY GIVEN IN THE PREFERRED ALTERNATIVE BECOMES 248 MMBF WHICH IS WELL BELOW INDUSTRIAL CAPACITY BUT PROBABLY CLOSE TO MARKET DEMAND IN 1983 AND 1984. THE OBVIOUS PROBLEM OCCURS WHEN MARKET DEMAND APPROACHES PRE-1980 LEVELS. AS A SIDE NOTE, IT IS ALSO IMPORTANT TO REALIZE THAT INDUSTRY PROFITS IN THE NORTHWEST SEEM TIED TO CAPACITY USE. OTHER MILLS SEEM ABLE TO PROTECT PROFIT LEVELS WITH LOWER CAPACITY USE RATES, WHILE

NORTHWEST MILLS, ESPECIALLY IN OREGON, SUFFER SIZEABLE DECLINES IN PROFITS PER WORKER HOUR WHEN OPERATING AT LOW CAPACITY.

THE OVERALL PICTURE OFFERS AN INTERESTING CHALLENGE. MILL PROFITS DECLINE WHEN DEMAND FALLS, AND EVEN WHEN DEMAND FALLS, MILL PROFITS ARE TIED TO THE AVAILABILITY OF PONDEROSA PINE. THE KEY QUESTION IS, CAN LOCAL MILLS MAINTAIN SUFFICIENT PROFITS WHEN DEMAND RISES (AS IT NOW IS) WITH LOWER VALUE SPECIES SUCH AS WHITE FIR AND DOUGLAS-FIR?

THE ONLY REAL POTENTIAL BRIGHT SPOT IS IN THE SPECULATION THAT THE UMATILLA NATIONAL FOREST AND THE MALHEUR NATIONAL FOREST MAY INCREASE HARVEST LEVELS IN THEIR PLANS DURING THE BOOM IN 1976, THE UMATILLA PROVIDED LOCAL MILLS WITH 30 MMBF OF SAWTIMBER. IF THE AREA COULD REGAIN THIS LEVEL OF TIMBER FROM THE UMATILLA, AS MARKET DEMAND INCREASES, THEN THE AREA SHORTFALL WOULD BE REDUCED TO 23 MMBF PER YEAR. WHILE SOME OF THIS SHORT FALL COULD BE MADE UP FROM THE MALHEUR NATIONAL FOREST, IT COULD ONLY OCCUR UNDER HIGH FINISHED PRODUCT PRICE/DEMAND CONDITIONS SINCE TRANSPORTATION COSTS TO LOCAL MILLS ARE EXTREMELY HIGH

FOREST SERVICE RESPONSE

This analysis by the State Department of Human Resources illustrates the complexity of the economic situation as seen through eyes of that particular agency.

COMMENT NO. 10: "WE THE MEMBERS OF THE BOARD OF DIRECTORS OF THE LA GRANDE/ UNION COUNTY CHAMBER OF COMMERCE, REPRESENTING THE ASSOCIATED BUSINESSES, INDUSTRY, AND GOVERNMENT OF UNION COUNTY, RECOMMEND THAT TIMBER PRODUCTION BE HELD AT A LEVEL THAT CAN BE SUSTAINED BY THE FOREST ON A LONG-TERM BASIS, I E., EACH OF THE THREE MAIN SPECIES CATEGORIES OF ABOUT 50 MMBF IN LODGEPOLE PINE 8 TO 10 MMBF, FOR A TOTAL OF 160 MMBF OF TIMBER HARVESTED EACH YEAR. THIS LEVEL OF CUT ON PONDEROSA PINE--FOR A REDUCTION OF 20 TO 25 MMBF FROM HISTORIC LEVELS, WE BELIEVE TO BE REALISTIC CONSIDERING THE FOREST'S KNOWN INVENTORY PLUS THE ANNUAL GROWTH INCREMENT GENERATED BY THE FOREST. THIS REDUCTION IN HARVEST SHOULD BE REPLACED WITH AN INCREASE IN THE HISTORIC CUT OF WHITE FIR AND OTHER. ALTHOUGH OF SOME LESSER VALUE, IT WOULD HELP REDUCE THE IMPACT ON THE LOCAL ECONOMIES "

FOREST SERVICE RESPONSE

In the final plan, we have attempted to even out the species distribution without seriously sacrificing present net value. We were able to approach the levels you have suggested

COMMENT NO. 11 "I THINK THE FOREST IS LIKE ANY OTHER CROP, IT SHOULD BE HARVESTED WHEN RIPE AND GET ANOTHER CROP STARTED SO THERE WILL BE TIMBER READY TO HARVEST IN FUTURE GENERATIONS "

FOREST SERVICE RESPONSE

Many people share your view.

COMMENT NO. 12 "TOURISM AND RECREATION JOBS ARE FINE, BUT THEY ARE NOT HERE YET. MY ADVICE WOULD BE TO KEEP THE HARVEST LEVEL AT HISTORIC LEVELS AND LET THE ELK TAKE CARE OF THEMSELVES. THE LOGGING IN THE PAST HAS NOT BEEN DETRIMENTAL TO THEIR EXISTENCE AND THERE IS NO REASON TO BELIEVE THAT IT WOULD BE IN THE FUTURE."

FOREST SERVICE RESPONSE:

We generally agree that there is not a problem with elk continuing to exist -- that is, they will not become extinct. We believe there is the possibility of other negative effects, such as are described in Chapter IV of the EIS. The current studies on the Starkey Experimental Forest by the Pacific Northwest Experiment Station are intended to shed light on this important matter.

COMMENT NO. 13: "I AM ENCLOSING AN ARTICLE THAT WAS WRITTEN BY JOHN CROWELL JR , JUST IN CASE YOU DIDN'T HAPPEN TO READ THIS. I CONCUR WITH WHAT HE SAYS. I AM JUST SORRY THAT YOUR ALTERNATIVE HAS MOST OF THE POINTS IN IT THAT MR. CROWELL WAS CONCERNED ABOUT."

FOREST SERVICE RESPONSE:

Mr. Crowell's main point seemed to us to be that on those Forests where there is a surplus of old-growth trees (primarily west of the Cascade Range), the old-growth should be harvested fairly rapidly. This, he contends, would help reduce the national debt and result in a better distribution of age classes for future high yield management. This point of view is shared by many, but there are many who disagree with the means or the end objective. On the Wallowa-Whitman, there is slightly more than enough old-growth remaining to satisfy management requirements. Our timber inventory and stand structure are different than the situation to which he referred.

COMMENT NO. 14. "THE LEVEL OF TIMBER HARVEST MUST BE BASED ON RELIABLE ESTIMATES OF FOREST POTENTIAL ANNUAL YIELD. HARVEST LEVELS MUST BE BROUGHT IN LINE, OVER A SPECIFIED PERIOD OF SAY TEN YEARS, WITH A SUSTAINED, NONDECLINING YIELD VALUE. I AM CONCERNED THAT INADEQUATE SITE CHARACTERIZATION HAS BEEN CARRIED OUT FOR THE VARIOUS FOREST SOIL TYPES. THIS IS EVIDENT FROM THE STATEMENT ..."SILVICULTURAL, AND SOILS MAPPING OF UNSUITED AND SUITED AREAS (TIMBER) RELY HEAVILY ON THE PROFESSIONAL JUDGMENT AND EXPERIENCE OF THE SPECIALISTS INVOLVED (DEIS)." LET'S FACE IT, THESE "PROFESSIONALS" BUDGET IS PROPORTIONAL TO THE LEVEL OF TIMBER HARVEST (RECEIVED)."

FOREST SERVICE RESPONSE

Our current data is more accurate than it was ten years ago, and is likely to be better in 10 years than it is now. But we will expect there will always be a need to rely on professional judgment and experience.

COMMENT NO. 15: "I BELIEVE THERE IS MORE THAN ADEQUATE WILDERNESS, SCENIC RIVERS, AND SPECIAL DESIGNATED LANDS SET ASIDE I FEEL THAT IF WE ARE GOING TO SUSTAIN THE ECONOMIC STABILITY OF THE COMMUNITIES IN THE STATE, WE NEED TO INTENSIFY PRODUCTIVITY OF ALL AVAILABLE TIMBER LANDS "

FOREST SERVICE RESPONSE:

Many share your opinion Intensifying management on all available timber lands would in many cases not be economically efficient, however

COMMENT NO. 16. "TIMBER VOLUMES, AS SHOWN IN YOUR ALTERNATIVE B, WOULD BE SATISFACTORY WITH THE ADDITION OF 25 MILLION BOARD FEET OF OTHER CHARGEABLES. BOTH ALTERNATIVE B-DEPARTURE AND C-DEPARTURE SHOW HIGHER VOLUMES AS ATTAINABLE. I WOULD PREFER ALTERNATIVE B WITH MODIFICATIONS OR THE COMMUNITY STABILITY ALTERNATIVE, SINCE THEY APPEAR TO BE MIDDLEGROUND AND ACHIEVABLE TRADITIONALLY ON A SUSTAINED YIELD BASIS."

FOREST SERVICE RESPONSE:

Others share your point of view Many would disagree that these alternatives are middle-ground, however.

COMMENT NO. 17 "ASSIGNMENT OF ACTIVITY LEVELS THROUGH NATIONAL AND REGIONAL PLANNING IS A VERY SHAKEY WAY TO PLAN. ACCURATE INFORMATION FROM ON THE GROUND STUDY IS ESSENTIAL TO DETERMINING LEVELS OF TIMBER HARVEST, WILDLIFE, FISH, RECREATION, AND OTHER MULTIPLE USES RPA TARGETS TEND TO BE MUCH HIGHER IN TIMBER EMPHASIS THAN POSSIBLE UNDER A TRUE SUSTAINED YIELD."

FOREST SERVICE RESPONSE:

We agree We believe RPA targets will be adjusted based on information from Forest Plans

COMMENT NO. 18: "ALTERNATIVE B REPRESENTS A GROSS PREOCCUPATION WITH TIMBER HARVEST TO THE DETRIMENT OF OTHER IMPORTANT FOREST VALUES "

FOREST SERVICE RESPONSE

Thank you for your point of view

COMMENT NO. 19 "ALTERNATIVE B PROVIDES A RELATIVELY ACCEPTABLE LEVEL OF TIMBER HARVEST BOTH NOW AND IN THE FUTURE."

FOREST SERVICE RESPONSE:

Thank you for your point of view

COMMENT NO. 20: "I THINK YOU SHOULD MAXIMIZE THE TIMBER HARVEST ON THE WALLOWA-WHITMAN BY ADOPTING ALTERNATIVE B-DEPARTURE "

FOREST SERVICE RESPONSE:

Thank you for your point of view.

COMMENT NO. 21: "OF THE ALTERNATIVES PRESENTED IN THE DEIS, ALTERNATIVE B-DEPARTURE BEST MEETS MY OBJECTIVES FOR THE MANAGEMENT OF OREGON'S FOREST LANDS. MY PRIMARY OBJECTIVES ARE THE MAINTENANCE OF EMPLOYMENT THROUGHOUT THE STATE AND OBTAINING THE MAXIMUM ALLOWABLE TIMBER HARVEST LEVELS FROM NATIONAL FORESTS THAT CAN BE CREDIBLY PRODUCED WHILE MEETING OREGON'S NEEDS FOR OTHER RESOURCES AND USES."

FOREST SERVICE RESPONSE:

Thank you for your point of view

COMMENT NO. 22: "ALTERNATIVE B-DEPARTURE HAS TOO MUCH ROADING AND TIMBER CUTTING "

FOREST SERVICE RESPONSE:

Thank you for your point of view

COMMENT NO. 23: "ALTERNATIVE B-DEPARTURE HAS NOT BEEN PRESENTED IN A FORM THAT THE DEPARTMENT CAN SUPPORT. THE ALTERNATIVE FAILS TO CONSTRAIN CHANGES IN TIMBER HARVEST LEVELS BETWEEN DECADES AND RESULTS IN AN UNACCEPTABLE LOSS OF PRESENT NET VALUES. RECOMMENDATION - REVISE ALTERNATIVE B-DEPARTURE BY INCLUDING A TEN PERCENT DECADAL HARVEST CHANGE CONSTRAINT IN THE HARVEST FLOOR OF 45.7 MMCF. THE PONDEROSA PINE AND DOUGLAS-FIR COMPONENTS OF THE FIRST DECADE TIMBER HARVEST IN ALTERNATIVE B-DEPARTURE SHOULD BE MAINTAINED AT LEVELS PROVIDED BY THE EXISTING TIMBER MANAGEMENT PLAN

MORE COSTLY LONG-SPAN CABLE AND HELICOPTER LOGGING ACRES SHOULD NOT BE SUBSTITUTED FOR TRACTOR LOGGING ACRES. DOING SO MAY DISTORT THE PNV ANALYSIS OF ALTERNATIVE B. IT STILL MAY BE NECESSARY TO CONDUCT ADDITIONAL FORPLAN RUNS TO DETERMINE THE OUTPUTS AND JUDGE THE ECONOMIC PERFORMANCE OF THIS MODIFIED ALTERNATIVE."

FOREST SERVICE RESPONSE:

Thank you for your point of view. We did not conduct the additional FORPLAN analysis since this alternative was not selected for implementation based on factors other than harvest level performance

COMMENT NO. 24: "THE DEIS STATES THAT MEETING THE ALTERNATIVE'S TIMBER PRODUCTION TARGETS WOULD (1) REQUIRE HARVEST ON LANDS "ONLY SUITABLE FOR HELICOPTER LOGGING ... AT A POINT WHERE COSTS EXCEED TIMBER HARVEST VALUES," (2) REQUIRE SALE OF TIMBER "AT A LOSS TO THE GOVERNMENT;" (3) INVOLVE SALES WHERE PURCHASERS "COULD NOT REALIZE NORMAL PROFIT MARGINS," AND (4) CREATE A SITUATION WHERE "PERHAPS NO ONE WOULD BID TO PURCHASE THE TIMBER" (DEIS IV-28). THESE OBSERVATIONS CLEARLY SUGGEST THAT ALTERNATIVE B-DEPARTURE IS NOT A REALISTIC

ALTERNATIVE FOR IMPLEMENTATION ON THE FOREST. THE NFMA CONFLICT IS PARTICULARLY TROUBLESOME AND PROBABLY INSURMOUNTABLE. FURTHERMORE, IF THE FOREST ANALYSIS IS REASONABLY ACCURATE, THE ADDITIONAL FIRST DECADE VOLUME MAY NOT BE EFFECTIVELY AVAILABLE TO INDUSTRY FOR ECONOMIC REASONS.

FOREST SERVICE RESPONSE:

We agree

COMMENT NO. 25 AS A RETIRED CLERGYMAN, I RARELY SPEAK IN THEOLOGICAL TERMS. HERE IS A TIME THAT I MIGHT WELL SET FORTH THE DEEP UNDERLYING PRINCIPALS OF ALL LIFE. JUST AS THE ONLY ULTIMATE SOLUTIONS OF LOCAL, NATIONAL, AND WORLD-WIDE DRUG PROBLEMS IS SPIRITUAL--THE ESTABLISHMENT OF HUMAN KIND, THE EVERLASTING VIRTUES OF LOVE, CARE, CONCERN, FORGIVENESS, COMMITMENT--SO IS THAT OF THE MANAGEMENT OF OUR NATURAL RESOURCES. THESE RESOURCES ARE OURS FOR THE WELL-BEING OF HUMANKIND, NOT JUST THE LOCAL PRESENT GENERATION. IT REQUIRES A THRIVING EARTH THAT THERE BY A THRIVING HUMANITY. A THRIVING FOREST KEPT REPLENISHED WILL PROVIDE THIS. WITH OUR SLOW REPLACEMENT IN THE WALLOWA-WHITMAN, IT IS NOT THE GREATEST OF WISDOM TO CUT AT LEVELS THAT THE TIMBER FOLKS DESIRE.*

FOREST SERVICE RESPONSE:

Thank you for your point of view

COMMENT NO. 26 ALTERNATIVE C ALLOWS ACCEPTABLE FUTURE TIMBER HARVEST WHILE MEETING OLD-GROWTH FOREST LEVELS

FOREST SERVICE RESPONSE

Thank you for your point of view.

COMMENT NO. 27. THE PROPOSED ALTERNATIVE WILL BRING NOTHING BUT HARDSHIP TO THE PEOPLE OF WALLOWA, UNION, AND BAKER COUNTIES. REDUCTION IN AREAS MANAGED FOR TIMBER HARVEST AND THE REDUCTION OF ALLOWABLE CUT ARE UNREASONABLE.

FOREST SERVICE RESPONSE:

Thank you for your point of view

COMMENT NO. 28. WHEN YOU TRY TO PACIFY THE LOGGERS AND SAWMILL WORKERS STATING THAT HARVEST INCREASES ON THE UMATILLA AND MALHEUR WILL OFFSET THE DECREASE ON THE WALLOWA-WHITMAN--IT DOESN'T HOLD WATER ANYTIME THE TRUCKING COSTS MAKE IT UNECONOMICAL FOR THE MILLS, IT WON'T WORK! THIS IS NOT A CONCILIATORY THOUGHT AT ALL.

FOREST SERVICE RESPONSE

We agree that hard costs are an important consideration, but, depending on the value of the timber, may not be a deterrent. Also, portions of the adjacent Forests are as handy to local mills as are many areas on the Wallowa-Whitman.

COMMENT NO. 29: IF WE INTERPRET THE PREFERRED ALTERNATIVE CORRECTLY, WE CONCLUDE THAT THE PLAN IS ONE OF THE MOST UNCONSCIONABLY, BIASED PROPOSALS TO MEET COMMODITY MARKETS WE HAVE EVER SEEN

FOREST SERVICE RESPONSE:

Thank you for your point of view. We hope you have misinterpreted the alternative,

COMMENT NO. 30: I AM CONCERNED WHEN COMPARING TABLE 4-1 (FORPLAN OUTPUT PREDICTIONS) WITH TABLE E-2 (ACTUAL OUTPUTS) TABLE 4-1 PREDICTS 219 MMAC/10 YR TO BE CUT TABLE E-2 SHOWS 220 MMAC/10 YR TO BE CUT TO MEET THE REGULATED TARGET (4 MAC SHIFTED FROM REMOVAL CUT AFTER SHELTERWOOD TO SELECTION CUT HOR RC (SEE COMPONENT). THE FIVE YEAR PICTURE LOOKS MORE UNBALANCED YET. IN ADDITION, TABLE E-2 SHOWS AN ADDITIONAL 107 MAC/10 YEAR TO MEET THE UNREGULATED TARGET (WHICH IN OTHER PORTIONS OF THE PLAN THE PROGRAM IS TO BE ADJUSTED TO MEET THIS TARGET MONITORING) AS FAR AS I CAN FIGURE OUT FROM THE PUBLISHED FIVE-YEAR PLAN, THIS ACREAGE IS REGEN CUTS IN LPP IF THIS IS SO, THE ENTIRE AMOUNT OF LAND ALLOCATED FOR TIMBER HARVEST (831 M ACRES) WOULD REALLY BE REGEN CUT IN 36 YEARS, -- NOT TO MENTION CONSIDERABLE ACREAGES OF INTERMEDIATE CUT AND SELECTION CUTS IN THE AMOUNT OF PRESENT REGEN CUT ON THE FOREST IF MORE ACREAGE IS CUT THAN THAT SHOWN IN FORPLAN (TABLE 4-1) SUSTAINED YIELD CANNOT WORK BECAUSE THOSE ACRES WILL NOT BE AVAILABLE TO CUT (GIVEN THE OVERRUN PROJECTION TABLE E-2) IN YEAR 37, 38, AND 39 .. UNTIL THE FIRST ARE OF MERCHANTABLE SIZE IN 60 TO 70 YEARS. BACK TO TABLE E-2, YOU SHOW IT WILL TAKE LESS ACRES THE SECOND FIVE YEARS TO PRODUCE THIS VOLUME - AN EXAMPLE. .137 M PER ACRE TO PRODUCE 467 75 MMBF SALVAGE VOLUME? LOOKING AT THE 10-YEAR TIMBER SALE PROGRAMS FROM SEVERAL DISTRICTS IT APPEARS SUSTAINED YIELD IS NOT A PART OF THE OVERALL PLAN. GIVEN THE ABOVE TWO OBSERVATIONS, I THINK SANITATION AND SALVAGE HAVE BEEN OVERPROGRAMMED. I FEEL THAT ACREAGE AND VOLUME OUTPUT PREDICTED BY FORPLAN (INCLUDING SALVAGE VOLUME) SHOULD BE A PART OF IMPLEMENTATION OF ANY ALTERNATIVE SELECTED. IF FORPLAN CANNOT PREDICT SALVAGE VOLUMES THEN ACREAGES AND TREATMENTS FOR THE SALVAGE SHOULD BE PROGRAMMED BACK INTO THE FORPLAN RUNS.

FOREST SERVICE RESPONSE.

Differences between Tables 4-1 and E-2 are due to rounding and are not significant, particularly considering that control of plan implementation is based on sale volume rather than acres treated. Unregulated volumes are not targets. They are estimates of salvage and other material likely to be available should market conditions permit. This is explained in the narrative in Appendix E. In some instances, this salvage volume may be from clearcutting of lodgepole pine stands, but other types of mortality are also included. The harvest schedule for regulated volume is based on the sustained yield principle. Periodic timber inventories are conducted to assure that overharvesting does not occur. A discussion of how new timber inventories will be used to adjust the allowable sale quantity has been added to Forest Plan Appendix E

COMMENT NO. 31 THERE REALLY IS ONLY ONE ISSUE WITH THE FOREST PLAN - THAT IS ALLOWABLE CUT

FOREST SERVICE RESPONSE:

We agree that there is some truth in this statement in that some other issues exist because of their potential effect on harvest levels -- and the effects of harvest on other resources.

COMMENT NO. 32 WE ARE VERY CONCERNED WITH THE FURTHER DEEMPHASIS OF TIMBER PRODUCTION IN THE PROPOSED PLAN IN ADDRESSING THE PLANNING PROBLEM WHEREIN SUBSTANTIAL FORESTRY OPPORTUNITIES HAVE ALREADY BEEN DENIED AS WE PERCEIVE THE TIMBER SUPPLY DEMAND SITUATION TRIBUTARY TO THE WALLOWA-WHITMAN, THE DENIAL OF FURTHER VOLUMES OF MARKETABLE TIMBER WILL MOST CERTAINLY RESULT IN THE LOSS TO THE ECONOMY OF ANOTHER MILL THE CRITICAL JUNCTURE.

FOREST SERVICE RESPONSE

We agree that the loss of a mill is one possible scenario. The timber sale volume from the Wallowa-Whitman is one factor among many that relate to the overall health of the local wood products industry

COMMENT NO. 33: I AM AGAINST THE FOREST SERVICE PLAN TO DECREASE THE LEVEL OF ALLOWABLE HARVEST ON THE WALLOWA-WHITMAN FOREST. GOD PUT THE TIMBER ON THIS EARTH FOR THE PEOPLE TO USE AND HE MADE EVERYTHING TO REPLACE ITSELF, WHEN ONE TREE IS HARVESTED, MORE WILL GROW IN ITS PLACE.

FOREST SERVICE RESPONSE:

Thank you for your point of view

COMMENT NO. 34: I BELIEVE IT IS IN THE BEST INTEREST OF THE PEOPLE OF EASTERN OREGON AND THE ENTIRE COUNTRY THAT YOU HARVEST TIMBER AT RESOURCES PLANNING ACT GOALS OR HIGHER. ALSO THAT YOU ALLOCATE THE ENTIRE 56% OF THE FOREST OPEN TO POSSIBLE MULTIPLE USE TO THAT PURPOSE, INCLUDING TIMBER MANAGEMENT.

FOREST SERVICE RESPONSE:

Many people share your view and it has been considered

COMMENT NO. 35: *THE COMMODITY PRODUCTION OF MERCHANTABLE TIMBER FOR THE EXISTING MILLING FACILITIES IS TOO LOW THIS SHOULD BE INCREASED TO MEET OR EXCEED THE LAST 10-YEAR AVERAGE VOLUME LEVELS SHOULD BE MAINTAINED WITH OLD-GROWTH PONDEROSA PINE HARVESTED AT ACCELERATED LEVELS TO MEET CURRENT DEMANDS. IT MAKES LITTLE SENSE TO SPACE THE HARVEST CUT FROM QUALITY PINE OVER A LONG PERIOD. CUT IT NOW AND THEN THE FOREST INDUSTRY CAN CONVERT THEIR FACILITIES TO HANDLE OTHER SPECIES AND YOUNGER PINE AS IT BECOMES AVAILABLE.

FOREST SERVICE RESPONSE

We have considered the approach you suggest as shown in Alternative C-departure. A problem sometimes overlooked is that the ponderosa pine often grows along with other species It is difficult, and usually undesirable, to remove it selectively from stands.

COMMENT NO. 36: FOREST MANAGEMENT SPECIALISTS INFORM ME THAT A SUSTAINABLE HARVEST OF OVER 200 MILLION BOARD FEET ANNUALLY IS POSSIBLE WITH EXISTING MANAGEMENT PRACTICES WHY LOWER THE CUT?

FOREST SERVICE RESPONSE

The harvest level was one of the issues considered. The resolution of other issues is less compatible with such a high harvest level. See Chapter I of the EIS.

COMMENT NO. 37: THE WALLOWA-WHITMAN NATIONAL FOREST ACKNOWLEDGES IN ITS DRAFT PLAN THAT RECENT TIMBER HARVEST LEVELS HAVE BEEN WELL ABOVE THIS FOREST'S SUSTAINED YIELD LEVEL. THIS OVERCUTTING HAS OCCURRED FOR AT LEAST 10 YEARS AND COULD BE AS MUCH AS 20 MILLION BOARD FEET PER YEAR. NEITHER THE DRAFT FOREST PLAN NOR THE EIS PROVIDE UNDERSTANDABLE INFORMATION CLARIFYING THE QUANTITIES OF TIMBER OVERCUT PREVIOUSLY OR THE IMPACTS THIS OVERCUTTING HAS HAD ON THE TIMBER RESOURCE. SUCH INFORMATION IS ESSENTIAL IN ORDER FOR THE PUBLIC TO REVIEW A FOREST PLAN. INCREDIBLY, THE WALLOWA-WHITMAN NATIONAL FOREST HAS NOT PROPOSED MITIGATION MEASURES IN ITS PREFERRED ALTERNATIVE TO COMPENSATE FOR PAST OVERCUTTING. INSTEAD, IT HAS PROPOSED INCREASING ITS TIMBER HARVEST LEVELS 4 MILLION BOARD FEET ABOVE WHAT THE ALLOWABLE SALE QUANTITY IS CURRENTLY AT. THE DEIS ILLUSTRATES THE PREFERRED ALTERNATIVE WILL HARVEST TREES AT A RATE FASTER THAN THE FOREST CAN GROW THEM. THE DRAFT PLAN MUST CONSIDER PAST OVERCUTTING IN DETERMINING FUTURE TIMBER HARVEST LEVELS. HARVEST LEVELS MUST NOT EXCEED SUSTAINED YIELD LEVELS.

FOREST SERVICE RESPONSE:

The Draft documents show that past harvest has been at a higher rate than the current direction (Alternative A) alternative indicates should be harvested for that particular land management allocation. In other words, we would have to reduce harvest if we were to continue to implement Alternative A. The harvest level for the Preferred Alternative, which is below the average historical level, is based on the updated timber inventory, and a different land allocation. It will be at a sustained yield level.

COMMENT NO. 38: OUR REVIEW OF THE PROPOSED PLAN INDICATES THERE WILL BE A DROP IN SAWTIMBER VOLUME FROM BOTH 155 MMBF UNDER THE 1962 TIMBER MANAGEMENT PLAN AS AMENDED AND THE 158 MMBF ACTUALLY SOLD IN 1975 TO 1984, TO A PROPOSED 137 MMBF. OUR REVIEW INDICATES THE FOREST IS ABLE TO SUPPLY A HIGHER YIELD WHILE MEETING MULTIPLE USE GOALS. WE RECOMMEND THE PLAN INCREASE THE YIELD TO 155 MMBF.

FOREST SERVICE RESPONSE.

Your recommendation has been considered in arriving at a final plan.

COMMENT NO. 39: THE PREFERRED ALTERNATIVE C WILL HAVE AN ALLOWABLE SALE QUANTITY OF 143 MILLION BOARD FEET. THIS IS A 22% REDUCTION FROM THE CURRENT TIMBER MANAGEMENT PLAN POTENTIAL YIELD OF 182 MMBF. THE AVERAGE ANNUAL CHARGEABLE HARVEST OVER THE PAST DECADE (1975-1984) HAD BEEN 196 MILLION BOARD FEET. THERE IS NO REASON TO CHANGE THIS TARGET OF 182.8 MMBF.

FOREST SERVICE RESPONSE

The numbers you present are not directly comparable. The potential yield from the 1962 Timber Management Plan (182 MMBF) is an estimate of the maximum harvest volume sawtimber sustainable under a fully managed forest condition. Actual volumes offered, sold, and harvested during the most recent 10-year period (FY 1977-1986) were 157, 153, and 152 MMBF, respectively.

COMMENT NO. 40: 'ISSUE'. THE PROPOSED ACTION OF THE DRAFT FOREST PLAN DOES NOT MEET THE ANTICIPATED DEMAND FOR TIMBER SUPPLY WHILE VASTLY EXCEEDING THE DEMAND FOR RECREATION. PROBLEM: IN THE SUMMARY TABLE THAT PROJECTED SUPPLY ANTICIPATED AND ANTICIPATED DEMAND IN THE DEIS (PAGE III-75), THE TIMBER DEMAND IS PROJECTED AT 250 MMBF ANNUALLY WHICH IS BASED UPON CURRENT INSTALLED MILL CAPACITY STUDIES FOR THE WALLOWA-WHITMAN NATIONAL FOREST. THE WALLOWA-WHITMAN'S PREFERRED ALTERNATIVE, HOWEVER, WILL ONLY SUPPLY 137 MMBF OR 55% OF ITS HISTORICAL SHARE OF THE TOTAL TIMBER DEMAND. CLEARLY THE DECISION TO SUPPLY LESS THAN THE DEMAND FOR TIMBER BY THE LOCAL MILLS IS NOT JUSTIFIED. YET, THE FOREST WILL SUPPLY SEVEN TIMES THE AMOUNT OF DISPERSED RECREATION DEMAND IN ADDITION TO SUPPLYING TWO TIMES THE AMOUNT OF NONROADED RECREATION DEMAND. ALLOCATING MORE OF THE LAND BASE TO SUPPLY TIMBER MORE THAN THE DEMAND FOR RECREATION IS SEVERELY AFFECTING THE FOREST SERVICE'S ABILITY TO MEET THE DEMAND FOR TIMBER SUPPLY. SOLUTION: THE FOREST SERVICE MUST EXAMINE ALTERNATIVES THAT MEET THE DEMAND FOR TIMBER AND NOT TO WRITE EXCESSIVELY FOR RECREATION USES OR DEMAND PROJECTS THAT DO NOT WARRANT SUPPLY NEEDS.

FOREST SERVICE RESPONSE

The timber harvest level for the Preferred Alternative does not result from increasing or providing a high supply of dispersed recreation. In fact, much of the supply of roaded recreation results from timber harvesting and the roads it provides.

COMMENT NO. 41: WE UNDERSTAND THAT, DUE TO INCORRECT INVENTORIES, THE FOREST SERVICE HAS BEEN EXCEEDING SUSTAINED YIELD HARVEST FOR MANY YEARS, AND FEEL THAT NEW PLANS SHOULD MITIGATE FOR THIS DEPARTURE FROM FEDERAL LAW AND GOOD MANAGEMENT PRACTICE.

FOREST SERVICE RESPONSE.

With the exception of accelerated harvest in the lodgepole pine species group, in order to salvage insect-caused tree mortality, the Forest has not been harvested at rates exceeding sustained yield levels. We believe some of this misunderstanding is due to the recent harvest levels being higher than shown for the current direction alternative. But this only means that the harvest level was based on a different land allocation than current direction assumed. (See discussion under Timber, Chapter 2, of the Forest Plan.)

COMMENT NO. 42. ALL MANAGEMENT AREAS PLACE TOO MUCH EMPHASIS ON MAXIMIZING TIMBER EXTRACTION. THERE IS NO BALANCE AMONG AREAS. THERE SHOULD BE AT LEAST FOUR AREAS WHERE AREAS ARE REMOVED FROM THE PROGRAMED HARVEST. CURRENTLY, EVERY AREA EXCEPT BACKCOUNTRY IS INCLUDED IN THE REGULATED HARVEST, WITH MANAGEMENT GOALS FOR TIMBER EXTRACTION EXCEEDING 60% OF MAXIMUM.

FOREST SERVICE RESPONSE:

In addition to "backcountry" (Management Area 6), regulated timber harvest is excluded from wilderness, dispersed recreation/native vegetation, forage, old-growth, wild river, the Starkey Experimental Forest, and research natural areas

COMMENT NO. 43: ONRC ESTIMATES 90 TO 100 MMBF AS A POSSIBLE TIMBER HARVEST. HARVEST SHOULD DECLINE GRADUALLY OVER A 15-YEAR PERIOD TO MODERATE IMPACTS ON TIMBER INDUSTRY AND ECONOMY. AFTER 15 YEARS, HARVEST SHOULD BE SUSTAINABLE WITHOUT FURTHER DECLINES. THE SHORT-TERM LOSS IN TIMBER ECONOMY SHOULD EVENTUALLY BE COMPLETELY OFFSET BY MORE DIVERSIFIED ECONOMY, RELY ON RECREATION AND TOURISM INDUSTRIES AS WELL AS TIMBER AND LIVESTOCK ONRC URGES CAREFUL CONSIDERATION OF REDUCING HARVEST NOW TO PROVIDE FUTURE GREATER BENEFITS TO OTHER RESOURCES "

FOREST SERVICE RESPONSE:

Many people share this point of view

COMMENT NO. 44: THE ALTERNATIVE DESCRIPTIONS IN THE DEIS SUGGEST THAT THE PREFERRED ALTERNATIVE DIFFERS FROM THE HIGH TIMBER ALTERNATIVES IN FOUR MAIN AREAS (1) GREATER EMPHASIS ON DEER AND ELK HABITAT PROTECTION, (2) GREATER EMPHASIS ON OLD-GROWTH MANAGEMENT, (3) GREATER EMPHASIS ON RECREATION DIVERSITY, AND (4) GREATER EMPHASIS ON VISUAL QUALITY PROTECTION. CHANGES IN THE FOREST'S APPROACH TO THESE FOUR ISSUES COULD HELP INCREASE TIMBER PRODUCTION WITHOUT EXCESSIVELY COMPROMISING OTHER MANAGEMENT OBJECTIVES MANAGEMENT OBJECTIVES FOR DEER AND ELK APPEAR TO BE A KEY REASON BEHIND THE FOREST'S DECISION TO REDUCE TIMBER SALE PROGRAM. THE DEIS STATES THAT SIGNIFICANT SHORTAGES OF COVER NATURALLY EXIST OR HAVE BEEN CAUSED BY TIMBER HARVEST OPERATIONS OF THE FOREST AND CONCLUDES THAT CONTINUED TIMBER HARVEST MAY MAINTAIN OR ENHANCE EXISTING COVER/FORAGE RELATIONSHIPS IF RATES OF HARVEST CAN BE LIMITED TO ALLOW PROPER DISTRIBUTION OF HARVEST UNITS THESE STATEMENTS CLEARLY IMPLY THAT BIG GAME MANAGEMENT OBJECTIVES CANNOT BE MET UNLESS TIMBER PROGRAM IS REDUCED BELOW CURRENT LEVELS. AS A RESULT THE PREFERRED ALTERNATIVES FOREGOES 2.3 MMCF OF TIMBER PRODUCTION PER YEAR IN THE FIRST DECADE DUE TO LAND ALLOCATIONS DESIGNED TO MAINTAIN BIG GAME WILDLIFE HABITAT CONDITIONS."

FOREST SERVICE RESPONSE

These points were carefully reviewed in revising the Preferred Alternative between draft and final.

COMMENT NO. 45 TIMBER PRODUCTION (GREENWOOD) IS REPORTED AT 143 MMBF PER YEAR FROM 831,700 ACRES IN ADDITION TO THIS, THERE WILL BE 77 MMBF PER YEAR HARVESTED AS MORTALITY, CULL, ROUNDWOOD, AND FUELWOOD TOTAL YEARLY HARVEST THEN IS 220 MMBF. THE TOTAL PROGRAM SALE IS LISTED ELSEWHERE IN THE DOCUMENTS AS 226.8 MMBF (PLAN E-4), WHICH CAN BE BROKEN DOWN TO 63.3 MMBF OF SALVAGE, POSTS, POLES, AND FUELWOOD (OR FUELWOOD COULD VARY FROM 22.5 TO 36.7 MMBF). THIS LEAVES 158.5 MMBF PER YEAR AS POSSIBLE HARVEST OF GREEN TIMBER THERE APPEARS TO BE SOME CONFUSION IN THE NUMBERS REGARDING VOLUME TO BE CUT IN THE VARIOUS CATEGORIES, AND THE TOTAL VOLUME BECAUSE HARVEST OF SALVAGE, POSTS, POLES, AND FUELWOOD

APPROACHES HALF THE VOLUME OF GREEN TREE HARVEST, IT SEEMS QUESTIONABLE WHETHER HARVEST AT THIS TOTAL PROGRAM VOLUME IS REASONABLE THE MAXIMUM TIMBER BENCHMARK WITH MMR'S IS ONLY 193 MMBF (DEIS II-75) *

FOREST SERVICE RESPONSE

You are correct that the proposed plan projected sawtimber production of 143 MMBF per year and the equivalent of an additional 77 MMBF of other products for a total of 220 MMBF. The 226.8 MMBF displayed on page E-4 of the proposed plan was the estimated volume for Fiscal Year 1987. While individual years may be higher or lower, we expect the 10-year average to approximate 220 MMBF (although the sawtimber volume is the only firm target). The 193 MMBF in the benchmark is only sawtimber. Nonchargeable material would be in addition to the sawtimber volume.

COMMENT NO. 46: IF YOUR INTENT IS TO PROVIDE COVER FOR ELK (FROM HUNTERS ONLY) THEN WHY NOT SIMPLY USE AREA 1, CLOSE MORE ROADS SUCH AS IS DONE IN NORGAARD AND CHESNIMNUS ROAD CLOSURES - MAKE THE HUNTERS HUNT BY WALKING. IF YOU ARE UNABLE TO ADOPT THE COMMUNITY STABILITY ALTERNATIVE, THEN PLEASE GO WITH ALTERNATIVE C-DEPARTURE AND PUT MORE THAN 28% OF THE LAND BASE IN AREA 1

FOREST SERVICE RESPONSE

The Norgaard and Chesnimnus areas have large amounts of hiding and thermal cover--more than if they were managed according to Management Area 1. However, in the final plan, we have increased the amount of Management Area 1. It is likely that there will be more area closures for certain parts of the year in the future.

COMMENT NO. 47 ALTERNATIVE F IS THE ONE ALTERNATIVE THAT IS MOST RESPONSIVE TO ALL RESOURCE CONCERNS ON THE FOREST. IT SIGNIFICANTLY REDUCES TIMBER HARVEST LEVEL ON OUR OVERCUT FOREST

FOREST SERVICE RESPONSE.

Thank you for your point of view

COMMENT NO. 48 WE'D LIKE TO SEE A COMBINATION OF ALTERNATIVES F AND E, BUT WOULD LIKE TO SEE EVEN LESS TIMBER HARVESTING

FOREST SERVICE RESPONSE

Thank you for your opinion

COMMENT NO. 49: HOW ABOUT A NO CUT ALTERNATIVE OR LESS THAN 100 MMBF AS IN ALTERNATIVE F?

FOREST SERVICE RESPONSE

We did not think a no cut alternative, or one much below the Alternative F level, would be within the reasonable range considering the local economic and timber harvest level issues.

COMMENT NO. 50 I SUGGEST THE INDUSTRY-SPONSORED COMMUNITY STABILITY ALTERNATIVE AND THE WALLOWA COUNTY COMMUNITY STABILITY ALTERNATIVE WHICH ASKS FOR AN ADDITIONAL 5 MMBF TO BE CUT ON THE NRA TO BRING IT FURTHER IN LINE WITH THE HISTORIC CUT OF 17 MMBF.

FOREST SERVICE RESPONSE

To increase the harvest level in the NRA by 5 MMBF would require a different land allocation. We chose not to reallocate the NRA as discussed in "Other Alternatives Eliminated from Detailed Study" in Chapter II of the EIS.

COMMENT NO. 51: LET'S NOT LISTEN TO GROUPS WANTING ALL OF OUR TIMBERLANDS LOCKED UP, BUT LET THE PROFESSIONAL FORESTERS IN GOVERNMENT AND PRIVATE INDUSTRY ALIKE TAKE CARE OF OUR FORESTS AND KEEP THEM IN PRODUCTION.

FOREST SERVICE RESPONSE

This would be one approach. There are others who want to have a say in forest management, however NEPA and NFMA each require public involvement in the management decision.

COMMENT NO. 52: THE AMOUNT OF ALLOWABLE CUT ON THE FOREST SHOULD NOT BE REDUCED JUST SO OWLS AND ELK AND OTHER WILDLIFE CAN LIVE WHEN THE PEOPLE NEED THE JOBS THAT KEEP THEM AND THEIR FAMILIES ALIVE.

FOREST SERVICE RESPONSE.

Others share your opinion.

COMMENT NO. 53: THE PROPOSED COMMUNITY STABILITY PLAN SEEMS, IN MY MODEST OPINION, A BIT TOO EXTREME IN THE ALLOWABLE CUT. A COMPROMISE BETWEEN YOUR INITIAL PLAN AND THE ONE PROPOSED BY THE COMMUNITY STABILITY PLAN IS WHAT I WOULD LIKE TO SEE ADOPTED. THIS, IF ADOPTED, WILL NOT DECREASE ECONOMIC ACTIVITY AND WILL ENHANCE THE GROWTH AND CONTINUITY OF OUR FOREST AND WILDLIFE *

FOREST SERVICE RESPONSE.

In terms of harvest levels, the first plan was adjusted and is now somewhat closer to levels proposed by the "Community Stability" alternative.

COMMENT NO. 54: I FEEL THE TIME HAS COME WE MUST REDUCE OUR TIMBER YIELD, OR IN 20 YEARS WE WILL NOT HAVE ANY TIMBER TO CUT WE CANNOT YIELD TO THE DEMAND OF BIG TIMBER MILLS.

FOREST SERVICE RESPONSE

We believe the proposed plan and all alternatives, except for those which provide departures, provide sustainable harvest levels.

COMMENT NO. 55 THE FOREST SERVICE SHOULD CONSIDER THE PROPOSED HARVEST LEVELS FOR THE WALLOWA-WHITMAN NATIONAL FOREST IN CONJUNCTION WITH THOSE PROPOSED BY OTHER NATIONAL FORESTS, BUREAU OF LAND MANAGEMENT, AND PRIVATE LANDS ACCUMULATIVE EFFECTS OF THESE HARVEST PLANS MAY HAVE ON MAJOR RAMIFICATIONS FOR OREGON'S LUMBER AND WOODS INDUSTRY. SIMILARLY, THE MARKET EFFECTS OF PROPOSED HARVEST LEVELS SHOULD ALSO BE ANALYZED *

FOREST SERVICE RESPONSE

Timber from these lands of other management was recognized as discussed in Local Economy, Chapter I of the EIS. The Wallowa-Whitman provides approximately half of the locally processed timber.

COMMENT NO. 56 WE BELIEVE THE FOREST IS BEING OVERHARVESTED. A DETAILED INVENTORY OF THE FOREST TIMBER BASE SHOULD BE COMPLETED AND AN ANNUAL HARVEST LEVEL SET THAT MAINTAINS RATHER THAN DEPLETES THAT TIMBER BASE TRUE SUSTAINED YIELD IS THE ONLY WAY THE NATIONAL FOREST CAN PROVIDE EQUAL RESOURCES TO ALL GENERATIONS

FOREST SERVICE RESPONSE

A timber management plan is included (Appendix E of Plan) which we believe provides an annual harvest level on a sustained yield, non-declining flow, basis.

COMMENT NO. 57. I HAVE THE FEELING THAT THE OUTCOME OF THE PLAN HAS BEEN PREDETERMINED. DOES THE CUT DEPEND ON THE PLAN AND THE ALTERNATIVE OR VISE VERSA? IF THE CUT IS SET IN STONE, THIS WHOLE EXTENSIVE PLANNING PROCESS HAS BEEN AN EXPENSIVE TRAVESTY AND A WASTE OF ENERGY AND TALENT.

FOREST SERVICE RESPONSE

The harvest level is an important issue. The final preferred alternative was adjusted to provide more harvest, as well as more unroaded recreation area.

COMMENT NO. 58 THE WALLOWA-WHITMAN HAS SET ARBITRARY HARVEST LEVEL FLOORS ON THE FORPLAN MODEL THIS HAS PROJECTED THE IMAGE THAT HARVEST LEVELS ARE MUCH LOWER THAN CAN BE MAINTAINED ON A SUSTAINED YIELD BASIS FOR GIVEN MANAGEMENT AREA ALLOCATIONS. FOR EXAMPLE, THE HARVEST FLOOR OF ALTERNATIVE B IS 85%. THIS FORCES THE FORPLAN MODEL TO STOP STAND SELECTION AT 158 MMBF AT MAXIMUM PNV IN REALITY, THE MODEL COULD HARVEST AT 186 MMBF IF LEFT TO RUN UNCONSTRAINED THIS HAS BEEN REALLY MISLEADING IN PROCESS OF ANALYZING THE ALTERNATIVES IN TERMS OF FOREST HARVEST VOLUMES

FOREST SERVICE RESPONSE

We believe the respondent misunderstood how the timber harvest floor was used in the FORPLAN model and what its effect was. The harvest floor sets the minimum harvest volume to be scheduled. It does not limit the maximum which can be scheduled. Removing this constraint significantly reduces harvest volume—a 20 - 25 percent drop in most alternatives.

COMMENT NO. 59. WE RECOMMEND THAT THE WALLOWA-WHITMAN LIFT THE HARVEST LEVEL FLOOR TO 99% SO THE MAXIMUM POTENTIAL WOULD BE KNOWN OPERATIONALLY, THE FOREST SERVICE SHOULD SCHEDULE HARVESTING ON THE MOST ECONOMICALLY FEASIBLE ACRES FIRST. THE SUBJECTIVE FLOORS HAVE ALSO REDUCED THE NUMBER OF ACRES SUITABLE FOR TIMBER PRODUCTION. THIS CONSTRAINT TENDS TO COMPRESS ALTERNATIVE C TIMBER MANAGEMENT AND HARVESTING INTO A SMALLER THAN NECESSARY ACREAGE BASE, I E , 832,000 OF 1,090,000 ACRES GENERALLY SUITABLE

FOREST SERVICE RESPONSE:

In Alternative C we used 90 percent of max-timber. We have explored lifting the harvest floor as you have suggested. At 99 percent of max-timber, first decade outputs for Alternative C are 31.4 MMBF or 158 MMBF. See response to following comment.

COMMENT NO. 60 THE TIMBER SALE CONSTRAINT IS ARBITRARILY IMPOSED. THE WALLOWA-WHITMAN IMPOSES A CONSTRAINT IN EACH ALTERNATIVE THAT DIRECTLY SETS THE FIRST DECADE SALE LEVEL. THE PREFERRED ALTERNATIVE USED 90% OF POTENTIAL SALES AS THE CONSTRAINT RECOMMENDATION. WE BELIEVE 100% SHOULD BE USED FOR ALL ALTERNATIVES SINCE THERE IS EVIDENTLY NO EFFECT ON LAND ALLOCATION OR ENVIRONMENTAL OUTPUTS. THERE IS NO JUSTIFICATION FOR LIMITING THE FULL TIMBER SALES POSSIBLE FROM THE SUITABLE LAND BASE DEFINED IN THE PREFERRED ALTERNATIVE. THIS IS CONSISTENT WITH THE DEFINITION OF ALLOWABLE SALE QUANTITY IN THE REGULATIONS."

FOREST SERVICE RESPONSE

Alternative C was developed to provide 90 percent of the maximum timber possible with that particular land allocation. To achieve the final 10 percent would mean harvesting from lands where economic costs far exceed economic returns.

COMMENT NO. 61 "MANAGEMENT AREA 3. THIS MANAGEMENT AREA WAS FORMULATED TO OPTIMIZE ELK AND ELK HUNTING. THE MODEL WAS CONSTRAINED TO ENSURE MAINTENANCE OF HIGH QUALITY BIG GAME HABITAT AND MORE CHALLENGING HUNTING OPPORTUNITIES. THE VEGETATIVE MANIPULATION CONSTRAINTS ARE OVERLY RESTRICTIVE AND THEY ARE BASED ON HIGHLY THEORETICAL UNTESTED DATA (JACK THOMAS, PERSONAL COMMUNICATION). THE FOREST SERVICE PLACES VERY SEVERE CONSTRAINTS ON THE PRECOMMERCIAL THINNING, REGENERATION HARVEST, AND OVERSTORY REMOVAL TO MAXIMIZE HABITAT AND THEN THEY USE "INDICES" WHICH TEND TO OVERESTIMATE THE IMPACTS OF TIMBER HARVEST ON ELK TO THE DEGREE THAT OTHER YOUNGER SUCCESSIONAL STAGES OR UNECONOMIC LANDS ARE INTERSPERSED WITH THESE MATURE STANDS. THE HABITAT EFFECTIVENESS INDEX WAS NOT MODELED IN FORPLAN, BUT AN ARBITRARY CONSTRAINT OF MAXIMUM AREA OF AREA CLASS 0 OF 12.7% PER DECADE WAS A PART THROUGH ALL DECADES. THERE IS NO DIRECTION GIVEN TO THE WALLOWA-WHITMAN TO MODEL FORPLAN USING THESE SEVERE CONSTRAINTS. THE OVERLY RESTRICTIVE AREA REDUCES TIMBER HARVEST LEVELS BY 2.32 MCF (12.76 MBF) PER YEAR. THERE IS NO EVIDENCE SHOWN IN THE DEIS THAT THIS RESTRICTION IS NECESSARY TO MAINTAIN VIABLE POPULATIONS OF ELK. THE MANAGEMENT OBJECTIVE IS SET BY THE ODF&W. IT IS OUR UNDERSTANDING THAT THE OREGON DEPARTMENT OF FISH AND WILDLIFE INSISTED THAT THE PLANNING STAFF DEVELOP AND USE AREA 3. WE FEEL THIS IS HIGHLY UNAPPROPRIATE AS THE ODF&W SHOULD BE IN AN ADVISORY CAPACITY ONLY.

FOREST SERVICE RESPONSE:

Area 3 is intended to ensure adequate amounts of cover, well dispersed throughout the timbered areas. We agree that it is subjective, but are confident that our method of modeling reasonably approximates the desired conditions. The planning team developed MA-3 but received advice from ODF&W biologists on conditions that would be desirable

COMMENT NO. 62 WE RECOMMEND THAT [AREAS 5, 2, 3, 6, 7, AND 18] BE DROPPED FROM THE WALLOWA-WHITMAN FOREST PLAN. THEY CONSTITUTE OVERRESTRICTIVE SPECIAL USE SET ASIDES AT THE EXPENSE OF JOBS, COUNTY REVENUES, AND COMMUNITY STABILITY WE RECOMMEND THE ACRES BE ALLOCATED TO THESE AREAS WITH YOUR PREFERRED ALTERNATIVE BE RETURNED TO MANAGEMENT AREA 1 IN YOUR FINAL EIS AND RECOMMEND ALTERNATIVE

FOREST SERVICE RESPONSE:

Many others agreed with this recommendation

COMMENT NO. 63 IT WOULD BE NICE IF THE U S FOREST SERVICE BASED ITS TIMBER PRODUCTION LEVELS ON THE PRODUCTIVITY OF THE LAND, THE AMOUNT OF AVAILABLE OLD GROWTH, AND THE ECOLOGICAL CONSIDERATIONS OF THE FOREST INSTEAD, ARBITRARY BENCHMARKS AND LEVELS OF NONDECLINING EVENFLOW ARE USED WHICH HAVE LITTLE TO DO WITH THE ABILITY OF THE FOREST TO SUSTAIN THESE

FOREST SERVICE RESPONSE:

These factors are considered in the development of management alternatives.

COMMENT NO. 64 "IT IS VERY DIFFICULT TO DETERMINE FROM THE DEIS EXACTLY WHAT THE MAGNITUDE OF THE TIMBER SALE PROGRAM REDUCTION WILL BE OR EVEN WHAT THE FOREST "HISTORIC" TIMBER SALE PROGRAM HAS ACTUALLY BEEN THE DRAFT PLAN STATES THAT COMPARED TO PRESENT LEVELS, THE PLAN WILL "ACHIEVE APPROXIMATELY 83% OF THE SAWTIMBER VOLUME IN THE FIRST DECADE" (DRAFT PLAN 3-2). SINCE THE DEIS STATES THAT THE "SAWTIMBER VOLUME TO BE SOLD IN THE FIRST DECADE" UNDER THE PREFERRED ALTERNATIVE WILL BE 28.3 MMCF ANNUALLY, THIS STATEMENT SUGGESTS THAT "RECENT LEVELS" HAVE AVERAGED ABOUT 34.1 MMCF PER YEAR HOWEVER, THAT "RECENT LEVEL" FIGURE DISPLAYED IN TABLE III-3a IS 28.6 MMCF (159 MMBF) PER YEAR ELSEWHERE IN THE DEIS THIS SAME VOLUME IS DESCRIBED AS THE AVERAGE ANNUAL VOLUME OF "SAWTIMBER SOLD IN RECENT YEARS". ALTHOUGH THE FOREST PROBABLY HAS LOGICAL EXPLANATIONS FOR THIS APPARENT DISCREPANCY, AN EXPLANATION IS NOT DESCRIBED IN THE DEIS. SIMILARLY, AS NOTED EARLIER, TABLE II-1 STATES THAT SAWTIMBER PRODUCTION WILL BE 90% OF "RECENT HISTORICAL LEVELS" -- NOT THE 83% CITED ABOVE. TO AVOID THIS CONFUSION, THE FEIS SHOULD CLEARLY DISPLAY "RECENT LEVELS" IN TERMS OF (1) AVERAGE VOLUME OFFERED FOR SALE OVER THE PREVIOUS DECADE, (2) AVERAGE VOLUME SOLD, (3) AVERAGE VOLUME HARVESTED, AND (4) THE POTENTIAL YIELD OF EXISTING MANAGEMENT PLANS."

FOREST SERVICE RESPONSE:

The 83 percent figure shown in the Draft Plan was in error It should be 90 percent as indicated in Table II-1 and elsewhere in the documents It is simply a comparison of the 159 MMBF recent

level volume with the 143 MMBF provided by the Preferred Alternative. The information you suggest for inclusion has been added.

COMMENT NO. 65: A PROBLEM INVOLVES THE SELECTION OF APPROPRIATE "HISTORIC" TIMBER PROGRAM WITH WHICH TO COMPARE THE PROPOSED PLAN'S ALLOWABLE SALE QUANTITY (ASQ). WE HAVE SEEN CASES IN OTHER REGIONS WHERE FORESTS HAVE COMPARED THEIR PROPOSED ASQ'S TO THEIR RECENT HARVEST LEVELS. PLANNING DOCUMENTS PRESENTED A CASE TO THE PUBLIC THAT, SINCE INDUSTRY HAD HARVESTED ONLY X MILLION BOARD FEET PER YEAR OVER THE PAST YEARS, THE FOREST NEEDED TO OFFER ONLY XX MILLION BOARD FEET TO MEET INDUSTRY'S NEEDS. THE IMPLICIT ASSUMPTION BEHIND THIS ARGUMENT, REGARDLESS OF HISTORIC EVIDENCE TO THE CONTRARY, WAS THAT ALL THE VOLUME OFFERED UNDER THE FINAL FOREST PLAN WOULD BE PURCHASED AND HARVESTED. IN REALITY, THIS HAS NEVER HAPPENED FOR A VARIETY OF GOOD REASONS, PRIMARILY INVOLVING THE FOREST'S INABILITY TO PUT UP ECONOMICALLY VIABLE TIMBER SALES. IN THE WALLOWA-WHITMAN'S CASE, IT LOOKS AS THOUGH THE FOREST CONSIDERS VOLUME SOLD TO BE THE APPROPRIATE HISTORIC TIMBER SALE PROGRAM FOR COMPARISON PURPOSES. AS NOTED EARLIER, THE 159 MMBF PER YEAR RECENT LEVEL FIGURE DISPLAYED IN THE DEIS, TABLE II-3a IS DESCRIBED ELSEWHERE IN THE TEXT AS THE AVERAGE ANNUAL VOLUME OF SAWTIMBER SOLD IN RECENT YEARS (DEIS III-23). THE IMPLICIT ASSUMPTION IN THIS CASE IS THAT, IF THE FOREST CONTINUES TO OFFER THE SAME VOLUME AS IS SOLD IN THE PAST, INDUSTRY'S NEEDS WILL BE MET.

FOREST SERVICE RESPONSE:

We tried in all cases to compare future offerings with past offerings. We did this because we can control how much we offer directly, whereas actual sales and harvests are subject to the vagaries of the marketplace. We acknowledge that this method is not without its problems, but consider the use of offerings to be superior to the use of either sales or harvests.

The wording cited by the respondent on page III-23 of the DEIS has been corrected to read "Annual sawtimber offered for sale" rather than "Annual sawtimber sold." Throughout the document, the term ASQ (Allowable Sale Quantity) is used synonymously with the expression of "annual sawtimber offerings" or "FORPLAN volume."

COMMENT NO. 66: THE WALLOWA-WHITMAN'S APPROACH ALSO ENGENDERS AN ERRONEOUS PUBLIC PERCEPTION THAT ALL OF THE VOLUME OFFERED UNDER THE PREFERRED ALTERNATIVE WILL BE SOLD AND HARVESTED. AS SHOWN IN TABLE 1 BELOW, ROUGHLY 6% OF THE SAWTIMBER VOLUME OFFERED FOR SALE BY THE FOREST OVER THE PAST 10 YEARS HAS GONE UNSOLD. THERE IS NO LOGICAL REASON TO ASSUME THAT THIS SITUATION WILL CHANGE IN THE FOREST PLAN. IN FACT, THE PROBLEM COULD BE WORSE GIVEN THE PREFERRED ALTERNATIVE'S PROPORTIONATELY GREATER EMPHASIS ON LODGEPOLE PINE SALES. TO INSURE THAT BOTH THE PUBLIC AND THE FOREST SERVICE DECISIONMAKERS CLEARLY UNDERSTAND THE RELATIONSHIP BETWEEN HISTORIC TIMBER SALE PROGRAM AND THE PROPOSED FOREST PLAN, THE FEIS SHOULD COMPARE HISTORIC VOLUME OFFERED BY THE FOREST THROUGH THE VOLUME THE FOREST HAS TO OFFER UNDER THE PROPOSED FOREST PLAN. (BY DEFINITION, ASQ REPRESENTS THE AVERAGE ANNUAL VOLUME OF TIMBER THE FOREST SERVICE PROPOSES TO OFFER FOR SALE OVER THE COURSE OF THE NEXT DECADE.) THIS PROCEDURE HAS BEEN RECOMMENDED BY A RECENT FOREST SERVICE REPORT FROM REGION 1 WHICH CONCLUDED THAT THE IMPACTS RESULTING FROM THE VOLUME CHANGES DURING THE FOREST PLAN IMPLEMENTATION SHOULD BE ESTIMATED BY COMPARING THE FUTURE "BID OPPORTUNITY" PROVIDED BY THE FOREST TO THE "PAST NATIONAL FOREST VOLUME OFFERED." COMPARING THESE TWO FIGURES INDICATES THAT

THE PREFERRED ALTERNATIVE'S ACTUAL PROGRAM REDUCTION FROM THE 'HISTORIC LEVELS' WILL BE ABOUT 13%.

TABLE I
SAWTIMBER VOLUME OFFERED AND SOLD
WALLOWA-WHITMAN NATIONAL FOREST

YEAR	OFFERED MMBF	SOLD MMBF
1976	179	182
1977	160	174
1978	181	177
1979	171	184
1980	105	105
1981	173	201
1982	197	132
1983	151	127
1984	163	126
1985	133	104
AVERAGE	161	151

SOURCE: BRUCE MCMILLAN, WALLOWA-WHITMAN NATIONAL FOREST, BY PHONE JULY 7, 1986 *

FOREST SERVICE RESPONSE:

We have assumed in our analyses that all material offered will be sold and that all material sold will be harvested. We did this because FORPLAN does not readily avail our handling such perturbations and because even after implementation of the Forest Plan (in whatever form) the reported outputs will not be "clean." For instance, a sale might have been offered unsuccessfully in 1986 (it did not sell). If it is reoffered in 1989 with minimal rework, the Forest may not claim its reoffering in meeting its targeted ASQ (Allowable Sale Quantity). This might occur if the sale were not grossly deficit to begin with and if market conditions improved. On the other hand, if the sale were to be reoffered after substantial rework, it would be claimed as contributing to meeting the ASQ.

It is interesting to note that in the period 1977-1981 sales (168 MMBF) actually outdistanced offerings (158 MMBF). None of this solves the problem or even alleviates it. Because of the concern showed by the respondent, we have beefed up the discussion of the matter in EIS Appendix B in the section entitled Uncertainty in the Analysis.

One purpose of the analysis is to aid the decisionmaker by providing a basis for comparing alternatives. That basic feature -- comparability -- is not significantly affected by these problems.

COMMENT NO. 67: A POINT WHICH THE DEIS DOES NOT DISCLOSE INVOLVES THE FACT THAT THE FOREST'S FULL 28.3 MMCF ASQ MAY NOT BE OFFERED FOR SALE ONCE THE PLAN IS IMPLEMENTED. THE DEIS DOES NOT DISCUSS THE FACT THAT (1) THE ASQ FIGURE IN FOREST PLANNING REPRESENTS A CEILING ON THE FOREST'S TIMBER SALE PROGRAM, AND (2) THE ACTUAL TIMBER SALE PROGRAMS COULD BE CONSIDERABLY LOWER DEPENDING ON

BUDGET, LIMITATIONS, AND OTHER ASSUMPTIONS IN THE APPROVED FOREST PLANS. THE FEIS SHOULD DISCUSS THOSE FACTORS THAT COULD RESULT IN ACTUAL TIMBER SALE PROGRAMS LESS THAN THE ASQ AND TO DESCRIBE THE DEGREE OF RISK INVOLVED

FOREST SERVICE RESPONSE:

We agree, though one could also reason equally well that the very terms "Allowable" - not "Required;" "Permitted" - not "Contracted;" and so on are sufficiently descriptive Appendix B, Uncertainty in the Analysis, and pages B-114-B-118, B-147-B-149, B-141, and B-144 did address the questions raised in a general sense. We have expanded its treatment in the FEIS Appendices. The "degree of risk" question is addressed.

COMMENT NO. 68: THE DEIS DOWNPLAYS THE SIGNIFICANCE OF THE PROPOSED PLAN'S TIMBER PROGRAM REDUCTION BY ARGUING THAT THE REDUCTION WOULD BE MITIGATED BY THE FACT THERE ARE OTHER SOURCES OF TIMBER SUPPLY INCLUDED IN STATE, PRIVATE, AND OTHER NATIONAL FOREST LANDS, AND BY THE LARGE ACCUMULATION OF TIMBER INVENTORY WHICH PURCHASERS HAVE NOT YET HARVESTED (DEIS IV-54) SINCE THE ACCEPTABILITY OF THE FOREST'S PROPOSED PROGRAM COULD HINGE ON THE VALIDITY OF THIS STATEMENT, THE QUALITY OF THE FOREST'S SUPPORTING DATA BECOMES A CRITICAL ELEMENT OF THE PLANNING ANALYSIS NEVERTHELESS, BEYOND THE SINGLE STATEMENT CITED, THERE IS NOTHING IN THE DEIS TO SHOW THAT THE FOREST RELIANCE ON OTHER SOURCES OF TIMBER IS JUSTIFIED. IN FACT, THE ONLY OTHER REFERENCES WE COULD FIND IN THE DEIS REGARDING THIS ISSUE SEEMED TO COUNTER THE FOREST'S POSITION

FOREST SERVICE RESPONSE:

We pointed out in the Forest Plan that approximately half of the locally processed timber comes from the Wallowa-Whitman (Timber, 2-15). We have added information to the EIS to this effect.

COMMENT NO. 69: THE FOREST'S DISCUSSION OF THE PRIVATE TIMBER SUPPLY ISSUE CITES THE OREGON DEPARTMENT OF FORESTRY'S "FORESTRY PROGRAM FOR OREGON" STUDY WHICH CALLS FOR HIGH LEVELS OF TIMBER OUTPUTS FOR FIVE DECADES TO "MITIGATE A PROJECTED SHORTFALL IN TIMBER HARVEST FOR PRIVATE LANDS" (DEIS II-33)* THE FACT THAT THE FOREST ANALYZED AN ALTERNATIVE BASED ON THE REPORT'S SUGGESTED TIMBER TARGETS CLEARLY SUGGESTS THAT THE FOREST FELT COMPELLED TO AT LEAST RECOGNIZE THE STATE'S CONCERN THAT AN IMPENDING SHORTFALL OF PRIVATE TIMBER SUPPLIES COULD OCCUR IN THE NEAR FUTURE NEVERTHELESS, THERE IS NO INDICATION IN THE DEIS THAT THE FOREST MADE ANY ATTEMPT TO INDEPENDENTLY ANALYZE THE LOCAL PRIVATE TIMBER SUPPLY SITUATION; NOR IS THERE ANY DATA PRESENTED IN THE DEIS TO JUSTIFY THE FOREST'S POSITION THAT PRIVATE TIMBER SOURCES WILL HELP MITIGATE THE REDUCED TIMBER SALE PROGRAM PROPOSED IN THE DRAFT FOREST PLAN. THIS IS A SERIOUS DEFICIENCY, ESPECIALLY THE APPARENT MAGNITUDE OF THE PROJECTED SHORTFALL THIS STATE'S SUGGESTED TARGETS FOR THE WALLOWA-WHITMAN ARE NOT DISPLAYED IN THE DEIS NEVERTHELESS, THE FOREST DID STATE THAT THEY "EXCEED THE ASSIGNED TIMBER PRODUCTION TARGETS FOR THE FOREST BY APPROXIMATELY 20%" (DEIS I-7). ASSUMING THAT THIS STATEMENT REFERS TO THE FOREST'S ASSIGNED RPA TARGETS, (220 MMBF PER YEAR FOR THE NEXT DECADE), IT LOOKS AS THOUGH THE STATE HAS RECOMMENDED A FIRST DECADE HARVEST OF THE FOREST OF ABOUT 264 MMBF PER YEAR. THIS NUMBER SUGGESTS THE POTENTIAL PRIVATE TIMBER SUPPLY SHORTFALL IN THE WALLOWA-WHITMAN COULD BE SUBSTANTIAL IT IS IMPERATIVE THAT THE FOREST ADEQUATELY ANALYZE THE PRIVATE TIMBER SUPPLY SITUATION BEFORE SELECTING THE FINAL PLAN AS WELL AS THE OTHER SOURCES OF SUPPLY. THERE IS ABSOLUTELY NO INDICATION IN THE DEIS THAT THE

FOREST MADE ANY ATTEMPT TO ASSESS THE FUTURE TIMBER SUPPLY LEVELS OF ADJOINING NATIONAL FORESTS LIKE IN THIS ANALYSIS, THERE IS ABSOLUTELY NO JUSTIFICATION FOR THE FOREST'S ASSERTION THAT TIMBER FROM ADJOINING NATIONAL FORESTS WILL HELP MITIGATE THE REDUCTION ON THE WALLOWA-WHITMAN. THE FOREST DEIS IS TOTALLY DEFICIENT IN THIS REGARD TO EFFECTIVELY OFFSET PROGRAM REDUCTIONS ON THE WALLOWA-WHITMAN, TIMBER SALE PROGRAMS FROM THE ADJOINING FORESTS WOULD HAVE TO INCREASE ABOVE THEIR OWN HISTORIC PROGRAM LEVELS. AVAILABLE EVIDENCE SUGGESTS THIS WILL NOT BE THE CASE THE FOREST'S ANALYSIS MUST CONSIDER HOW THE PREFERRED ALTERNATIVE ASQ'S ON THE MALHEUR, UMATILLA, AND PAYETTE NATIONAL FORESTS COMPARE TO THE HISTORIC TIMBER SALE PROGRAM LEVELS ON THESE FORESTS PRESUMABLY, THIS DATA SHOULD BE AVAILABLE BY NOW EVEN THOUGH DRAFT PLANS HAVE NOT BEEN PUBLISHED

FOREST SERVICE RESPONSE:

Information on the private timber inventory is sketchy, as we learned during the Analysis of the Management Situation Estimates as to the time of its harvest are even more vague. We have not spoken to any mitigating effect by the private timber sources, but have rather simply recognized that the Wallowa-Whitman has been providing about half the raw material processed locally (Forest Plan, Chapter 2). Material purchased on other National Forests, the BLM, and other sources is also processed locally.

The State's suggested targets (1986) for the Wallowa-Whitman are those contained in the PFO Alternative Alternative B-departure is explained in the DEIS

At the time the document was being prepared, the Malheur and the Umatilla National Forests had not yet released their DEIS's The FEIS reflects the information gathered together at the Regional level on the aggregate timber supply demand association

COMMENT NO. 70: THE COMMUNITY STABILITY ALTERNATIVE DEVELOPED BY THE LOCAL TIMBER INDUSTRY IS AN ALTERNATIVE TO THE WALLOWA-WHITMAN'S PREFERRED ALTERNATIVE IT PROPOSED A CHARGEABLE GREEN SAWTIMBER PROGRAM OF 158 MMBF PER YEAR IN THE FIRST DECADE - A LEVEL 10% HIGHER THAN THE ASQ OF THE PUBLIC FOREST'S PREFERRED ALTERNATIVE AND ROUGHLY EQUIVALENT TO THE AVERAGE VOLUMES OFFERED FOR SALE OVER THE PREVIOUS DECADE. THIS PROGRAM, WHICH REFLECTS THE LOCAL TIMBER INDUSTRY'S ESTIMATE OF THE MINIMUM VOLUME OF TIMBER NEEDED FROM THE WALLOWA-WHITMAN TO SIMPLY MAINTAIN EXISTING TIMBER INDUSTRY, WOULD INCLUDE 150 MMBF OF PONDEROSA PINE, DOUGLAS-FIR, LARCH, WHITE FIR, AND SPRUCE AND 8 MMBF OF LODGEPOLE PINE WITH THE ADDITION OF ANOTHER 25 MMBF OF OTHER CHARGEABLE VOLUME, THE FOREST'S FIRST DECADE TIMBER SALE PROGRAM WOULD TOTAL 183 MMBF PER YEAR. IN VIEW OF THE STATE OF OREGON'S TIMBER TARGETS FOR THE FOREST, THIS ESTIMATE COULD BE CONSERVATIVE.

FOREST SERVICE RESPONSE:

The "Community Stability" Alternative, we agree, would more closely approximate the targets suggested by the State of Oregon in 1986. The State has since recognized that its estimates were based on a different land base than currently available We do not believe the requested species distribution can be maintained for the Community Stability Alternative in the amounts originally presented, but agree that the alternative is otherwise possible.

COMMENT NO. 71: GIVEN THE LIMITATIONS OF CURRENT SCIENTIFIC KNOWLEDGE AND STATE-OF-THE-ART COMPUTER MODELING TECHNOLOGY, SCIENTIFIC UNCERTAINTY IS A "FACT OF LIFE" IN NATIONAL FOREST PLANNING, ESPECIALLY IN SUCH AREAS AS SEDIMENT PRODUCTION ESTIMATES, WILDLIFE POPULATION PROJECTIONS, AND ESTIMATES OF FUTURE RECREATION DEMAND. NEVERTHELESS, MANY OF THE DRAFT PLANS WE HAVE REVIEWED IN THE PAST HAVE INCLUDED NO DISCUSSION OF THE SCIENTIFIC UNCERTAINTY ASSOCIATED WITH THEIR PROJECTIONS WITH ENVIRONMENTAL IMPACTS. THE WALLOWA-WHITMAN'S DEIS IS BETTER IN THIS REGARD. THE DEIS CLEARLY DISCLOSES THAT, DUE TO THE FACT THAT MUCH OF THIS ANALYSIS IS BASED ON MODELING, MANY OF THE FOREST'S PREDICTIONS ARE "AT BEST ROUGH ESTIMATES" (DEIS IV-2). NEVERTHELESS, THE PROPOSED FOREST PLAN INCLUDES STRINGENT TIMBER HARVESTING CONSTRAINTS - INCLUDING THE MMR'S BASED ON THE FOREST'S PROJECTIONS OF POTENTIAL ENVIRONMENTAL IMPACTS. THESE CONSTRAINTS FOR DISPERSION, OLD GROWTH PROTECTION, PINE MARTEN, RIPARIAN ZONES, AND SIMILAR ENVIRONMENTAL CONCERNS REDUCE THE FOREST'S FIRST DECADE TIMBER PRODUCTION POTENTIAL BY 36.5 MMBF PER YEAR (DEIS B-104).

SOME SPECIAL INTEREST GROUPS WILL ARGUE, GIVEN THE UNCERTAINTY OF ENVIRONMENTAL IMPACT ESTIMATES, THAT TIMBER HARVEST ON THE FOREST SHOULD BE CONSTRAINED EVEN FURTHER TO MINIMIZE THE RISK OF POTENTIALLY EXCESSIVELY ENVIRONMENTAL DAMAGE. ON THE OTHER HAND, WE BELIEVE THAT THE FOREST'S PROPOSED TIMBER HARVEST CONSTRAINTS ARE EXCESSIVE AND SCIENTIFICALLY UNSUPPORTABLE - ESPECIALLY IN VIEW OF THE URGENT NEED FOR SUFFICIENT TIMBER HARVEST ON THE FOREST TO AVOID SERIOUS ADVERSE ECONOMIC IMPACTS ON LOCAL COMMUNITIES. ANY CONSTRAINTS WHICH NEEDLESSLY LIMIT TIMBER PRODUCTION ON THE FOREST, BASED ON ENVIRONMENTAL IMPACT PROJECTIONS OF QUESTIONABLE SCIENTIFIC VALIDITY, MUST BE AVOIDED IN NATIONAL FOREST PLANNING UNTIL SUCH TIME AS THE NEED FOR SUCH CONSTRAINTS IS UNQUESTIONABLY ESTABLISHED BY MONITORING OR SCIENTIFIC RESEARCH.

WE BELIEVE THAT AN EFFECTIVE MONITORING PROGRAM, RATHER THAN STRICT TIMBER HARVEST CONSTRAINTS, IS THE APPROPRIATE WAY TO DEAL WITH SCIENTIFIC UNCERTAINTY IN NATIONAL FOREST PLANNING. MONITORING IS A KEY CONCEPT WHICH MUST BE STRONGLY EMPHASIZED IN THE FINAL FOREST PLAN. IF INDUSTRY'S MINIMUM TIMBER REQUIREMENTS CANNOT BE MET WITHOUT RELAXING THE PREFERRED ALTERNATIVE'S TIMBER HARVEST CONSTRAINTS, THE FINAL PLAN SHOULD RELAX THEM AND STRESS MONITORING RATHER THAN MODELING CONSTRAINTS AS THE PRIMARY METHOD OF INSURING THAT ENVIRONMENTAL VALUES ARE ADEQUATELY PROTECTED. IF MONITORING INDICATES THAT UNACCEPTABLE IMPACTS ARE OCCURRING AS A RESULT OF THE PUBLIC FOREST TIMBER SALE PROGRAM, THE FOREST PLAN'S ASQ CAN ALWAYS BE REDUCED. IF NOT, THE FOREST WILL HAVE AVOIDED NEEDLESSLY HURTING THE TIMBER INDUSTRY AND LOCAL TIMBER-DEPENDENT COMMUNITIES.

FOREST SERVICE RESPONSE:

Many people would agree with the approach you suggest as a means of addressing the local economic needs and timber harvest issue. But we do not believe it is reasonable to rely only on monitoring as a means of addressing the other issues involved.

COMMENT NO. 72 : THE PLAN ILLEGALLY COMBINES THE WALLOWA AND WHITMAN FORESTS TO CALCULATE THE ALLOWABLE CUT. THE NFMA CLEARLY STATES THAT THE ALLOWABLE CUT IS TO BE CALCULATED FOR EACH NATIONAL FOREST AND ONLY WHERE "A FOREST HAS LESS THAN TWO HUNDRED THOUSAND ACRES OF COMMERCIAL FOREST LAND, THE SECRETARY MAY USE TWO OR MORE FORESTS FOR PURPOSES OF DETERMINING THE SUSTAINED YIELD." 16 U.S.C. 16. THE COMBINED ALLOWABLE CUT IS MOST LIKELY GREATER THAN THE

SUM OF THE SEPARATELY CALCULATED CUTS OF THE TWO FORESTS. THIS IS DUE TO THE "ALLOWABLE CUT EFFECT" WHEREBY FOREST A IS ABLE TO ACCELERATE ITS LOGGING IN ANTICIPATION OF FOREST B TAKING UP THE SLACK IN LATER DECADES THERE IS NO JUSTIFICATION FOR FLAGRANTLY IGNORING THE CLEAR CONGRESSIONAL DIRECTION IN NFMA THE FOREST STAFF IS NOT IGNORANT OF THE LAW FOR THERE IS A MEMO OF AUGUST 1, 1984 FROM J. S. TIXIER TO THE CHIEF ADDRESSING THIS VERY QUESTION THE ALLOWABLE CUTS MUST BE RECALCULATED SEPARATELY BEFORE THE FINAL FOREST PLAN MAY BE ISSUED

FOREST SERVICE RESPONSE:

This matter is documented in the DEIS Appendix B, pages 103 and 105, Table B-1, and is similarly shown in the Final Appendix

COMMENT NO. 73: I APPLAUD THE PLANNING PROCESS AND EFFORTS BY THE F. S. TO BALANCE TIMBER HARVEST LEVELS WITH OTHER RESOURCE VALUES IN THE WALLOWA-WHITMANS IN PARTICULAR, THE OLD-GROWTH ALLOCATIONS SCATTERED THROUGHOUT THE MANAGED AREAS, THE GOAL OF ENHANCING STREAMSIDE VEGETATION IN THE RIPARIAN ZONES AND CONSTRAINT ON TIMBER HARVEST FOR BIG GAME MANAGEMENT ARE ALL POSITIVE ACTIONS WHICH WILL HELP ASSURE A HEALTHY AND VARIED WILDLIFE MIX

FOREST SERVICE RESPONSE:

Thank you for your opinion

COMMENT NO. 74: THE WALLOWA-WHITMAN EIS DOES NOT INCLUDE A NO-ACTION ALTERNATIVE AS REQUIRED BY NEPA A NO-ACTION ALTERNATIVE IS NEEDED TO COMPARE THE EXISTING PLAN WITH THE PROPOSED PLAN. THE COUNCIL ON ENVIRONMENTAL QUALITY (CEQ) HAS DEFINED THE "NO-ACTION ALTERNATIVE" IN THE CONTEXT OF LAND MANAGEMENT PLANS. THE NO-ACTION ALTERNATIVE "IS NO CHANGE FROM CURRENT MANAGEMENT DIRECTION." (CEQ, 40 MOST ASKED QUESTIONS 46 FED. REG. 18026) THUS, NEW YIELD TABLES, NEW LAND SUITABILITY, AND NEW MINIMUM MANAGEMENT REQUIREMENTS ARE ELEMENTS OF THE NEW PLAN AND SHOULD BE INCLUDED FROM THE PORTRAYAL OF THE EXISTING PLAN. THE POTENTIAL YIELD OF THE EXISTING TIMBER MANAGEMENT PLAN IS 183 MMBF/Yr THE "CURRENT DIRECTION" ALTERNATIVE IN THE EIS LISTS CHARGEABLE TIMBER VOLUME AS 139 MMBF/YR. THIS MISLEADS THE PUBLIC INTO BELIEVING THAT THE PREFERRED ALTERNATIVE INCREASES THE TIMBER SALE PROGRAM OVER THE CURRENT PLAN

WE BELIEVE THE FOREST SERVICE SHOULD ACCURATELY IDENTIFY THE NO-ACTION ON WALLOWA-WHITMAN SO AS TO GIVE THE PUBLIC A GOOD BASIS FOR COMPARISON

FOREST SERVICE RESPONSE:

A no-change alternative was added to the DEIS by Supplement

COMMENT NO. 75: AS A BUSINESSMAN I WOULD HATE TO SEE A REDUCTION IN TIMBER EMPLOYMENT BUT THAT WOULD BE PREFERABLE TO THE COMPLETE LOSS OF TIMBER CUTTING 8 TO 10 YEARS FROM NOW. A CUT OF 100 MILLION WOULD PROBABLY BE CLOSER TO WHAT THE WALLOWA-WHITMAN COULD MAINTAIN

FOREST SERVICE RESPONSE

Thank you for your opinion

COMMENT NO. 76: IT SEEMS TO ME THAT YOUR MENSURATIONAL PROCEDURES HAVE BLOCKED OUT SILVICULTURAL LOGIC AND ECONOMIC CONSIDERATIONS IN YOUR PLAN I WOULD SUGGEST THAT YOU MAKE A DECISION TO KEEP ALL THE ACRES OF YOUR FOREST OPEN FOR TIMBER HARVEST, SET THE HARVEST LEVEL AT 170-180 MMBF.

FOREST SERVICE RESPONSE.

Thank you for your opinion

COMMENT NO. 77: REDUCE THE PONDEROSA CUT AND CLEAN UP THE STANDS THAT HAVE BEEN DEGRADED IN THE PAST BY EMPHASIZING THE CUTTING OF WHITE FIR.

FOREST SERVICE RESPONSE.

Thank you for your opinion. It will be necessary to harvest a greater proportion of true fir in the future if projected total volume estimates are to be achieved.

COMMENT NO. 78: THE OREGON ECONOMY IS DIRECTLY TIED TO THE FOREST INDUSTRY WHICH PROVIDES NEARLY 100,000 JOBS THIS DOES NOT ACCOUNT FOR THE NUMBER OF JOBS IN OTHER INDUSTRIES (SUCH AS TRANSPORTATION, PETROLEUM PROJECTS, MACHINE SHOPS AND OTHER COMMUNITY BUSINESSES) WHICH ARE HEAVILY DEPENDENT UPON THE TIMBER INDUSTRY

SEVENTY PERCENT OF PEERLESS' ANNUAL SALES CAN BE DIRECTLY ATTRIBUTED TO SALES TO WOOD PRODUCTS COMPANIES. OUR BUSINESS IS ONE OF THOSE THAT WILL BE AFFECTED BY THE ANNUAL TIMBER CUT ON THE WALLOWA-WHITMAN WE SUPPORT MAXIMUM TIMBER PRODUCTION FOR MAXIMUM PUBLIC BENEFIT."

FOREST SERVICE RESPONSE

Thank you for your information and opinion

COMMENT NO. 79: YOUR FOREST LANDS INCLUDE THE MOST OUTSTANDING NON-VOLCANIC MOUNTAINS IN OREGON. I HAVE BEEN IMPRESSED WITH THE WALLOWAS AND ELKHORNS, AND I FEEL THAT I AM IN THE AMERICAN WEST WHEN ON YOUR FOREST. YOU ARE THE GUARDIAN FOR ONE OF THE PRIME RECREATION AREAS, INCLUDING OUTSTANDING GAME HUNTING, IN OUR STATE

MULTIPLE USE MEANS OTHER USES SHOULD RECEIVE ATTENTION IN YOUR TEN YEAR AND FIFTY YEAR OUTLOOKS BESIDES TIMBER HARVEST - AS EXAMPLES WATERSHED PROTECTION, SCENIC RIVERS, WILDLIFE HABITAT PROTECTION, AND RECREATION OPPORTUNITIES INCLUDING A TRAIL SYSTEM TO PROVIDE MORE OPPORTUNITIES "

FOREST SERVICE RESPONSE:

We believe "other" uses have been given attention. Many people share your feelings about the character of the Forest

COMMENT NO. 80 IF THE BUREAUCRATS IN WASHINGTON D.C. PROVIDE YOU WITH UNREALISTIC QUOTAS FOR TIMBER HARVESTS IN THE NATIONAL FORESTS, I URGE YOU AND OTHERS IN YOUR POSITION TO JOIN WITH CONCERNED CITIZENS TO EDUCATE OUR ELECTED REPRESENTATIVES

FOREST SERVICE RESPONSE:

We agree that education is a part of the process

COMMENT NO. 81 OUR COMMENTS START WITH THE BASIC PREMISE THAT AN ADEQUATE NATIONAL FOREST TIMBER SALE PROGRAM - WITH OPPORTUNITIES FOR GROWTH IF POSSIBLE -- IS VITAL TO OREGON'S SOCIAL AND ECONOMIC WELL-BEING AND TO THE WELL-BEING OF THE LOCAL BUSINESSES AND PEOPLE RESIDING IN THE WALLOWA-WHITMAN'S ZONE OF INFLUENCE. THE DEIS NOTES ACCURATELY THAT: (1) THE ECONOMIES OF BAKER, UNION, AND WALLOWA COUNTIES ARE "AFFECTED SIGNIFICANTLY BY THE ACTIVITIES AND OUTPUTS OF THE WALLOWA-WHITMAN NATIONAL FOREST; AND (2) THAT TIMBER SALE OFFERINGS ARE "BY FAR THE MOST IMPORTANT CONSIDERATION" (DEIS I-8) WE BELIEVE THAT NATIONAL FOREST PLANS SHOULD PROVIDE OPPORTUNITIES FOR INCREASED PRODUCTION AND ECONOMIC GROWTH IN RURAL AREAS SUCH AS THE TRI-COMMUNITIES WHOSE BASIS FOR EXISTENCE, QUOTING THE DEIS, "LIES IN SUCCESSFUL DEVELOPMENT OF ITS NATURAL RESOURCE BASE" (DEIS B-63).

ONE OF THE BASIC REASONS FOR ESTABLISHING THE NATIONAL FORESTS WAS TO PROVIDE OPPORTUNITIES FOR ECONOMIC DEVELOPMENT AND COMMUNITY STABILITY IN SUCH COMMUNITIES AS LA GRANDE, BAKER, AND ENTERPRISE. AS EARLY AS 1897 CONGRESS MANDATED THAT THE FOREST SERVICE PROVIDE A CONTINUOUS SUPPLY OF TIMBER FOR THE USE AND NECESSITIES OF THE CITIZENS OF THE UNITED STATES. CONGRESS STATED AS FOLLOWS:

"NO PUBLIC FOREST RESERVATION (NATIONAL FOREST) SHALL BE ESTABLISHED, EXCEPT TO IMPROVE AND PROTECT THE FOREST WITHIN THE RESERVATION (NATIONAL FOREST) OR FOR THE PURPOSE OF SECURING FAVORABLE CONDITIONS OR WATER FLOWS, AND TO FURNISH A CONTINUOUS SUPPLY OF TIMBER FOR THE USE AND NECESSITIES OF THE CITIZENS OF THE UNITED STATES" . .

THIS STATUTE, POPULARLY KNOWN AS THE ORGANIC ACT, IS STILL IN EFFECT FOREST SERVICE REGULATION HAS INTERPRETED THIS STATUTE TO MANDATE COMMUNITY STABILITY. THE REGULATIONS AT 36 CFR 221 4 STATE AS FOLLOWS.

- A. MANAGEMENT PLANS FOR NATIONAL FOREST TIMBER RESOURCES SHALL BE PREPARED AND REVISED, AS NEEDED, FOR WORKING CIRCLES OR OTHER PRACTICABLE UNITS OF THE NATIONAL FOREST. SUCH PLANS SHALL:
 - 1. BE DESIGNED TO AID IN PROVIDING A CONTINUOUS SUPPLY OF NATIONAL FOREST TIMBER FOR THE USE AND NECESSITIES OF THE CITIZENS OF THE UNITED STATES ...

2. PROVIDE SO FAR AS FEASIBLE AN EVEN FLOW OF NATIONAL FOREST TIMBER *IN ORDER TO FACILITATE THE STABILIZATION OF COMMUNITIES AND THE OPPORTUNITIES FOR EMPLOYMENT* (EMPHASIS ADDED)
3. PROVIDE FOR COORDINATION OF TIMBER PRODUCTION AND HARVESTING WITH OTHER USES OF NATIONAL FOREST LAND IN ACCORDANCE WITH THE PRINCIPLES OF MULTIPLE-USE MANAGEMENT.
4. ESTABLISH THE ALLOWABLE CUTTING RATE WHICH IS THE MAXIMUM AMOUNT OF TIMBER WHICH MAY BE CUT FROM THE NATIONAL FOREST LANDS WITHIN THE UNIT BY YEARS OR OTHER PERIODS.

THE PASSAGE OF THE MULTIPLE USE-SUSTAINED YIELD ACT OF 1960, 16 USC 528-531, SUPPLEMENTED THE ORGANIC ACT OF 1897. HERE CONGRESS STATED:

"THE PURPOSES OF THIS ACT ARE DECLARED TO BE SUPPLEMENTAL TO, BUT NOT IN DEROGATION OF, THE PURPOSES FOR WHICH THE NATIONAL FORESTS WERE ESTABLISHED AS SET FORTH IN THE ACT OF JUNE 4, 1897 * (16 USC 528)

THE MULTIPLE USE-SUSTAINED YIELD ACT REQUIRES THAT NATIONAL FOREST LAND BE MANAGED IN A MANNER WHICH IS HARMONIOUS AND COORDINATES THE VARIOUS USES OF THE FORESTS. THE STATUTE FURTHER PROVIDES THAT A SUSTAINED YIELD OF THE VARIOUS RENEWABLE RESOURCES OF THE NATIONAL FORESTS MUST BE MAINTAINED WITHOUT IMPAIRMENT TO PRODUCTIVITY OF THE LAND (16 USC 531) NEVERTHELESS, CONGRESS, IN ENACTING THIS STATUTE, CLEARLY INTENDED THAT THE NATIONAL FOREST BE MANAGED TO MAINTAIN A VIABLE TIMBER INDUSTRY AND THE STABILITY OF TIMBER-DEPENDENT COMMUNITIES. THE MULTIPLE USE-SUSTAINED YIELD ACT DID NOT CHANGE THE BASIC REQUIREMENT OF THE ORGANIC ACT TO PROVIDE A CONTINUOUS SUPPLY OF TIMBER FROM THE NATIONAL FORESTS TO STABILIZE DEPENDENT COMMUNITIES AND ENSURE EMPLOYMENT IT SIMPLY IMPOSED ADDITIONAL RESPONSIBILITY ON THE AGENCY TO HARMONIZE THE MANAGEMENT OF ALL USES SO THAT MULTIPLE OUTPUTS COULD BE REALIZED THE MULTIPLE USE-SUSTAINED YIELD ACT CLEARLY ENVISIONED INTENSIVE TIMBER MANAGEMENT DESIGNED TO ENSURE A CONTINUOUS SUPPLY OF TIMBER AS WELL AS STABILITY OF LOCAL DEPENDENT COMMUNITIES.

FOREST SERVICE RESPONSE:

We believe any of the Alternatives A through H meet the intent of the Organic or Multiple Use-Sustained Yield Acts and the timber management planning regulations.

COMMENT NO. 82: I WANT YOU TO KNOW THAT I AM VERY CONCERNED ABOUT THE IMPACT OF YOUR PROPOSED FOREST PLAN ON MY JOB, MY FAMILY AND THE COMMUNITY I LIVE IN THE FINAL FOREST PLAN MUST PRODUCE SUFFICIENT TIMBER, RANGE AND OTHER COMMODITY RESOURCES TO SUPPORT OUR EXISTING RESOURCE-BASED INDUSTRIES I SUPPORT THE "COMMUNITY STABILITY ALTERNATIVE" PROPOSED BY THE COMMITTEE FOR A STABLE COMMUNITY AND URGE YOU TO IMPLEMENT IT AS YOUR FINAL FOREST PLAN

FOREST SERVICE RESPONSE:

This was an opinion frequently expressed It was carefully considered in developing the Final Forest Plan.

COMMENT NO. 83: AN ARTICLE IN THE OREGONIAN DATED 10-18-88 MENTIONS THAT NEARLY 304 MBF OF TIMBER WERE HARVESTED ON THE WALLOWA-WHITMAN DURING THE FISCAL YEAR ENDING 9-30-88 THAT'S AN INCREASE OF 74 MBF OVER THE PREVIOUS YEAR AND NEARLY DOUBLE THE RECOMMENDED HARVEST LEVEL RECOMMENDED IN YOUR PREFERRED ALTERNATIVE TO THE FOREST PLAN. HOW CAN ANYONE REALISTICALLY ASSUME THAT THESE HARVEST LEVELS CAN BE MAINTAINED? THIS IS EXACTLY THE REASON WHY MANY REASONABLE PEOPLE ARE RECOMMENDING RETENTION OF ALL REMAINING ROADLESS AND OLD GROWTH AREAS

FOREST SERVICE RESPONSE:

Chapter III of the DEIS has been expanded to compare recent sell and harvest volume figures. Harvest figures are often high in some years to make up for poor market years when harvest levels were low.

COMMENT NO. 84: I REALLY WOULDN'T CARE WHAT THE ALLOWABLE CUT THAT IS PLANNED IF THE FOREST SERVICE WOULD CORRECT IT TO CONFORM TO THE REALITY INDICATED BY THE SCHEDULED 1990 TIMBER INVENTORY THE FOREST SERVICE SHOULD PREPARE AND MAKE PUBLIC A MODEL OF AN INVENTORY THAT WOULD THOROUGHLY JUSTIFY THE ALLOWABLE CUT AS PLANNED THE ACTUAL INVENTORY WOULD THEN BE COMPARED TO THE PUBLISHED MODEL. THEN, ABSOLUTELY, THE ALLOWABLE CUT SHOULD BE ADJUSTED TO COMPENSATE FOR ANY DISCREPANCY OF MORE THAN TWO PERCENT IN ANY PART OF THAT COMPARISON OF THE MODEL AND ACTUAL INVENTORY. THAT MIGHT KEEP US FROM DIGGING A DEEPER ECONOMIC HOLE.

FOREST SERVICE RESPONSE:

We intend to recalculate the harvest levels early in the 1990 decade.

COMMENT NO. 85 : SIGNIFICANTLY REDUCE THE HARVEST LEVEL (30-50%) UNTIL IMPACTS OF PRIOR LOGGING OVER AT LEAST THE LAST 5 YEARS HAVE BEEN ASSESSED BY ACTUAL OBSERVATION AND MEASUREMENTS, I E , WATER MONITORING STATIONS TO PROVIDE BASELINE DATA IN PINE CREEK ABOVE THE VALLEY FLOOR, CLEAR CREEK ABOVE THE VALLEY FLOOR; EAST PINE ABOVE THE VALLEY FLOOR, EAST EAGLE, WEST EAGLE, AND LITTLE EAGLE ABOVE CONFLUENCE WITH MAIN EAGLE. IN ADDITION TO DATA-GATHERING FROM MONITORING STATIONS, CONDUCT STREAM INVENTORIES TO DETERMINE QUALITY OF STREAM BED, RIPARIAN VEGETATION, SEDIMENT LOAN, ETC

FOREST SERVICE RESPONSE:

We intend to do more water monitoring and inventorying of riparian areas We do not believe this will necessitate a reduction in harvest levels prior to such work being accomplished