

Appendix D

Response to Public Comments

The DSEIS was advertised for public comment in January 2002. In June 2002, the Clearwater National Forest completed a content analysis of all the comments that were received for the Draft Supplemental EIS (DSEIS). The results of the content analysis are included in the Project File for the DSEIS. Volume 18, Document 758 of the project file is the content analysis report, including quotes from the original comment letters and a listing of the letter and comment codes that were assigned to each quote by the content analysis team. Volume 18, Document 757 lists the standardized comment category codes that were used by the content analysis team. The original comment letters are included in Volumes 6 and 7 of the Project File.

Because of the large number of comments that were received, the Interdisciplinary Team paraphrased the original comments and grouped similar ones together. The original letter numbers are noted beside each comment so that members of the public who offered comments on the DSEIS can see how the IDT interpreted their statements.

Because of the extensive public involvement efforts that have been ongoing since the beginning of this project in 1996, many comments that were received for the DSEIS have been addressed previously in the Final EIS (FEIS, June 1999), the Vegetation and Aquatic Management Record of Decision (Veg ROD, April 2000), the Recreation and Access Management Record of Decision (Access ROD, April 2000), or the DSEIS itself (DSEIS, January 2002). For comments that have been previously addressed, only a short notation is included here, indicating the document where the earlier response can be found.

The Regional Forester reversed the decisions that were advertised in the Veg ROD in April 2000, so those decisions are invalid. A new decision document will be advertised for vegetation management proposals that were analyzed in the DSEIS and FSEIS. However, for reference purposes only, a copy of the April 2000 Veg ROD document has been retained in the project file to document previous responses to comments (DSEIS Project File, Volume 5, Document 452a).

101: Ecosystem Health

I prefer Alternative 2. (Letter 25)

SEIS, Page 2-15

Veg ROD, Page 16

DEIS, Page 33

I am not in favor of using timber sales to manage vegetation. (Letters 28, 65, 138)

FEIS, Page 32, Description of the no action alternative

I am in favor of using timber sales to manage vegetation. (Letter 46)

FEIS, Pages 33-41, Description of the action alternatives

I am in favor of using prescribed fires to manage vegetation. (Letters 46)

FEIS, Pages 33-41, Description of the action alternatives

Local concerns should be considered. (Letters 42, 55)

Veg. ROD, Attachment 6, Page 23

The proposed actions will improve forest health. (Letter 46)

FEIS, Pages 124-132, Vegetation Effects analysis

The proposed actions will not improve forest health. (Letters 28, 138)

FEIS, page 191, Comment 97

This proposal is not consistent with the principles of ecosystem management. (Letters 55, 65, 138)

Veg. ROD, Attachment 6, pages 14 and 17

I am concerned about fish, wildlife, and sensitive plant habitats (Letters 46, 139, 155)

Veg. ROD, Attachment 6, Page 8, 12-15

Economic impacts should be considered. (Letters 55, 79)

Veg. ROD, Attachment 6, page 18

FEIS, Page 208

102: Fragmentation

The analysis of patch sizes was not adequate. (Letters 138, 151)

DSEIS pages 2-9, 3-17 and 3-33.

Proposed management activities will adversely affect the North Lochsa Slope Inventoried Roadless Area. (Letter 151)

Veg. ROD, Attachment 6, Page 19

103: Linkages and Corridors

Wildlife habitat connectivity between roadless areas should be considered. (Letters 104, 138)

Veg. ROD, Attachment 6, Page 12

Cumulative effects of logging and road building should be analyzed. (Letter 138)

Veg. ROD, Attachment 6, Page 15

104: Old Growth

Do Not Cut Old Growth. (Letters 38, 118, 119, 151)

DSEIS pages 2-29, 2-30, and 3-49

Existing Old Growth on CNF is Below FP Standard of 10%. (Letters 118, 139, 161)

Veg. ROD, Attachment 6, Page 13

I am concerned about Walde Ancient Cedar Grove. (Lettes 119)

The selected action does not harvest timber in verified and tentatively verified old growth forest stands. Large, old (“ancient”) cedar trees in this area, not already included in verified or tentatively verified old growth stands, are essentially limited to Riparian Habitat Conservation Areas. The trees would be retained in default PACFISH buffers.

Old Growth surveys/modeling are inadequate. (Letters 138, 139, 151)

DSEIS page 3-47; DSEIS PF 468

Table 3-20 (DSEIS page 3-49) contains errors. (Letters 139, 161)

These errors have been corrected in the FSEIS (FSEIS Appendix B).

I am concerned about tentative/replacement Old Growth. (Letters 139, 151)

Veg. ROD, Attachment 6, Page 13

I do not agree with cutting Old Growth. (Letter 118, 161)

Veg. ROD, Attachment 6, Page 13. The selected action does not harvest timber in verified and tentatively verified old growth forest stands. No changes in old growth forest structure would occur.

I am concerned about the fragmentation of Old Growth. (Letter 138)

The selected actions do not include timber harvest in verified and tentatively verified old growth stands. No changes in old growth forest structure would occur.

105: Biodiversity

Don't trade short term economic benefits for long term care of the land. (Letter 98)

Veg. ROD, Attachment 6, Page 18

The analysis shows insufficient concern for "wild biodiversity." (Letter 131)

Veg. ROD, Attachment 6, pages 12 and 14.

108: General Resource Protection

Maximize quality habitat protection and recovery of degraded habitats. (Letters 80, 101, 109, 115)

Veg. ROD, Attachment 6, pages 7 through 9, and 14

Nature and wildness have value (Letter 95, 99)

Veg. ROD, Attachment 6, Page 18

Logging and road building disregard environmental concerns (Letter 98)

Veg. ROD, Attachment 6, Page 28

Proposed activities should protect and restore aquatic habitats (Letter 115)

Veg. ROD, Attachment 6, Pages 7-9

109: Questions “Forest Health”

The ecosystem does not need “restoring” (part of the purpose and need of the project) if existing densities are similar to historic conditions (Letter 146)

Veg. ROD, Page 2-3

The document contradicts itself on recognizing the ecosystem as fire dependent but only mimicking wildfire, not letting them burn and calling intense wildfire uncharacteristic (Letter 146)

Veg. ROD, Attachment 6, Page 26

110: Natural Processes

Forest systems respond to disturbance effectively, including harvest and prescribed fire (Letter 117)

FEIS, Page 192, Comment 101

Let the ecosystem manage itself (Letters 118, 151)

Veg. ROD, Attachment 6, Page 28

Explain how project goals are superior to natural processes for ecological health (Letter 131)

Veg. ROD, Attachment 6, Page 28

Evaluate the degree to which natural disturbance events created existing conditions (Letter 138)

FEIS, Page 96, Paragraph 5

Evaluate likelihood of a future wildfire occurring within historic fire intervals (Letter 138)

Veg. ROD, Attachment 6, Page 27

Historic fire interval estimates may not be accurate (Letter 138)

FEIS PF 753 & 754; SEIS PF 170A, pg 5. Research, via several public scoping episodes, continued literature reviews and professional contacts, to refute or substantially refine historic fire data, were unsuccessful. Based on continued efforts to validate fire interval estimates throughout the analysis, the IDT could not find substantiated rationale to alter fire interval estimates.

Patch size analysis does not cover the size or effects of the previous or proposed logging (Letter 138)

SEIS, Page 3-6 and 3-7

Proposed harvest and road building activities are dissimilar to disturbances (Letter 138)

Veg ROD, pg 16 (“Diagnoses have...); FEIS page 176 (#40); SEIS 1-18, 3-18 to 20, 46 and 47. Road building activities have neither been depicted nor implied as a natural disturbance. Road access is a management activity to access certain timber harvest activities.

Erosional events after wildfires are a natural part of the ecosystem, FS management activities should not exacerbate erosion (Letter 151)

Veg. ROD, Attachment 6, Page 8, 9, 24

There is no scientific evidence in the SEIS that shows logging replicates natural fires (Letter 161)

FEIS, page 178 (#48); FEIS PJ, Doc 754; SEIS 2-16 to 18, 3-46 & 47. Logging (timber harvest), in an ecosystem management context, is a tool applied at the scale, intensity and frequency of the typical fire regime disturbances typical for an LTA. Timber harvest is not intended to “replicate natural fires”.

Treating vegetation will have little influence on stand-replacing fires since fire suppression has only occurred within the last 70-90 years; this is still within the estimated stand replacement fire interval (Letter 161)

Veg. ROD, Attachment 6, Page 27

112: HRV – Historic Range of Variability

HRV is being used in a confusing and inaccurate manner (Letter 80, 161)

SEIS, Pages 3-1 through 3-15

Forest “historic levels” are unknown and we may not be able to achieve those levels (Letter 120, 161)

Veg. ROD, Attachment 6, Page 18

Forest doesn’t use credible scientific documentation regarding HRV. The arbitrary HRV is not defensible and is being used to drive action alternatives (Letter 138, 161)

SEIS, Page 3-8, Paragraph 1. Research, via several public scoping episodes, continued literature reviews and professional contacts, to refute or substantially refine HRV estimates, were unsuccessful. Based on continued efforts to validate HVRs throughout the analysis, the IDT could not find substantiated rationale to alter historic forest features and characteristics.

No evidence to characterize pre-1900 vegetative conditions (Letter 161)

FEIS, Page 194, Comment 108. Research, via several public scoping episodes, continued literature reviews and professional contacts, to refute or substantially refine historic vegetation data, were unsuccessful. Based on continued efforts to validate vegetation estimates throughout the analysis, the IDT could not find substantiated rationale to alter historic vegetation characteristics.

Some age classes are predominant because of early wildfires, a natural event. The project is designed to prevent stand replacing wildfires but “historic conditions” are predicated on a condition created by wildfires. Inconsistency not explained. (Letter 161)

Veg ROD, pg 18 (Response to “The NLF project alone...); SEIS 1-1 (...range of alternatives that are designed to:”)

The SEIS is not precise in how it defines forest health, historic conditions, or HRV, or what criteria were used to define them. (Letter 161)

SEIS 1-6 to 20; FEIS, Pages 124-132, page 191 (#97)

Is forest health being within HRV or does it include human economic concerns as well? (Letter 161)

Veg ROD, pg 18 (Economics); FEIS pages 176 (#40), 191, (#97)

HRV is not long enough or accurate (Letter 161)

FEIS, Page 194, Comment 108

Assumptions about vegetation, pre-1910 and fire frequency may be inappropriate (Letter 161)

FEIS, Page 194, Comment 108

Managing for open ponderosa stands is inappropriate given the maritime climate and Lewis and Clark description of “dense thickets” of trees (Letter 161)

FEIS, Page 3-2 and 3-3

1001: Timber Production v. Recreation Use

Develop alternatives to wood products for consumers to use so that less timber harvest is needed. (Letters 63)

SEIS Pages 1-7 through 1-18, Purpose and Need for Action. Timber harvest is a tool that will be used to achieve ecosystem objectives.

People should consume fewer wood products so that less timber harvest is needed. (Letters 66)

SEIS Pages 1-7 through 1-18, Purpose and Need for Action. Timber harvest is a tool that will be used to achieve ecosystem objectives.

Timber sales will reduce recreation opportunities in the project area. (Letters 123, 138, 156)

Veg ROD, Response to Comments, Page 19.

SEIS Pages 3-351 through 3-353, environmental consequences for recreation. Timber harvest and prescribed burning effects on recreation are expected to be short-term. Some project activities may attract more recreationists to the project area.

Recreation activities in this area would produce more money than timber sales would. (Letters 97, 130)

Veg ROD, Response to Comments, Pages 18 and 19.

SEIS Pages 3-364 through 3-370, environmental consequences for community economics.

I am concerned about Road 500, west of Unit 101 and north of Mex Mountain. This part of Road 500 was not designed to support the higher traffic levels that would result from precommercial thinning activities. Also, the historic route of the Lewis and Clark Trail is nearby. (Letter 110)

Veg ROD, Response to Comments, Page 19.

Unit 101 will be dropped from the selected alternative because it is in lynx habitat.

1002: Timber Production v. Other Uses

I do not think this area should be used for timber production. (Letters 75, 100, 104, 105)

Veg ROD, Pages 16 through 18.

SEIS, Pages 1-7 through 1-18, Purpose and Need for action; Pages 3-16 through 3-17, environmental consequences of the No Action alternative.

Other uses of this area would create greater economic benefits than timber production. (Letters 74, 79)

Veg ROD, Response to Comments, Page 18

SEIS, Pages 3-364 through 3-370, community economics environmental consequences.

1003: Amenities v. Jobs/Economy/Timber

I do not think products from the National Forests should be sold for profit. (Letters 39)

Veg ROD, Response to Comments, Page 18

SEIS, Pages 1-7 through 1-18, Purpose and Need for action.

I agree with selling products from the National Forests for profit, but an in-depth economic analysis should be done first. (Letter 80, 138)

Veg ROD, Response to Comments, Page 18

SEIS, Pages 3-364 through 3-370, community economics environmental consequences.

The monetary value of amenities such as clean water, old growth, unlogged landscapes, and a “sense of wonder” should be considered as well as commodity values. (Letter 146)

Veg ROD, Response to Comments, Page 18

SEIS, Pages 3-364 through 3-370, community economics environmental consequences.

1004: FS v. State Mgt.

No comments regarding Forest Service versus State management were received.

1005: FS as Land Managers

A lack of active management in this area between 2012 and 2025 may lead to catastrophic wildfires. (Letter 46)

Veg ROD, Response to Comments, Pages 24, and 26.

SEIS, Pages 3-338 through 3-344, wildfire environmental consequences. SEIS, Pages 3-16 through 3-17, environmental consequences of no action for vegetation.

1006: Political Influence

Management of the National Forests should not be the result of political pressure. (Letter 52)

See ROD, pages 12-14, decision criteria

Tribes, federal agencies, and local citizens must work to ensure that critical fishery habitat is improved. (Letter 80)

Veg ROD, Response to Comments, Pages 7, 8, 9, NPTEC--1, NPTEC--3, and NPTEC—8.

1007: Interagency Relations

No comments about interagency relations were received.

1008: Community Relations

Visitors who come to this area to celebrate the Lewis and Clark Bicentennial will not like the visual effects of prescribed burning. (Letter 91)

Veg ROD, Page 19.

SEIS, Pages 3-351 through 3-353, recreation environmental consequences.

1101: Human Health & Safety (gen.)

No general comments about human health and safety were received.

1102: Noise

No general comments about noise were received.

1103: Danger from Mixed Traffic on Roads

I am concerned about logging truck traffic on Highway 12, and in the project area during the Lewis and Clark Bicentennial. (Letters 109, 136)

The IDT considered safety concerns during alternative development. The Wild and Scenic Rivers specialist's report offers several suggestions for improving safety during log hauling on Highway 12, including restrictions on hauling during the summer season and during the peak daily traffic hours (FEIS Project File, Document 730, Page 2).

1104: Danger from Helicopter Operations

I am concerned about helicopter landings in the Wild and Scenic River Corridor. (Letter 118)

FEIS, Page 22, "Safety"

1105: Potential for Fuel Spills

No comments about the potential for fuel spills were received.

1201: Noxious Weeds

Because of the magnitude and intensity of the project and no effective control plan, we fear the project will likely increase noxious weed infestation (Letter 80)

The SEIS, Ongoing Efforts, pg3-71, Effects Common to All Alternatives, pg 3-76 and 3-77 shows that there is an ongoing effort in the area and SEIS Appendix E documents an aggressive control plan.

The attempt to control the spread of noxious weeds is also praiseworthy (Letter107)

Thank you

Please include noxious weed control (Letter 118)

This comment was addressed in SEIS Effects Common to All Action Alternatives, pg 3-76 and 3-77

The FS does not evaluate the degree to which management activities are creating situation ripe for noxious weed infestation (Letter 138)

This comment was addressed in SEIS, Effects Common to All Action Alternatives, pg 3-76 to 3-84

The FS does not evaluate whether there is actually a need to use chemical treatment (Letter 138)

This comment was addressed in SEIS, Ongoing Efforts and Description of Proposed Action, pg 3-71, which shows an integrated pest management strategy.

The FS does not evaluate whether CNF Plan Appendix N is fully considered (Letter 138)

The SEIS, pg 3-68,. next to last paragraph, has a description of Appendix N, which is one of the documents forming the basis of the weeds analysis and documentation in the SEIS.

Feels that purpose and need statements 1 and 4 and 3 conflict with each other (Letter 138)

Comment is unclear.

I support addressing the noxious weed problem, but not with chemicals (Letter 146)

This comment was addressed in SEIS, Ongoing Efforts, pg 3-71 and 3-72, which shows an integrated approach.

The NLF relies on strategies to address weed control rather than prevention (Letter 151)

This comment was addressed in SEIS, Effects Common to All Action Alternatives, pg 3-76 to 3-84.

Project soil disturbing activities contribute to spread of noxious weeds (Letter 151)

This comment was addressed in SEIS, Effects Common to All Action Alternatives, pg 3-76 to 3-84.

The best way to deal with weeds is prevention (Letter 161)

This comment was addressed in SEIS, Effects Common to All Action Alternatives, pg 3-76 to 3-84.

Require all vehicles be inspected so logging trucks and pickups do not spread noxious weeds (Letter 161)

Regardless of stereotypes some may have of loggers, logging trucks are washed weekly by most truck drivers. Since these vehicles are driven on maintained roads the exposure to noxious weed is very low to start with.

Prohibit stock grazing in areas with noxious weeds (Letter 161)

This action is outside the scope of this analysis. This will be addressed when Allotment Management Plans are renewed.

Prohibit ORV's from trails with noxious weeds (Letter 161)

The Clearwater NF and Lochsa District prefer an integrated approach to controlling weeds rather than an edict that locks out the public.

Require that all administrative sites (including dispersed camp sites) be made weed free within 5 years (Letter161)

The SEIS description of noxious weeds existing conditions, beginning on page 3-68 shows an aggressive integrated approach to weed control that includes weed control in campgrounds.

Quarantine all animals for 48 hours (Letter161)

Wildlife cannot be quarantined. Cattle grazing issues will be addressed at the time of Allotment Management Plan updates, since that is outside the scope of this decision.

Require palletized feed (Letter161)

Cattle grazing issues will be addressed at the time of Allotment Management Plan updates, since that is outside the scope of this decision.

Use volunteers and others in effort to eradicate weeds in specific areas (Letter 161)

Mechanical treatment means have been used in the Lochsa Corridor, and will continue to be used as appropriate. This is a very time consuming method and not very rewarding for volunteers.

Consult organic farming protocol for dealing with weeds (Letter 161)

All sources of information are being used to develop the integrated weed management approach discussed in the SEIS, pages 3-71 and 3-72.

Monitoring is a crucial element in weed control (Letter 161)

This comment was addressed in SEIS, SEIS, Ongoing Efforts, pg 3-71 and 3-72.

1202: Spraying for Weeds

Herbicides introduce chemicals into the forest environment, the Tribe believes that herbicides should be used as a last resort (Letter 80)

This comment was addressed in SEIS, SEIS, Ongoing Efforts, pg 3-71 and 3-72.

Repeated treatments along roads may cause a buildup of herbicides in the soil (Letter 80)

This comment was addressed in the FEIS, Chapter 6, pg 205, item 172.

The Nez Perce Tribe endorses the FS policy of establishing a 50 foot buffer zone along flowing waters to receive other than chemical treatment (Letter 80)

Thank you

The Nez Perce Tribe recommends the increased use of biological methods to control weeds (Letter 80)

The SEIS, Ongoing Efforts, pg 3-71 and 3-72, shows an integrated approach that includes biological methods.

Noxious weeds should be treated using chemical and mechanical methods (Letter 145)

Agree

Purpose and need is defined too narrowly, precluding selection of alternatives that do not use chemicals for weed control (Letter 161)

This comment was addressed in SEIS, Chapter 1, pg 1-17, first 4 paragraphs and bold statement on weeds, which established a need for aggressive weed control.

1203: Gopher Control

No comments were received for the DSEIS regarding gopher control.

1204: Site Prep/Release

No comments were received for the DSEIS regarding site prep/release.

1205: Insects & Disease

No comments were received for the DSEIS regarding insects and diseases.

1206: Root Rot

No comments were received for the DSEIS regarding root rot.

1301: Quality of Life

I have traveled extensively and my favorite place is Three Rivers in Idaho (Letter 43)

Appreciates existing places located within the Lochsa Wild and Scenic river corridor. Three Rivers is located outside the North Lochsa Face project area, but within the Lochsa Wild and Scenic River Corridor.

Logging the area would damage the hunting, fishing and aesthetic values of the area (Letter 96).

SEIS: Page 3-352

FEIS: Page 151, Paragraphs 2 to 3

FEIS: Page 151

FEIS: Page 148; SEIS Pages 3-271 to 272

Environmental consequences resulting from treatment proposals, including logging, to recreational hunting are disclosed in the SEIS, page 3-352, to fishing in the FEIS, page 151, and to the area's aesthetics or scenic quality in the FEIS, page 148 and the SEIS pages 3-271 and 272.

I have concerns regarding protection of threatened, endangered and sensitive birds, fish and carnivores as well as humans (Letter 115).

FEIS: Pages 114-123

FEIS: Pages 143 to 156

Environmental consequences resulting from treatment proposals to threatened/endangered/sensitive birds, fish and carnivores are disclosed in the FEIS pages

114 to 123. Social effects, which relate to “ourselves” wording in the comment are disclosed in the FEIS pages 143 to 156.

Due to the increased stress experienced by Americans as a result of the September 11th events and other events of this uncertain time in American history; Americans need roadless and wild places to experience and escape to (Letters 167, 175).

FEIS: Pages 141 to 143; 143 to 156

SEIS: Pages 3-298 to 300

Environmental consequences to roadless and social values are addressed in the FEIS and SEIS. The no action alternative considers the effects of no vegetative restoration activities, thus under the no action alternative natural processes would be allowed to continue without active management to restore the ecosystem.

1302: Spiritual

Nature is important to nurturing human spirits (Letter 86).

FEIS: 143 to 156

Environmental consequences to social values are addressed in the FEIS. The no action alternative considers the effects of no vegetative restoration activities, thus under the no action alternative natural processes would be allowed to continue without active management to restore the ecosystem.

1303: Future Generation

Concern is expressed that treatment proposals adversely affect the quality of the landscape for future generations express concern (Letters 50, 63, 75, 100, 140, 142, 167, 172).

SEIS Page H-1

The no action alternative considers the effects of no vegetative restoration activities.

1304: Sense of Place

Concern is expressed that proposed vegetative restoration treatments will result in changing the current “sense of place” expressed by those making comments; that a reduction in solitude would result in the roadless areas with man’s presence being more evident as a result of treatment in these areas (Letters 73, 98, 111, 117, 135, 138, 66).

SEIS Page H-1

The no action alternative considers the effects of no vegetative restoration activities, thus under this alternative the “sense of place” would be one that existed because natural processes were allowed to continue without active management to restore the ecosystem.

1400: Economics

Maximize utilization of forest products with any commercial value (letter 55)

The FEIS, pg 155, table 4.30, shows alternative 2 would produce almost \$20,000,000.

1401: Community Stability

Logging will not provide for long-range benefit of the Clearwater Valley (letter 109)

The Veg ROD, Attachment 6, pg 18, second comment, first paragraph shows that many non timber resources will continue to provide benefits to local residents and visitors.

Recreation and historical resources provide economic opportunities for local communities (letter 131)

See the FEIS, public involvement, pg 208, item 196 for discussion on this topic.

Hunting, recreation, OHV will provide constant source of revenue (letter 145)

agree

Community stability descriptions in the document do not justify timber harvest (letter 146)

FEIS, public involvement, pg 208, item 198, communities are dependent on timber resources, however, the purpose and need statement SEIS, pg 1-7 shows why there is a need to manage timber in the area.

Community stability data in the document support diversification, why do the action alternatives propose timber harvest (letter 146)

FEIS, Chapter 1, pg 15, community economics shows that the timber industry still plays an important part in the local communities.

Economic data is erroneous or outdated (letter 146)

The ID Team used the data and methodology developed in the regional office, see Veg ROD, Attachment 6, pg 18, second comment, first paragraph.

Calling the communities logging dependent is erroneous (letter 146)

Data shows that communities in the area are timber dependent, see FEIS, public involvement, pg 208, item 198.

Studies have shown that there is little relationship between timber harvest and employment (letter 151)

The FEIS, b. Estimated Economic Impacts, pg. 154, related jobs generated, shows that at the local level jobs are created or maintained by logging and manufacturing forest products.

1403: Economic Diversification

There are economically feasible ways to harvest trees without destroying the wilderness (letter 108)

This comment was addressed in Veg ROD, Attachment 6, Economics, second comment, pg 19, last paragraph

Destroying our national heritage will reduce tourism related opportunities (letter 131)

This comment was addressed in Veg ROD, Attachment 6, Economics, second comment, pg 19, last paragraph

Timber dependent communities are no different or more isolated than other small rural communities (letter 151)

The SEIS, Community stability, pg 3-358, paragraphs 2 and 3, shows recent studies that provide insight to local rural communities.

1405: Dependency on NF

Corporate profits should not be disguised as jobs for the local community (letter 105)

The FEIS, b. Estimated Economic Impacts, pg 154TSPIRS coefficients, shows that there will be a tremendous benefit to individuals and local school districts, etc.

Other economic publications dispute the economic analysis in the document (letter 146)

This comment was addressed in Veg ROD, Attachment 6, pg 18, second comment, third paragraph

1406: Benefits & Costs from Tourism/Recreation

Tourism is an economic contributor, but they come to see pristine land not logged land (letter 60)

The Veg ROD, Attachment 6, Economics, second comment, pg 19, last paragraph, shows that the scenic and historic resources will be maintained.

How does the cost of the sales compare to the potential lost revenue from tourism (letter 106)

This comment was addressed in Veg ROD, Attachment 6, pg 18, second comment, first paragraph.

The project is large and will have a negative effect on the local economy (letter 169)

The FEIS, b. Estimated Economic Impacts, pg 154, table 4.30 shows economic benefits will accrue to the local economy.

Myself and my friends do not come to see logged land (letter 169)

This comment was addressed in Veg ROD, Attachment 6, Economics, second comment, pg 19, last paragraph

1407: Benefits & Costs from Sale of Timber

Alternative 2 has better PNV than alternative 6 and economics does count for something (letter 46)

The NFMA, Sec. 6, (g),(3), E, (iv), provides direction that the decision to use various harvest systems will not be based on economics alone.

Economic benefit is probably minor and transient to the local economy, when compared to long-term health of the people and ecology (letter 131)

This comment was addressed in Veg ROD, Attachment 6, pg 18, second comment, first paragraph.

A reasonable range of alternative is precluded due to the need established to supply timber products (letter 138)

The FEIS, E. Purpose and Need statement, pg 11 provided the basis for this project.

The economic analysis did not disclose the cost of road building, firelines, other infrastructure, and future maintenance costs (letter 138)

This comment was addressed in FEIS, public involvement, pg 208, item 198

Short-term creation of jobs must be weighed against future declines in employment due to ecological degradation and lower timber producing capacity (letter 138)

This comment was addressed in Veg ROD, Attachment 6, pg 18, second comment, first paragraph

I oppose the economic justification for this project (letter 146)

This comment was addressed in Veg ROD, Attachment 6, pg 18, second comment, first paragraph

Many people want honest economics that also accounts for ecological cost (letter 146)

This comment was addressed in Veg ROD, Attachment 6, pg 18, second comment, first paragraph

Many people disagree with the idea of commercial timber harvest on National Forests (letter 146)

The FEIS, E. Purpose and Need statement, pg 11 follows direction in the Organic Act, NFMA, and other laws.

1408: Effect on Timber Industry

Alternative 2 makes the best contribution towards providing timber for local small business (letter 46)

agree

1409: Effect on FS Timber Program

The claim to restore forests and improve watershed is a deception, this project is meant to boost the local economy through massive logging (letter 109)

This comment was addressed in SEIS Purpose and Need Statement, pgs. 1-7 and 1-8

1411: Economic Feasibility

The Forest Service should devise a plan that is more sensitive to the economic effects on environment (letter 79)

This comment was addressed in Veg ROD, Attachment 6, pg 18, second comment, first paragraph.

The habitat destroyed is more valuable than the economic benefit (letter 82)

This comment was addressed in Veg ROD, Attachment 6, pg 18, second comment, first paragraph.

The district should explain better what would happen if the removal of off site timber at Bimerick Meadows is uneconomical (letter 136)

This comment was addressed in Veg ROD, Attachment 6, pg 18, first comment.

The local economy has to benefit from this project (letter 145)

The FEIS, b. Estimated Economic Impacts, pg 154, table 4.30 shows economic benefits

1501: Archeo Sites – Protection

I am not in favor of logging because of the areas historic value. (Letters 71, 109)

The affects of proposed activities on historic sites, historic setting and other heritage resources issues has been analyzed as discussed in the SEIS pages 3-320 through 3-334.

The precommercial thinning north of Mex Mountain Work Center should not be conducted in order to protect the Lewis and Clark route. (Letter 136)

Unit 101 has been dropped from the selected actions because it is located in Lynx habitat. (ROD page ROD-5).

More thought should be put into the prescribed burning along Willow Ridge to protect historical resources. The presence of fire in this area is every bit as historic as the historical use of the old trail systems, but the statement that fire should have little effect seems like wishful thinking. (Letter 136)

The presence of fire is indeed a part of the historic condition of the landscape and the Lolo Trail National Historic Landmark. The use of fire is a means of restoring and maintaining this historic character. Specific protection measures are outlined in the SEIS, and additional consultation with the Idaho SHPO and National Park Service will be conducted to identify specific protection measures prior to implementing the proposed actions. (SEIS Page 3-328 through 3-331).

The SEIS notes that several pre-european contact native american sites are in the area, how will they be protected? Have all the historic trails and heritage resources been identified, and how will they be protected? (Letter 161)

Specific treatments are prescribed for all known sites in areas of potential effect. These are outlined in the SEIS (Pages 3-324 through 3-328). However, since surveys have not covered the entire project area, not all of the historic trails and heritage resources have been identified. An agreement with the Idaho State Historic Preservation Office and the National Park Service states that surveys and consultation with the Idaho SHPO, Park Service and others will be conducted prior to approving the implementation of any phase of the North Lochsa Face project (SEIS Pages 3-328 through 3-329). Protection measures will be prescribed and agreed to through this process of “phased identification and evaluation”. A set of treatment options for the protection of heritage resources is also outlined in the SEIS (Page 3-330). Additional protection and consultation methods are further discussed on pages 3-332 through 3-333 of the SEIS.

1502: Inventory

Existing heritage resource surveys are inadequate. A complete heritage resources survey must be conducted before actions take place that could affect these resources. Modern systematic sampling methods, as recommended by Renfrew and Bahn, should be used. (Letters 127, 151)

Surveys in the North Lochsa Face area date from the late 1970’s to the present. It is true that some of the older surveys are inadequate based on our current knowledge and standards. All existing surveys in a project area are evaluated for their adequacy and additional surveys are planned where needed. The Renfrew and Bahn volume (Project File Volume 2, Document 83a) cited in this comment is an introductory level text that outlines a variety of techniques available to archaeologists in a very general sense. The standards for survey in North Lochsa Face have been agreed to in a memorandum of agreement between the Clearwater National Forest, the Idaho State Historic Preservation Office and the National Park Service (SEIS Pages 3-328 through 3-329; Project File Volume 2 Document 102, pages 1-5). Additional surveys are prescribed in that agreement prior to implementing individual North Lochsa Face projects. All surveys will meet Forest and State standards as well as the Secretary of Interior’s standards for historic preservation (Project File Volume 2, Document 83c Pages 1-62).

How can the SEIS fulfill NEPA requirements when there is a lack of heritage resource information on 85% of the area? (Letter 161)

The 15% of the North Lochsa Face project area that has been surveyed was an adequate sample from which to develop a model of the likely types and locations of heritage resources throughout the planning area (SEIS pages 3-320 through 3-324). This model, combined with the 128 known sites, provided adequate information with which to assess the likely effects of the project on heritage resources. This was then combined with a “phased identification and evaluation” approach that insures that additional surveys will be completed, protection measures will be prescribed, and consultation will be conducted with the Idaho SHPO, National Park Service, Nez Perce Tribe and others prior to approving the implementation of the individual elements of the North Lochsa Face project (SEIS 3-328 through 3-333). This approach is specifically designed for use in large project planning efforts in the implementing regulations for the National Historic Preservation Act (Title 36 Chapter 800.4b(2) of the Code of Federal Regulations).

When will heritage resource surveys be completed? (Letter 161)

Several of the project areas have already been surveyed. Additional surveys will be conducted, protection measures prescribed, and consultation completed prior to the approval of the implementation of individual elements of the North Lochsa Face project (SEIS Page 3-328).

Has formal consultation with the Nez Perce Tribe taken place with regard to heritage resources? (Letter 161)

The Nez Perce Tribe was consulted during all phases of North Lochsa Face planning (SEIS page 2-2). The Tribe was specifically consulted on heritage resources issues and participated in the analysis provided in the SEIS (Project File Volume 2 Document 94a page 1) and in the development of the memorandum of agreement for outlining additional survey and protection measures (Project File Volume 2, Document 101 page 4; SEIS Page 3-328). Additional consultation with the Nez Perce Tribe is called for as part of the additional survey and consultation for heritage resources as outlined in the SEIS Page 3-332.

1504: Lewis & Clark Nat’l Historic Trail

The Lewis and Clark Trail, and its setting, should be protected. (Letters 58, 62, 64, 70, 73, 105, 124, 127, 133, 135, 158)

Protection of the Lewis and Clark Trail, the Lolo Trail National Historic Landmark, and other heritage resources is outlined on pages 3-324 through 3-334 of the SEIS.

The corridor of the Lolo Trail National Historic Landmark averages to 6 miles wide and no prescribed burning should occur within that corridor. (Letter 127)

The Lolo Trail National Historic Landmark has an officially designated boundary that follows section, half section and quarter section lines. On average the boundary is only approximately ½ mile wide, and the North Lochsa Face analysis area contains only 10,600 acres of the NHL. Management of the National Historic Landmark emphasizes the historic character and setting as it relates to the historic events for which the NHL is designated (SEIS Page 3-321). Fire was an important part of this landscape prior to suppression efforts in the 20th century. Returning fire to the landscape enhances the historic character of the landmark (SEIS Page 3-331).

Cultural values along the Lewis and Clark Trail would be adversely affected. (Letter 155)

Project File, document 102 is an agreement between the Idaho SHPO, National Park Service and the Forest that prescribes and agrees to the methods used to avoid and resolve adverse effects to cultural resources.

The precommercial thinning north of Mex Mountain Work Center should not be conducted in order to protect the Lewis and Clark route. (Letter 136)

Unit 101 has been dropped from the selected actions because it is located in Lynx habitat (ROD page ROD-5).

Where in the laws designating the historic trail does it allow for prescribed burning? (Letter 161)

Section 7(c) of the National Trails System Act of 1968 states that other uses which will not substantially interfere with the nature and purposes of the trail may be permitted (Project file Volume 2, Document 83b). Analysis of the use of fire in the Lolo Trail National Historic Landmark determined that returning fire to the landscape is a means of

restoring and maintaining the historic character and would not adversely affect the trail or NHL (SEIS Page 3-331).

1602: Treaty Rights

The analysis area is totally within the treaty-territory of the Nez Perce Tribe. The tribe has explicitly reserved rights to fish, hunt, and gather within the project area described in the SEIS. (Letter 80)

The commenter is correct in the statement that the analysis area is totally within the 1855 treaty territory of the Nez Perce Tribe. The SEIS on pages 3-353 to 3-357 discloses the American Indian Treaty Rights Existing Conditions and the environmental consequences to the American Indian Treaty Rights of both the No Action and the Action Alternatives.

When addressing tribe's treaty rights the Forest Service has a trust responsibility to protect – not degrade – the habitats that support fish species subject to treaty rights. When addressing anadromous fish habitat needs, various means may be used, but the final choice may not balance treaty rights with other economic interests, but must turn to the biological needs of the fish. (Letter 168)

The SEIS describes the environmental consequences on fishing from the Alternatives on page 3-355. “Proposed activities are not likely to have an effect upon the ability of the Nez Perce Tribal member to exercise their rights to fish within and near the North Lochsa Face area.”

1605: Coordination with Tribe

By virtue of its treaty and trust obligations to the Nez Perce Tribe, the United States and its agencies, including the Forest Service, have substantive duties to consult with the tribe and to implement measures to protect and enhance tribal resources. (Letter 80)

The SEIS describes the Treaty Rights, Trust Responsibilities on page 3-354. The Environmental Consequences on the Treaty Tribal Rights is discussed on page 3-355 thru 3-356. The cumulative effects on the Treaty Rights are discussed on page 3-357.

The Nez Perce Tribe is disappointed that the Forest proceeded with development of the SEIS without substantive consultation with the Tribe. (Letters 80, 161)

The tribe has been significantly involved in the development of the Supplemental Environmental Impact Statement. In a letter dated March 2, 2001, the Tribe thanked to Forest for the opportunity to provide input into the development of the SEIS for North Lochsa Face (Project File Volume 6 Document CA-8). At several points, draft sections of the SEIS concerning cultural resources, economics, treaty rights and environmental justice were forwarded to Tribal officials for review and comment (Project File Volume 6 Document CA-15, CA-16, CA-17, CA-19; Volume 2 document 94a). Forest Service representatives met with Tribal officials on several occasions including November 28, 2001 and May 9, 2002 to discuss issues related to North Lochsa Face and the SEIS (Project File Volume 6 Document CA-24; Volume 7 Document CB-13). The tribe submitted substantial comments for the North Lochsa Face SEIS on February 28, 2002 (Project File Volume 6 Document CA-80 pages 1-28). In the cover letter transmitting these comments the Tribe expressed their appreciation for the opportunity to review and comment on the SEIS.

Additional consultation is also outlined in the SEIS on page 3-356 under the Past, Present, and Foreseeable Future Actions the report which states: “However, consultation with the Tribe would be initiated with each sale proposal, and appropriate design or mitigation measures would be implemented to minimize or eliminate any adverse effects.” There is additional mention of the fact: “Currently, the Forest is working with the tribe on a strategic plan for the bicentennial period which includes protection and monitoring of these sites.” (referring to important tribal sites) on page 3-357. Additional consultation with the Tribe is called for on page 3-332 of the SEIS to insure discussions about protection of cultural and traditional sites.

1700: Roadless – General

Roadless areas must be protected (Letter 105)

DSEIS, pages 3-306 to 3-319. This section discusses impacts and management of roadless areas for Fish Creek, Bimerick and Face Drainages and for the entire North Lochsa Slope roadless area.

Roadless boundaries must be validated (letter 138)

Roadless area boundaries were established in the 1979 RARE II evaluation. The North Lochsa Slope roadless area boundary was established in the GIS system using hard copy quad maps specific to the forest in 1994. The Clearwater National Forest created a GIS layer displaying the all forest roadless areas in 1998 and 1999 using local maps. This GIS layer of roadless areas was used to display roadless areas during the development of the 2001 Roadless Area Rule and is currently used for project analysis.

Forest plans permit but do not mandate development of roadless areas (letter 138)

No timber harvest will occur in roadless areas (ROD page ROD-7).

1701: Wilderness Characteristics

Road construction and timber harvest will not preserve wilderness values in the N. Lochsa Slope Roadless area (Letters 42,62, 80, 90, 118133, 139, 143, 161, 166, 172)

No timber harvest will occur in roadless areas (ROD page ROD-7).

Roadless areas provide habitat for wildlife, plants and to preserve biodiversity. (Letters 138, 139,151, 158, 174)

SEIS pages 3-53 to 3-62, 3-87 to 3-158 describe wildlife and sensitive species habitat.

NEPA analysis, cumulative effects and irreversible/irretrievable commitment of resources, of the roadless area is inadequate and violates NEPA. (letters 161)

SEIS pages 3-298 and 3-299 discuss how the Forest Plan did not make irreversible or irretrievable commitment of resources.

1702: Wilderness Designation

NLF roadless area should be evaluated for wilderness designation (letters 38, 138, 139)

SEIS pages 3-298 to 299 discuss Forest Plan Direction to not recommend NL Slope roadless area as wilderness.

SEIS does not analyze the impacts to potential wilderness suitability (letters 151, 161)

SEIS pages 3-306 to 3-319 discuss impacts to wilderness characteristics.

1703: Development Adjacent to Roadless

Logging inside roadless area negatively affects its naturalness (Letter 161).

There will be no timber in harvest in roadless area (ROD page ROD-7).

1704: Leave Roadless Alone

Do not log or burn in NL Slope roadless area (Letters 26, 28, 38, 62, 94, 96, 104, 117, 118, 123, 131, 135, 139, 151, 158, 165, 172, 176, 177) .

There will be no timber in harvest in roadless area (ROD page ROD-7).

1705: Timber Harvest in Roadless

Ecosystem impacts from logging will be long-term; timber sale is too large (Letters 33, 80, 92, 125,).

There will be no timber in harvest in roadless area (ROD page ROD-7).

1706: Roadless Policy

NLF roadless area should be protected from logging as described in the Roadless Conservation Rule (letters 107, 125 and 138).

There will be no timber in harvest in roadless area (ROD page ROD-7).

1707: Burning in Roadless

SEIS does not demonstrate why the NLF roadless area needs fuel reduction by burning (letter 151).

The DSEIS describes the role of natural fire in maintaining ecosystems and the changes in the project area due to fire suppression. These changes have created the need to introduce fire back on the landscape. DSEIS pages 3-335 to 3-344.

1801: Hazard Reduction (fuel reduction)

The majority of the area is still in its natural fire interval this contradicts the need to reduce severe fire risk. (Letter 80, 168)

The SEIS p. 1-24 states the proposed prescribed burning acres within the analysis area. An analysis of aerial photos was done to determine the stands that had missed their fire return interval primarily due to effective fire suppression. Fuel reduction by prescribed fire will be used only in stands that are outside of their normal fire regime. See PF Vol.1 Doc 24 Page 1-33.

SEIS implies that logging will reduce fire risk this isn't true. (Letter 151)

Due to the random nature of lightning it is impossible to predict where wildfires will start. Approximately 25 wildland fires will burn in the analysis area every year. If a wildfire starts in an area where fuel loads have been reduced by logging and slash disposal has been completed there is improved probability under most weather conditions that initial attack fire suppression efforts will be effective. SEIS p. 3-339, Veg ROD p. 27

1802: Ecosystem Burning

I would like to commend the Forest service for including the recognition of the historical and crucial role of fire in the ecology of a boreal forest. (Letter 107)

The North Lochsa Face SEIS does recognize the importance of natural and prescribed fire in the ecology of the boreal forest.

1803: Prescribed Burning

Prescribed burning is wise and necessary; the statement that burning should have little effect to ancient trail system is wishful thinking. (Letter 136)

Wildland fires have burned across the landscape since the beginning of time. Most ancient trail systems have seen multiple fire events. The prescribed burning will be accomplished in a controlled manner that will have less intensity than many of the previous natural wildland fire events. No hand or mechanical fireline will be constructed and a qualified archaeologist will be on site to monitor the prescribed fires. The greatest danger to the site is continued fire suppression that only delays and provides additional fuel to an inevitable wildland fire that will cross the trail system. SEIS p. 3-326 - 331

Why is logging needed when prescribed burning could provide habitat? (Letter 138)

The Clearwater Forest Plan provides management direction under which the Forest will be managed. It sets forth the general direction for managing all of the Forest resources, and consists of both Forest-wide and area-specific goals, standards, and guidelines that provide for land use with anticipated resource outputs. SEIS p. 1-5.

Prescribed burning should follow a strict schedule. (Letter 145)

The prescribed burning will follow a schedule. SEIS p. 3-193. Weather conditions will be the primary factor determining the exact day of ignition and the sequence of unit's ignitions. Veg ROD p. 7

I support prescribed fire. (Letter 146,151,177)

The North Lochsa Face FEIS takes an aggressive approach to prescribed management ignited fire and natural fire use events.

The SEIS does not analyze impacts of the extensive prescribed fire program in the Lochsa to produce elk forage. (Letter 161)

The SEIS did not analyze the effects prescribed fire has on elk forage production. The SEIS takes an ecosystem management approach to managing Forest health. Elk forage conditions were only viewed over the entire analysis area and by major drainage. SEIS p. 3-97 – 103. Any elk forage that is produced as a result of prescribed burning for forest health is a positive addition.

The SEIS proposes to prescribed burn and timber harvest in thousands of acres of roadless areas...no roads should be allowed and maximum PACFISH buffers should be utilized, not cause unnecessary harm to fish and wildlife. (Letter 168,177)

No timber harvest or road construction in roadless areas is proposed in the final ROD. No road construction is proposed for prescribed burning activities. Default PACFISH riparian habitat conservation areas will be observed. Veg ROD p.21. Ignition of prescribed burns will not take place within PACFISH buffers. SEIS p. 3-287. Wildlife is adapted to fire. No unnecessary harm to wildlife is anticipated from the prescribed burning.

To remove off site trees burning alone or with cutting or girdling would be reasonable. (Letter 172)

The final ROD does not propose any timber harvest in roadless areas. The off- site pine in the Bimerick Creek area will be burned. Some trees may be cut or girdled prior to ignition to provide a fuel bed. The trees that survive the prescribed fire will be girdled. The site will then be planted.

1807: Wildfire

EIS glosses over benefits of stand replacing fire to down woody material and species that thrive in burned stands. (Letter 161)

SEIS p.3-5 discusses the ecological importance of dead wood both standing and on the forest floor. SEIS table 3-12 lists the effects of vegetation management including fire to standing dead and woody debris. SEIS p. 3-87 –3-159 discusses wildlife existing condition and environmental consequences. Wildlife species that benefit from fire and thrive in burned areas are listed here with a discussion of how the fire-killed wood provides benefits.

Question whether non-lethal fire played much of a role in this area. (Letter 161)

EIS p. 3-335 paragraph 1 addresses non-lethal fire. Both lethal and non-lethal fire played major roles in the fire history of the North Lochsa Face analysis area. Tables 1-3 through 1-7 of the SEIS list the characterization of the land type association including the fire regime in years and the intensity of the fire. All landtypes experience lethal stand replacement fire. Generally lethal stand replacing fires occur at long time intervals when systems operate under natural conditions. Historically the breaklands and mid slopes had frequent fires of low to moderate intensity. Past suppression actions have changed the fire regime on these landtypes the most. Without the frequent low intensity fires to remove undergrowth the stands on these landtypes are moving toward a lethal stand replacing fire regime. The suppression of non-lethal fires on the other landtypes has had relatively little impact to their fire regimes. Over 50% of these old surfaces have burned since 1910. These areas can be expected to burn in a stand replacement fire again in approximately 200 to 300 years if weather patterns remain at historic normals.

The importance of non-lethal fire is a matter of scale. The moist old surfaces that have burned or been logged are not significantly affected by non-lethal fire and in our life span will not be affected by lethal fire. The breaklands and mid slopes have already been greatly affected by the absence of non-lethal fire. The breaklands and mid slopes can be expected to burn in the foreseeable future. The changed fuels condition resulting from fire suppression is changing the fire regime in these fire regimes from non-lethal to lethal. These areas offer the greatest opportunity to reduce fuel loads and slowly reintroduce fire.

SEIS p. 3-335

Lodgepole pine research in Yellowstone found stand replacing or severe fires are more of a function of weather not fuel loads (Turner et al. 1994). GAO report page 3-5 not best science. (Letter 161)

SEIS p. 3-5 states: “The most extensive and serious problem related to the health of national forests in the interior West is the over –accumulation of vegetation, which has caused an increasing number of large intense, uncontrollable, and catastrophically destructive wildfires.” This statement from the GAO report correctly states the problem. It does not deal with the relative comparison of fire severity. Yellowstone research compared similar stands of decadent lodgepole pine with similar fuel loads and concluded that fire severity was a function of fire size and fire size was a function of weather. No large lodgepole pine stands (fire group three, and four) exists in the analysis area. There are three factors that effect fire behavior these are fuel, weather, and topography. All three factors work together to determine fire severity. A hot dry day alone without a large fuel bed will not create a large wildfire; fuel must be present before a fire problem can exists.

Lodgepole pine research Yellowstone (Turner et al. 1994)

The effects of wildfires in roadless areas are much lower and do not result in the chronic sediment delivery hazards exhibited in areas that have been roaded. Roaded areas have a high potential for restoration action. (Letter 151)

SEIS p. 2-15 – 2-37 proposes prescribed fire in the roaded and roadless portion of the analysis area. Restoration actions were balanced across the management area. Prescribed fire is the only management option in the Fish / Hungry roadless area due to the settlement agreement SEIS p. 2-4.

Biggest threat to resource values is Alternative 1 (Letter 46)

The final ROD selects alternative 5.

Explain how the goals of harvest and burning are superior to the natural process for ecological health. (Letter 131)

The Clearwater Forest Plan provides management direction under which the Forest will be managed. It sets forth the general direction for managing all of the Forest resources, and consists of both Forest-wide and area-specific goals, standards, and guidelines that provide for land use with anticipated resource outputs. SEIS p. 1-5. Wilderness areas are lands where management direction views natural process superior to person made processes. No designated Wilderness areas exist in the analysis area.

Explain the difference between the mimicked historic fires and the natural wildfires. (Letter 131)

The prescribed burning in most cases is intended to mimic natural events. The primary difference is that the prescribed ignitions will be implemented in multiple stages to slowly reduce the fuel loads. Also the prescribed burning on the old surface landtypes will not be as large as the historic patch size. SEIS p. 1-13 Veg ROD p. 7

1808: Suppression

Normal ecological process involves high intensity wildfires but EIS emphasizes the need to suppress catastrophic wildfires. (Letter 131, 80)

The SEIS (page 1-13) states that the primary ecological process within LTA 71B/71C is high intensity wildfires at intervals of 76 to 200 years along with periodic mountain pine beetle attacks, windthrow and stem breakage. The SEIS is designed to manage the analysis area not at the extremes but in the middle. It is not socially acceptable or logical to manage the forest for mountain pine beetles or high intensity fires. Both of these are natural events that have many undesirable consequences. Our management efforts are focused at desirable outcomes with the understanding that natural processes will still often override our best efforts. By definition a catastrophic wildland fire is a stand replacing event with a disastrous end. Not all stand replacement fires are catastrophic. A catastrophic wildland fire requires a suppression response to limit the negative impacts. It is our responsibility to insure that catastrophic events do not happen more often or at greater intensities and size than historically.

EIS never discloses whether fire would be suppressed under the action alternatives as under the no action alternative. It is contrary to the Forests obligations to restore aquatic habitat to conduct fire prevention activities where they are not necessary. (Letter 138, 131, 168)

Federal Fire Policy that directs suppression actions is outside of the scope of the North Lochsa Face SEIS. Federal Fire Policy the Clearwater Forest Plan and the Clearwater Fire Management Plan provide direction regarding fire suppression policy. The North Lochsa Face SEIS p. C-1 does propose a site specific Forest Plan amendment for all action alternatives that does change the target maximum burned acres to “unscheduled”

for all management areas within the analysis area except E1 and M1. This may change fire suppression actions to a less aggressive mode based on cost plus loss analysis of each fire. A Fire Use plan will also be put in action for a portion of the analysis area. Veg. ROD p. 26. The no action alternative would follow current Forest Plan Direction. Veg. ROD p. 21

The FS should develop a science based fire management policy through the Forest Plan amendment process. (Letter 138, 151)

Federal fire management policy is outside the scope of this analysis.

Declining elk habitat conditions brought about by 60 years of effective suppression is a significant factor in this reduction.(Letter 147)

Effective fire suppression has played a partial role in the decline of elk habitat conditions. The brush fields that were created by the large stand replacing fires in the first part of the 20th century led to a large elk population. Over half of the analysis area burned between 1910 and 1934. As time progresses these brush fields are becoming timbered stands and the brush (the primary food source of the elk) is dieing out or becoming decadent. Even without fire suppression the elk populations would have declined as tree succession advanced. The fire regime for much of the analysis area is greater then 200 years. The managed forest and previously burned areas would therefore not support large fire growth for several generations. Fire suppression did decrease the acres burned in the analysis primarily in the breaklands but most probably not on the scale of the 1910 and 1934 fires.

The North Lochsa Face SEIS manages the land for multiple resource objectives. When the large fires burned they were considered catastrophic unwanted events that had many negative impacts. The boom in elk populations was a surprising positive impact. It would not be reasonable to expect that it would be desirable to have such large wildland fires again that benefit one resource but have negative impacts to many resources.

Map on page A-13 is unreadable.(Letter 161)

The map on page A-13 is very difficult to read. The fire history map in the EIS on the last page of chapter 3 is a much higher quality map. Maps with greater detail may be obtained from the project file.

EIS is inconsistent and unclear on recent fire suppression and its impacts. (Letter 161)

SEIS p. 3-335 states that 450 natural fires have been suppressed in the analysis area between 1955 and 1994. This time frame had the only reliable data at the time the document was prepared. No statistics on the number of person caused fires was given. The large fire history map SEIS p. A-13 displays that only 2 wildland fires (one of these was person caused) became large fire events since 1934. This very successful fire suppression effort has led to a biomass and fuels build up across much of the analysis area. Veg. ROD p. 2. SEIS p. 3-1 – 3-48 describe the existing vegetative condition.

SEIS claims a 70 to 90 year suppression history. Letter 161

SEIS p. 3-336 paragraph 3 states “stand densities in the North Lochsa Face analysis area are generally increasing, largely due to successful suppression of fire over the last 60 years

1809: Managed Wildfire

Let naturally occurring fires resume their role in the Lochsa River drainage.(Letter 151, 131)

The North Lochsa Face FEIS p. 33, 35, 37, 173 states that a prescribed natural fire (PNF) plan will be prepared for the analysis area. Federal Fire Policy has change since the original North Lochsa Face document was prepared. Prescribed Natural Fire has been changed to Fire Use. Federal Fire Policy states that when an approved Fire Management Plan is in place a Fire Use Plan can be put into action. The Clearwater Forest Plan and the Clearwater Fire Management Plan allow for Fire Use in most management areas in the Forest. Portions of the analysis area will be included in the current Clearwater Forest Fire Use Plan. The exact boundaries of the Fire Use Area have not been determined at this time. An area that meets Forest Plan direction, has defensible boundaries and is large enough to have successful Fire Use events will be determined prior to inclusion in the Fire Use Plan.

201: Water Quality

Cumulative effects will harm the Lochsa River (Letter 111)

Cumulative effects to the Lochsa River were previously discussed (Veg. ROD, Attachment 6, Page 3).

Research whether the proposed action will improve water quality (Letter 118)

This topic was previously discussed (FEIS, Page 181, Comment 61; 186, Comment 75).

Logging if Fish Creek could negatively affect water quality (Letter 33, 138)

This comment was previously discussed (Veg. ROD, Attachment 6, Page 8).

Logging and motorized access has not created all the stream problems in the area (Letter 145)

This comment was previously discussed (Veg. ROD, Attachment 6, bottom of Page 6).

Was a changed condition analysis completed for the WATBAL analyses in the SEIS (Letter 161)?

Yes, the existing condition sediment values were updated for the SEIS WATBAL analysis (SEIS, Page 3-189).

Sediment increases are being allowed in streams not within Forest Plan standards (Letter 161)

The Vegetation ROD, Attachment 6, Pages 2 through 4, discusses this issue in detail. In summary, the preferred alternative will not measurably increase sediment in any analysis area streams.

202: Water Quantity (vol. & timing)

Unclear as to whether the ECA procedure used underestimates water yield increases from past logging activities (Letter 126)

The Forest does not use the ECA procedure to estimate water yield. Instead WATBAL is used and relies on peak flow values to determine whether or not there will be channel-changing effects to analysis area streams. None of the WATBAL model runs indicate a peak flow increase over 15%, which is the generally accepted increase at which channel changes would be measurable (SEIS, Pages 3-207 through 3-258). ECA values are reported in the SEIS as requested by the National Marine Fisheries Service.

203: Sedimentation

Road obliteration is sometimes not justified if roads are grown over with brush. Disturbing them could increase sediment (Letter 25)

This comment was previously discussed (Veg. ROD, Attachment 6, Page 1 and 2).

Logging could cause sediment in area streams (Letter 157)

This comment was previously discussed (Veg. ROD, Attachment 6, Page 9).

There is no significant difference between Alt. 2 and 6 concerning the impact on water quality and fish populations given the logging equipment used today (Letter 80)

The effects alternatives on water quality and fish are found in the SEIS (Pages 3-201 through 3-267). Neither Alternative 2 nor 6 would add measurable amounts of sediment to streams or affect fish populations.

Huntington (1998) uses the forest data to show that watersheds where wildfires have occurred are in better condition from a sediment perspective than those with timber harvest or prescribed fire (Letter 80)

Past timber harvest has contributed sediment to streams primarily as a result of narrow or no buffers on streams and through road building activities. Current management activities implement large PACFISH buffers, obliterate unnecessary roads, and removes sediment traps to minimize sediment input into streams. Current practices are expected to improve sediment trends in degraded watersheds. Sediment conditions can take decades to improve in both watersheds with only wildfire and those with management activities.

PACFISH buffers don't occur in areas of past management. Sediment will continue to be delivered to streams in these areas (Letter 80)

The baseline information for the WATBAL existing condition include areas of past management in the analysis (SEIS, Page 3-185 and 186). WATBAL estimates no measurable increase in sediment production under any of the action alternatives.

Road failures continue to occur off Forest Road #101 (Smith Cr.). These failures could deliver enough sediment to violate the "no measurable effect" standard (Letter 80)

Large road failures on the Smith Creek Road occurred during the 1995/96 flood events. Corrective actions were taken to fix those areas. The road is a major access route onto national forest lands and receives a high level of maintenance. **There have been few/no failures since the flood events.** WATBAL was not designed to model landslide events

The ROD should indicate if the WATBAL guide has been updated to include a more realistic assessment of stream routing (Letter 126)

The WATBAL guide has not been updated; however it is never used alone as the district or forest hydrologist always uses professional experience and interpretation when running the model (FEIS, Page 183, Comment 65). WATBAL incorporates existing road information in the model but does not account for road obliteration activities. It therefore overestimates sediment production (Veg. ROD, Attachment 6, Page 5).

Are WATBAL sediment values accurate for watersheds within the in rain-on-snow elevations (Letter 126)?

WATBAL sediment values have been validated over time in watersheds within rain-on-snow elevations, such as Pete King and Lolo Creek drainages. The model is validated against actual long-term sediment data taken at gauging stations throughout the forest. We feel the sediment values are accurate for rain-on-snow elevations.

Increases in sediment in Walde, Nut, Pete King, Canyon, SF Canyon, WF Deadman, Fish and Glade Creeks are not consistent with the Clean Water Act (Letter 139)

This comment was previously discussed in the Vegetation ROD, Attachment 6, Page 4

The Forest Service must acknowledge that sediment input after a large wildfire is natural. Their management activities should not exacerbate the sediment situation (Letter 151)

This comment was previously discussed (Veg. ROD, Attachment 6, Page 2 and 3). No measurable increase in sediment will be produced under the preferred alternative.

The SEIS fails to support the conclusions that harvest in the Lochsa River face drainages will not increase sediment delivery and potential for landslides (Letter 168)

The effects analysis shows that no measurable increase in sediment will occur under the preferred alternative (SEIS, Page 3-258 through 3-261). The Vegetation ROD (Attachment 6, Page 30) discusses PACFISH buffers and their affect on mass surface movement (landslides).

The SEIS uses pre-1995/96 data to describe current watershed conditions and underestimates likely adverse impacts from sediment (Letter 168)

Stream habitat surveys provide the baseline stream information necessary for the fisheries and watershed specialists to complete effects analyses for their resources. Adequate habitat surveys have only been conducted since 1990 and are generally scheduled to occur on a stream every 10 years. Outside of special monitoring projects, these surveys provide the most current available data for our use. It is not likely that WATBAL underestimates sediment as it cannot model either PACFISH buffers or road obliteration

activities which are designed to minimize and reduce potential sediment impacts (Veg. ROD, Attachment, Page 5).

204: Channel Stability

The cobble embeddedness standard changes for Pete King Creek depending on the part of the SEIS consulted (Letter 161)

The Forest Plan standard for sediment (not to exceed 55% over natural) is not the same measurement as cobble embeddedness (not to exceed 35%). Cobble embeddedness estimates come from habitat survey data while sediment production is modeled. The standard remains the same for Pete King throughout the document. Table 3-83 (SEIS, Page 3-223) shows the existing cobble embeddedness levels in the different tributaries of Pete King Creek.

205: WQLS

The SEIS does not disclose how temperature impacts were analyzed. The SEIS fails to layout a “tool” to measure water temperature changes (Letter 139)

Water temperatures are not measured since it is assumed, and science shows, that PACFISH buffers are adequate to prevent stream temperature changes (Veg. ROD, Attachment 6, Page 10)

206: BMP's

Based on increase landslide activities in 1995/96, BMP's are not adequate to prevent landslides from delivering sediments to streams.

The effectiveness of BMP's can be found in the SEIS (Page 3-191). Prior to 1995/96, state Forest Practice Act buffers were used, as opposed to the much larger PACFISH buffers used for this project. PACFISH buffers would protect stream processes, but would not prevent landslides from occurring. Landslides are a natural event and PACFISH buffers will provide the components necessary to improve or maintain aquatic habitats. Other BMP's such as avoiding high landslide hazard areas will also reduce the landslide risk.

Were the Clearwater Forest BMP audits peer reviewed and were the sites selected at random?

The timber sales chosen for BMP audits were selected at random and are generally reviewed internally. In some instances, IDEQ and IDL representatives have attending the audits. Copies of all BMP reports were sent to IDEQ, NMFS, and the USFWS. Five forest service timber sales were independently audited under an IDEQ BMP audit; results are pending (SEIS, Page 3-191).

208: Cumulative Effects

Cumulative effects outside the analysis area should be considered, including projects on private lands and state highway projects.

The cumulative effects analysis area for the Lochsa River included the analysis area and the entire Lochsa basin (SEIS, Page 3-264). It includes activities on private lands.

210: Riparian Areas

The Tribe requests the use of 300' buffers on all streams to minimize impacts to the aquatic system.

This concern was addressed in the response to the Tribe's comments in the FEIS (NPTEC, Page 3, Comment 4). PACFISH buffers are adequate to protect and provide the needs for aquatic resources.

211: Watershed Restoration (including rd. decommissioning)

I support road obliteration, placing roads into long-term storage, and rehabilitating streamside areas (riparian planting).

Watershed restoration projects would be implemented under all action alternatives (SEIS, 2-10 through 2-12) including noxious weed control, road obliteration, long-term storage of roads, sediment trap removal, and riparian planting.

Will native tree species be planted in riparian areas along Fish and Pete King Creek? If not, then will they pose the same problems as those occurring in the Bimerick drainage (off-site pine in poor condition).

Native tree species adapted to the elevation and habitat type would be planted to avoid the problems associated with the Bimerick drainage.

The SEIS links watershed restoration with timber harvest proposals. This approach does not allow a watershed to restore or recover itself.

The effects analysis (SEIS, Pages 3-194 through 3-267) shows that under all action alternatives, watershed recovery would continue to occur and that timber harvest would not slow that recovery. In addition, active restoration activities will help to reduce the recovery time.

Restore and recover degraded watersheds as quickly as possible, especially in Pete King, Canyon, and Deadman Creeks.

Watershed restoration activities would occur under all action alternatives. These will assist watersheds on their continuing recovery trend.

Stop road building and maintain or remove roads already in place.

Road obliteration activities would occur under all action alternatives. Maintenance would also occur to prevent or minimize road surface erosion. Newly constructed roads will only be located on ridgetops away from live water. The majority of roads proposed for construction would be temporary in nature and would be obliterated after use (SEIS, Page 2-29).

Why is the forest undertaking restoration in roadless areas when there are roaded areas in need of restoration work.

Restoration work inside roadless areas include prescribed fire and riparian planting. Prescribed fire will reduce the potential for catastrophic wildfire in portions of the watershed and riparian planting will re-establish trees along Fish Creek that were previously killed by wildfire. Road obliteration activities will occur outside of roadless areas (SEIS, Appendix D-1). The Forest also has a strong road obliteration and culvert replacement program for roaded areas outside the North Lochsa Face analysis area.

2000: Range - General

There is no site specific range trend or carrying capacity discussion (letter 161)

This comment was addressed in FEIS, Chapter 6, Public Involvement, pg 211, comment 212.

The SEIS has not analyzed important aspects of shrub and range ecology (letter 161)

This comment was addressed in FEIS, Chapter 6, Public Involvement, pg 211, comment 212

2201: General Concerns

Carex hendersonii and Cypripedium fasciculatum will be negatively affected by logging in the Pete King drainage. Please do not log in this drainage (Letter 118):

The SEIS acknowledges the presence of Carex hendersonii and Cypripedium fasciculatum (page 3-55, 3-57) in the analysis area. The SEIS states that the action alternatives could impact known or suspected populations of these species (page 3-63). However, because Carex hendersonii is typically associated with moist areas protected by default PACFISH buffers, the effects of the planned actions are not expected to result in a trend toward federal listing or reduce viability for the population or species (SEIS page 3-63, paragraph 3). Individuals of Carex hendersonii may be negatively impacted, but overall population impacts are expected to be minor (SEIS pages 3-65, 3-67). Overall, Cypripedium fasciculatum populations are expected to benefit from the planned actions (SEIS page 3-63, paragraph 3; page 3-64, 3-67), although some individuals may be negatively impacted (SEIS, page 3-64, 3-67).

Full surveys should be conducted throughout the season for all threatened and sensitive plants. Rare plants are not given the protection they need. How do you know these plants won't be impacted?(Letter 138):

The SEIS reports that habitat evaluations for the three threatened plant species possibly occurring in the Clearwater National Forest conclude that there is a low probability of their presence in the North Lochsa Face area (page 3-53). Much of the analysis area has been evaluated for known populations of sensitive plants and all sensitive species have been assessed for possible occurrence and impacts (SEIS pages 3-54 through 3-67). The SEIS reports that individuals of some species may be negatively impacted by proposed management action, but overall populations will be minimally impacted (pages 3-54 through 3-67). Additional information on plant surveys is provided in the project file (FEIS PF, Vol. 8, Doc. 570; FEIS PF, Vol. 13, Docs. 783, 787; SEIS PF, Vol. 1, Doc. 65; SEIS PF, Vol. 16, Doc. 692; SEIS PF, Vol. 17, Doc. 754).

2500: Laws, Regs, Policy (General)

Corporate interests such as logging should be a lower priority for management actions on National Forest lands than other multiple uses. (Letters 52, 68, 84, 91)

See DSEIS, Page 1-1, Purpose and Need for action. The alternatives are designed to “manage forest vegetation to restore ecological structure, function, processes and composition; improve forest health; and reduce the risk of uncharacteristically intense wildfire...” Logging is a tool that can be used to achieve management objectives. Other management actions were considered by the IDT (see DSEIS Pages 2-7 through 2-9) but were not analyzed in detail.

Logging destroys the land. (Letter 87)

See Veg ROD, Attachment 6, Responses to Comments on the FEIS. Also see the DSEIS, Chapter 3, environmental consequences for each resource, and DSEIS Pages 1-19 through 1-23. Land management activities that were analyzed in the action alternatives are consistent with current laws, regulations, Forest Service manual and handbook direction, and the Forest Plan.

Cumulative sediment impacts on the Lochsa River should be considered. (Letter 161)

The cumulative effects analysis for the Lochsa River is included in the DSEIS on Pages 3-296 through 3-298. There would be no cumulative effects resulting in a decline of the outstandingly remarkable values of the Lochsa Wild and Scenic River.

The proposed off-site pine harvest would violate NEPA and NFMA. (Letter 173)

The environmental effects of the proposed off-site pine harvest are disclosed in the DSEIS in Chapter 3. All of the action alternatives meet NFMA requirements. The analysis of the off-site pine harvest is also consistent with requirements of NEPA.

In response to public concerns about timber harvest in roadless areas, the decisionmaker has selected Alternative 5, which does not include the off-site pine harvest in Bimerick Creek. Please note that the Alternative 5 map which was displayed in the DSEIS included the “species conversion” units in this area, which was an error. A corrected map of Alternative 5 is included in the Record of Decision.

2501: Legal Requirements

The Forest Service must comply with trust responsibilities to the Nez Perce Tribe, as well as Forest Plan standards, state water quality standards, the Endangered Species Act, the National Forest Management Act, the National Historic Preservation Act, and the Clean Water Act. (Letter 172)

The selected actions are consistent with the Clearwater Forest Plan, current Forest Service manual and handbook direction, and all Federal laws and regulations (ROD Pages ROD-30 through ROD-35).

The proposed actions in the SEIS have changed very little from those that were presented in the Veg ROD, which was reversed by the Regional Forester in July 2000. (Letter 92)

This statement is correct. In July 2000 the Regional Forester reversed the decisions that were presented in the Veg ROD, and directed the Forest Supervisor to prepare a Supplemental EIS that would clarify the environmental analyses related to road obliteration (DSEIS Page 1-3). Alternative 6, the new alternative that was added in the DSEIS, consists of the actions that were selected in the July 2000 Veg ROD, with modifications to address issues that have arisen since the FEIS was published. Alternative 6 responds to the issues of harvest in old growth and precommercial thinning

in lynx habitat. The effects of road obliteration have been clarified in the DSEIS, and the effects analyses for all of the alternatives have been updated.

The Forest Service has not demonstrated that logging in the inventoried roadless area is necessary to maintain or restore characteristics of ecosystem composition and structure as required by CFR 294.11(i) and (ii). (Letter 138)

All of the action alternatives meet the purpose and need for action, including the need to “improve forest health, reduce the risk of severe wildfire, and maintain and restore ecological processes, function, structure and composition.” (DSEIS, Page 1-7). The selected actions comply with current direction regarding road construction, reconstruction, and timber harvesting in inventoried roadless areas (DSEIS, Page 1-21 through 1-23). In response to public concerns about timber harvest in roadless areas, the decisionmaker has selected Alternative 5. The selected actions do not include timber harvest in roadless areas.

The analysis in the SEIS is not scientifically valid in the absence of monitoring that is required by the Forest Plan. (Letter 161)

Monitoring that is included in the selected actions is described on pages 2-12 through 2-14 of the DSEIS. The monitoring described in the DSEIS meets Clearwater Forest Plan requirements.

2502: NEPA

Page 1-25 of the SEIS says commercial thinning would retain 70% of the live basal area; page 2-18 says commercial thinning would retain up to 67% of the trees in the LTA. The statement on Page 2-18 could be interpreted to mean that no more than 67% of the live basal area trees will be retained, and that there is the potential to retain less than that. This discrepancy should be corrected. (Letter 157)

See FSEIS, errata, Appendix B.

The only alternative that did not include commercial thinning was discarded because it would not meet social values. Why didn't any of the alternatives propose commercial thinning in places besides drainages and roadless areas? (Letter 157)

Because “drainages” extend from ridgetop to ridgetop, all areas of the landscape are included in drainages.

Commercial thinning was proposed outside of roadless areas in all of the action alternatives. Alternatives 2, 3, 3a, and 6 also proposed commercial thinning inside of roadless areas, while Alternatives 4, 4a, and 5 did not propose any timber harvest within roadless areas. Alternative 5 has been selected by the decisionmaker. The selected actions do not include timber harvest in roadless areas.

The alternatives that were considered but eliminated from detailed study are described in the DSEIS on pages 2-7 through 2-9.

The range of alternatives was inadequate because no alternative was included that would not build roads or log the area. (Letter 161)

The no action alternative does not include road-building or logging. However, it would not meet the purpose and need for action (ROD, decision criteria, page ROD-12). A restoration-only alternative was considered by the IDT but was not analyzed in detail because it would not meet the purpose and need for action and would not respond to a significant issue (DSEIS page 2-9).

The North Lochsa Landscape Assessment (NLLA) was used to make “programmatic” decisions regarding Desired Future Conditions and the Historic Range of Variability. Because the NLLA was not a decision document, and did not go through NEPA, the site-specific actions proposed in the SEIS are in violation of the Forest Plan. (Letter 161)

The North Lochsa Landscape Assessment (NLLA) was completed in June 1996. The NLLA described relationships between landforms, vegetation, aquatic systems, wildlife species, disturbance regimes, and human influences (ROD, Attachment 6, page 17). The NLLA was used to develop Desired Future Conditions for the project area. The IDT considered this information when developing the purpose and need for action and the action alternatives for the North Lochsa Face project. The NLLA was not a decision document, and did not identify management actions that would occur on the landscape.

The North Lochsa Face FEIS did not tier to the NLLA watershed assessment (Veg ROD, Attachment 6, page 22).

The analysis in the SEIS regarding the irreversible and irretrievable commitment of resources in the roadless area is inadequate. (Letter 161)

The existing conditions and environmental consequences for roadless areas within the project area are described on pages 3-298 through 319 of the DSEIS. No irreversible and irretrievable adverse resource effects were identified.

2503: NFMA

An in-depth economic analysis should have been completed to determine if the project maximizes net public benefits. (Letter 138)

An economic analysis was completed for the North Lochsa Face project. It is included in the DSEIS on pages 3-357 through 3-3-370.

The analysis for effects on old growth dependent species is inadequate because only 3,710 acres provide old growth habitat and because the population trends of old growth indicator species have not been monitored. (Letter 139)

The effects analysis for old growth habitat is included in the DSEIS on pages 3-47 through 3-52. The selected actions do not include timber harvest in old growth.

Clearcutting is not the optimum method for removing off-site pine in Bimerick Creek. Management actions other than clearcutting should have been considered for removing the off-site pine in Bimerick Creek. (Letter 156, 172)

The IDT considered a reasonable range of alternatives for the North Lochsa Face project. All alternatives are consistent with Forest Plan direction and are in compliance with the 1993 Stipulation Agreement between the Forest Service and the Wilderness Society et al. (DSEIS, page 2-9). The alternatives that were considered but not analyzed in detail are described in the DSEIS on pages 2-7 through 2-9. The selected actions do not include

timber harvest in the Bimerick Creek drainage or any other roadless areas (ROD Page ROD-7).

Clearcutting in Bimerick Meadows will harm recreation resources such as hunting, fishing and hiking. (Letter 156)

The selected actions do not include timber harvest in the Bimerick Creek drainage or any other roadless areas (ROD Page ROD-7).

All alternatives except for no action include 2200 acres of clearcutting. (Letter 156)

Alternatives 1, 4, 4a, and 5 do not include any clearcutting.

The selected actions do not include clearcutting in the Bimerick Creek drainage or any other roadless areas (ROD Page ROD-7).

To implement the concept of "patch size," the Clearwater National Forest routinely overrides the 40-acre size-of-opening restriction. This violates NFMA, regional guidelines, and the forest plan. (Letter 172)

The Regional Forester's approval for exceeding the 40-acre size limitation was signed on December 23, 1998. It is included in the FEIS Project File (Document 670).

NFMA and USFS regulations require the maintenance of viable populations of management indicator species, sensitive species, and Threatened and Endangered species, including northern goshawk, fisher, wolverines, boreal toads, lynx, bald eagle, black-backed woodpecker, and flammulated owls. Without viability analysis or population surveys, the effects analyses for these species are inadequate. (Letters 172, 174).

The Forest Service is responsible to manage wildlife and fisheries habitat, not the populations themselves. The effects analysis for wildlife habitat is included in the DSEIS on pages 3-87 through 3-158.

Clearcutting in the Bimerick Creek drainage will cause sedimentation that will adversely affect beavers and boreal toads. (Letter 172)

The environmental consequences for aquatic resources in the Bimerick drainage are included in the DSEIS on pages 3-246 through 3-250. Alternatives 1, 4, 4a, and 5 do not include clearcutting in the Bimerick drainage. Timber harvest under Alternatives 2, 3, 3a, and 6 would be staggered to allow for stream recovery to occur between entries. There would be no changes in channel structure or function as a result of management actions (DSEIS page 3-249).

The selected actions do not include clearcutting in the Bimerick drainage.

The action alternatives fail to provide for a diversity of plant and animal communities; this is a violation of NFMA. (Letter 174)

All of the action alternatives would meet the purpose and need for action, which includes the need to “improve forest health, reduce the risk of severe wildfire, and maintain and restore ecological processes, function, structure, and composition” (DSEIS page 1-7).

2505: ESA

The analysis fails to disclose the potential direct, indirect, and cumulative effects of management actions on bull trout and their habitat. (Letter 139)

Potential direct, indirect, and cumulative effects of management actions on bull trout and their habitat are included in the DSEIS on pages 3-203 through 3-205, 3-223 through 3-224, 3-233 through 3-234, 3-240 through 3-241, 3-247 through 3-248, and 3-252 through 3-254.

The SEIS does not disclose whether consultation requirements under the ESA are being met. (Letter 161)

Consultation with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service regarding the North Lochsa Face project began in 1997 (Project File, Volume 1, Documents 33 through 70). Consultation for non-lynx species was concluded with a Biological Assessment dated October 1, 2001 (SEIS Project File Volume 1, Document 64). Consultation for Canada lynx was concluded with a Biological Assessment dated

November 21, 2001 (SEIS Project File Volume 1, Document 68). In a letter dated February 12, 2002, the National Marine Fisheries Service stated that reinitiation of consultation was not needed for minor modifications to the proposed action (SEIS Project File Volume 1, Document 74).

2507: Laws (not specific to above)

Alternatives 2, 3, 5, and 6 will not meet requirements of the Clean Water Act because they will increase sediment in Walde, Nut, Pete King, Canyon, South Fork Canyon, West Fork Deadman, Fish, and Glade creeks. (Letter 139)

The Clean Water Act requires states to designate the beneficial uses of each stream, and determine the criteria sufficient to protect these uses (DSEIS page 3-180).

Water Quality Limited Segments (WQLS) are streams with water quality concerns that have been identified by the State of Idaho. All of the streams listed in this comment are Water Quality Limited Streams within the North Lochsa Face analysis area (DSEIS page 3-180). The Clearwater Forest Plan includes Forestwide standards for water (Clearwater Forest Plan, Appendix K). The Forest Plan Stipulation Agreement (SEIS Project File, Document 732) states “The Forest Service Agrees to Proceed only with those projects that would result in no measurable increase in sediment production in drainages currently not meeting Forest Plan standards” (DSEIS page 3-182).

The environmental consequences for aquatic resources are included in the DSEIS on pages 3-179 through 3-267. All alternatives are consistent with the Clean Water Act because they would protect beneficial uses (DSEIS page 3-220). Each alternative was evaluated at the subwatershed level to ensure it would be consistent with the Clearwater Forest Plan, and if applicable, the “no measurable increase” standard agreed to in the 1993 Stipulation Agreement. All alternative are consistent with the applicable criteria (DSEIS page 3-220).

The project does not comply with Executive Order 12898 because it will cause adverse economic effects in the area and discriminates against the people who live locally. (Letter #146)

The executive order on environmental justice, EO 12898, is discussed in the DSEIS on page 1-23. EO12898 requires Federal agencies to ensure that Federal programs do not use criteria, methods, or practices that discriminate on the basis of race, color, or national

origin. The potential effects of Federal actions, including effects on human health, economics and social effects, and effects on low-income or minority communities, must be analyzed as required by NEPA. The DSEIS discusses community economics on pages 3-364 through 3-370. The effect of implementing the North Lochsa Face project would provide economic benefits across the spectrum of local residents. There would be no disproportionate effects on minorities or low income groups (DSEIS page 3-366).

2600: Forest Plan - General

Highest public use of the area is to close roads and stop the logging (letter 71).

Vegetation and Aquatic ROD, page 11 and 12, Rationale for My Decision and Recreation and Access Management ROD, page 5-6, Rationale for My Decision. This discussion provides the rationale that the decision is responsive to public comments and responds to the issues.

The Forest Plan has not dealt effectively with the issue of noxious weeds (letter 80).

This is outside of the scope of this project specific decision. Forest Plan issues will be dealt with during the revision of the Forest Plan scheduled to start in fiscal year 2003.

Population trend monitoring of MIS and old growth dependent species has not completed (letter 161 page 122 and letter 172 page 128).

Page 6 Document 754, Vol 17 of SEIS. This documents the forest plan requirement to monitor wildlife and MIS species and the ruling of the 9th Circuit Court of Appeal that viability requirements can be met by maintaining sufficient habitat for MIS.

2601: Allocations - General

A forest plan amendment is needed to address the old growth issue (Letter 46).

A forest plan amendment is outside the scope of this project specific decision.

The SEIS adopts a completely new definition of old growth that is inconsistent with the Forest Plan (letter 161).

SEIS, page 3-47 Old Growth Existing Conditions; interim CNF direction of July 1998 adopted a definition of old growth for the Clearwater National Forest.

2602: Allocations - Changes

Suggests that the project area be managed as a wildlife, fish, plant habitat sanctuary preserve (Letter 38).

SEIS, page 1-5 and 1-6, Management Direction. Provides discussion of the Management Areas prescribed by the Forest Plan for the project area.

Can we not use this roadless area for potential research or as a natural area (letter 115).

The selected alternative will not harvest timber in roadless but will treat areas with prescribed fire. DSEIS, page 1-121 to 1-123 and ROD.

Forest plans do not mandate the development of roadless areas, they merely permit it. Tradeoffs between preservation and development would be thoroughly evaluated at the project level (Letter 138).

The selected alternative will not harvest timber in roadless but will treat areas with prescribed fire. DSEIS, page 1-121 to 1-123 and ROD.

Pages 3-299 and 300 unilaterally amend the Settlement agreement from what it says. B-2 settlement agreement areas are to be managed as B-2 in all aspects (Letter 161).

SEIS, page 3-298 and 3-299, North Lochsa Slope roadless area existing condition. Prescribed burning would still be done in accordance with Management Area direction for CA6 and C3.

2603: Standards & Guides (General)

The SEIS appear to not comply with the direction in their Forest Plan to effectively manage for MIS like the pileated woodpecker (Letter 80).

SEIS, page 3-105 to 3-111, Pileated Woodpecker: Existing condition, Forest Plan Direction. Cumulative effects discussion states the project will meet forest plan standards and provide habitat for 40 to 45 breeding pairs of pileated woodpeckers.

How can the Pete King watershed system be in compliance with the Forest Plan when all its major tributaries are well outside the standard for cobble embeddedness (Table 3-83) Letter 80.

SEIS, page 3-221, Pete King Creek Existing Conditions, 5th paragraph. High flows during 1995-96 scoured out much of the sediment in Pete King Creek, and that sediment in this stream is on the decline.

The treatment of old growth is not consistent with the CNF Plan (Letter 139).

No old growth will be harvested. Page ROD-5 of ROD.

A forest plan amendment is required to implement site-specific management prescriptions that are not part of the CNF forest plan (Letter 161).

Completing a Forest Plan amendment is outside the scope of this project specific decision.

The Forest Plan requires an area analysis prior to roadless area entry (Letter 161) .

The FEIS roadless area analysis was completed during project analysis; PR, Vol 12, Documents 732-743. FEIS discussion of the roadless area issue is presented on page 86-87 in Chapter 3 and pages 141-143 of Chapter 4 in FEIS. Appendix H, page H-2 of the SEIS discusses the roadless area issue used to drive further analysis and alternatives in the SEIS. Further roadless area analysis for the SEIS is contained in the PR, Vol. 8,

Documents 521-562. In the SEIS pages 3-298 to 3-319 provide analysis of roadless areas by alternatives.

The SEIS does not address logging in areas that have not yet reached CMAI (Letter 161).

Forest Plan Standard #7-Timber, page II-25, provides direction for development of silvicultural examinations and prescriptions for vegetation and other resources. Prescriptions are developed to provide for treatment of vegetation, wildlife and other resources with appropriate consideration of CMAI concepts. Volume 11 of the FEIS and Volume 10 of SEIS contain silvicultural prescription documentation.

SEIS's action alternative would not meet the settlement agreement for old growth standards found in the forest plan (Letter 161).

No old growth will be harvested (ROD page ROD-5).

2609: RNAs

Cumulative impacts from logging on Fish Creek are a serious concern (Letter 92, comment 12.)

Vegetation and Aquatic ROD, pages 20 and 21 – Consistency with the Clearwater Forest Plan. Standard 8C discussed on page 8 of the ROD provides for protection of streams and fish habitat from sediment.

2700: SEIS for the Project

The SEIS is essentially the same as the FEIS. (Letter 80)

The SEIS is essentially the same as the FEIS, updated for changes and new information that has come to light since the analysis in the FEIS was completed.

The purposes of this proposal are in conflict. (Letter 177)

The purposes for the project, and the background from whence they came, are described in Chapter 1 of the SEIS. (SEIS, Pages 1-1 to 1-18)

I must voice my strong opposition to parts of this plan such as the lack of public support for this project. (Letter 146)

Thank you for this comment. We appreciate the fact that you support parts of the project.

2701: Corrections/Changes to Document

The SEIS needs to recognize the continued use of the area by the Nez Perce Tribe. (Letter 80)

The continued use of the area, including the Nez Perce Tribe's reserved treaty rights, has been recognized throughout the analysis and document. (Veg ROD, NPTEC—2; SEIS, Page H-11)

Ongoing efforts described in Chapter 3 need to be included in Alternative 2. (Letter 80)

The description of Alternative 1 states "current activities" would continue and the Activities Common to All Action Alternatives section either already contained the items or now contain them via the errata sheet. (SEIS, Page 2-15, Pages 2-10 and 2-11; FSEIS Errata, Appendix B).

The effects analysis on noxious weeds is confusing. (Letter 80)

The effects analysis describes the effects of the proposed alternatives on the potential spread of weeds. (SEIS, Pages 3-72 to 3-86)

It is unclear if the mitigation measures listed for each alternative will be implemented or not. (Letter80)

Mitigation measures included in the description of each alternative is an integral part of that alternative. Mitigation measures to be implemented with the selected alternative will be included in the ROD. (SEIS, Pages 2-10 to 2-33)

The cumulative effects analysis areas are quite variable. (Letter 80)

The size of each cumulative effects area varies with the species or resource being analyzed. (SEIS, Page 1-28)

Unit 101 (a 295 acre precommercial thinning unit) is shown in Appendix I as not being a part of Alternative 6 but is displayed on the map of Alternative 6 in Appendix A. (Letter 110)

Corrected maps are included in Appendix A of the FSEIS.

This project is too large to tackle under one EIS, I suggest a smaller scale project in order to better monitor the results.. (Letter 120)

Monitoring will be by timber and individual resource activity for the alternative selected. (SEIS, Pages 2-12 to 2-33; Veg ROD, Response to Comments, Page 16)

Comment 12: Alternatives to harvesting the offsite pine in Bimmerick Meadows, as burning or simply leaving them there, need to be presented. (Letter 136)

We recognize these offsite pine have a low market value and have considered the alternatives of leaving or burning. Veg ROD, Response to Comments, Page 18.

I would like to suggest a section in the ROD discussing “timing” of the harvest to address the issue of logging truck and public safety. (Letter 136)

Thank you for your suggestion.

The maps for the SEIS do not clearly show the small amount of new road construction. (Letter 136)

Thank you for your comment. We will try to make the roads more apparent on subsequent maps.

The total winter range in available forage shown in Table 3-38 should be changed to 9 percent from 39 percent. (Letter 147)

Thank you for your comment. This change has been noted in the errata, Appendix B.

There should be some analysis of how the Forest is implementing the October 2000 "Cohesive Strategy". (Letter 151)

A Forest-level analysis of this issue is beyond the scope of this project specific decision.

There should be a discussion of how the Forest is responding to the 2001 Review and Update of the 1995 Federal Wildland Fire Management Policy. (Letter 151)

A Forest-level analysis of this issue is beyond the scope of this project specific decision.

The SEIS provides conflicting information on commercial thinning by stating on page 1-25 approximately 70 percent of the basal area would be retained, page 2-18 states up to 67 percent of the trees would be retained on any LTA. (Letter 157)

The commenter is correctly citing the SEIS but confusing/crossing 70 percent of the basal area with 67 percent of the trees. The amount of basal area per tree varies by size of the trees. The prescription is to leave approximately 2/3 of the trees, marking the stand so as to leave approximately 70 percent of the basal area.

The GIS maps are hard to read. (Letter 161)

Thank you for your comment. We will try to make the maps for the Record of Decision more readable.

What is the basis by which the “historical range of variability” was determined? (Letter 161)

The process used to determine the “historical range of variability” is located in the North Lochsa Face Landscape and Watershed Assessment. (PF, Vol. 1A, Doc. 73)

The SEIS does not analyze the temporary impacts of logging to roadless values. (Letter 161)

In the section on Roadless Environmental Consequences, the SEIS describes the effects of timber sale activities to remoteness and solitude. (SEIS, Page 3-316)

There are inconsistencies between charts in the SEIS regarding whether streams meet standards. In particular, the cobble embeddedness standard for Pete King Creek is inconsistently described. (Letter 161)

It should be noted that cobble embeddedness is not a forest plan standard but rather a technique used to measure sediment. (SEIS, Pages 3-182 and 3-183)

Figures for cobble embeddedness are presented for several years, one needs to be sure one is comparing the same years. In addition, this monitoring data is presented by stream reaches and also presented as an entire stream average as measured at the mouth of the stream. (SEIS, Pages 3-179 to 3-267)

2702: Data Used is Questioned

There is concern that the assumptions and analysis used in the vegetation and old growth conditions described in the SEIS are dated and has not kept up with conditions that have changed. (Letter 80)

The existing conditions of vegetation, including old growth and sensitive plants, has been updated in the SEIS. (SEIS, Pages 3-1 to 3-67)

What evidence is there that leaving 50% of the existing vegetation will prevent impacts and landslides on breaklands? Is there an analysis that this prescription will protect against landslides when a 25-year or 50-year storm hits the watershed (Letter 80)?

The SEIS (page 3-164 through 3-169) provides a detailed examination of the 93 landslides that occurred in the analysis area in 1995-1996. Fifteen of these landslides were related to previous harvest activities, with 14 occurring in clearcut units and one occurring in a clearcut with reserves unit. Across the Clearwater National Forest, there were 160 harvest related landslides and all but 2 occurred within regeneration harvest units. The canopy retention in these units was near 0% in all cases. The proposed harvest units in the North Lochsa Face analysis area retain from 25-95% of the existing canopy cover, with the minimum canopy retention on breaklands being 50%. There were no landslides occurring in harvest units retaining 50% of more canopy cover. The storm events of 1995-1996 across the Clearwater National Forest ranged from 2-year to 25-year storm events (SEIS PF, Vol. 9, Doc. 563, Page 19).

In addition, all proposed treatment units were evaluated for the five factors identified by McClelland et al. (SEIS PF, Vol 9, Doc 563) from their survey of the 1995-1996 landslides across the Clearwater National Forest. Appendix F of the SEIS provides a unit-by-unit evaluation of these five factors. Appendix F also lists the primary landtypes within each proposed treatment unit and the high potential hazards associated with each landtype. The SEIS (pages 3-169 through 3-178) provides an evaluation of the environmental consequences of all alternatives. *It is unclear what study or data supports the statement that forage is the most limiting factor for elk in the analysis area. (Letter 80)*

If the last contact with the U. S. Fish and Wildlife Service was back in January 4, 2001, the threatened and endangered species list is out dated and another list should be requested. (Letter 80)

A current species threatened and endangered species list has been obtained and is included in the Project File, Volume 1.

Since 1998 data is the most current data presented, the analysis of existing condition for Pete King Creek is dated. (Letter 80)

This information was updated for 2001 Existing Condition. (SEIS, Page 3-224, Table 3-83) The effects of implementing the alternatives are disclosed. (SEIS, Pages 3-228 to 3-231)

The face drainages along the Lochsa River were analyzed using the WEPP model. Is this model peer-reviewed and appropriate for use on the Clearwater (Letter 80)?

The documentation for the WEPP model is provided by Elliott et al. (SEIS PF, Vol 15, Doc. 662). This model has been developed as a process based model and is appropriate for smaller watersheds, including the face drainages along the Lochsa River, that cannot be evaluated with the WATBAL model (SEIS pages 3-185 through 3-186).

The WATBAL model is flawed. (Letter 80)

This is a model developed on the Clearwater considering the site specific conditions of this Forest. (Veg ROD, Response to Comments, Pages 4 and 5)

The “science” behind this proposal to log and thin over 7000 acres is shoddy at best. This is a huge area on proven, unstable substrate given to failure (landslides?) (Letter 105):

The SEIS (page 3-159 through 3-178) provides a thorough discussion of landslide and erosional hazards within the analysis area and the potential impacts of all alternatives on these processes. Further information is provided in the project file (SEIS PF, Vol. 9). All action alternatives were designed to maintain erosional hazards within historical ranges.

The premise and justification for the proposed logging is based more on timber output and less on the needs of old growth dependent species. (Letter 139)

None of the logging will be conducted in old growth. (ROD Page ROD-5)

The use of LTAs is problematic. LTAs mix types across incredible elevation and vegetative zones, better suited to a coarser analysis than a finer analysis (1:24,000?) which one would expect the SEIS to adopt (Letter 161):

LTAs were used as the landscape level ecological units for describing disturbance regimes and processes at a broad scale (SEIS pages 1-6 through 1-16). Finer scale ecological land units, including landtypes and landtype phases (SEIS pages 3-159 through 3-164), were used for different levels of analyses in the project development and design.

2703: Conclusions Drawn and/or Analysis is Questioned

The SEIS proposes to harvest late mature timber. It is unclear how the Forest will meet their Old Growth Standard in the near term future if there is continued harvest of late mature timber. (Letter 80)

The existing condition and the effects of implementing this project on old growth is disclosed in the SEIS. (SEIS, Pages 3-47 to 3-52)

The SEIS fails to objectively and effectively deal with noxious weeds. (Letter 80)

The existing condition and the effects of implementing this project on noxious weeds is disclosed in the SEIS. (SEIS, Pages 3-68 to 3-86)

The effects analysis for Alternative 1 does not incorporate the effects of ongoing noxious weed control efforts that will presumably continue if this alternative is selected. (Letter 80)

The effects of continuing to implement ongoing noxious weed activities should Alternative 1 be selected, is disclosed in the SEIS under the discussion of the No Action Cumulative Effects. (SEIS, Page 3-79)

It is unclear why habitat effectiveness in the Gass and Obia elk analysis areas is showing a reduction of 5 percent for Alternatives 2, 3, 5 and 6 and yet is considered to meet the habitat objective of 100 percent for Alternatives 2 and 3. (Letter 80)

It appears there is a typographical error in this comment since Alternatives 2 and 3 are mentioned twice. In reviewing the table referenced in the comment, I assume that the intended comment is as follows:

It is unclear why habitat effectiveness in the Gass and Obia elk analysis areas is showing a reduction of 5 percent for Alternatives 2, 3, 5 and 6 and yet is considered to meet the habitat objective for Alternatives 3A and 4/4A.

If this is the intended comment, the reason for the difference in the elk habitat effectiveness is explained in the SEIS. The reason for the difference is due to the mixed severity and underburns scheduled for Alternatives 2, 3, 3A, 5 and 6 but will not be conducted in Alternatives 4/4A. (SEIS, Table 3-35; Pages 3-92 to 3-96)

There is an error in Table 3-35. For Alternative 3A, the elk habitat effectiveness for Gass Creek should be 75% and for Obia Creek should be 80%. Please see FSEIS errata, Appendix B.

The SEIS provides no evidence that PACFISH buffers have been effective in preventing or minimizing large landslides, debris torrents and channelized flows. (Letter 80)

PACFISH buffers were not intended to prevent these types of events. The sediment these buffers were intended to prevent are identified in the SEIS. (SEIS, Page 3-192)

Minimizing debris from large landslides, debris torrents and channelized flows has been incorporated into project design. (SEIS, 3-173 to 3-175)

The mitigation values used in the WATBAL model analysis have been changed. The specific changes (values) have not been disclosed.

The changes made in the values used were specific to the Landtype Associations within the watershed under analysis. (SEIS, 3-189)

The landslide study conducted by McClelland et al. (1997) did not conduct the requisite statistical analysis such as stepwise, multi-regression and principal component analyses. Will utilization of the landslide screen they developed prevent a landslide on a breakland landtype. (Letter 80)

Due to the wide variability in the landslide data, such an analysis was not possible. However, the SEIS (page 3-164 through 3-169) provides a detailed examination of the 93 landslides that occurred in the analysis area in 1995-1996. Fifteen of these landslides were related to previous harvest activities, with 14 occurring in clearcut units and one occurring in a clearcut with reserves unit. Across the Clearwater National Forest, there were 160 harvest related landslides and all but 2 occurred within regeneration harvest units. The canopy retention in these units was near 0% in all cases. The proposed harvest units in the North Lochsa Face analysis area retain from 25-95% of the existing canopy cover, with the minimum canopy retention on breaklands being 50%. There were no landslides occurring in harvest units retaining 50% or more canopy cover.

The SEIS provides that sediment standard compliance with the Forest Plan must be interpreted at the mouth of the large parent channels. This is an erroneous interpretation; they should be interpreted by reaches. (Letter 80)

As described in the Forest Plan (FP, Page K-5), the standard, consistent procedure for measuring water quality for a stream is to measure it at the mouth. Changing this procedure is beyond the scope of this project specific document.

2704: Public Involvement - Quality

Listen more to the public and stop contracting large and destructive timber sales (Letters 47).

People have expressed concerns about the size of the proposed harvest in the past. The selected actions will result in multiple timber sales that will be implemented over a period of five to seven years. Also, the analysis area is very large. Only about 6% of the analysis area has proposed timber harvest. Clearcutting was proposed only in the Bimerick area, and the selected actions do not include timber harvest in that area. The level of intensity is equal to or less than timber sales proposed for most other areas on the Clearwater National Forest (Veg ROD, Attachment 6, page 16).

This forest project implements the Clearwater National Forest Plan, which is a contract with our public that has gone through the NEPA process. This project is needed to achieve the resource goals and objectives outlined in this plan.

Issues raised by the public have not been addressed and a number of meaningful alternatives have not been considered. (Letter 138)

The Veg ROD Attachment 6 page 20-21 Range of Alternatives discusses how the alternatives were developed to analyse the issues developed during the scoping process. A sufficient range of alternatives are described in the SEIS.

There has not been a meaningful public involvement process. (Letter 138)

The Public Participation section in the DSEIS in Chapter 2 on page 2-2 describes clearly the public participation activities that have occurred in the development of this project.

The Grangeville Mentality of endless road building & clear cutting practices is all that you listen to. (Letter 141)

The IDT is not aware of the “Grangeville Mentality.” The selected actions include no new road construction and only 3.5 miles of temporary road construction (DSEIS, page 2-37).

The timber management practice of clear cutting was considered for Alternatives 2, 3, 3a, and 6. The selected actions, however, do not include the clearcut units in Bimerick Creek. In fact, the selected actions do not include any timber harvest in inventoried roadless areas (ROD page ROD-7).

DSEIS Page 3-362 generalizations are made about people who might express interest in the study area and are concerned about protecting diversity in the ecosystem. There appears to be an attempt to marginalize and minimalize these interested citizens by labeling them “environmentalist” and stating that they are generally found in the larger communities of Missoula, Lewiston, and Moscow...” as if the main weight of people interested in these things for the Clearwater National Forest can be found in these three little cities. (Letter 146)

The groups listed on page 3-361 thru 3-362 are those groups that have expressed interest in the North Lochsa Face project. No marginalizing or minimalizing of the group was intended by attaching the label of “environmentalists.”

The United States Taxpayers who do not approve of commercial logging on the land that belongs to them have not been included in the list of “Interest Groups” on page 3-361 and 3-362 in the SEIS. (Letter 146)

No contact from a group labeling themselves as “all the US Taxpayers who do not approve of commercial logging on the National Forest land” have come forward during public scoping and the public participation process to express their views about the proposals.

I don’t want to see commercial timber harvest in the area. Too much emphasis has been given to the social values of local logging communities, and there has been too little consideration given to the public’s idea about managing for wilderness values. (Letter 157)

Commercial timber harvest is consistent with Clearwater National Forest management direction for the project area area. In response to public concerns about roadless areas, the decisionmaker has selected Alternative 5, which does not include timber harvest in inventoried roadless areas. (Veg ROD page ROD-7).

The 45 days allowed to review this large and controversial project is not sufficient time to adequately review a project that proposes major entry of a 112,000 acre roadless area. (Letter 161)

The public involvement process for the North Lochsa Face project has been ongoing since 1995. The public has had many opportunities to comment on the proposals outlined in the DEIS, FEIS, and DSEIS. The proposals in the DSEIS have changed very little from those that were presented in the FEIS. In July 2000 the Regional Forester reversed the decisions that were presented in the Veg ROD, and directed the Forest Supervisor to prepare a Supplemental EIS that would clarify the environmental analyses related to road obliteration (DSEIS Page 1-3). Alternative 6, the new alternative that was added in the DSEIS, consists of the actions that were selected in the July 2000 Veg ROD, with modifications to address issues that have arisen since the FEIS was published. Alternative 6 responds to the issues of harvest in old growth and precommercial thinning in lynx habitat. The effects of road obliteration have been clarified in the DSEIS, and the effects analyses for all of the alternatives have been updated.

Because previous opportunities for public review and comment had been extensive, and because the proposals in the DSEIS have changed very little from those that the public

reviewed in the FEIS, the decisionmaker felt that the standard 45-day timeframe for public review and comment on the DSEIS was adequate.

2705: Disclosure of Information

The magnitude of the threat of invasive, undesirable species should be more fully addressed. The SEIS should contain a full discussion of the environmental impacts of the alternatives and mitigation measures to inform decision makers and the public of potential adverse impacts. (Letter 80)

This comment was previously addressed in the Veg ROD, Attachment 6, page 20. The DSEIS addresses Noxious Weeds on pages 3-68 through 3-86. It addresses the Existing Condition and the Environmental Consequences of each alternative in detail.

Salvage sales will be planned in the Deadman watershed. The effects and impacts from these sales have not been evaluated or disclosed in the DSEIS. (Letter 80)

No sales are currently planned. If any salvage sale opportunities develop in the future, a NEPA Analysis will be completed at that time.

The SEIS does not contain a sufficient discussion of the relationship between the project area and other areas on the forest where natural fires should be allowed to burn. (Letter 151)

An analysis of all the areas on the Clearwater Forest where natural fires should be allowed to burn is outside the scope of this project-level analysis.

2706: Monitoring

It is unclear from the past Inventory and Monitoring Reports whether and to what extent the Clearwater has gathered inventory and monitoring data for its MIS's? (Letter 107)

Questions concerning the Clearwater National Forest's annual monitoring report for its MIS species is beyond the scope of this analysis.

2708: Draft Should Address ...

There is no quantified assessment of the impacts on culturally-significant plants (Letter 80).

The SEIS on page 3-356 Gathering Activities describes the effects on tribal gathering activities and cumulative effects on treaty rights.

Biological methods are the best method for attacking noxious weeds.

The SEIS on pages 3-75 discusses the effects of using only biological control methods.

The ideas of improving forest health, restoring ecological processes, and how to describe the goals to be attained need to be described.

The SEIS on pages 1-7 to 1-23 describes the findings from the North Lochsa Landscape Assessment and the basis for the Purpose and Need.

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The ideas of improving forest health, restoring ecological processes, and how to describe the goals to be attained need to be described (Letter 80).

The SEIS on pages 1-7 to 1-23 describes the findings from the North Lochsa Landscape Assessment and the basis for the Purpose and Need. The desired condition of the landscape is described for the project area by LTA.

The need to contribute timber products to the local economy is not identified in the landscape assessment, other assessments or policies (Letter 80).

The SEIS on page 1-18 discusses the need to contribute timber products to the economy. This is a finding from the North Lochsa Landscape Assessment.

Biological methods to attack noxious weeds are the best way to protect the long term health and welfare of tribal members (Letter 80).

The SEIS on page 3-76 discusses the use of an Integrated Pest Management system in all action alternatives to attack noxious weeds.

The phrase forest health should be more accurately defined and ideas to improve forest health and restore ecological processes is not well developed (Letter 80).

The SEIS on pages 1-7 to 1-16 describes forest health and the desired condition for the different landforms in the project area.

What is the definition of a proposed action and a preferred alternative (Letter 80).

SEIS on page 2-15 describes how the proposed action was developed. The proposed action is developed to specifically respond to the Purpose and Need for Action. The preferred alternative is the alternative tentatively selected in the SEIS. The final

alternative described in the Record of Decision may be different than the preferred after the deciding officer reviews the analysis and public input.

The forest needs to conduct an Old Growth Analysis that displays the likelihood of compliance with the forest plan standard (Letter 80).

On pages 3-47 to 3-49 in the DSEIS the old growth analysis process used for this analysis is described.

What are cumulative effects on growth from this project, the Middle Black project and the West Fork of Potlatch (Letter 80).

This is outside the scope of this project specific analysis. The cumulative effects of all alternatives is discussed on pages 3-51 and 3-52 in the DSEIS.

Sensitive plant populations particularly susceptible to adverse effects from noxious weeds should be listed and discussed (Letter 80).

The SEIS discusses all the Sensitive Plants analyzed in this project on pages 3-54 to 3-62. Table 3-25 on page 3-67 specifically summarizes the effects of Alternative 1 on sensitive plants.

The SEIS should analyze the human health impacts of herbicides associated with the proposed action to both Forest Service workers and the general public (Letter 80).

Pages 3-72 to 3-85 in DSEIS discuss the level of risk or likelihood that the proposed action and action alternatives would increase weed spread within the North Lochsa Face project area. Pages 3-85 and 3-86 in the SEIS discuss the risk to humans of using chemicals to control noxious weeds.

There is no cumulative effects analysis for grizzly bear (Letter 80).

Environmental consequences of alternatives on grizzly bear is discussed on pages 3-121 to 3-122 in the DSEIS. Cumulative effects to grizzly bear is described on pages 3-122 and 3-123 in the DSEIS.

The SEIS proposes to remove pileated woodpecker habitat (old growth and mature forest) at an accelerated rate. Where is the cumulative impact analysis and monitoring data that establishes the viability of this species over time (letter 80)

The SEIS, Chapter 3, Tables 3-41,3-42, and 3-43, and Cumulative Effects to pileated woodpecker, pg 3-110 answers this question.

The SEIS proposes to reduce pileated pine marten. Where is the cumulative impact analysis and monitoring data that establishes the viability of this species. The SEIS shows that surveys for this species have not been done (letter 80)

The SEIS analysis used habitat criteria to evaluate effects to potential habitat for American Pine Marten, pg 3-111 through 3-115.

The cumulative effects analysis for lynx, fisher, flammulated owl, and wolverine does not discuss the effects arising from multiple sources and activities and does not provide rationale for the author stating that the project may impact individuals or habitat but will not likely contribute to Federal listing or cause loss of viability (letter 80)

This question was covered in the wildlife category 400.

Where is the analysis for limiting factors for elk such as disturbance, cover and access. Also, impacts to habitat due to warm winters is not considered (letter 80)

This question is answered in the SEIS project record 754, pages 7-10, 15,16 21-27, and 60-72.

There is no cumulative effects analysis on viability of wolverine (letter 80)

SEIS 3-156 & 157; SEIS PF pg 97-122

The estimated number of snags would be an appropriate measure for comparing alternatives for effect on pileated woodpecker (letter 80)

SEIS 2-23 & 24 (Regeneration Harvest – tree retention – same for all action alternatives), 3-105 to 111; SEIS PF Doc 754 (pages 11, 29 & 30, 59, 73-75), Doc 696 (pages 2-5)

A discussion between the predator prey relationship would be valuable (letter 80)

SEIS PF 754, pg 69 (last paragraph)

Potential cumulative effects on bald eagles were not discussed (letter 80)

SEIS PF 754, pg 34 & 35 (bald eagle; SEIS BA PF 64 (pg 20).

The SEIS speaks to substantial changes from the FEIS, a comprehensive changed condition analysis should take place (letter 80)

In July 2000 the Regional Forester reversed the decisions that were presented in the Veg ROD, and directed the Forest Supervisor to prepare a Supplemental EIS that would clarify the environmental analyses related to road obliteration (DSEIS Page 1-3). Alternative 6, the new alternative that was added in the DSEIS, consists of the actions that were selected in the July 2000 Veg ROD, with modifications to address issues that have arisen since the FEIS was published. Alternative 6 responds to the issues of harvest in old growth and precommercial thinning in lynx habitat. The effects of road obliteration have been clarified in the DSEIS, and the effects analyses for all of the alternatives have been updated.

The analysis displays an elevated risk of channel degradation in Bimerick Creek, the SEIS predicts no degradation to the system as the system is resilient, yet the SEIS does not display under what conditions this resiliency would fail (letter 80)

Reading the paragraph in question in the SEIS, Chapter 3, pg 3-249, the statement shows that flow values indicate a risk of channel degradation, actual channel surveys show a resilient system that is not sensitive to changes in flow or sediment.

The Lochsa River is a “no effect” stream in the forest plan, yet the SEIS documents a great deal of activity to take place in the next 10 years, and the FS has not evaluated all these projects for cumulative effects (letter 80)

The SEIS, Chapter 3, pages 3-264 through 3-267, discusses cumulative effects to the Lochsa River, note the sidebar on pg 3-265.

The cumulative effects analysis for Pete King Creek only documents a small amount of salvage tree harvest, yet other resource sections list other projects such as Knoll Creek Bugs, Swan Creek Fuels and other activities, that do not seem to be considered in the cumulative effects to aquatic resources (letter 80)

The other projects listed do not lie within the Pete King watershed or other watershed in the NLF analysis area, thus they would not affect the aquatic resources in those watersheds. Other resources use analysis areas for cumulative affects that may lie outside the watershed.

The cumulative effects discussion on the Lochsa River should include Highway 12 road maintenance and snow removal activities (letter 80)

The cumulative effects analysis in the SEIS, pg 3-264 included road maintenance as a consideration in the effects on the Lochsa River. Road maintenance of the pavement and ditches of Highway 12 would produce sediment that is very small in relation to the sediment carrying capacity of a large river such as the Lochsa, see first paragraph pg 3-264 of SEIS.

The discussion of the cumulative effect of the no action alternative on the Lochsa River does not include all of the activities discussed for the action alternatives (letter 80)

This is correct, the no action alternative only described the activity that would take place within the analysis area. However, since the action alternatives were designed to meet

watershed standards for the Lochsa River, by including activities in the alternative plus all other activities, the cumulative effect of the no action alternative, which is smaller scale and scope would also meet the watershed standard.

The environmental effects of prescribed burning, particularly short term effects on scenic quality have not been adequately disclosed (letter 80)

The SEIS, Chapter 3, Scenic Quality Environmental Consequences, pg 3-274, last paragraph for alternative 2 discusses effects of prescribed burning on the scenic resource.

An inclusion of a summary of the specific management objectives for the Lochsa Research Natural Area would be helpful (letter 80)

This information is available in the Clearwater Forest Plan, there is no activity proposed in the RNA, and not including the management objectives for this area allows the SEIS to be somewhat shorter and less confusing.

The Nez Perce Tribe would like additional information to better understand the Range of Natural Variability, such as: variable measured, sites used to derive RNV, size of site sampled, length of time spanned in sample, structural parameters measured and values, and how often human intervention would be needed to stay within the RNV (letter 80)

The SEIS, pg 3-8 describes the analysis process to determine RNV. The timber stand data base was used to determine existing vegetation conditions in the analysis area. This data is based on a 20% sample area by timber stand. The FEIS project file Vol 1A, document 73 provides additional information.

The SEIS fails to consider the tribal salmon recovery plan or the federal recovery strategy (letter 80)

The FEIS, Chapter 6, pages 181 and 182, items 60,61, and 62 address this question.

Has the intensive logging on the Bitterroot National Forest been taken into account with the cumulative effects analysis for this project (letter 104)

This is outside the scope of this analysis. The logging in the Bitterroot area is in a different state, national forest, and watershed.

I am against disturbing the quality of the Fish Creek drainage, which is a WQLS. How will prescribed burns in Fish Creek improve fish habitat? (letter 119)

The SEIS, Fish Creek Environmental Consequences, pages 3-206 through 3-220, shows no effect of the project on Fish Creek. The prescribed burn plan is to not ignite any fire in the riparian buffers. The watershed analysis accounted for some creeping of fire into the riparian zone at low intensity.

2709: Alternatives

The preferred alternative for the DSEIS is too large. (Letter 80)

Alternative 6 was the Preferred Alternative in the DSEIS. Alternative 5 has been selected by the decisionmaker. Alternative 5 responds to the issue of timber harvest in inventoried roadless areas; it does not include any timber harvest in roadless areas. To address public concerns about timber harvest in old growth and lynx habitat, the decisionmaker has chosen to drop any timber harvest units in old growth and precommercial thinning units in lynx habitat.

The timber sales associated with this project would be staggered over a period of years. Also, the analysis area is very large. Timber harvest would occur on only about 6% of the analysis area. Commenters have expressed concerns about the size of the proposed harvest in the past. Please see the Veg ROD, Attachment 6, Page 16.

The alternatives presented in the DSEIS are nearly identical to those that appeared in the DEIS and the FEIS. (Letter 80)

This statement is correct. In July 2000 the Regional Forester reversed the decisions that were presented in the Veg ROD, and directed the Forest Supervisor to prepare a Supplemental EIS that would clarify the environmental analyses related to road obliteration (DSEIS Page 1-3). Alternative 6, the new alternative that was added in the

DSEIS, consists of the actions that were selected in the July 2000 Veg ROD, with modifications to address issues that have arisen since the FEIS was published. Alternative 6 responds to the issues of harvest in old growth and precommercial thinning in lynx habitat. The effects of road obliteration have been clarified in the DSEIS, and the effects analyses for all of the alternatives have been updated.

Other action alternatives should have been considered. (Letter 106, 138)

The IDT considered a reasonable range of alternatives for the North Lochsa Face project. All alternatives are consistent with Forest Plan direction and are in compliance with the 1993 Stipulation Agreement between the Forest Service and the Wilderness Society et al. (DSEIS, page 2-9). The alternatives that were considered but not analyzed in detail are described in the DSEIS on pages 2-7 through 2-9. Alternative 5, the selected alternative, does not include timber harvest in the Bimerick Creek drainage or any other roadless areas. In response to public concerns about old growth and lynx habitat, the decisionmaker has chosen to drop all timber harvest units in old growth and precommercial thinning in lynx habitat (ROD page ROD-5).

This issue has been raised in the past. The action alternatives were developed to address issues that were raised in the scoping process, and to respond to the purpose and need for the project (Veg ROD, Attachment 6, pages 20 through 21).

I support the no action alternative. (Letters 109, 124, 133,138 141, 156)

The no action alternative would not meet the purpose and need for action (ROD, decision criteria, pages ROD-30).

Please eliminate clearcutting and active management in roadless and research natural areas. (Letter 118)

Alternative 5, the selected alternative, partially responds to this concern because it does not include timber harvest in inventoried roadless areas. However, Alternative 5 does include prescribed burns in roadless areas. Alternatives 1, 4, and 4a would not harvest timber or burn in roadless areas; however, they did not meet the decision criteria as well as Alternative 5 (ROD page ROD-30).

Please include road obliteration and biological noxious weed control, and scale down the project to research whether the proposed actions will improve water quality. (Letter 11)

The activities common to all action alternatives, including the selected alternative, are described on pages 2-10 through 2-12 of the DSEIS. Road obliteration and control of noxious weeds are included among the activities common to all action alternatives.

Monitoring that will be implemented for all action alternatives is listed in the DSEIS on pages 2-12 through 2-14. The results of forestwide monitoring efforts are compiled in an annual report, the “Clearwater National Forest Monitoring and Evaluation Report” (Project File Volumes 19 and 20; Veg ROD, Attachment 6, page NPTEC--5). Monitoring data is used to evaluate BMP effectiveness so that management practices can be modified, if need be, to improve their effectiveness.

Do not cut any old growth. (Letter 118)

In response to public concerns about old growth, the decisionmaker has dropped all timber harvest in old growth habitat from the selected actions (ROD page ROD-5).

I oppose Alternative 6 because it is too large to carry out efficiently. (Letter 120)

All of the action alternatives that were considered in the DSEIS are viable and implementable. The decisionmaker has selected Alternative 5 (ROD page ROD-5).

I do not support timber harvest in the vicinity of the Lewis and Clark Trail. (Letter 124)

Concerns about the Lewis and Clark Trail have been considered throughout the North Lochsa Face analysis process. The Clearwater Forest’s strategy is to protect the Lewis & Clark route and all the historic trails that cross the Forest. No logging is proposed on or near the Lewis and Clark Trail (Veg ROD, Attachment 6, pages 19 and NPTEC—10).

I am opposed to timber harvest and road construction. (Letter 124)

The no action alternative would not meet the purpose and need for action (ROD, decision criteria, pages ROD-30).

A watershed-restoration-only alternative was considered by the IDT but was not analyzed in detail because it would not meet the purpose and need for action and would not respond to a significant issue (DSEIS page 2-9).

The analysis does not show that the action alternatives will accomplish the purpose and need for action. (Letter 106, 131)

All of the action alternatives respond to the purpose and need for action. The effects analyses for the alternatives are presented in the DSEIS in Chapter 3.

The Forest Service should have considered a single alternative that would exclude logging in roadless areas, logging in old growth, and logging in Wild and Scenic river corridors. (Letter 138)

Alternatives 1 (no action) and Alternative 4a would address these issues and were analyzed in detail by the IDT. Alternative 1 would not respond to the purpose and need for action. The decisionmaker has selected Alternative 5 rather than Alternative 4a for the reasons cited in the Record of Decision for the FSEIS (ROD page ROD-30).

A watershed-restoration-only alternative should have been considered. (Letters 139, 161, 172)

A restoration-only alternative was considered by the IDT but was not analyzed in detail because it would not meet the purpose and need for action and would not respond to a significant issue (DSEIS page 2-9).

The action alternatives harvest too much of the mature and late seral forest in a project area that is not in compliance with Forest Plan old growth requirements. (Letter 139, 161)

In response to public concerns about the old growth, the decisionmaker has dropped all timber harvest in old growth habitat from the selected actions (ROD page ROD-5). The

five drainages listed in the DSEIS that currently are below the 5% Forest Plan old growth standard are Upper Hungry Cr, Lower Hungry Cr, Willow Cr, “Black Canyon Face” (the portion of the Lochsa River Canyon between Old Man Creek and Snowshoe Creek), and Lower Fish Creek (DSEIS page 3-49). These drainages are all included within inventoried roadless areas. The selected alternative does not include timber harvest within inventoried roadless areas, so there will be no timber harvest in these drainages.

We are opposed to Alternative 2 because it would harvest timber in an inventoried roadless area. (Letter 139)

The decisionmaker has selected Alternative 5, which responded to concerns about roadless areas by dropping all timber harvest within inventoried roadless areas. The selected actions do not include timber harvest within inventoried roadless areas.

Prescribed fire only, not logging, should be the management action used in roadless areas. (Letter 139)

The decisionmaker has selected Alternative 5, which responds to this concern. Alternative 5 includes prescribed burning, but not timber harvest, within inventoried roadless areas.

With wolf reintroduction underway, we need more elk habitat. The preferred alternative would reduce elk habitat. (Letter 141)

Alternative 6 was the preferred alternative in the DSEIS. The decisionmaker has selected Alternative 5, with modifications to address public concerns about old growth and lynx habitat. Table 3-35 on page 3-92 of the DSEIS shows elk summer habitat effectiveness by alternative for the 19 EAA’s within the project area. Table 3-36 on page 3-92 of the DSEIS shows changes in elk habitat effectiveness by management area, by alternative. Elk habitat effectiveness would be slightly reduced in some Elk Analysis Areas under Alternative 5. All action alternatives are consistent with the Clearwater Forest Plan (DSEIS page 3-96).

We support Alternative 2, but it should be modified to include selective cutting, thinning, and prescribed burns to create a forest with a tiered age structure. (Letter 145)

The decisionmaker has selected Alternative 5. Alternative 5 includes timber harvest, prescribed burning, thinning, and other vegetation management activities to achieve ecosystem objectives in roaded areas; it includes prescribed burning, but not timber harvest, in roadless areas.

We support alternative 2 because it would add elk habitat. (Letter 145)

Alternative 6 was the preferred alternative in the DSEIS. The decisionmaker has selected Alternative 5, with modifications to address public concerns about old growth and lynx habitat. Table 3-35 on page 3-92 of the DSEIS shows elk summer habitat effectiveness by alternative for the 19 EAA's within the project area. Table 3-36 on page 3-92 of the DSEIS shows changes in elk habitat effectiveness by management area, by alternative. Elk habitat effectiveness would be slightly reduced in some Elk Analysis Areas under Alternative 5. All action alternatives are consistent with the Clearwater Forest Plan (DSEIS page 3-96).

Based on changes in the area that I have observed over the last 20 years, more trees should be removed; retention levels should be less than 50%, 35%, or 25%. (Letter 145)

Canopy retention in proposed treatment units will provide shade and organic matter for natural soil processes to continue. The SEIS (pages 2-17 through 2-18, 2-21, 2-24, 2-26 through 2-27, 2-29, 2-31 through 2-32, 3-18 through 3-20, 3-173 through 3-174) outlines how canopy retention will vary by treatment type and landtype association ranging from approximately 25% in regeneration harvests on low relief, rolling hills (except for the species conversion units in the Bimerick area) to 95% retention for salvage harvests and underburns.

At least one action alternative should have been considered that would not include 2200 acres of clearcutting. (Letter 156)

Alternatives 1, 4, 4a, and 5 do not include the 2200 acres of clearcutting proposed for offsite pine in Bimerick Creek. The decisionmaker has selected alternative 5.

Another action alternative should have been considered that would harvest less timber and improve habitat for TES species through prescribed burning. (Letter 160)

The IDT considered a reasonable range of alternatives for the North Lochsa Face project. All alternatives are consistent with Forest Plan direction and are in compliance with the 1993 Stipulation Agreement between the Forest Service and the Wilderness Society et al. (DSEIS, page 2-9). The alternatives that were considered but not analyzed in detail are described in the DSEIS on pages 2-7 through 2-9. Alternative 5, the selected alternative, does not include timber harvest in the Bimerick Creek drainage or any other roadless areas. In response to public concerns about old growth and lynx habitat, the decisionmaker has chosen to drop all timber harvest units in old growth and precommercial thinning in lynx habitat (ROD page ROD-5).

This issue has been raised in the past. The action alternatives were developed to address issues that were raised in the scoping process, and to respond to the purpose and need for the project (Veg ROD, Attachment 6, pages 20 through 21).

The range of alternatives is too narrow because the purpose and need for action is too restrictive. (Letter 161)

The purpose and need for action for the North Lochsa Face project was developed in response to landscape conditions that were described in the North Lochsa Landscape Assessment (NLLA). The NLLA was completed in June 1996. The NLLA described relationships between landforms, vegetation, aquatic systems, wildlife species, disturbance regimes, and human influences (ROD, Attachment 6, page 17). The NLLA was used to develop Desired Future Conditions for the project area. The IDT considered this information when developing the purpose and need for action and the action alternatives for the North Lochsa Face project. The NLLA was not a decision document, and did not identify management actions that would occur on the landscape. The North Lochsa Face FEIS did not tier to the NLLA watershed assessment (Veg ROD, Attachment 6, page 22).

Other actions should have been considered for the off-site pine conversion, in addition to clearcutting. (Letter 161)

The pine in Bimerick Creek has a low market value. Because of that concern, coupled with the need to eliminate this off-site gene source, in Alternatives 2, 3, and 3a the IDT identified the option to burn those trees in case the timber does not sell DSEIS, Attachment 6, Page 18).

The action alternative would reduce elk habitat effectiveness below Forest Plan requirements. (Letter 161)

The decisionmaker has selected Alternative 5, with modifications to address public concerns about old growth and lynx habitat. Table 3-35 on page 3-92 of the DSEIS shows elk summer habitat effectiveness by alternative for the 19 EAA's within the project area. Table 3-36 on page 3-92 of the DSEIS shows changes in elk habitat effectiveness by management area, by alternative. Elk habitat effectiveness would be slightly reduced in some Elk Analysis Areas under Alternative 5. All action alternatives are consistent with the Clearwater Forest Plan (DSEIS page 3-96).

The SEIS does not quantify how much stand-replacing wildfires will increase under the no action alternative. (Letter 161)

The potential for wildfires to occur in the project area would increase under the no action alternative (DSEIS page 3-339). However it is not possible to quantify the amount of wildfire that may occur because it is not possible to predict episode occurrence, scale, and duration.

2711: Request New Alternative

The Nez Perce Tribe would like to see an ecosystem restoration alternative crafted that includes: salmon recovery, adoption of riparian buffers, no Roadless logging or roadbuilding, replant Fish and Pete King Creeks with shade providing vegetation, no new road construction, increase amount of riparian restoration, and protect culturally significant plants. (letter 80)

Create another alternative by combining some of the features of 2,3,4,5,and 6 to provide: no loss of TES or MIS habitat, no Clearcutting in NLRSA, no new road construction, no old growth timber harvest.(letter 107)

The FEIS, Chapter 6, pg 182, item 62, pg 185 item 71, addressed tribal concerns for salmon recovery and anadromous habitat recovery. Alternatives 3 and 4 SEIS, pg 2-19 and 2-24 include the features of the ecosystem restoration suggested by the Tribe. Letter #107 also suggests making a new alternative with features from all the action alternatives. FEIS Chapter 6, pg 185 item 72 addresses this concern.

Alternatives to timber harvest in the Bimerick Area have not been addressed (letter 139)

SEIS, Alternative Five, Chapter 2, pg 2-29 and 2-30 does not include commercial harvest of the timber in Bimerick. Veg ROD, attachment 6, pg 18, economics section, first comment addressed this issue.

The scale of the action alternatives is too large and damages the resources (letter 150)

Range of alternative is discussed in the Veg ROD, attachment 6, pg 20.

A restoration alternative is not considered (letter 168)

FEIS Chapter 6, pg 185 item 72 addresses this concern

The FS fails to justify inclusion of the local timber products need (letter 168)

FEIS, Chapter 6, pg 208, items 197 and 198 addresses this issue.

The Forest should include an ecosystem restoration alternative (letter 168)

The FEIS, Chapter 6, pg 182, item 62, pg 185 item 71, addresses concerns for salmon recovery and anadromous habitat recovery. Alternatives 3 and 4 SEIS, pg 2-19 and 2-24 include the features of the ecosystem restoration suggestion. FEIS Chapter 6, pg 185 item 72 addresses this concern.

Treatment of off-site pine in Bimerick Creek only considers harvest and does not include an alternative for girdling or burning (letter 172)

SEIS, Alternative Five, Chapter 2, pg 2-29 and 2-30 does not include commercial harvest of the timber in Bimerick. Veg ROD, attachment 6, pg 18, economics section, first comment addressed this issue.

Clearcutting will result in habitat modification substantially altering roadless characteristics of the area (letter 172)

This concern was addressed in Chapter 6 of the FEIS, pg 197, item 125. Also, the SEIS evaluation of effects to Roadless area beginning on pg 3-316 documents effects.

Consider mechanical girdling or felling of only the off-site trees in the Bimerick Area (letter 172)

Felling or girdling of the off-site pine without removing the trees would increase risk of insects, and would result in unacceptable fuel loading that could result in catastrophic wildfire.

I would like to see an alternative that does not impact any TES species (letter 174)

SEIS Chapter 3, Table 3-59, pg 3-158 shows that alternative 1 has no impact to TES.

2712: Literature Cited

The SEIS fails to discuss the consistency of the proposal with the Tribe's salmon recovery plan (letter 80)

This comment was addressed in FEIS, Chapter 6, pg 182, item 62.

Because of its flaws, the use of WATBAL places the risk on aquatic resources (letter 80)

This comment was covered in the FEIS Chapter 6, pg 186 and 187, items 76 and 80. Also, Veg ROD, attachment 6, pg 4 and 5.

It is not clear in the discussion (SEIS pg 3-188) concerning ECA and peak flows whether the ECA procedure significantly underestimated actual water yield (letter 126)

There is a difference between average annual water yield and peak flow, since annual water yield includes the peak flow values. The SEIS, Chapter 3, pg 3-188 shows that for

watershed stability, a peak flow increase of 15-20 percent is used as a red flag. Peak flow is not being used in an absolute sense, but rather as an indicator of possible channel stability problems.

The ROD should indicate whether the analysis tools including WATBAL and the ECA procedure accurately portrayed the impacts that would occur to each of the watersheds in the Analysis Area from each action alternative (letter 126)

Comment answered by item 80, pg 187, Chapter 6, FEIS. The Forest is using the latest credible models available, as well as monitoring and local experience to make evaluations on watershed effects.

No burning or thinning should occur in the L&C historic corridor until a comprehensive heritage and resource inventory and evaluation is completed (letter 127)

This comment was addressed in section 1500, heritage resources.

The declaration that prescribed burning benefits elk is contradicted by the scientific literature (letter 131)

SEIS project file documents 693, 694, 705, 706 and 708 provide the basis for the need to burn for elk browse.

The SEIS states that salvage logging has no effect on fisher and marten, when down wood is a key component for forage and denning (letter 131)

SEIS, Chapter 3, pg 3-139 actually states that salvage harvest, mixed severity burns, and underburn are expected to have mixed results. Denning could be reduced, but conditions for foraging could be improved.

Hessberg and Lemkuhl suggest that prescribed burning alone can be utilized in many cases where managers assume that mechanical fuel reduction must be used (letter 138)

In management areas allocated to timber production by the Clearwater Forest Plan, the window to use prescribed fire to reduce fuels very narrow. Using timber harvest to reduce fuels allows the value of the timber to pay for the fuel reduction. Using prescribed fire would require appropriated funds.

The definition of Roadless areas also includes areas adjacent to existing wilderness areas regardless of size (letter 138)

FEIS, Chapter 6 pg 197, item 125 covered the Roadless policy.

Roadless areas provide a sanctuary to animal and plant species (letters 138 and 139)

The effects of the project to Roadless areas was evaluated and documented in the SEIS, Chapter 3, pg 3-116 to 3-319, environmental consequences to Roadless area.

Timber sale activities may significantly impact recreational opportunities in unroaded areas (letter 138 and 139)

The effects of the project to Roadless areas was evaluated and documented in the SEIS, Chapter 3, pg 3-116 to 3-319, environmental consequences to Roadless area.

The decision to develop a Roadless area must be analyzed in an EIS (letter 138)

The North Lochsa Face Analysis is an EIS

The Forest Service should recognize the value in Roadless and unfragmented areas (letter 138)

The effects of the project to Roadless areas was evaluated and documented in the SEIS, Chapter 3, pg 3-116 to 3-319, environmental consequences to Roadless area.

The Forest Service should have addressed the full effect of the project by analyzing the cumulative impact beyond the immediate analysis area (letter 138)

The Veg ROD, attachment 6, pg 21 discusses cumulative effects.

Cumulative effects of past activity from a watershed, regional ecosystem level, and edge effects of fragmentation need to be considered (letter 138)

The Veg ROD, attachment 6, pg 21 discusses cumulative effects.

Ecosystem management principles include focus on landscape scale concept and design of large biological reserves and buffer zones and connectors (letter 138)

The Veg ROD, attachment 6, pg 21 discusses cumulative effects. SEIS, Chapter 1, pg 1-2 Background describes the size of the analysis area, which covers 128,000 acres.

Roadless areas constitute the last reservoirs of ecological diversity (letter 139)

The Veg ROD attachment 6, pg 19, first paragraph states that no harvest is proposed in Roadless area except for the helicopter units along the breaklands and in Bimerick, where forwarder would be used. Bimerick area is not an area of ecological diversity since the vegetation is off-site pine.

Fish habitat presence, population, and biomass is inversely related to road densities (letter 139, comments 24 and 26)

The SEIS, Chapter 3, Lochsa River Environmental Consequences, pg 3-263 to 267 demonstrates the project is designed to ensure that there are limited effects, in duration and magnitude, in the short term and neutral or beneficial effects in the long term to the aquatic ecosystem.

The leading cause of bull trout population decline is logging and roadbuilding (letter 139)

The SEIS, Chapter 3, Lochsa River Environmental Consequences, pg 3-263 to 267 demonstrates the project is designed to ensure that there are limited effects, in duration and magnitude, in the short term and neutral or beneficial effects in the long term to the aquatic ecosystem.

Quigly and others concluded that designated wilderness and potentially unroaded areas are important anchors for remaining strongholds of native fish (letter 139)

The SEIS, Chapter 3, Lochsa River Environmental Consequences, pg 3-263 to 267 demonstrates the project is designed to ensure that there are limited effects, in duration and magnitude, in the short term and neutral or beneficial effects in the long term to the aquatic ecosystem.

Wilderness fish habitat is a source habitat and the roaded land base is a sink habitat (letter 139)

The SEIS, Chapter 3, Lochsa River Environmental Consequences, pg 3-263 to 267 demonstrates the project is designed to ensure that there are limited effects, in duration and magnitude, in the short term and neutral or beneficial effects in the long term to the aquatic ecosystem.

Biological, clean water values, value of old growth and landscapes were not included in the economic analysis (letter 146)

This comment was covered by Veg ROD, attachment 6, pg 18, answer to economic comments.

The SEIS concludes that even with the boost in winter range habitat by the action alternatives, the trend will continue downward since the scale of activity is not high enough to change the trend (letter 147)

Agree, however, other resources such as watershed, old growth, and visual quality, begin to show negative effects if too large a scale of disturbance is implemented.

Consider using an adaptive management approach in cooperation with other agencies to develop data bases using standardized protocols for storing and querying wildlife monitoring information for implementation of this project (letter 147)

We agree that this is a good approach.

An agency may not define the objectives of it's action so narrow that only one alternative would accomplish the goals of the action (letter 161)

The range of alternatives question was answered in the Veg ROD, attachment 6, pg 20

An alternative may not be disregarded merely because it does not offer a complete solution to the problem (letter 161)

This is correct, however, an alternative that does not contribute towards the purpose and need would be outside the scope of this analysis.

The court held that the agency had not considered an adequate range of alternatives to determine how to allocate the land among management categories (letter 161)

Allocation of land among management categories is outside the scope of this analysis, and is done at the Forest Plan level.

In the present case, an FEIS written with deletions of either the tracts subject to the moratorium or the boundary dispute might also have been a very different document (letter 161)

We are not aware of a dispute regarding boundaries in the NLF area or a moratorium that was not considered in project design.

The FEIS is hopelessly skewed in favor of small deletions from the proposed sale, massive logging is the only possible outcome (letter 161)

The range of alternatives question was answered in the Veg ROD, attachment 6, pg 20

While the agency has analyzed alternatives that would not log or develop Roadless areas, these appear to be designed as throw-away alternatives, not tailored to meet the purpose and need of the agency (letter 161)

This comment seems to contradict other statements in the letter that state the range of alternatives is limited. Any of the alternatives documented may be selected.

The SEIS does not provide any evidence that logging replicates natural fires, although that is the inference in the document (letter 161)

Regeneration harvest of timber followed by burning to reduce slash and prepare the site results in post treatment conditions similar to those found after a stand replacement fire. Grass, shrubs, and brush with conifer regeneration occupy the site.

The SEIS is not precise in how to define forest health, if it includes human economic concerns as well, how can science define what is healthy (letter 161)

The FEIS, Chapter 6, pg 191, item 97 answered this question.

What proof is there that 1850 or 1900 are representative of ecological perspective rather than 2,000 to 3,000 years in length (letter 161)

We know that there have been climate events such as the “little ice age” within the last few thousand years. Recent points in time such as conditions during the year 1900 are more representative of current climate.

The steady state theory of ecology is inappropriate for time scales more than 200 year in length. The historic range of variability on anything less than a time scale that takes into account climate change may not be valid (letter 161)

At this point we do not know if the climate is changing or which direction the climate may be changing. The range of variability in the ecosystem would increase as the time period is increased. However, without knowing the future, we stand only small chance of guessing correctly with any predictions made, particularly if we want to look at the next 1,000 or 2,000 years. Plans in this project for managing vegetation are based on current climate conditions, since many of the species in the project area (such as white pine) have a fairly wide ecosystem amplitude and would be maintained in area as long as the productive soil is maintained on the site.

Both the Sierra Nevada and Columbia Basin Ecosystem Management Projects found that logging was a major reason for increasing the severity and intensity of wildland fire (letter 161)

The FEIS and SEIS both describe that the regeneration harvest proposed would remove merchantable timber and treat the slash created, and existing fuels with prescribed fire. See SEIS, table 3-12, pg 3-18. This reduces both the total fuel loading on the site as well as the flashy fine fuels. The remaining trees are spaced wide enough that crown fires will not become established in the area. Conifer plantations on the deep soils of the old surfaces do not provide enough dead fuels or dry live fuels to have a high risk of fire.

One of the biggest problems with the SEIS is the lack of comparability between LTA's and habitat types, and it is hard to believe the large elevation differences between LTA's (letter 161)

LTA's are accumulations of similar habitat types. The FEIS, files 753 and 754 tie LTA's, habitat type groups, and fire groups together. There was utility in dealing with aggregations of habitat types, since large fires would normally cover groups of habitat types.

Research from lodgepole pine in Yellowstone found stand-replacing or severe fires are a function of weather, not fuel load (letter 161)

See 1807, Wildfire, Comment #3 for answer to this comment.

The SEIS does not analyze impact to sensitive species (carnivores) from human disturbance under the action alternatives (letter 161)

Environmental effects to the carnivorous wildlife species is covered in Chapter 4 of the FEIS and Chapter 3 of the SEIS, in discussions by species.

One of the first issues that needs to be dealt with is the fact that unmanaged watersheds are in better condition than managed watersheds (letter 161)

This comment was answered in the watershed discussion 200.

3001: Visuals

Will there be effects from logging to the scenic quality, wildlife habitat and historical values found within the project area (Letter 109)?

FEIS: Pages 148 (scenic quality), 152 to 154 (historical values), 117 to 129 (wildlife habitat)

SEIS: Pages 3-268 to 272 (scenic quality), 3-320 to 324 (historical values), 3-87 to 152 (wildlife habitat)

Vol 14, Documents 809, Pages 1 to 12

We are concerned that the FS adequately analyzed aesthetic impacts (including visual and noise impacts) at multiple viewpoints along all sensitivity level 1 and 2 travel corridors, including Road 101, in the proposed action. (Letter 138).

FEIS: Pages 148 to 151

FEIS PF: Vol. 12, Documents 727 to 731

SEIS: Pages 3-268 to 3-272, 3-298 to 3-319

SEIS, pg 3-269, last paragraph

SEIS, pg 3-271, second paragraph shows how concern levels were developed.

SEIS PF: Vol. 10, Documents 617 to 652, Map Document M115, Pages 1 to 13

Multiple viewpoints along wild and scenic river corridors, trails and other recreational travelways, such as the Motorway, were analyzed throughout the project area using the scenery management system (SMS) including visibility simulations. The results from this analysis are disclosed in both the FEIS and SEIS in the environmental consequences sections for scenic quality. In addition, noise impact was analyzed and disclosed in the SEIS in the environmental consequences sections for the North Lochsa Slope and North Lochsa Face roadless areas as a component of isolation from sound as it pertains to the solitude feature.

All identified viewpoints in the Clearwater National Forest Plan, Appendix G within the project area are Sensitivity Level 1. Without being specified in Appendix G, the sensitivity level of other interior Forest areas, away from the specified travel corridors of A4, A5, and A6 is 3, this includes Road 101, which is not within the A4, A5 or A6 corridors, and not considered as a remote, rarely visited location. However, SMS does recognize that remote, rarely visited areas can have high scenic value. Two examples of this in the project area are Trails 224 (Fish Creek) and Trail 234 (Hungery Creek), which are identified in the Forest Plan as Sensitivity Level 1. A number of viewpoints in these more remote areas, within the North Lochsa Slope Roadless area, such as Trail 224 (Fish Creek), Trail 69 (Lewis and Clark Route), and Trail 237 (Willow Ridge area) were used for visibility simulations to evaluate retention of scenic quality in these remote areas when evaluating impacts of proposed treatments.

The SEIS does not disclose whether any firelines will be constructed for the project. We are concerned that if constructed firelines are used in Hungery Creek they would adversely affect the qualities of an eligible Wild and Scenic River Corridor. The FS also needs to consider and control the potential for off-road use in these and other Wild and Scenic River Corridors (Letter 138).

FEIS PF: Vol 13: Document 756, page 2, Paragraph 5 and Document 760, pages 1-3 (recognizes the roadless character of Hungery/Fish Creek Drainages related to fire use and suppression strategies).

REC Rod: Attachment 2 (Access Option 3-Monitoring Plan)

Burn plans will be written after the project is approved, and closer to the time of implementation to better describe existing fuel conditions. There is no intent to construct hand fireline in Hungery and Fish Creeks. Firelines will be made using fire to create fuel breaks (blacklines) around the burn area. Efforts to use only blackline will be preferred

over the construction of hand fireline. Hand fireline would not be effective for the size and fire intensity anticipated for these units when they are within prescription. Short pieces of incidental, constructed hand fireline will be used only to mitigate undesired firespread.

The potential for new off-road motorized use developing in the Fish and Hungry Creek drainages (eligible wild and scenic river corridors) should be nullified by the implementation of the Access Option 3-Monitoring plan as described in the Recreation and Access Record of Decision. This would include preventing any future use of firelines as trail corridors. A plan for considering and controlling the potential off-road use in Wild and Scenic river corridors outside the North Lochsa Face area is a request for analysis that is beyond the scope of this project specific decision.

3002: Helicopter Landings

I do not agree with clearcutting in roadless areas to eliminate off-site ponderose pine trees, nor do I support creating helicopter landings to support this logging (Letter 118).

FSEIS ROD; Page ROD-7

The selected actions do not include clearcutting in roadless. The selected actions do not include use or construction of any helicopter landings in roadless in support of selected actions. The only exception to this would be helispots designated as emergency landing sites during prescribed fire operations.

I do not support the use of helicopter landings within the Lochsa Wild and Scenic River Corridor, including the one proposed for use up Pete King Creek. I question whether helicopter logging is either economical or safe within the corridor especially during the Lewis and Clark Bicentennial. I have concerns that helicopter logging is not beneficial for the watershed or safe for recreationists (Letter 118).

FEIS: Pages 148 to 151

VEG Rod: Page 19 (Proximity to Lewis and Clark Route)

FEIS PF: Vol 12, Documents 727 to 731

Vol 14, Documents 809, Pages 1 to 12

Vol 16, Document 848, Pages 17-25

Vol 26, Documents 1104 to 1116

SEIS: Pages 3-268 to 272, 3-289 to 298

SEIS PF: Vol 10, Documents 617, 624 to 626

Helicopter landings and associated helicopter logging within the Wild and Scenic River corridor has been fully analyzed and the effects disclosed in the environmental consequences sections of the SEIS for Scenic Quality and the Lochsa Wild and Scenic River. The Helipace model was used to determine the economic feasibility for helicopter logging. This model contains criteria that were used to establish treatment prescriptions for areas feasible for helicopter logging. Document 730 outlines mitigation measures associated with helicopter logging along the Wild and Scenic River Corridor. When implemented, these mitigation measures provide for: additional coordination with the Idaho Department of Transportation to provide for increased public safety during helicopter logging operations, and specific timing for logging operations to minimize impact to area recreationists including spring boating season on the river, and summer visitor traffic.

After treatment, how would the cutting units and helicopter landings within the Lochsa Wild and Scenic River Corridor appear to viewers? If there were impacts would they be mitigated (Letter 118)?

FEIS: pages 148 to 150

FEIS PF: Vol. 12, Documents 727 to 731

SEIS: pages 3-268 to 3-272, 3-289 to 298

SEIS PF: Vol. 10, Documents 617, 624 to 626

The results from both the Wild and Scenic River and Scenic quality analyses are disclosed in both the FEIS and SEIS in the environmental consequences sections for those resources. Simulated Modifications, or computer pictures of the landscape following management activities have been done and are displayed in the SEIS PF, Document 625. Mitigations for treatment activities within the Wild and Scenic River Corridor are outlined in the FEIS PF, Volume 12 Document 730. The Forest has experience with timber harvest in the Wild and Scenic River corridor due to previous logging of private properties encumbered by scenic easement. These harvests have been

successful in protecting the river's ORV's. Timber harvest on National Forest land within the Wild and Scenic River corridor will adhere to the same standards as used on private land.

FROM 2600, 2607: W&S RIVER SUITABILITY

I have a concern that the activities proposed outside the Wild and Scenic River Corridor were not analyzed regarding their impact to the Outstanding and Remarkable Values (ORV's) of the Wild and Scenic River Corridor (Letter 177).

FEIS: pages 148 to 150

FEIS PF: Vol. 12, Documents 727 to 731

SEIS: pages 3-268 to 3-272, 3-289 to 298

SEIS PF: Vol. 10, Documents 617, 624 to 626

The results from both the Wild and Scenic River and Scenic Quality analyses are disclosed in both the FEIS and SEIS in the environmental consequences sections for those resources. These analyses evaluated effects of all treatment alternatives, regardless of whether they were located in or out of the Wild and Scenic River Corridor on the Wild and Scenic River resource. In addition, the SEIS Page 3-296 to 298 discloses past and present actions in the cumulative effects analysis area of the Lochsa and Middle Fork Clearwater Wild and Scenic Rivers. These include activities located both on and off National Forest lands.

We are opposed to timber harvest in the Wild and Scenic River Corridor due to its potential to conflict with the Wild and Scenic River Act. The SEIS should include information regarding whether ORV's are diminishing or increasing and full disclosure of all planned and reasonably foreseeable actions in the Lochsa River watershed and how they would impact ORV's for the Wild and Scenic Lochsa River (Letter 177).

FEIS: pages 148 to 150

FEIS PF: Vol. 12, Documents 727 to 731

SEIS: pages 3-268 to 3-272, 3-289 to 298

SEIS PF: Vol. 10, Documents 617, 624 to 626

The results from both the Wild and Scenic River and Scenic Quality analyses are disclosed in both the FEIS and SEIS in the environmental consequences sections for those resources. The SEIS PF Document 624 specifically addresses effects of proposed harvest activities and associated mitigation measures within the Wild and Scenic River Corridor. This document also discloses the effects to ORV's and that ORV's will be either protected and/or enhanced by the proposed treatment activities and the associated activity mitigation. The Forest has experience with timber harvest in the Wild and Scenic River corridor due to previous logging of private properties encumbered by scenic easement. These harvests have been successful in protecting the river's ORV's. Timber harvest on National Forest land within the Wild and Scenic River corridor will adhere to the same standards as used on private land. The SEIS Page 3-296 to 298 discloses past and present actions in the cumulative effects analysis area of the Lochsa and Middle Fork Clearwater Wild and Scenic Rivers. These include activities located both on and off National Forest lands.

The SEIS does not address the Clearwater National Forest Plan direction for the A7 management area (Lochsa Wild and Scenic River Corridor) (Letter 177)

FEIS: pages 148 to 150

FEIS PF: Vol. 12, Documents 727 to 731

SEIS: pages 3-268 to 3-272, 3-289 to 298

SEIS PF: Vol. 10, Documents 617, 624 to 626

The management area direction for A7 is disclosed in the SEIS on Page 1-5. This direction is addressed in the results from both the Wild and Scenic River and Scenic Quality analyses. The results of these analyses are disclosed in both the FEIS and SEIS in the environmental consequences sections for those resources. The SEIS, Page 3-298 discloses the consistency of the Wild and Scenic Rivers Act with the Clearwater National Forest Plan.

FROM 2600, 2608: W&S RIVER ELIGIBILITY

Designate the following streams as National Wild Rivers: Hungery, Fish, Pete King, Canyon, Deadman, Bimerick, Apgar, Glade, Rye Patch, Nut and Walde Creeks (Letter 38).

A plan and accompanying analysis for considering rivers for Wild and Scenic River status for rivers not previously designated in the Forest Plan or subsequent Forest Plan amendments is a request for analysis that is beyond the scope of this project specific decision.

A wild and scenic river eligibility or non-eligibility designation is needed for Pete King, Canyon, and Deadman Creeks due to their remarkable fishery value prior to finalizing this project. This is needed, as an eligibility study and has not been done (Letter 177).

SEIS: Pages 3-179 to 268

A plan and accompanying analysis for considering rivers for Wild and Scenic River status for rivers not previously designated in the Forest Plan or subsequent Forest Plan amendments is a request for analysis that is beyond the scope of this project specific decision. The fisheries values of Pete King, Canyon and Deadman Creeks are recognized in the project analysis, and the effects of the proposed treatment activities on the fishery resource are disclosed in the SEIS in the aquatic resources environmental consequences sections for Pete King Creek (SEIS Page 3-221), Canyon Creek (SEIS Page 3-232), and Deadman Creek (SEIS Page 3-239).

FROM 2600, 2609: RNA's

We are concerned about disturbing the quality of the Bimerick Meadows Natural Research Area. We feel the Bimerick Meadows area has potential to be evaluated as a research natural area (Letters 120, 161).

SEIS: Pages 3-280 to 285, 3-298 to 319

401: Habitat (general)

Preserve irreplaceable habitat intact. (Letters 38, 62, 142, 158, 167, 75, 92, 135, 141, 76)

Multiple references and documentation (Rec ROD pg 14; Veg ROD, FEIS, SEIS, SEIS proj file) indicate that habitats and species known or suspected to occur in the NLF study area have been addressed. Planned management actions, including Alternative 1, have varying affects on wildlife (even for the same species). These documents indicate a mix of habitat effects (beneficial and adverse) by species, management actions, and

alternatives. Though habitat may be reduced for some species in the short-term, planned actions are intended to retain suitable habitats as generally described in SEIS PF Doc 754, pg 12. All planned actions, though impacting individual animals or habitat, "...will not likely contribute to a trend toward federal listing or cause a loss of viability to the population or species." All planned actions and associated habitat effects comply with the direction provided in the Clearwater National Forest Plan.

Project will destroy, adversely affect or threaten wildlife and endangered species habitats. (Letters 73, 90, 93, 101, 92, 131, 107, 160, 52, 630)

See response to comment 401, above.

Analysis lacks consideration for wildlife. (Letters 109, 133, 177, 28, 131, 105)

Veg ROD; FEIS; SEIS; SEIS Proj File, Volumes 1 (Docs 47, 64-66, 68-72 & 75), 16 and 17)

Protect old growth to meet species viability needs. (Letter 138)

The selected action would not harvest old growth forest.

402: Big Game Habitat

Elk habitat will be compromised. (Letter 77)

Rec ROD, pg 6 (#3); Veg ROD, pgs 13, (#3), FEIS 195 (#'s 115 & 116); SEIS, pg 3-92 to 3-97

Analysis fails to estimate increases in the elk population. (Letter 80)

Veg ROD, pg 6; FEIS pg 123 (Cumulative Effects – Past, Present, and ...); SEIS, pg 3-96 (Cumulative Effects paragraphs 4 & 5)

Project decreases (summer) elk habitat effectiveness. (Letters 92,161)

Rec ROD, pg 6 (#3); Veg ROD, pgs 13, (#3), 195 (#'s 115 & 116); SEIS, pg 3-92 to 3-97

Analysis fails to adequately address elk habitat components. (Letter 161)

Veg ROD, pgs 72 to 74 and 122 to 123; SEIS, pg 3-88 to 3-103; SEIS PF Doc 725 to 750 and Doc 754, pages 7 to 10, 21 to 27, and 60 to 70.

Elk will reach their natural population balance when ecosystems function naturally (Letter 172)

SEIS, pg 3-88 and pg 3-91 (No Action Alt paragraphs 3 and 4); 3-97 to 3-102.

Do not negatively impact elk habitat. (Letters 131,141)

Rec ROD, pg 6 (#3); Veg ROD, pgs 13, (#3), 195 (#'s 115 & 116); SEIS, pg 3-92 to 3-97

Project provides long-term benefits to elk (Letter 147)

Rec ROD, pg 6 (#3); Veg ROD, pg 13, (#3), 195 (#'s 115 & 116); SEIS, pg 3-92 to 3-102

Harvest timber and burn to increase available forage. (Letters 145, 46)

Veg ROD, pg 13, (#3); FEIS, pg 122-123; SEIS, pg 3-93 to 3-102

Burn winter range to improve elk habitat. (Letter 147)

Veg ROD, pg 13, (#3); FEIS, pg 122-123; SEIS, pg 3-97 to 3-102

Recover imperiled species (elk). (Letter 80)

Veg ROD, pg 13, (#3); FEIS, pg 122-123; SEIS, pg 3-93 to 3-102

The scale of the planned projects are inadequate to substantially improve elk winter habitat. (Letters 147,161, 80)

SEIS 100-102; SEIS PF 754 (pages 68-70).

All action alternatives for elk winter habitat improvement are consistent with the Forest Plan but Alternatives 4/4a are unclear as to how. (Letter 80)

Elk winter range improvement practices to increase browse are consistent with the management direction in the Forest Plan. Alternatives 4/4A, because they increase browse production, comply with Forest Plan direction. Management actions in Alternatives 4/4A, however, would not achieve the low range of desired winter range for NLF. Acreages of winter range treated by the actions in Alternatives 4/4a indicated that browse production would be greater than Alternative 1, but less than the other action alternatives.

Because project decreases (summer) elk habitat effectiveness, it violates Forest Plan Settlement Agreement. (Letters 92,161)

Rec ROD, pg 7, J.; Veg ROD, pg 23

403: Elk Vulnerability

Analysis failed to address short-term effects on hunting in relation to habitat changes. (Letter 80)

Rec ROD, pg 6 (#3); FEIS pg 59-66, 145-147 and 195 (#114); SEIS 3-93 to 97. A specific discussion relating to hunting and habitat changes (associated with the removal of hiding cover by logging) was not done. Gratson and Whitman (1997 and 2000) were reviewed in the analysis (SEIS PF 754, pg 22). The Rec ROD, however, pre-empted

much of the potential increased vulnerability of bull elk (as the combined result of hiding cover reductions adjacent to roads) to hunting by restricting motorized access throughout much of the NLF. This was accounted for in the elk habitat analysis process. Planned actions to decommission unneeded roads, and place others in long-term maintenance (intermittent use) status, would also improve elk security and habitat effectiveness. All alternatives acknowledged the increased availability of security habitat (as the result of access restrictions and opportunities) during the general big game season.

405: Grizzly Bear

The CNF should not be exempt from grizzly bear recovery. (Letter 131)

SEIS PF 754, pg 33-34

408: TES Access Management

Analysis fails to address short-term effects from human disturbance to sensitive species habitats. (Letter 161)

SEIS pg 3-138 to 141 (fisher), pg 3-146 (harlequin duck), pg 3-147 & 151 (northern goshawk), and pg 3-152 to 157 (wolverine); pg SEIS PF 754, pg 42 and 89-91 (fisher), pg 44 and 99-100 (harlequin duck), pg 48 and 96-99 (wolverine); pg 101 to 110 (selected sensitive plant species)

409: Wildlife & TES Cumulative Effects

Project will destroy or adversely affect wolverine, fisher and lynx habitat and fails to manage for biological diversity. (Letters 47,140,146,161,96, 82)

Respondent(s) referred to Douglas & Strickland, 1987; Powell and Zeilenski; Banci; Hendee et.al, 1990; Hornocker and Hash, 1981 (refer to Ruggiero, et. al. 1994 for major doc source. SEIS PF Docs 713 and 717, superceded the suggested documents and represented contemporary science for wolverine and fisher. SEIS File Doc 710, superceded the suggested documents and represented contemporary science for Canada lynx.

How many wolverine will be around to see this improvement? (Letter 131)

SEIS 3-153-157; SEIS PF 754 (pages 96-99). It is beyond the scope of this analysis to predict populations of this habitat generalist (that typically "...inhabits remote mountainous areas where human disturbance is unlikely")

The critical nature of connecting habitat is relevant and is ignored. (Letter 172)

SEIS PF 754, pg 4

The analysis fails to adequately address species viability from habitat analysis. (Letters 174, 80, 160)

SEIS PFs 707 (pg 1-4), 711 and 754 (pg 2-4).

Project will damage black-backed woodpecker, pileated woodpecker and northern goshawk habitats and fails to manage for biological diversity. (Letters 156,107)

FEIS pg 72 and 119-121; SEIS pg 3-133 to 136 (black-backed woodpecker), 3-147 to 151 (northern goshawk), 3-105 to 111 (pileated woodpecker); SEIS PF 754, pg 4. The habitat feature for northern goshawks is retaining nesting habitat (larger than 25 acres) within breeding territories. Assuming nesting territories range in area between 4000 and 6000 acres (average 5000 acres), there are an estimated 20 to 30 nesting territories within the 128,000 NLF analysis area. A minimum of about 43,000 acres of potential northern goshawk nesting habitat would remain in the NLF with all alternatives. Potential nesting habitat, therefore, would average between 1400 and 2100 acres per breeding territory. Suitable nesting habitat to sustain existing northern goshawk breeding territories would be retained throughout the NLF. This would be true even in lower Fish Creek, where suitable nesting habitat is less available than the general NLF analysis area. Though nesting habitat could be reduced up to 5000 acres in the NLF, suitable nesting habitat would remain in all breeding territories. Breeding territories and breeding pairs, therefore, are not expected to decline as the result of NLF planned actions.

The Clearwater Forest Plan fails to track old growth indicator and sensitive species populations and population trends. NLF proposal also fails to meet these requirements. (Letters 139,161, 172)

SEIS PF 754, pg 6. Specifically tracking old growth indicator and sensitive species populations and population trends within the NLF is beyond the scope of the analysis.

Viability of goshawk populations should be demonstrated. (Letters 160,172,174)

SEIS PF 754, pg 2-4. Refer to above.

Wildlife and land managers should use an adaptive management approach, cooperate to increase existing population data on selected wildlife species using standardized protocols, and to develop spatially-explicit data bases for storing and querying wildlife monitoring information. (Letter 147)

SEIS PF 754, pg 6. While the concept of joint monitoring and data bases should be explored, it is more appropriately addressed administratively. Administrative evaluation of this suggestion is beyond the scope of this analysis.

415: Single Species Mgt.

Single species management is ineffective in keeping forests healthy. (Letter 118)

Veg ROD, pg 14; SEIS PF 754, pages 1-3 and 119-120

416: Lynx

Literature is not clear that logging will help lynx. (Letter 161)

SEIS PF Docs 66, 68 (pg 13 and 24-26), PF 715 (pg 2 'Regeneration') and 754 (pg 12).

How does reducing lynx denning habitat recover the species? (Letter 80)

SEIS PF Docs 66, 70 (pg 17-19) and 754 (pg 12 and 81-85)

USFWS concurs with lynx determination. (Letter 85)

SEIS PF Docs 66

Has lynx distribution been studied and measures to comply with lynx management standards been taken? (Letter 104)

FEIS pg 69 & 119 and pg 196, # 120; SEIS, pg 3-124 to 3-132; SEIS PF Doc 66, 753 and Doc 754 pg 81 - 85.

Lynx habitat above 4000' elevation and cedar hemlock habitats were excluded from NLF LAUs. (Letter 161)

SEIS PF 754 pg 37. SEIS PF 68, pages 8-12. LAUs were identified using a combination of habitat descriptions and size guidelines described in the LCAS, 2000 (2nd Edition), SEIS PF 714 {pages 3 (Idaho), 5 (Programmatic planning—guidelines)}. Per LCAS guidelines, including western redcedar habitats were specific to northern Idaho watersheds north of the Clearwater National Forest and “only when in association with subalpine fir and spruce habitats....The types of (forests) most importance to lynx include those where lodgepole pine is a seral species and moist habitat types that can produce dense understory shrubs.”

Lynx habitat analysis is inadequate or unclear or contradictory regarding consultation, human disturbance, snowshoe hare habitat features, and lynx population estimates. (Letters 131, 160, 172)

SEIS, pg 3-124 to 3-132; SEIS PF 66 and 753

Since Bimerick Meadows is referred to in the question as Bimerick Meadows Natural Research Area it is unclear whether the concern is with the existing Lochsa Research

Natural Area (RNA), or with the Bimerick Meadows area, which someone may want designated as a RNA.

If the concern is with the affects of the proposed action to the existing Lochsa Research Natural area, then the SEIS discloses the environmental consequences of the proposed treatment activities on the existing RNA.

If the concern is with designating Bimerick Meadows as a new RNA, then the request for a plan and accompanying analysis for considering additional RNA's, for areas not previously designated in the Forest Plan or subsequent Forest Plan amendments, is a request for analysis that is beyond the scope of this project specific decision.

If the concern is with protecting the resources found in the Bimerick Meadow environment for future designation as a RNA, then the effects of the proposed treatment activities on the aquatics resource are disclosed in the SEIS aquatic resources environmental consequences section for Bimerick Creek (SEIS Page 3-246). In addition, Bimerick Meadows is located within the North Lochsa Slope Roadless area and the effects to the roadless characteristics of the Bimerick Creek drainage, including the meadow, are disclosed in the roadless area environmental consequences section, and specifically outlined in the Bimerick Creek drainage table found on SEIS page 3-308.

500: Vegetation Management Harvesting of offsite ponderosa pine (letters 15, 172)

This comment was responded to in the following citation concerning off site pine conversion: Veg ROD, Attachment 6, Page 20

Logging for restoration is unfounded and will damage soil, water, wildlife, fish, plants, recreating and roadless resources. (letters 38, 52, 80, 166, 175)

These comments were responded to in the Ecosystem Disturbance section of the following citation: Veg ROD, Attachment 6, Page 17

Oppose any logging activity within inventoried roadless (letter 172)

This comment was responded to in the following citation “Proximity to Lewis and Clarke Route, Proposed Wilderness, etc”(also addressed in the responses to the Nez Perce Tribe): Veg ROD, Attachment 6, Page 19.

501: Growth and Yield

Are we just going to let loggers “thin” or “conserve” trees and create devastation in the Lochsa Face area? (letters 84 & 114)

These two comments were addressed in the “Ecosystem Disturbance” and “Economics” sections of the following citation: Veg ROD, Attachment 6, Page 17 & 18

SEIS is too vague in stating what trees would be logged and it does not define what a suppressed tree is. Leaves door open to log big trees. (letter 157)

The SEIS does not define what a suppressed tree is. A “suppressed tree” as defined by the Society of American Foresters is: a tree that has its crown in the lower layers of the forest canopy, the leading shoot is not free and the tree is growing very slowly (from SAF publication “Terminology of Forest Science, Technology Practice and Products, 1971.)

Alternative #5 with no harvesting in the roadless areas will be the selected alternative. On SEIS pages 2-28 & 29, is the Design Criteria and Features of Alternative 5. Under Regeneration Harvest it states that “sample stand diagnoses of proposed harvest treatments can be found in Appendix G.” On page G-4 is a section titled “Marking Guides for Group Selection and Commercial Thinning.”

In the group selection regeneration harvest areas, all trees in groups of ¼ to 2 acres in size would be harvested, leaving standing 2 to 3 overstory trees per acre in these groups. These leave trees would be the best ones on site. “Best” would be defined as the healthiest tree, with a full green crown, good vigor and of good form with a large percent total line crown and which has no evidence of insect or disease agents affecting it nor any mechanical damage.

For the commercial thinning areas, thinning from below would be done to retain 120 square feet of basal area per acre. Remove understory trees and pest infected trees first, then thin the remaining healthy trees to the 120 foot target.

In the SEIS the definitions of the various seral stages by age are inconsistent with the Clearwater inventory data which uses different age groupings, thus it is impossible to validate the SEIS figures. (letter 161)

The age groupings in the SEIS are different than the age groupings in the current Clearwater inventory data. The inventory data uses the following grouping: 1-24 years, 25-49 years, 50-99 years, 100 –149 years and 150+ years. The age groupings in the SEIS on page 3-3 are: 0-40 years, 41-60 years, 61-100 years, 101-160 years, and 160+ years. The age groupings are not the same and are discretionary by the individual requesting the inventory run. Age, seral successional stage and size class by diameter do not correlate well due to many different factors and are not interchangeable. Those listed on page 3-3 of the SEIS are but general estimates of the ages of any particular size class or successional stage. The age groupings are however very close to each other. The SEIS figures do not need to be validated since they were obtained from the same data base using the same inventory query with but a slightly different age class request.

502: Suitability of Land

Logging in Bimerick drainage of offsite pp would affect a potential research/natural area along the creek and meadow complex. (letter 92)

This comment was responded to in the “Off Site Pine Conversion” section of the following citation: Veg ROD, Attachment 6, Page 20

503: Reforestation

Loss of wildlife habitat should outweigh the benefits of removing the off-site pp. The wildlife are using these trees. (LETTER 90)

This comment was responded to in the “Off Site Pine Conversion” section of the following citation Veg ROD, Attachment 6, Page 20

We miss the advantages of logging off-site pp near a roadless area?(letter 106)

This comment was responded to in the “Off Site Pine Conversion” section of the following citation Veg ROD, Attachment 6, Page 20

I support the logging of the off-site pp and the harvest of commercially valuable trees. (letter 117)

The Purpose and Need statement (E), 2-.Timber Harvest, in the following citation discusses the proposal to log the off-site pine and to harvest mature timber from suitable timber lands in the North Lochsa Face analysis area:Veg ROD, Page 2 & 3

504: Salvage of Dead and Dying

It is wise to select log bug infested areas to curb the spread of the insect infestation. (letter 55)

The Purpose and Need statement, 1-Vegetative Management, Timber Harvest of the following citation describes the reasons why it is desirable to do what the above comment suggests: FEIS (Purple cover, June 1999), chap. 1, p 11-12.

To create better browse for elk, all timber harvest below 4000 feet should retain no more than 15% of the timber there now, except on breaklands. (letter 145).

This comment is responded to in the following two citations: Veg ROD, Attachment 6, page 13- third paragraph and Page 16-third paragraph.

506: Even-Aged Management (Clearcutting)

I take exception to and oppose the timber harvest method of clearcutting for the off-site pp removal. (letters 50, 107, 115, 141, 158, 167, 176)

These comments have been responded to in the following citation: Veg ROD, Attachment 6, Page 16, section titled “Clearcutting and Even-aged Management”.

Clearcutting of the off-site pp on 2200 acres in Bimerick Creek drainage does not seem to be the optimum method of harvesting these trees, but NFMA only allows clearcutting when it is the optimal method of timber harvest. (letters 107, 118, 120, 156, 161, 172, 174)

These comments have been responded to in the following citation: Veg ROD, Attachment 6, Page 16, section titled “Clearcutting and Even-aged Management”.

Why wouldn't natural selection be the best method to weed out the off-site pp and their genes? Why are they a problem?. (letter161)

These two comments were addressed in the “Off Site Pine Conversion” section of the following citation: Veg ROD, Attachment 6, Page 20

The SEIS also does not describe what will be done with pp seedlings that may emerge in or around the area in the future since it is likely they would have some of this off-site genetic material. (letter161)

The selected alternative does not include any harvesting in the roadless area which includes the off site ponderosa pine planted in Bimerick Creek in 1934. These areas would however be broadcast burned. The commenter is correct that the SEIS doesn't say what will be done with any pp seedlings in and around the area that has ponderosa pine that does or may contain this non-adapted genetic material from the original stock.. After 68 years the contamination of the gene pool has already occurred both within the North Lochsa Face analysis area and beyond it and nothing can be done to completely eliminate it, except the natural selection against the non-adapted trees in the environment over time. Even the broadcast burning will not assure that the mature or younger off site ponderosa pine trees will be killed and thereby stop the dissemination of these off site genes.

The Clearwater has not monitored for boreal toads, but the SEIS admits that the Bimerick Creeks headwaters are suitable breeding habitat for boreal toads. (letter 172)

SEIS 3-151 & 152; SEIS PJ 717, pg 6. Planned actions are expected to keep sediment production within Forest Plan standards. Based on the respondent's input and rationale, the biological determination should be changed from 'No Impact' to 'May impact individuals....'.

The preferred alt will decrease the wilderness features/roadless characteristics within the roadless area portion of Bimerick Creek. (letter 174)

This was covered in the following citation concerning proposed wilderness: Veg ROD, Attachment 6, Page 19. However, the FSEIS ROD selects Alt 5 with no harvesting in

roadless – only burning. Therefore the wilderness features/roadless characteristics within the analysis area will be unaffected.

507: Size and Shape of Openings

The size of the proposed logging is too large (i.e. over 7000 acres) and violates the NFMA limit of 40 acres on the size of new openings and uses the concept of patch-size that is without NEPA or NFMA compliance. (letters 82, 90, 101, 102, 117 & 161)

This comment has been discussed in the section titled “Clearcutting and Even-age Management”, paragraph 6 of the following citation: Veg ROD, Attachment 6, Page16

The impacts of logging are quite different from those of wildfire and natural disturbance and the analysis of patch size doesn't cover the size or effects of the logging proposed which are very dissimilar to those of natural disturbances. (letter 118).

This comment was covered in the discussion of Soils in the third paragraph on page 28 which describes what will most likely occur if no treatments are undertaken. The comment is correct in that some effects of harvesting do not exactly mimic those of wildfire and some natural disturbances. In fact some disturbances such as landslides or stand replacement wildfires would produce more adverse environmental effects than harvesting. Veg ROD, Attachment 6, Page28.

509: Logging Practices (heli vs. roaded, etc.)

Logging could be accomplished via helicopter or horse logging methods w/o the construction of new roads. (letters 55, 59)

This comment was covered in the following two citations: Veg ROD, Attachment 6, Page18 & FEIS, chap 1, p 11.

Assertions in the SEIS that the use of forwarders, skyline and helicopter logging methods can protect roadless areas is not demonstrated in SEIS 3-312 & 313.(letter 138)

The commenter is correct in that the SEIS does not show how the use of forwarders, skyline and helicopter yarding methods would protect roadless areas other than not building system roads, however, in the FSEIS ROD, the selected alt.5 would not include any harvesting in roadless areas, only burning, which would dismiss this concern.

511: Below Cost Sales

We request a full analysis to ensure that taxpayers do not subsidize below cost logging and that an accurate economic analysis be done of the North Lochsa Face project. (letters 138 & 172)

This analysis has been done and has been discussed in the “Economics” section of the following citation: Veg ROD, Attachment 6, p 18-19, paragraph 3.

512: Land Should Be Managed

Comment 1: Recommend Alt 2, that it be accomplished in a series of timber sales ranging from 4-15 MMBF and that this alt be expanded to include much more acreage to be

This comment has been responded to in the Range of Alternatives section of the following citation: Veg ROD, Attachment 6, p 20-21.

The EIS is not based on science and fact, but rather a desired philosophy of management to create a parklike state with little regard to sound forest management. (letter 55.)

This comment was covered in the “Ecosystem Disturbance” section and in the “Range of Alternatives” sections of the following document: Veg ROD, Attachment 6, p 17 & 18 and p. 20-21.

Timber needs to be removed in greater amounts than the 50%, 35% and 25% retention levels. This should be changed to no greater than 15% timber retention except on breaklands where the retention would be increased to 25%. (letter 1450)

The response to this comment is contained within the “Soils” section of the following citation: Veg ROD, Attachment 6, p 27-29.

513: Oppose All Harvest

I urge you to re-consider the long-term ecosystem impacts of this ill-advised logging plan and cancel the project in its entirety and preserve the natural environment along scenic Highway 12 corridor. (letters 26, 28, 33, 52, 58, 59, 70, 73, 77, 90, 92, 100, 137, 142, 143, 144, 155, & 167)

These comments are responded to in the “Ecosystem Disturbance”, “Proximity to Lewis and Clark Route, Proposed Wilderness, Etc.” and “Soils” sections of the following citation: Veg ROD, Attachment 6, p 17, 19 & 28.

514: Burning Commercial Timber

Recommend utilizing small logging operations instead of prescribed burning prior to any timber harvest or salvage harvesting of commercial forest products. (letter 55)

This comment was responded to in the Fire Management section of the following citation: Veg ROD, Attachment 6, p 25, second paragraph.

Prescribed burning should be used when the value of the timber is lower than the cost to get it out. (letter 145)

This comment was responded to in the “Economics” and “Fire Management” sections of the Veg ROD, Attachment 6, p 18-19 and p.24-27..

The SEIS failed to disclose the impacts of road construction on soil productivity loss, soil compaction, and as a new weed vector (Letter 139):

The effects of road construction on soil compaction and productivity are discussed in the soils report for the FSEIS (Project File, Volume 9 Document 588a). The impacts of road construction on noxious weeds are discussed in the SEIS (pages 3-68 through 3-86) and proposed weed treatments are displayed in Appendix E of the SEIS.

601: Stability

There will be an increase in soil erosion and landslides. (Letters 73,82,86,90,155,156,157,168,172)

The DSEIS (pages 3-159 through 3-178) provides a thorough discussion of landslide and erosional hazards within the analysis area and the potential impacts of all alternatives on these processes. Further information is provided in the project file (PF, Vol. 9). All action alternatives were designed to maintain erosional hazards within historical ranges.

Proposed logging is on the same type of slopes that failed in 1995-1996. (Letters 92,106,140,141,161)

The DSEIS (pages 3-164 through 3-169) provides a detailed examination of the 93 landslides that occurred in the analysis area in 1995-1996. Fifteen of these landslides were related to previous harvest activities, with 14 occurring in clearcut units and one occurring in a clearcut with reserves unit. Across the Clearwater National Forest, there were 160 harvest-related landslides and all but 2 occurred within regeneration harvest units. All the proposed harvest units in the North Lochsa Face analysis area retain from 25-95% of the existing canopy cover, so landslide hazard should be within historical ranges.

In addition, all proposed treatment units were evaluated for the five factors identified by McClelland et al. (PF, Vol 9, Doc 563) from their survey of the 1995-1996 landslides across the Clearwater National Forest. Appendix F of the DSEIS provides a unit-by-unit evaluation of these five factors. Appendix F also lists the primary landtypes within each proposed treatment unit and the high potential hazards associated with each landtype. The DSEIS (pages 3-169 through 3-178) provides an evaluation of the environmental consequences of all alternatives.

Such a large logging project is inappropriate on fragile soils. (Letter 92,112)

The DSEIS (pages 3-169 through 3-178) evaluates the potential impacts of the all alternatives on the soil resources within the analysis area. The alternatives provide a variety of treatments including prescribed burning, thinning, salvage, and regeneration harvests. Appendix F of the DSEIS lists the erosional hazards for all units. Treatment units were designed to maintain the soil resource within historical levels by retaining canopies of 25-95%.

Activity areas can be impacted by motorized vehicle use including 4-wheel drive vehicles, ORVs, and even snowmobiles. NEPA analyses must evaluate cumulative detrimental soil disturbances from these causes. None of these impacts are disclosed in the DSEIS. (Letter 161)

Motorized vehicle impacts were evaluated in the Recreation and Access Management Record of Decision (Rec ROD), which was signed April 6, 2000. The impacts of motorized vehicles including trailbikes, off-highway vehicles (OHVs) with a tread width of 50 inches or less, and snowmobiles were evaluated for the trails listed in Attachment 1 in the Rec ROD. The impacts of the all motorized vehicles (including vehicles with tread widths greater than 50 inches) were evaluated for the roads listed in Attachment 1 in the Rec ROD. The use of motorized vehicles outside of these locations is prohibited by law.

The DSEIS fails to disclose how the 15% Regional soil standard of detrimental soil impacts is being addressed. Has actual field monitoring taken place to assess past soil impacts? (Letter 161)

The discussion of procedures for evaluating past detrimental soil impacts with respect to the Regional soil quality standards are presented in the soils report, Volume 9, Document 588a of the FSEIS Project File.

The DSEIS implies that anything less than a loss of the Mazama ash layer is not an irreversible and irretrievable commitment of resources. (Letter 161)

The DSEIS (page 3-178, paragraph two) states that the ash layer has persisted through natural fire and erosional processes for over 6700 years. If proposed management activities are of a scale less than historical disturbances, the impacts should maintain the ash layer. As long as the ash layer is maintained on-site, there is not an irreversible and irretrievable commitment of resources. Detrimental soil impacts are evaluated based on the Regional soil quality standards (PF, Vol. 9, Doc. 563a) that limit detrimental soil impacts to 15% of an activity area.

602: Productivity

Many of the proposed activities are on south-facing slopes with dry soils. A clearcut will decrease soil health and won't provide shade for seedlings. (Letter 156)

Canopy retention in proposed treatment units will provide shade and organic matter for natural soil processes to continue. The DSEIS (pages 2-17 through 2-18, 2-21, 2-24, 2-26 through 2-27, 2-29, 2-31 through 2-32, 3-18 through 3-20, and 3-173 through 3-174) outlines how canopy retention will vary by treatment type and landtype association ranging from approximately 25% in regeneration harvests on low relief, rolling hills (except for the species conversion units in the Bimerick area) to 95% retention for salvage harvests and underburns.

We find no evidence that guidelines such as Graham et al. (1994) were used in the analysis, or that sufficient coarse woody debris will be left on site (Letter 113):

The importance of dead wood, both standing and on the forest floor, is recognized in both the FEIS (pages 79-80) and the DSEIS (pages 3-5 through 3-6) as ecologically important for wildlife habitat and also its role in nutrient cycling and site productivity. Graham et al. (1994) did not sample western redcedar habitat type series, which are common types in the analysis area, but determined that the minimal levels of coarse woody debris to retain on sites in the closely related western hemlock series are 17-33 tons/acre. The proposed vegetation treatments in the North Lochsa Face project will have canopy retention levels ranging from 25% to 95% depending on treatment type and landtype association (DSEIS pages 2-17 through 2-18, 2-21, 2-24, 2-26 through 2-27, 2-29, 2-31 through 2-32, 3-18 through 3-20, and 3-173 through 3-174). This level of tree retention will retain levels of coarse woody material exceeding those recommended by Graham et al.

There was no site-specific analysis of existing detrimentally disturbed soil conditions so any decisions resulting in any soil impacts will be made lacking the cumulative effects analysis that NEPA requires. (Letter 161)

The site-specific analysis of current soil conditions and evaluation of past detrimental soil impacts are discussed in the soils report, Volume 9 Document 588a of the project file.

700: Recreation

Recreational opportunities will be degraded by the proposed action (Letter 150)

SEIS, Pages 3-351 to 353

It is unclear from the comment which recreational opportunities will be degraded.

Page 3-351 states the direct effects to recreation opportunities of all alternatives.

Page 3-352, paragraphs 6 & 7 state the indirect effects to recreation opportunities of all alternatives, specifically big game hunting, and firewood gathering.

Page 3-353 paragraphs 1-5 state the cumulative effects to recreation opportunities of alternatives, specifically anticipated changes in visitor use associated with the Lewis and Clark Bicentennial, as well as anticipated redistribution of motorized and non-motorized use as associated with trail reconstruction projects. Potential accommodations to meet the anticipated increase in visitor use are also disclosed.

Page 3-353 paragraph 6 states the adverse effects to recreation, which cannot be avoided. This specifically discloses the effects to the desires of both motorized and non-motorized users.

701: OHV Use

Eliminate all off-road vehicles and snowmachines (Letter 38)

SEIS, Page 3-353, Paragraph 6

This paragraph discloses that there are adverse effects, which cannot be avoided as associated with recreational motorized and non-motorized opportunities. One of these effects is that those desiring a non-motorized experience, such as that provided by “all off-road vehicles and snowmachines”, may be adversely affected by the recreational, proposed and existing, motorized opportunities. Likewise, those desiring motorized recreational opportunities may be adversely affected by proposed and existing non-motorized opportunities.

702: Wilderness Use

Recreationists using the roadless/"wilderness" areas in the North Lochsa Face area expressed their opposition to harvesting and road building in this area (Letters 58,169).

SEIS, Pages 3-351 to 352

SEIS, Pages 3-16 to 17

SEIS, Pages 298 to 300

In essence, these comments are statements of fact that these commenters oppose logging and roadbuilding within the roadless/"wilderness" area of the North Lochsa Face landscape. The No Action alternative satisfies their comments that no timber harvest or roadbuilding take place on this landscape.

The effects to recreation of not harvesting or building roads in the roadless portion of this landscape are disclosed in the No Action alternative and addressed specifically on pages 3-351 to 352 in the SEIS. The effects to timber harvesting and associated road building of the No Action alternative does not meet the purpose and need as addressed specifically on pages 3-16 to 17 of the SEIS. Effects of the proposal to roadless values are also disclosed on pages 3-298 to 3-300.

707: Wild & Scenic Rivers

Impacts to Outstanding and Remarkable Values (ORV's), associated with the Lochsa Wild and Scenic River, are not addressed. Protection and/or enhancement of these ORV's is not addressed in the proposa. The DEIS must provide support and explanation that activities will not degrade ORV's. l (Letter 177).

FEIS: pages 148 to 150

FEIS PF: Vol. 12, Documents 727 to 731

FEIS PF, Vol 12, Doc 730, Pages 1 to 3

SEIS: pages 3-268 to 3-272, 3-289 to 298

SEIS PF: Vol. 10, Documents 617, 624 to 626

The results from both the Wild and Scenic River and Scenic Quality analyses are disclosed in both the FEIS and SEIS in the environmental consequences sections for those resources. The SEIS PF Document 624 discloses the effects to ORV's and that ORV's will be either protected and/or enhanced by the proposed treatment activities and the associated activity mitigation. The SEIS Page 3-296 to 298 discloses past, present and reasonably foreseeable actions in the cumulative effects analysis area of the Lochsa and Middle Fork Clearwater Wild and Scenic Rivers. These include activities located both on and off National Forest lands.

FEIS PF, Vol 12, Doc 730, Pages 1 to 3

Provides support and explanation that ORV's will not be degraded, and that treatments could protect and enhance the ORV's by implementing treatment mitigation measures.

SEIS, Pages 3-285 to 3-298

This section of the SEIS addresses both the existing conditions and the environmental consequences of the proposal on the Lochsa Wild and Scenic River and the Wild and Scenic River eligibility for Fish and Hungry Creeks. The environmental consequences section specifically addresses the impacts ORV's associated with the Lochsa Wild and Scenic River. Page 3-295 specifically discusses how Alternative 4/4a specifically protects and enhances ORV's associated with the Lochsa Wild and Scenic River.

SEIS, Pages H-3 to 4, H-3 Paragraphs 3-5, H-4 Paragraphs 1-5

These paragraphs specifically discuss that there was issue resolution undertaken in the SEIS surrounding evaluating trade-offs associated with the effects of timber harvest and prescribed burning on ORV's, and notes that an alternative was specifically developed (Alternative 4/4a) that would not harvest or burn in the wild and scenic river corridor.

713: Lewis and Clark Bicentennial

Treatment proposals are inappropriate, due to both the actions they involve and the timing at which they will occur. This is due to their location and timing proximity to the upcoming Lewis and Clark Bicentennial (Letters 2, 60, 63, 75, 92, 93, 106, 112, 115, 125, 140, 144, 146, 148, 156, 165, 172).

FEIS: Pages 141 to 143, 143 to 147, 148 to 150, 152 to 154

Rec/Access ROD: Attachment 4, Page 3, Paragraph 2

SEIS: Pages 3-268 to 272, 3-285 to 324

The results from the Heritage Resources, Wild and Scenic River, Scenic Quality, and Recreation analyses are disclosed in both the FEIS and SEIS in the environmental consequences sections for those resources. These resource areas address many of the issues and concerns associated with the upcoming Lewis and Clark Bicentennial including visual effects of proposed treatment activities on sensitive viewing corridors, the accommodations needed for increased visitation to the area, and the need to address impacts and/or needed mitigation for logging traffic during the bicentennial time period.

Many of the foreseeable future actions disclosed in the recreation cumulative effects section are project improvements designed to assist in meeting the needs of additional visitors during the Lewis and Clark Bicentennial period. In addition, the heritage resources section discloses that the best available sources have been used to document the historic route and coordinate the planning of treatment areas.

No harvest treatments overlie the historic routes as no harvesting or road building is occurring within the North Lochsa Slope Roadless area, which contains the segments of the Lolo Trail National Historic Landmark Corridor, Lewis and Clark National Historic Trail and the Nee-Me-Poo National Historic Trail located within the project area. No harvesting or road building is proposed even near the Lewis and Clark National Historic Trail. To protect the areas scenic quality harvest and burn units, throughout the project area, have been designed to appear natural when compared with similar natural landscapes.

Burn units are designed to emulate natural openings and do not overlie the historic routes although fire could spread over the routes. Burn plans will include low impact mitigation measures to keep fire off the historic routes. However the plans will not include using machine or hand constructed fireline to accomplish this. Mitigation will also include the timing of prescribed burns. Efforts will be made to not ignite unit's over weekends. Consideration will be given to not burning on heavy visitor use days in close proximity to the historic routes in the anniversary years of 2005 and 2006. Burning will occur primarily in the spring and fall when visitation to the corridor is lower. While the short-term impacts of burning may be obvious from the Lolo Trail Corridor, burning would have the appearance of a natural event since the remnants of the fire would remain intact after the burn. Although the proposed burning activities would change the appearance of the area from what it is currently, the overall character of the landscape would not change.

The Wild and Scenic River analysis outlines mitigation measures associated with helicopter logging along the Wild and Scenic River Corridor. When implemented, these mitigation measures provide for: additional coordination with the Idaho Department of

Transportation to provide for increased public safety during helicopter logging operations, and specific timing for logging operations to minimize impact to area recreationists including spring boating season on the river, and summer visitor traffic associated with the Lewis and Clark Bicentennial.

800: Visuals - General

Heavy logging is really ugly (letter52)

FEIS: pages 148 to 150

FEIS PF: Vol. 12, Documents 727 to 731

SEIS: pages 3-268 to 3-271, 3-289 to 298

The SEIS, pg 3-272, second paragraph, shows that important view points would have scenic quality maintained.

SEIS PF: Vol. 10, Documents 617, 624 to 626

The results from both the Wild and Scenic River and Scenic quality analyses are disclosed in both the FEIS and SEIS in the environmental consequences sections for those resources. Visibility Simulations, or computer maps of the visible landscape overlain with management activities have been done and are displayed in the SEIS PF, Document 625. Mitigations for treatment activities within the Wild and Scenic River Corridor are outlined in the FEIS PF, Volume 12 Document 730.

The SEIS only looks at a narrow range of impacts such as reducing size of openings. It does not address the visual effect of tree stumps, large equipment, and the movement of wildlife away from openingst (letter 177)

SEIS: pages 3-268 to 3-280

The results from the Scenic Quality analysis are disclosed in both the FEIS and SEIS in the environmental consequences sections for the scenic quality resource. This section discloses the environmental consequences, and cumulative effects of past, present, and foreseeable future actions (pgs 3-278 and 3-279) across the full range of impacts in space and time.

901: Road Closures (Administrative)

Road closures are good for the area. (Letter # 15, 39, 92)

A minimum road system is needed for the area to accomplish the desired land management activities. Closing all roads would make it impossible to accomplish the land management goals for the area. Selective closure of roads not needed for future management activities, high risk roads that are located on unstable land types, roads crossing or adjacent to important streams, and other roads with major problems have been scheduled for obliteration. See SEIS, Appendix D, Road Obliteration section for a complete list of proposed road obliteration.

Road closures should not be tied to logging proposals. *(Letters 92, 115, 156)*

This was addressed in the FEIS on page 185 item 74. In the last two years, approximately 25.7 miles of roads were obliterated within the NLF area. Most of the recent obliteration projects were outside of active timber sale boundaries; there was no funding associated with timber sales that was programmed or available to do this work.

The road decommissioning activities can occur as NEPA planning for the project is completed and funding is secured. There is no reason to tie the decommissioning of roads to the logging operations. Since the benefits of the decommissioning are sometimes used to help offset the impacts of timber harvest it can be beneficial that the decommissioning activities occur first.

I don't agree with proposal for closing roads in the area. (Letter 101)

FEIS page 190 states that: "The point of road obliteration is to eliminate roads from the landscape which pose a risk to the aquatic resource or which are no longer needed for future use. The road obliteration will speed the recovery of area streams faster than if no action was taken and the current conditions are allowed to heal with time."

SEIS states on page 3-194: "Obliteration would occur on roads that are at high risk of landslide or debris torrent, close to fish bearing streams and are chronic sediment sources."

Careful planning has identified those roads within the planning area that meet these criteria. Only those roads identified as no longer being needed for the long-term management of the area are scheduled for obliteration.

903: Road Const./Reconst.

Leave existing low standard roads in existing condition north of Mex Mtn. for existing users. Timber management will damage road and there is no support for road improvements. (Letter # 136)

The ROD Rec. & Access Management shows all of Road 5548 as being in a yearlong closure, except the first 0.2 miles, which will be open yearlong to all motorized traffic. ROD Vegetation and Aquatic Management describes that timber harvest is proposed for the area near Mex Mountain in the southwest quarter of the Fish Creek drainage, which is outside of the proposed wilderness boundary (HR 1570).

The DEIS states on page 2-21 :”Another 3.4 miles of an old logging road (#5548) needs to be reconstructed in the Mex Mountain area, ..”

The Rec ROD states in Attachment 1, page 9 of 12 (there are no page numbers): Road # 5548 is proposed to be closed to all motorized traffic from MP 0.2 except for snowmachines from 12/1 – 6/1.

During periods of non-use the road can remain in the existing condition. During periods of timber harvest, use of the road as a timber haul route will alter the existing condition. The timber purchaser will be required to maintain the road commensurate with the use. The existing condition of the road will be reconstructed to a status where timber haul can effectively, efficiently and safely use the road. This activity can include brushing, blading, curve widening, realignment, surfacing, and installation of drainage structures.

Maps in Supplemental EIS do not clearly show the new road construction planned. (Letter 136)

The maps are very difficult to read. At the scale printed the locations of the roads scheduled for construction are very difficult to see. A project map clearly showing the road locations can be seen at the district office. Due to the high cost of reproduction the map was not included with the information handed out to the reviewers.

No new road construction due to the large number of existing roads with erosion occurring and weed problems. (Letter 151)

The SEIS states on page 1-26: “To complete the timber harvest, 1.1 miles of permanent road would be constructed along a ridge and approximately 13 miles of road will be reconstructed (curve widening, realignment, surfacing, and installation of drainage structures). Ten temporary roads (3.7 miles) would be constructed for access and obliterated (returned to contour) after use.

The SEIS also states on page 3-198 that: “Additionally, any new construction (permanent and temporary) would have a slash filter windrow at the toe of the fill. This technique, of placing slash at the bottom of the fill slope, is highly efficient at trapping and retaining sediment (Burrough and King, 1989).

The SEIS states on page 3-199 that: “Based on the following factors there is a low risk that new road construction would fail due to landslides.

1. Temporary roads would be built, used and obliterated all in the same year, decreases the likelihood that the roads will be saturated with water.
2. None of the proposed roads cross water.
3. Roads are located on gentle slopes, generally less than 40 percent.
4. Roads are located on ridgetops.”

The SEIS in Chapter 3, Noxious Weeds Environmental Consequences, page 3-72 thru 3-86, describes the risk of weed expansion with each of the alternative actions. It also details the management practices to be followed with each action to decrease noxious weed occurrence.

The total amount of new road construction is limited and controlled with all the proposed action alternatives. The potential impacts due to erosion and noxious weeds and the proposed treatments have been addressed.

No new road construction to subsidize timber industry. (Letter 158)

The Forest Service has historically used the value of timber products to construct roads for access to achieve land management activities. The timber purchasers use this timber value to pay for the construction of the new roads. They can be expected to make a reasonable profit for their investment of time, equipment and resources into completion of projects.

905: Decommissioning

Road decommissioning must occur at the same time that as logging was done with assurances that both will be completed. (Letter 136)

In the FEIS on page 186 it states: “In the past two years, approximately 25.7 miles of road were obliterated within the NLF analysis area.” This work is multi-financed using a variety of funding sources including emergency funds to repair damage from recent landslides, challenge cost share money through the Nez Perce Tribe, and appropriated funds for watershed, fish and wildlife habitat improvement. Most of the recent obliteration projects were outside of activity timber sales boundaries; there was no funding associated with timber sales that was programmed or available to do this work.

The road decommissioning can occur as NEPA planning process for the project is completed and funding is secured. There is no reason to tie the decommissioning of roads to the logging operations. Since the benefits of the decommissioning are sometimes used to help offset the impacts of timber harvest it is beneficial that the decommissioning activities occur first if possible.

Only roads causing major problems should be obliterated. No road should be obliterated until local OHV people have been consulted. Specified roads should be obliterated to OHV trails. Road 30T should not have anything done to it. (Letter 145)

SEIS states on page 3-194 :”Obliteration would occur on roads that are at high risk of landslide or debris torrent, close to fish bearing streams and are chronic sediment sources.”

Careful planning has identified those roads within the planning area that meet these criteria. Only those roads identified as no longer being needed for long-term management of the area are scheduled for obliteration.

Rec.ROD. All the roads to trail conversion decisions to support motorized recreational use have been made in the Rec. ROD. This project has gone through the NEPA process, with public scoping, public meetings and comment periods on the draft documents. The local OHV groups and individuals have been consulted prior to the decision. A survey of the obliteration candidate road will be completed prior to obliteration.

The FEIS states on page 145 that: “Effects due to Proposed Road Obliteration: There is some loss of motorized recreation, especially for OHV’s, due to the 94 miles of road obliteration proposed by this project. However, the majority of the roads obliterated on

the forest since 1992 were physically unusable by vehicles, prior to obliteration, due to an abundance of brush, trees or in some cases, landslides in or on the road prism. Only 5 % were physically accessible to full size vehicles and 25% accessible to OHV's. In addition, many of the roads that were physically accessible were restricted yearlong, as per the Forest's Access Guide. Although the survey of the obliteration candidate roads in the area is not yet complete, it appears that the trend will be similar to that of the program as a whole.

All the road to trail conversion decisions to support motorized recreational use have been made in the Rec. ROD. A survey of the obliteration candidate road will be completed prior to obliteration.

In the FEIS, Volume 16, document 846, page 101 a recommendation for the route was given: "This is a 1.0 mile long, native surfaced route that will not be needed for future timber management of the area and should be scheduled for obliteration. The route is no longer drivable by vehicles over 50 inches, due to the number of large waterbars that have been installed. An on-the-ground survey of these routes should be made to determine what work is required to obliterate the route. This route may not require very much work and could possibly be just closed off and abandoned to complete the obliteration work."

The road is shown as scheduled for Level 1 Obliteration in the FEIS in Appendix E-4.

Level 1 Obliteration of work includes route decommissioning that simply conducts an on-the-ground inspection to verify ground conditions. Once conditions are found to be such, the road can be simply walked away from, abandoned. The road would then be shown in the roads inventory as having been decommissioned. There is very little or no physical work actually done on the ground. There may be some minor work at the beginning of road required to obliterate the entrance to road. The road would not be available for any future management.

Road 418B to Road 418C back to Road 418 should be changed to LTIU. (Letter 145)

Rec. ROD. The road decisions have been made in the Rec. ROD. A survey of the obliteration candidate road will be completed prior to obliteration.

Road 75141 to Road 75138 to ROAD 5517 to LTIU Road 52T then back to Road 101 should all be changed to LTIU roads. (Letter 145)

Rec. ROD. The road decisions have been made in the Rec. ROD. A survey of the obliteration candidate road will be completed prior to obliteration.

Road 1T to Road 7T to LTIU Road 486L to Road 486H would make an excellent OHV loop. (Letter 145)

Rec. ROD. All the roads to trail conversion decisions to support motorized recreational use have been made in the Rec. ROD. A survey of the obliteration candidate road will be completed prior to obliteration.

Convert Road 445 to LTIU road from Road 101 to Road 5540. Future use as OHV trail for either a north or south loop. (Letter 145)

Rec. ROD. All the roads to trail conversion decisions to support motorized recreational use have been made in the Rec. ROD. A survey of the obliteration candidate road will be completed prior to any obliteration work.

Objective of road obliteration should be to consider whether it can be used as a OHV trail. (Letter 145)

Rec. ROD. All the roads to trail conversion decisions to support motorized recreational use have been made in the Rec. ROD. A survey of the obliteration candidate road will be completed prior to any obliteration work.

To achieve forest health obliterate more roads and restrict OHV use. (Letter 176)

To achieve most of the scheduled forest management activities for an area other than wilderness and roadless, a road system must be in place for access. Obliteration of more roads beyond the minimum road system needed for the future management of the forest will not enable the purpose and need for management of the area to be met.

Rec. ROD. All the roads to trail conversion decisions to support motorized recreational use have been made in the Rec. ROD. A survey of the obliteration candidate road will be completed prior to any obliteration work.
