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Re: Nez Perce-Clearwater National Forests Draft Forest Plan and Draft Environmental Impact Statement

Thank you for the opportunity to comment on the Nez Perce-Clearwater National Forests (NPCNF) Draft Forest Plan and Draft Environmental Impact Statement (EIS). The following comments were developed in coordination with the Idaho Governor's Office of Energy and Mineral Resources, the Idaho State Department of Agriculture, the Idaho Department of Environmental Quality, the Idaho Department of Lands, the Idaho Department of Parks and Recreation, the Idaho Department of Fish and Game, the Idaho Geological Survey, the Idaho State Historic Preservation Office, the Idaho Department of Water Resources, and the Idaho Governor's Office of Species Conservation.

General Comments

Draft EIS and Draft Forest Plan Overall

Having clear, concise, and understandable planning documents makes future management easier to implement, as well as making the planning process transparent for the public and other commenters. These documents are difficult to navigate, with similar topics spread out across multiple sections, standards, guidelines and goals that have inconsistent wording, and no preferred alternative selected. Under these conditions, the desired management direction of the forest is unclear. Some language in the Forest Plan components is ambiguous with the potential for misinterpretation, which may contribute to inconsistent future decisions. Therefore, the plan components in the Final Forest Plan should be checked for consistency.

The Final Forest Plan and associated Final EIS would benefit from additional integration among document sections. Integration is essential for reader comprehension and careful examination of analyses. Currently, sections often use differing terminology, measurement units, formatting, and writing styles. Consistency will help the plan be more cohesive and understandable. More importantly, information and analysis in some sections of the Draft EIS are not accurately represented in other sections. For example, the elk plan components are not correctly represented in the Forestlands Section. Thoroughly integrating Draft EIS sections (including component analyses, interpretations and discussions) should alleviate concerns.

Management Areas

The State agrees with the approach of stratifying the NPCNF into Management Areas (MA). The MA approach acknowledges the management limitations of several different land designations. To achieve the NPCNF's Natural Range of Variation (NRV), focus must be placed on MA2, which is explicitly described within the Forestlands Section. The Forest Plan and Final EIS should encourage the use of all management tools legally available in MA2.

Forest Plan Comments

General Forest Plan Comments

The spatial scale at which NRV is assessed and directs forest management is crucial. To restore resilient landscapes, project planning must analyze NRV and spatial patterns at both project and landscape scales.[1] The Forest Plan often relies on applying NRV only at a forest-wide, coarse-filtered scale to analyze and manage habitat for the majority of species on the forest. The State agrees with the NRV concept and focusing the Forest Plan on restoration, but also recognizes the coarse-filter concept is unproven (as stated in the Draft EIS) and might not address the needs of all species. The scale at which NRV is assessed is a critical consideration for species habitat management and the success of the Forest Plan.

Landscape-scale ecological processes (e.g., fire spread, insect dispersal, and wildlife movement) are influenced by spatial patterns of forest habitats (e.g., patch size and shape, vegetation clumps and gaps, etc.)[6]. Likewise, habitat use by wildlife is influenced by spatial forest patterns (e.g., live trees, snags, openings, etc.). When relying on NRV to address most species, analyses must be accurately assessed at a spatial habitat scale important to focal species. If NRV is assessed at a forest-wide scale, analysis would be less likely to detect areas that are not achieving NRV due to the course analysis resolution. This point is highlighted in bullet 2 on page 3.2.1.1-105 in the Draft EIS's Forestlands Section, which states " Expected trends for terrestrial vegetation forest-wide show little to no variance across alternatives, due to the limited scope and impact of vegetation management treatments at that scale which are masked by the effects of natural disturbances." Therefore, we recommend applying NRV at the MA (minimum) or HUC 4 (preferred) level rather than forest-wide.

The 2012 Planning Rule expects forest plans to use an adaptive management strategy. The planning rule also indicates that focal species should be used as part of a forest monitoring strategy. Focal species monitoring provides information regarding the effectiveness of forest plans in providing ecological conditions necessary to maintain the diversity of plants and animals and the persistence of native species in the plan area. The Forest Plan's monitoring strategies appear not to contain focal species as required by the 2012 Planning Rule. Monitoring focal species is important for the success of the adaptive management approach. The State can make data available to aid in selection of focal species for monitoring.

Forest Plan Chapter 1

On pages 12 through 14 in Section 1.1.2.4.1 Wildlife Species, a list of wildlife species is provided. There should be an explanation at the beginning of the Wildlife Species section why certain species are highlighted while others are not. Currently, bighorn sheep, fisher, anadromous fish, endemic gastropods, elk, harlequin duck, mountain quail and Whitebark pine are highlighted. This list does not include the North American wolverine or Canada lynx. The

[1] Haugo, R., and T. Benton, "Forest composition and structure restoration needs within the Clearwater Basin, Idaho. The Nature Conservancy in Idaho and Ecosystems Research Group report" (2014).

document should either include these species for consistency throughout the document or explain why they are not being included.

Forest Plan Chapter 2
On page 22, the desired condition FW-DC-BIOPHY-04 in the Biophysical Features Section of the Draft Revised Forest Plan states: "Biophysical features continue to provide habitat for species, particularly bats, that require specialized niches for raising young, roosting, and overwintering. New bat diseases, such as white-nose syndrome (Pseudogymnoascus destructans), are not introduced into biophysical features." A guideline should be created in the Wildlife Section that details how potential disease introduction will be avoided.

The State agrees with the Forestlands Section's quantitative approach to plan components on page 23 - 34 and suggest this strategy be used in other sections of the Forest Plan wherever possible.

Existing and desired condition tables (Tables 3–10) within the Forestlands Section need to be updated with current MA conditions.

The Forest Plan needs more focus on restoring Ponderosa Pine habitats. The Draft EIS Wildlife Section identifies declining ponderosa pine associated species and the Forestlands Section shows that ponderosa pine habitats are predicted to decline under all Draft EIS alternatives.

Snags and woody debris are important habitat features for numerous forest species and ecosystem processes. As described in the Abundance and Diversity of Wildlife Section of the Draft EIS on page 3.2.3.2-41, at least 139 species use snags and/or downed woody debris on the NPCNF. Snags and woody debris should therefore be represented on the landscape within NRV relative to density, size, species and spatial pattern for each PVT. However, the Draft EIS and Forest Plan components for retaining snags and coarse woody debris are applied forest-wide to broad NRV potential vegetation types, which are too coarse for all wildlife concerns. Accordingly, the State provides the following recommendations:

- NRV snag densities and sizes should reflect wildlife habitat and ecosystem needs.
- Analyze snags and course woody debris at a spatial resolution meaningful to associated wildlife species (e.g., at least HUC 4/5 scale).
- Prioritize the retention of all snags greater than and equal to 20-inches DBH. Several species (e.g. pileated woodpeckers, fisher, and marten) require snags equal to or often larger than 20-inches DBH.
- Page 3.2.3.2-102 of the Draft EIS details snag recommendations for white-headed woodpecker. The snag guidelines in the Forestlands Section do not meet the snag recommendations for white-headed woodpeckers.
- As currently written, it seems snags are only required to be retained within the project area and not cut units. Although a potential human safety issue, snags are needed in cut units to represent NRV.
- To safely create future snags within cut units, consider girdling and retaining broken topped/damaged live trees that are good snag candidates.
- If snags are removed from a particular cut unit, project analyses should ensure that snags are retained within the broader project planning area. It is important to consider

cumulative effects and make sure snags retained within the project area will not be affected by future projects within the amount of time it takes for new snags to be formed within the area.

On page 34 of the Draft Revised Forest Plan, MA3-DC-FOR-08 states: "Density within Management Area 3 promotes vigorous stands of the Whitebark pine and other dominance types given in Table 9 and provides for wildlife habitat, produces timber, provides resistance to stand replacing fire, or meets other desired conditions." Having a Desired Range of 35-50% for Whitebark pine within Management Area (MA)3 does not seem to align with the MA3's direction of flexibility. Currently Whitebark pine is considered a candidate species for listing and potentially carries with it several restrictions that would limit the potential for flexibility in this MA. Having a desired condition of up to half of the area being composed of this species carries with it some potential implications for management.

In the Forest Plan on page 52, FW-GL-CWN-01 states "The Nez Perce-Clearwater works with the National Marine Fisheries Service, U. S. Fish and Wildlife Service, and the Nez Perce Tribe to plan and implement projects that contribute to recovery goals for aquatic species…". However, this does not mention involvement or coordination with state agencies with aquatic species expertise. Please add the State of Idaho to FW-GL-CWN-01 on page 52 as both the Idaho Department of Fish and Game (IDFG) and Idaho Governor's Office of Species Conservation implement projects that contribute to the recovery of Endangered Species Act listed species.

Consider combining FW-GL-CWN-01 and FW-GL-CWN-02 on page 52 into one guideline.

The Aquatic and Riparian Conservation Strategy (ARCS) Section of the Forest Plan balances protecting fisheries with restoring aquatic ecosystems. Although similar to PACFISH/INFISH, the Forest Plan allows more flexibility to achieve restoration goals. Riparian restoration efforts will ideally help increase broadleaf species where appropriate and also increase riparian habitat complexity. The ARCS Section currently focuses on fisheries; however, many wildlife species also rely on riparian and aquatic habitats, which are addressed in the Forest Plan's Wildlife Section. For consistency, the State recommends appropriate information from the Wildlife Section be incorporated or cross-referenced in the ARCS Section.

The State appreciates that ARCS and Elk Plan components are consistent among Draft EIS alternatives. This consistency should maximize the benefits of ARCS and Elk Plan components to fish and wildlife species across the NPCNF.

The Forest Plan should explicitly recognize IDFG fisheries management plans and authorization to stock fish in waters on national forest lands.

Use of "stream reach" in FW-STD-RMZ-01 on page 55 (part d. second bullet) may be subjective and might benefit from being defined or re-worded.

Page 59, Section 2.2.5 FW-STD-ARE&M-01 states: "Plans of Operation that propose activities in riparian management zones shall include a reclamation plan and a reclamation bond…". This should specify if that bond with the Forest Service is separate to the bond with the Idaho

Department of Lands, which requires that all mines in the state of Idaho have an approved reclamation bond.

Page 61 in section 2.2.6 of the Forest Plan FW-GDL-ARGR-01 states: "New grazing authorizations and reauthorizations that contain low gradient channels of a less than 2.5 percent valley slope should require that end of season stubble height be at least fifteen centimeters along the greenline to help achieve conditions at site scales that enable attainment and maintenance of desired conditions in these locations…". This guideline is arbitrary, unwarranted and impractical to apply at a forest-wide scale. The NPCNF admits that this six-inch stubble height requirement "may be more burdensome to those permittees with more accessible stream reaches within their allotments" found on page 14 of the Livestock Grazing Section of the Draft EIS. This guideline could have a substantial negative effect on livestock grazing permittees forest wide. While various studies have identified varying ranges of stubble height to meet specific objectives in specific riparian areas, there is no peer-reviewed or accepted research that a six-inch stubble height is required to manage for healthy stream banks across the NPCNF. According to the University of Idaho Stubble Height Review Team;

"Clary and Leininger proposed a 10-cm residual stubble height criterion as a "starting point for improved riparian grazing management." However, they acknowledged that, in some instances, 7 cm may provide adequate riparian protection and that, in others, 15 to 20 cm may be required to limit streambank trampling or to reduce willow browsing. Thus, the criteria could vary depending upon local environmental variables and the timing, duration, and intensity of livestock use. Unfortunately, the linkages between stubble height and riparian functions have had limited experimental examination. For this reason, stubble height as an annual indicator of grazing use in riparian areas should only be used where existing science suggests that it is appropriate and should be used in combination with longer-term monitoring of vegetation and channel parameters." [2]

Appropriate stubble height varies by plant species and herbaceous species may not be present on all stream reaches due to site potential. Stubble height metrics also do not take into consideration the impacts that wildlife have on stubble height. It is very possible that wild ungulates such as elk could cause the stubble height threshold to be exceeded before livestock reach the allotment. It is imperative that the NPCNF remove this guideline for stubble height requirements, as best available science has proved it is improper to use stubble height to set a blanket use criterion at this scale (i.e. Forest-level). Again, stubble height should only be used in specific riparian areas where existing science suggests it is appropriate and where other long-term monitoring methods are used to assess resource goals as well.

There is also a lack of information regarding stubble height requirements on the NPCNF. The State has worked with NPCNF employees, contractors, past employees, and other regulatory agencies to try and find any documentation of consultation that has required a stubble height guideline for livestock grazing on the forest. All of these entities have been unable to find any documentation or past plans that identify stubble height as a necessity for ESA species habitat

[2] Bryant, L. & Burkhardt, W. & Burton, T. & Clary, W. & Henderson, R. & Nelson, D. & Ririe, W. & Sanders, K. & Wiley, R., "Using Stubble Height to Monitor Riparian Vegetation," Rangelands (Univ. of Ariz. 2006), *available at* 28. 10.2458/azu_rangelands_v28i1_bryant.

through consultation. Stubble height has been arbitrarily applied on the NPCNF in the past and is now again arbitrarily being applied at a forest wide scale.

Standard FW-STD-ARGR-01 on page 61 of the Forest Plan is very subjective and will leave much up for interpretation. Currently, this standard reads in part, "Livestock grazing shall be authorized or reauthorized only when measures are included in the authorization to avoid or mitigate adverse effects to fish and riparian habitat that may result from grazing practices". With this sentence included in the standard, it creates an unnecessary burden on both the Forest Service and the permittee. It is not outlined what adverse effects are and is written too broadly by including all fish and riparian habitat. This standard should be focused on desired conditions. Therefore, this sentence should be removed, and this standard should only contain the second sentence with one minor edit, the removal of the word "retard", as it is not clearly defined. The phrase "retard attainment of aquatic and riparian desired conditions" could be interpreted many different ways and will surely be misapplied, having a negative impact on permittees and the management of livestock grazing. FW-STD-ARGR-01 should read, "Where livestock grazing is found to prevent attainment of aquatic and riparian desired conditions, grazing practices shall be modified by practices such as, but not limited to adjusting accessibility of riparian areas to livestock, length of grazing season, stocking levels, or timing of grazing". Written this way, it is tied directly to desired conditions and creates an adaptive management situation.

FW-GDL-ARGR-04 on page 61 states: "To reduce risks to incubating eggs and embryos, measures should be included to prevent trampling of native fish redds, when authorizing or re-authorizing livestock grazing operations, or updating annual operating instructions". The Forest Service is not required to apply measures for all native fish, therefore making this guideline arbitrary and unwarranted.

While the State understands that there is no longer any active sheep grazing on the NPCNF, we do not support the complete removal of sheep AUMs on the forest. Domestic sheep grazing is still a viable and important industry to the State of Idaho and by eliminating sheep AUMs on the NPCNF, it eliminates the opportunity for domestic sheep grazing to return to the NPCNF. This direction is also inconsistent with the 2010 Idaho Bighorn Sheep Management Plan.

If the opportunity arises for domestic sheep grazing to return to the NPCNF, the Draft Forest Plan contains an arbitrary standard on page 64 that will severely impact domestic sheep grazing. That standard found in FW-STD-WL-02: "In order to prevent disease transmission between wild and domestic sheep, domestic sheep or goat grazing shall not be authorized in or within 16 miles of bighorn sheep occupied core herd home ranges." The Forest Service does not manage bighorn sheep. Therefore, it is improper to apply arbitrary buffers between bighorn and domestic sheep. The proper language for this standard should read: "Coordinate with the State of Idaho, permittees, and tribal representatives in order to utilize voluntary best management practices for separation between domestic sheep and bighorn sheep within Population Management Units (PMUs) as identified in the Idaho Bighorn Sheep Management Plan and Idaho Code 36-106(e)5(E)." This language will ensure there is coordination with the State of Idaho, livestock producers, and tribes in the management of bighorn sheep and will make the Forest Plan consistent with Idaho's Bighorn Sheep Management Plan.

The Fisher Plan Component mentioned in FW-DC-WL-04 on page 64 should be consistent among Draft EIS alternatives. The State suggests a Management Approaches section for fisher,

which should explain the intent of the Fisher Plan Component and provide project planners strategies to ensure fisher habitat is maintained. The State is available to aid in development of a Management Approaches section for fisher.

The minimum DBH for the "large" snag category is 20 inches although fishers prefer 30–50-inch DBH snags. Therefore, some snags classified as "large" may not provide fisher habitat.[3]

Elk Plan Components use the best available science on elk nutrition to provide a science-based approach to improve elk habitat on the NPCNF. The intent of the Elk Plan Components is explained well in the elk management approaches section. Literature citations should be added to the elk management approaches section for ready reference by future project planners.

Page 64, Section 2.3 FW-GDL-WL-01 states, "In order to provide connectivity between watershed basins (HUC10), corridors of mature and mid-seral forest with canopy closure greater than forty percent should be retained…". This guideline makes no reference to a guide or analysis that this percentage is based on. It is unclear if this guideline includes all wildlife.

Page 64, Section 2.3 FW-GDL-WL-03 states "When closing mines, actions should be taken to avoid loss of bat maternity or hibernation habitat, or bat entombment." It is unclear what type of action would be appropriate to take here. Please specify the Forest Service expectations for proper mine closure.

For FW-DC-WLMU-05 on page 65, states: "Natural processes contribute to the mosaic of habitats needed by ungulates." Please consider adding "Active management and" so that it reads "Active management and natural processes contribute to the mosaic of habitats needed by ungulates" to be certain all tools are available to restore wildlife habitat.

FW-DC-ELK-02 on page 66 currently states: "Elk populations are distributed throughout the planning area in suitable habitats. Motorized access does not preclude the use of high or moderate quality nutritional resources." Consider rewording this second sentence to "motorized access does not preclude the use of high or moderate quality nutritional resources as identified by the MA-specific elk plan components." The State's goal is to meet MA-specific components in regard to the usability of forage without unintended consequences of precluded nutritional resources from main travel routes.

We suggest changing the analysis note that a substantial number of elk winter within the forest to "many elk reside year-round (winter, spring, summer, and fall) on the NPCNF," or similar.

Currently, MA2-OBJ-ELK-02 on page 67 allows vegetation desired conditions to be achieved through wildland fire on 10,000 to 15,000 acres annually. Wildland fire is an important tool, but additional active management tools (e.g., timber harvest and thinning) should be identified as available in this component.

[3] Raley, C.M. & Lofroth, E.C. & Truex, Richard & Yaeger, John & Higley, J.M., "Habitat ecology of fishers in western North America: a new synthesis," Biology and Conservation of Martens, Sables, and Fishers: A New Synthesis, 231-254 (2012).

Prioritizing summer nutrition (early seral forest conditions) will likely provide the greatest habitat benefits to elk herds on the NPCNF (i.e., the best available science indicates that spring, summer, and fall nutrition determines elk calf production). However, the importance of secure ungulate winter range should also be noted.

The Draft EIS and Forest Plan should address restrictions for motorized public access within winter range to protect ungulates from detrimental disturbances. FW-GDL-WLMU-03 on page 66 should also include public over-the-snow travel.

As acknowledged in the Recreation Section, over-the-snow vehicle technology (e.g., snow bikes) is increasingly allowing access to more areas. This needs to be considered when addressing over-the-snow travel and potential affects to wildlife. Vegetation may be less of an access barrier to motorized travel on winter range as habitats advance toward NRV.

One major problem with this plan is it did consider draft travel plan decision information when developing the Recreational Opportunity Spectrum (ROS) for the range of alternatives in the Forest Plan. The draft travel plan decision would have closed XXX miles of trail from single-track motorized to non-motorized trail.

The Forest Plan revision's staff requested more recreation economic information. Attached is the OHV Economic Analysis and Winter Economic Analysis. The updated OHV Sticker information was provided to Jennie Fisher who is the project lead for the DRAMVU (Travel Plan) Project.

Page 68, Section 2.4 FW-GL-AIR-01 states: "Coordinate with local and regional partners to reduce cumulative air quality impacts prior to planned ignition activities." This should include cooperation with the Idaho Department of Environmental Quality that monitors state air quality standards.

Forest Plan Chapter 4

On page 80, Section 4.6 FW-OBJ-INF-01, under Section 4.6 states: "Decommission or place into intermittent stored service 30 miles of FS system roads … every 5 years." There should be an explanation given as to why this number of roads was chosen, and why every 5 years is given as the timeframe.

Forest Plan Chapter 5

FW-STD-TBR-05 on page 91 states that adjacent openings do not need to be considered when creating new openings. Cumulative effects of created openings on the landscape is an important consideration for NRV. Spatial patterns are crucial considerations for wildlife habitat. Temporal scale of created openings should also be considered to improve landscape diversity.

In section 5.3 of the Forest Plan, Desired Condition FW-DC-GRZ-01 on page 95 does a great job of explaining the importance of livestock grazing to the forest and local communities, but it is not written in a way that is achievable through actions on the forest. All actions on the forest should work towards achieving desired conditions, but the way this is written, there is no achievable condition. The State recommends rewriting this desired condition to contain action verbiage and an attainable condition. Much of this desired condition can remain if the following wording is added: "Maintain or increase current AUM levels on the Nez Perce Clearwater National Forest". This can be followed by the language from the current desired condition

outlining the importance of livestock grazing. It is important that the NPCNF includes language regarding the increase of AUMs on the forest, as there are many vacant allotments across the forest. The NPCNF has failed to analyze the vacant allotments and the potential AUMs that would be added to the forest with the restocking of those. It should be a priority for the NPCNF to restock these allotments in order to assist with fuels management, create revenue for the forest and local communities, and maintain a viable livestock industry within the planning area.

FW-DC-EM-06 on page 95 in Section 5.2 states: "Energy resources, such as oil, natural gas, geothermal, wind and solar, are available for lease." This condition does not mention hydropower or hydroelectric resources. Please include hydropower resources in this section or make references to other areas in the Forest Plan where hydropower could be found.

Regarding FW-GDL-GRZ-02 on page 96 of the Forest Plan, there is concerning use of a broad "active growth period". Across the forest there are numerous active growth periods, making it extremely difficult to adhere to this guideline. More so, each species of plant will have a different active growth period. We recommend removing the first sentence of this guideline and address active growth periods at the site-specific level. Another concern is the inclusion of at-risk and culturally important botanical species. This may create unintended consequences and an increased workload for the NPCNF and livestock grazing permittees. Please consider rewriting this guideline to read: "New or revised allotment management plans should design grazing practices to avoid, minimize, or mitigate adverse livestock related effects to listed, threatened, and endangered botanical species".

The NPCNF has identified the negative consequences that could occur if these standards and guidelines are implemented as written. This includes the potential for livestock grazing permittees to vacate allotments and potentially go out of business. The NPCNF has failed to identify and analyze the social, economic and ecological impacts that this would have on Idaho's lands and communities. This has created a flawed and incomplete analysis. If permittees vacate allotments and possibly go out of business, there would be a severe social and economic impact to local communities and the State of Idaho. The NPCNF has made it clear on page 95 of the Forest Plan with FW-DC-GRZ-01 how important livestock grazing is to the forest and the local communities but is attempting to apply arbitrary requirements that will have a devastating effect.

Not only would these requirements have economic and social effects, but if allotments are vacated and ranches are sold, this will also have extensive ecological impacts. Livestock grazing permittees provide water and habitat for a multitude of wildlife species on USFS lands. Private ranches provide some of the most important wildlife habitat in Idaho. If ranches are lost and allotments are vacated, important infrastructure will not be maintained on the forest. Necessary wildlife habitat will be severely impacted and valuable open spaces will be lost. Livestock grazing also provides important fuels reduction and has the potential to assist in the management of uncharacteristic wildfires.

According to Svejcar et al. (2013): "Grazing is one of the few tools available to reduce the herbaceous vegetation that becomes fine fuel on rangelands, particularly at large spatial scales. This is especially true if invasive annual grasses are present (e.g. Diamond et al. 2012). Native bunchgrasses also can be more susceptible to fire mortality when they are not grazed because litter accumulates near their growing points; bunchgrass mortality opens the plant community to

invasion by exotic annuals (Davies et al. 2009). These situations provide examples of the importance of maintaining grazing as a vegetation management tool."[4]

It is imperative for the NPCNF to fully analyze the impacts that this Forest Plan can have on the livestock industry, wildlife, forest lands, and local communities. It is of great importance to Idaho's livestock industry that these issues be resolved in the Forest Plan and Final EIS.

The plan is also setting up to manage recommended wilderness as actual Wilderness by setting the only allowable uses as non-motorized and non-mechanized in recommended Wilderness. Motorized use and non-mechanized use have never been a deterrent from an area becoming Wilderness. The Gospel Hump, Hells Canyon, and Frank Church River of No Wilderness all had levels of motorized use before they were designated as Wilderness. The Forest Service should not be designating areas as recommended wilderness such as Meadow Creek (East) and the Hoodoo that have established motorcycle, snowmobile and mountain bike use.

The proposed plan also is considering recommending several stream segments as eligible under the Wild and Scenic Rivers Act. The purpose of the act was to prevent dam construction of designated rivers and was passed in 1968. Today, the United States is more active in removing dams than actually constructing them. The list of potential eligible segments is very unlikely to have dams constructed on them and they are also protected in many cases by the Idaho Roadless Rule. The Forest Service should focus on those segments that are outside of roadless areas.

Mountain goats winter in the Black Lead area of Hoodoo where over-the-snow travel is proposed in Alternative Y, suggested on page 103 of the Forest Plan. IDFG has recorded significant mountain goat population declines in the Black Lead/Williams Lake area. The State recommends a component be included that eliminates over-the-snow travel and heli-skiing in mountain goat winter range. Disturbance can particularly harm wintering mountain goats (e.g., panic-caused increases in metabolic rates/energy expenditures and reduced time feeding), which inhabit extremely harsh winter ranges and are stressed by cold and limited forage.[5] Repeated winter disturbances (e.g., helicopters, snow-machines, logging, road building, etc.) can ultimately contribute to population declines by displacing mountain goats from important habitats.[6]

MA2-SUIT-RWILD-21 on page 105 in Table 33 of the Forest Plan allows administrative uses within Recommended Wilderness. The State recommends a similar Forest Plan component for Recommended Wild and Scenic Rivers.

MA2-GL-IRA-01 on page 110 under Section 5.6.3 states "Coordinate all proposed management activities with the Idaho Roadless Commission." This goal should also aim to coordinate with state agencies that have a vested interest in Idaho Roadless Areas.

Draft EIS Comments

Executive Summary

[4] Svejcar, T., Boyd, C., et al., "Western land managers will need all available tools for adapting to climate change, including grazing: A critique of Beschta et al. Environmental Management," (2014), *available at* 1-4.doi:10.1007/s00267-013-0218-2.
[5] Gordon, S. M., and D. M. Reynolds, "The use of video for mountain goat winter range inventory and assessment of overt helicopter disturbance. Biennial Symposium of the Northern Wild Sheep and Goat Council," 12:26–35 (2000).
[6] Chadwick, D. H., "A beast the color of winter," San Francisco, CA: Sierra Club Books (1983).

The Draft EIS Table 2 on Executive Summary Page 13 is incorrect under the No-Action Alternative. The table states that the Nez Perce portion of the Forest does not have a travel plan. The Nez Perce Forest did designate areas, roads, and trails for motorized uses in the last forest plan and the current travel plan combined with special orders. The Nez Perce Forest does have a travel plan, but it is not in compliance with the Motorized Travel Rule.

Chapter 3.2.1.1 Forestlands
The Forestlands Section of the Draft EIS, page 3.2.1.1-99 states that fisher habitat management applies only to Alternative Z. As a Species of Conservation Concern (SCC), fisher plan components should apply to all alternatives.

Chapter 3.2.2.1 Water Resources
It may be helpful to the reader if there was a paragraph about wild and scenic rivers that discusses Federal Wild and Scenic and State Wild and Scenic/Minimum Stream Flow water rights individually. This could explain subordination opportunities and limitations, mitigation requirements, etc. Include a table that lists the appropriate Federal and State wild and Scenic/Minimum Stream Flow water rights. This is addressed vaguely in Appendix K, but a more detailed description might be beneficial in the main part of the Draft EIS.

In section 3.2.2.1-11, paragraphs 1 and 2 reference 16 and 17-year-old documents. Has the information been verified to include potential changes?

In section 3.2.2.1-11, paragraph 3 may include the other uses identified. The minimum stream flow is the amount of flow necessary to preserve desired stream values, including fish and wildlife habitat, aquatic life, navigation and transportation, recreation, water quality, and aesthetic beauty.

On 3.2.2.1-11, the Groundwater Use paragraph does not explain or reference any restrictions that were implemented or have been rescinded since.

Chapter 3.2.2.2 Fisheries
Include the Lochsa River on Page 3.2.2.2-27 as areas known to have juvenile lamprey.

Consistently use “subwatershed” in place of subbasin, which appears to be used interchangeably.

Chapter 3.2.3 Wildlife
At several locations, the Draft EIS states that the Forest Plan will “conserve the persistence of **MOST** species.” The 2012 Planning Rule requires forests to maintain the diversity of plant and animal communities and support the persistence of native species within the plan area. If a coarse filter is inadequate to conserve all species, then fine filter components should be developed to address gaps not adequately addressed with a coarse filter.

The Wildlife Section lacks discussion and consideration of pollinators. The recent petition of Western Bumble Bee highlights the importance of considering pollinators within forest management. In addition, the Draft EIS fails to recognize competition from domestic honeybees as a threat to nectar resources.

Although some species may use smaller snags, we are unaware of species that prefer smaller snags over larger snags as the Wildlife Section suggests.

The Wildlife Sections Literature Cited does not contain all literature cited parenthetically.

Chapter 3.2.3.2 Abundance and Diversity of Wildlife
The unique, rare, or endemic species – Rocky Mountain Refugium Section on page 3.2.3.2-5 does not recognize endemic aquatic invertebrate species for which the NPCNF comprises a large part of their known range.

The Amphibian Assemblages Section on page 3.2.3.2-7 incorrectly identifies Coeur d'Alene salamanders (CDAs) as being found far from water. Having no lungs and needing to always be wet, CDAs almost always occur in water, particularly seeps and waterfall mist zones.

Regarding the Fisher Section of the Draft EIS on page 3.2.3.2-83, the fact that this is considered a Distinct Population Segment should be made known in the summary. According to the U.S. Fish and Wildlife Service (USFWS) website, based on the best scientific and commercial information available, USFWS found that the Northern Rocky Mountain fisher is genetically different from other fisher populations and qualifies as a distinct population segment under the ESA. In addition to this there is a genetic haplotype native to ID/MT referred to as the bitterroot haplotype. Although, many of the fisher now residing in ID and MT carry a haplotype from transplant populations from both the upper Midwest and British Columbia as well.

Chukar and California quail are incorrectly described on page 3.2.3.2-92 as invasive species instead of non-native upland game birds.

Chapter 3.2.3.3 Threatened, Endangered, Proposed and Candidate Wildlife Species
The Forest Plan should analyze and address needs for specific SCC (i.e., fish, wildlife, and botanical species) on the NPCNF. Protecting SCCs is addressed in the U.S. Forest Service's (USFS) 2012 Planning Rule, which provides direction to include SCCs in forest plans. Consequently, the Forest Plan should address needs to restore, protect, and sustain SCCs on the NPCNF.

The Draft EIS contains direct linkages to desired conditions and standards for some SCC species. To fully address SCC needs, linkages should be made for all NPCNF SCCs, and the Forest Plan include SCC-specific components. The 2012 Planning Rule states, "Identifying SCC's is necessary for the development of forest plan components (36 CFR 219.7)." The Final EIS should therefore define and select for analysis those relevant species on the Regional Office's SCC list. The Final EIS should also describe the process used to identify SCCs and outline SCCs protections in the Forest Plan, with a cross-referencing of SCC information across plan components. Coarse-scale versus fine-scale plan components are a key concept of the 2012 Planning Rule. Fine-scale components should address SCC issues not adequately addressed through coarse-scale vegetation components.

Page 4 of Chapter 3.2.3.3 Wildlife TECP states: "Error! Reference source not found. and Error! Reference source not found." The NPCNF should include full reference in Final EIS.

Page 10 of Chapter 3.2.3.3 Wildlife TECP states: “Lynx did avoid high intensity use ski resorts, especially when use was intense.” This sentence should read ‘Lynx did avoid high intensity use ski resorts during winter seasons.’ instead of ‘high intensity use when use was intense’.

Page 12 of Chapter 3.2.3.3 Wildlife TECP states: “Therefore, under the Northern Rockies Lynx Management Direction, the Nez Perce National Forest is considered unoccupied and the Clearwater National Forest is considered occupied. The USFWS has determined that lynx “may be present” on both Forests, and both Forests are considered to be secondary areas. While lynx have occasionally been sighted on the Forests, currently, little evidence exists of a resident lynx population or reproduction on the Nez Perce-Clearwater due to the infrequent nature of lynx observations. The 2005 Canada Lynx Recovery Area map identified the Nez Perce-Clearwater as a “secondary” Canada lynx area (U.S. Department of Interior, 2005).” This statement is hidden on page 12, when the lynx section begins on page 3. This factor should be announced at the beginning of the lynx section to help the reader and managers understand the status of lynx on each forest and with that how management direction may differ because of this.

Page 20 of Chapter 3.2.3.3 Wildlife TECP states: “The Nez Perce National Forest has not yet undergone travel planning for motorize winter recreation.” Use ‘motorized’ instead of ‘motorize’.

Page 21 of Chapter 3.2.3.3 Wildlife TECP states: “…given that increased traffic and urbanization are projected for the northern Rockies, mitigation such as land purchases and conservation easements may be necessary to preserve connectivity among lynx populations… the Forest Service can support habitat connectivity through its management of National Forest System lands by encouraging or acquiring conservation easements along highways…” There is a degree of uncertainty/lack of commitment to these statements here that makes it hard to gauge what the management strategy is: does the NPCNF plan to support conservation easements implemented along highways through desired conditions, standards, guidelines, etc. in the forest plan? If so, a reference to which management actions in the forest plan should be stated for the above statement. Does the NPCNF have plans with the Idaho Transportation Department, Idaho Department of Fish and Game or others for the identification of highway crossing structure locations on the forest? As stated on 3.2.3.3-21 The areas where Squires et al (2013) mapped lynx connectivity did not include the NPCNF. Most of the lynx sightings on the NPCNF appear to be observations of transient individuals, suggesting that lynx move through the plan area. It should be stated if the forest has plans to map lynx connectivity on the forest.

Regarding the Environmental Consequences – Canada Lynx section on pages 22 through 56 of the Draft EIS, to provide consistency with the rest of the plan, this entire section should be laid out in a similar fashion as the wolverine section, breaking down how each alternative affect lynx in one space, instead of spreading out the information in multiple different tables and headings. There is a more extensive body of research to draw from for lynx, and it the level of analysis and detail is welcome. However, consistency across these sections would make synthesis of this plan easier for the public, agencies, and other commenters.

Page 30 of Chapter 3.2.3.3 Wildlife TECP states: “Analysis of Forest Inventory and Analysis…” Consider changing the first ‘Analysis’ to ‘Review’.

Page 36 of Chapter 3.2.3.3 Wildlife TECP states “This analysis assumes that the Northern Rockies Lynx Management Direction will be implemented on the Nez Perce National Forest and will consult with the U.S. Fish and Wildlife Service on fuels exemptions for that Forest for fuels treatments within Community Protection Zones.” After this statement, FW-STD-WL-01 should be referenced to help the reader understand that the Northern Rockies Lynx Management Direction and Final Record of Decision or any amendment or update to that document is set into the plan as a standard and will be followed by the forest.

Page 37 of Chapter 3.2.3.3 Wildlife TECP states: “…the scope of effects of fire suppression is estimated to be somewhere between 30 to 70 percent.” 30 - 70 percent is a large range, is there a more specific metric for the scope of effects of fire suppression? This estimated range should have a citation regarding how it was derived.

Page 40 of Chapter 3.2.3.3 Wildlife TECP states: “There is a high level of uncertainty about some of these hypothesized effects…” This section is vague and could use more technical descriptions. Other sections go into greater detail about the risks of climate change, like under the wolverine section, and it would help with overall consistency to model other similar sections about climate change.

Page 46 of Chapter 3.2.3.3 Wildlife TECP states: “Few if any lynx are known to have been killed on the paved roads in the plan area … . Perhaps the most significant impact is to lynx habitat connectivity. These roads currently represent only very minor impacts to connectivity.” This is a wordy section that is hard to follow and should be condensed. A possible revision: "The overall impact from these roads is not expected to affect more than 10% of the lynx population since most paved roads do not travel through lynx habitat on the Nez Perce-Clearwater. Lynx are not expected to be crossing them, and based on available information, few if any have been struck by vehicles in the past. (This statement should be verified with the Idaho Department of Transportation and the Idaho Department of Fish and Game.) The larger concern of these roads is habitat connectivity, but that should only be minimally impacted for similar reasons." This last statement should be cited with through a peer reviewed scientific paper such as the Squires et al 2013 paper cited on 3.2.3.3-21.

Page 48 of the Draft EIS 3.2.3.3 Wildlife TECP states: “The effects to transient lynx from intensive over-snow travel is unclear.” Over-snow travel effects on lynx comes up earlier in the EIS in Section 3.2.3.3, page 10, paragraph 2, which states: “ It is summarized that based on U.S. Fish and Wildlife Service (USFWS) determination and science from Kolbe et al 2007, there is not a population level impact on lynx and compacted trails was not considered a threat to lynx. Also based on Squires et al 2010 there was no evidence that lynx selected areas away from National Forest System roads or groomed snowmobile trails during winter… .” Based on the scientific literature in this EIS and the USFWS determination the reference regarding the impact of over show travel on transient lynx should be rewritten to align with the above science and determination or be removed.

Page 54 of the Draft EIS 3.2.3.3 Wildlife TECP states: “On National Forests in the cumulative effects’ analysis area, the wildland urban interface has vegetation treatments using the exceptions and/or exemptions to the Northern Rockies Lynx Management Direction vegetation standards, which may adversely affect stand initiation or multi-story hare and lynx habitat. … Combined, the exemptions and exceptions could affect about 3.9 percent of the lynx habitat on the Nez

Perce-Clearwater. However, the Nez Perce National Forest did not consult on incidental take because they were considered unoccupied. Thus, the Nez Perce National Forest was not issued exemptions or exceptions for these activities." It needs to be made clear in this statement that the Nez Perce National Forest was and still is considered unoccupied habitat by the State of Idaho as well as the Northern Rockies Lynx Management Direction. The percentage of 3.9 percent should be broken out into occupied and unoccupied habitat based on the Nez Perce and Clearwater Forest boundaries. Also, the Nez Perce National forest should not need to have an exemption or exception and should be able to freely conduct these activities because the habitat is considered unoccupied, secondary lynx habitat.

Page 54 of Chapter 3.2.3.3 Wildlife TECP states: "Although lynx are known to cross openings, Squires et al (2013) found that lynx generally use habitat within about 300 feet of cover. Because cover is altered by wildfire, insects, disease, and actions on other land ownerships, it is difficult to predict when or where these effects to cover would occur." A single statement about fragmentation due to loss of cover is not appropriate. The NPCNF should either provide a more technical description of current percentages of openings within lynx habitat that are larger than 300 feet between cover, sources of fragmentation due to loss of cover, or remove this section.

Page 55 of Chapter 3.2.3.3 Wildlife TECP states: "Connectivity from the Nez Perce-Clearwater to Canada is relatively well connected with cover conditions that facilitate lynx travel." Unless there is documented lynx travel between Canada and the Nez Perce Clearwater, this seems like speculation. Considering connectivity is a major focus of habitat management under Idaho State Wildlife Action Plan and the Northern Rockies Lynx Management Direction the NPCNF should elaborate on which of the 105 species were most similar to lynx to help better make the connection regarding lynx travel between the Nez Perce-Clearwater and Canada.

Page 64 of Chapter 3.2.3.3 Wildlife TECP states: "Wolverine mortality from collisions with vehicles has occurred in the state but at low levels." The NPCNF should provide where, when and the number of wolverine fatalities to help the reader understand how this relates to the Nez Perce-Clearwater Forest.

Page 64 of Chapter 3.2.3.3 Wildlife TECP in the Climate Change section states: "The effects of climate change are outside of Forest Service control, though the forest service has the authority to manage other activities… ." In this sentence the second usage of 'forest service' should be capitalized.

Page 73 of Chapter 3.2.3.3 Wildlife TECP states: "The Idaho management plan for the Conservation of Wolverines in Idaho identifies seven objectives for actions that would help conserve wolverines. These objectives address concerns about threats to wolverines and would not be inconsistent with this plan." The NPCNF should list these seven objectives and show examples as to how this plan would be consistent with them. Aspects of 4 of the 7 of objectives are already discussed throughout this section on pages 73-75, but making a more clear and direct connection to the IDFG Management Plan for Conservation of Wolverines in Idaho 2014 - 2019 would be beneficial to the public, agencies, and other commenters.

Page 89 of Chapter 3.2.3.3 Wildlife TECP states: "Bears dispersing through this area would also face significant barriers through Highway 93 and associated development into the Bitterroot Ecosystem area. However, if they made it through these areas, bears would have an easy time

reaching the Bitterroot Ecosystem because they would enter into the Bitterroot National Forest and be a short distance away from the Bitterroot Ecosystem boundary." The NPCNF should revise the italicized sentence as such: "However, if they made it through these areas, the bear's passage through the Bitterroot National Forest would provide easy access to the Bitterroot Ecosystem boundary."

Page 89 of Chapter 3.2.3.3 Wildlife TECP states: "Idaho's strategy for grizzly bears, outlined in their Statewide Wildlife Action Plan, includes continuing conservation partnerships, reducing or preventing illegal and accidental mortalities, reducing anthropogenic attractants and other potential for human-bear conflicts, and managing access to limit conflict and disturbance." The NPCNF should point to the standards, guidelines, objectives, etc. that align this forest plan with Idaho's grizzly bear management strategy in the Statewide Wildlife Action Plan.

Chapter 3.2.3.4 Multiple Uses of Wildlife Resources

The Multiple Uses of Wildlife Resources Section details the economic and social importance of game species to the NPCNF and local communities. We suggest this also be represented in the Economics Section.

Table 1 incorrectly lists Eurasian collared-dove on page 3.2.3.4-4 and rock pigeon as upland game species. Rock pigeon is not classified as upland game in Idaho and Eurasian collared-dove is considered to be a non-native invasive species.

Chapter 3.4.1 Cultural Resources

The Idaho State Historic Preservation Office (SHPO) generally agrees with the effect assessments on Page 3.4.1-14 and the numerical weighting of effect provided in Table 3 on Page 3.4.1-18 of various actions proposed in Alternatives W, X, Y, and Z. As Table 3 shows, Alternative X has the highest potential to adversely affect historic properties, although all alternatives have the potential to affect historic properties. We note that this section does not acknowledge that under all alternatives, undertakings with the potential to affect cultural resources must be consulted on individually and the affects of each undertaking to specific historic properties must be avoided, minimized, or mitigated pursuant to the National Historic Preservation Act and implementing regulations 36 CFR 800.

Chapter 3.4.2 Sustainable Recreation

The State recommends the Recreation Opportunity Spectrum (ROS) mentioned in 3.4.2-4 analyze suitability of motorized travel in big game winter range and elk calving areas. Effects to wildlife should be considered in the ROS. The 2014 Assessment details (including scientific literature) effects to ungulates when motorized travel occurs in wintering and rearing areas. Much information developed for multiple use and ecosystem services in the 2014 Assessment has not been used to inform the Recreation Section.

Table 5 on Page 3.4.2-12 shows Mile of Trail by designed use managed by Nez Perce-Clearwater ranger districts. The biggest problem with this table is that it really does show what is designated for motorized and non-motorized uses. This is what the public is looking for. A pack and saddle trail can accommodate motorcycle use according to the USFS Trail Manual. Motorcycle trails can have steeper grades, tighter switchbacks, less clearing limits and a rougher surface than stock trails according to the manual. The Table should be changed to show what is actual designated, not designed.

Page 3.4.2-22 states that mountain biking is “limited” in Wilderness. Mountain Biking is generally not allowed in Wilderness unless Congress specifically states that it can occur in the law creating the Wilderness. The Clearwater Travel Plan eliminated mountain biking, motorcycle, and snowmobile use in recommended wilderness in both the Mallards Larkins and the Hoodoo recommended wilderness.

Chapter 3.5.2 Energy and Minerals

On page 3.5.2-8-9, under the State and Local Laws section, there should be a discussion about reclamation bonds that must be held by the Idaho Department of Lands, and the State Historic Preservation Office and their role in Section 106 consultation.

On page 3.5.2-11 of the Draft EIS, coal, oil and gas are listed as leasable mineral materials, and that their potential for development is very low during the planning period. There is no mention of other leasable mineral materials such as phosphate, potassium, sodium, gilsonite, oil shale, and sulphur.

On page 3.5.2-12 of the Draft EIS, under the Abandoned Mines section, there is no mention of collaboration with the Idaho Department of Lands for cataloguing or closure of abandoned mines.

On page 3.5.2-19, under the Effects to Resources from Mineral Management section, please refer to the Idaho Department of Environmental Quality for references of up-to-date air quality standards.

Chapter 3.5.3 Livestock Grazing

The NPCNF has identified the significant impact this plan will have on livestock grazing permittees but has still elected to apply the following guideline to all action alternatives. Page 17 of the NPCNF Livestock Grazing Section in the Draft EIS states; “All of the action alternatives would include provisions for the protection of non-ESA listed native fish species redds from livestock trampling, in addition to redd protection for ESA listed fish species. The additional impacts to livestock management associated with non-ESA listed fish redd protection may be significant. Over time, some permittees may elect to vacate their allotments due to the workload and financial impacts associated requirements for riparian management and native fish redd protection.”. These arbitrary guidelines will have a significant negative impact on Idaho’s range livestock industry, subsequently inhibiting the ability for public lands within the NPCNF to provide food and fiber for the nation as required in the Federal Land Policy and Management Act. This will also create a significant burden for the NPCNF, as they would now be required to identify what native species create redds, identify where these redds are, and continually monitor all of these redds. Due to staffing and capacity, this would be impossible for the NPCNF to complete. Again, it is imperative that these broad guidelines pertaining to all native fish be removed from the EIS. The NPCNF is required to work with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, permittees, and partner agencies through Section 7 ESA consultation during the authorization or reauthorization of grazing permits. If concerns regarding ESA fish species arise through Section 7 consultation, guidelines for ESA fish species should be implemented at that time and on the site-specific scale.

Chapter 3.6 Designated and Proposed Areas

The State appreciates the allowance of administrative uses within Recommended Wilderness. However, if Recommended Wilderness is officially designated as Wilderness these allowances are no longer guaranteed. The State is concerned with the lack of clarity regarding Idaho's ability to manage wildlife populations (e.g., state-regulated hunting, fishing, and trapping) and habitats within designated wilderness.

There is additional concern about changes in the Roadless Area theme when a Recommended Wilderness designation occurs. Roadless Areas that become Recommended Wilderness change to a Wildland Recreation theme. The Wildland Recreation theme has more restrictions on allowed management actions than the Backcountry Restoration theme. This Roadless Area theme change limits land manager's ability to conduct restoration.

Noxious weed and invasive species control are key to USFS management of fish and wildlife habitat. The State is concerned about limitations on modern tools available to federal land managers to effectively control noxious weeds and invasive species in designated wilderness. For example, a simple prescription for non-motorized, non-mechanized power is inadequate to control noxious weeds unless infestations are very small. The plan should identify general criteria where use of motorized or mechanized power is administratively necessary for weed or invasive species control.

Lack of trail maintenance within wilderness has limited both administrative access and access for use and enjoyment of the wilderness by the public. Trails are important for both recreation and administrative use and trail maintenance should be a high priority for wilderness managers. We recommend that wilderness and recommended wilderness plans include management of trails and routes to provide administrative and recreation access. These plans should include clear objectives for trails and schedules for trail maintenance and identify general criteria where the use of power saws is administratively necessary (e.g., clearing trees blocking trails in jackstraw pattern from broad-scale fire or storm events).

In Chapter 3.6.1 of the Draft EIS, Table 14, the alternatives presented offer varying levels of ROS and recommended wilderness, and with that differing balances of conservation and human needs. As ombudsmen for the people of the state, we would like the NPCNF to acknowledge the economic opportunities mixed non-motorized and motorized recreation brings to the local communities. Under Alternative Y, upwards of 200,000 acres of motorized recreation would be lost, while other alternatives supply a much more moderate change in ROS while still meeting crucial conservation goals. The NPCNF should choose an approach that maintains an appropriate balance for motorized and non-motorized recreation. Analyzing the impact each management action has to each type of recreation is important ecologically, but it is very important to not miss the important social and economic factors that keep the small communities adjacent to the forest boundaries sustainable. The reduction of certain types of actions for threatened, endangered and other wildlife is important in some cases, but there also must be a balance with the community that uses the Forest Service Managed lands.

In the Wilderness: Recommended Areas Section 3.6.2, the Forest Service needs to take into consideration the impacts their selections have on the community when recommending wilderness areas. Tables 4, 10, 11 in Draft EIS Chapter 3.4.2 Sustainable Recreation and Table 14 in Draft EIS Chapter 3.6.1 Designated Areas clearly indicate the large impact of recommended wilderness on recreational and forest management opportunities, and in turn

dramatically change management goals for these areas. Through the increase in recommended wilderness acres comes a decrease in not only the Forest Service's ability to manage, but also the State of Idaho's ability to manage its lands and wildlife. Areas such as the West Meadow Creek Roadless Area that are currently considered under the management theme of Backcountry Restoration are examples of reducing the Forest Service's ability to manage. According to the Federal Register document for the Idaho Roadless Rule, Backcountry Restoration allows the cutting, sale or removal of timber to reduce hazardous fuel conditions inside and outside of community protection zones where wildfire presents a high risk, to improve threatened, endangered, proposed or sensitive species habitat as well as other designated allowances. Instances such as this needlessly restrict the management ability of the Forest Service, state agencies and the public.

Chapter 3.8.1 Economic Sustainability

The Wildlife Section of the Draft EIS and the 2014 Assessment contain information about the economic value of fish and wildlife to the Forest Plan area. We recommend that this information be added to the Economic Section in chapter 3.8.1. The Economic Section currently underestimates the value of fish and wildlife related recreation to local economies. For example, the 2014 Assessment highlights the combined economic impact of elk hunting to Clearwater and Idaho Counties exceeded $27.6 million in 2007.[7] The 2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation estimated that individuals participating in fishing, hunting and wildlife watching spent $156.9 billion dollars nationally in expenditures for fishing, hunting and wildlife watching.[8] Wildlife and fish recreation needs to be fully considered in the economics section of the Draft EIS.

Appendix E

In Appendix E, on page E- 25, the third paragraph should clarify what "There may be water rights within or downstream of roadless areas" means.

Appendix K

In Appendix K, on page K-24, the information presented in the Water Rights section appears to be outdated. The Final Unified Decree for the SRBA was signed on August 25, 2014, and that decree can be viewed at srba.idaho.gov. Please revise this section with up to date information and data.

Page K-24 states ""Licensed" water rights are permits issued by Idaho Department of Water Resources allowing the use of water." This statement is inaccurate. IDWR issues permits that can become licenses.[9]

On page K-25, in the paragraphs on Surface Water Use and Groundwater Use, both paragraphs reference 16 and 17-year-old documents. Has the information been verified to include potential changes?

[7] Unites States Forest Service. 2014 Nez Perce-Clearwater National Forest Plan Assessment.
[8] U.S. Department of the Interior, U.S. Fish and Wildlife Service, and U.S. Department of Commerce, U.S. Census Bureau. 2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation.
[9] A good summary of the water right process can be found on the website of the Idaho Department of Water Resources: https://idwr.idaho.gov/files/water-rights/water-rights-brochure.pdf.

On page K-26, the Wild and Scenic Rivers Agreement and Wild and Scenic Watersheds section states “In addition to quantifying the wild and scenic water rights, the Wild and Scenic Agreement subordinated the wild and scenic water rights to certain existing and future water uses”. It may be helpful to expand on the topic of subordination for the reader to better understand what this opportunity means and what limitations there are.

Page K-26 states “Rapid River, Salmon River, Middle Fork Clearwater, Lochsa, and Selway rivers all have established minimum flow water rights.” and “All surface water rights and ground water rights diverted from sources hydraulically connected to the wild and scenic river reaches upstream from the ending points are recorded, tracked, and administered as anticipated under the provisions of the Wild and Scenic Agreement”. It would be helpful to the reader to discuss whether the various “eligible” rivers are tributary to any of the established minimum flow water rights. This would also be helpful in the main body of the document.

Page K-26 states “Rapid River, Salmon River, Middle Fork Clearwater, Lochsa, and Selway rivers all have established minimum flow water rights.” The St. Joe River is also discussed in the document. It is unclear whether the St. Joe River in the document is the same as the St. Joe River that also has a minimum stream flow right.[10]

[10] *See* Idaho Department of Water Resources website at https://idwr.idaho.gov/files/legal/wild-and-scenic-rivers/st-joe/49576-91-07624-20160929-Partial-Decree-St-Joe-Wild-and-Scenic-River.pdf.