



United States  
Department of  
Agriculture

Forest Service

Northern Region

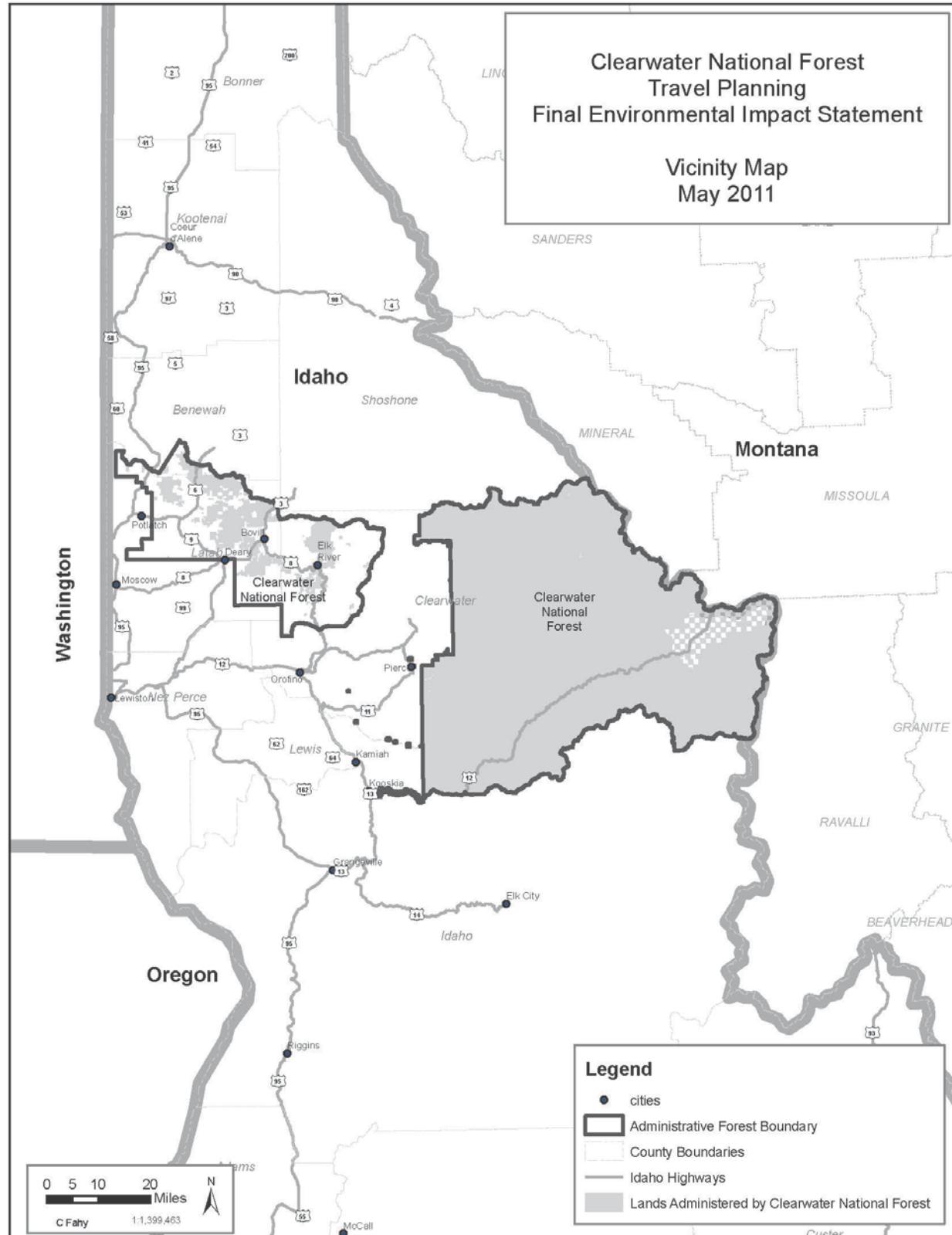
Clearwater  
National Forest

November 2011

# Travel Planning

## Record of Decision





## **RECORD OF DECISION**

### **Travel Planning**

**Clearwater National Forest  
Idaho, Clearwater, Latah, Benewah, and Shoshone Counties, Idaho**

**November 2011**

---

**Lead Agency:**

USDA Forest Service

**Responsible Official:**

Rick Brazell  
Forest Supervisor  
Clearwater National Forest  
12730 U.S. Highway 12  
Orofino, ID 83544

**For Further Information, Contact:**

Kathy Rodriguez  
North Fork District Ranger  
(208) 476-4541

**Abstract:** This Record of Decision (ROD) identifies the alternative selected by the Forest Supervisor for the Clearwater National Forest Travel Management Plan. It documents the Forest Supervisor's rationale for the selection of Alternative C Modified, as described in the Clearwater National Forest Travel Planning Final Environmental Impact Statement (FEIS), August 2011. Alternative C Modified minimizes effects on resources and values identified in the Clearwater National Forest Plan while responding to a broad range of public sentiment regarding management of motor vehicles. The FEIS analyzed five alternatives, including No Action, for managing motorized travel within the 1,827,380-acre Clearwater National Forest. Alternative C Modified provides the best mix of motorized and non-motorized opportunities. The selected actions include an amendment to the 1987 Clearwater Forest Plan. The new Travel Plan will establish a system of designated routes for summer motorized uses. Off-route travel by motorized vehicles will be prohibited, except for snowmachines in winter.

*The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). USDA is an equal opportunity employer.*



# Table of Contents

<b>TABLE OF CONTENTS .....</b>	<b>5</b>
<b>INTRODUCTION .....</b>	<b>9</b>
<b>BACKGROUND.....</b>	<b>10</b>
<b>PURPOSE AND NEED FOR ACTION.....</b>	<b>10</b>
2005 TRAVEL MANAGEMENT RULE: DESIGNATION OF MOTORIZED ROUTES .....	10
SYSTEM TRAILS.....	11
OVER-SNOW VEHICLES.....	12
BICYCLES.....	12
RECOMMENDED WILDERNESS.....	12
<b>ALTERNATIVE DEVELOPMENT.....</b>	<b>13</b>
<b>DECISION AND REASONS FOR THE DECISION.....</b>	<b>14</b>
DECISION CRITERIA .....	14
<i>Summer Recreation Opportunities.....</i>	14
<i>Winter Recreation Opportunities.....</i>	15
<i>Resource Protection .....</i>	15
<i>Forest Plan Goals and Objectives.....</i>	16
DECISION .....	16
<i>Screening Criteria for User-Suggested Routes .....</i>	16
Table ROD-1: Single-Track Trails (106, 167, 191, 445, 594, and 632 (N. Section)) That Would Change in Alternative C Modified, Compared to Alternative C: .....	18
<i>Alternative C Modified Road Actions .....</i>	18
<i>Alternative C Modified Trail Actions .....</i>	18
<i>Alternative C Modified Over-Snow Vehicle Actions.....</i>	19
Table ROD-2: Alternative C Modified Route-Based Restrictions for Over-Snow Vehicles .....	19
ACTIONS COMMON TO ALL ACTION ALTERNATIVES, INCLUDING ALTERNATIVE C MODIFIED .....	21
<i>Roads Actions Common to All Action Alternatives.....</i>	21
<i>Trails Actions Common to All Action Alternatives.....</i>	22
<i>Bicycle Actions Common to All Action Alternatives.....</i>	22
<i>Over-snow Vehicles Actions Common to All Action Alternatives .....</i>	22
<i>Forest Plan Amendment.....</i>	23
<i>Tribal Treaty Rights .....</i>	23
<i>Endangered Species Act Section 7 Consultation .....</i>	23
REASONS FOR THE DECISION .....	25
<i>General Rationale .....</i>	25
Summer Recreation Opportunities .....	25
Winter Recreation Opportunities.....	26
Resource Protection.....	27
Forest Plan Standards, Goals, and Objectives .....	28
Table ROD-3: Compliance With Forest Plan Standards.....	28
<i>Rationale by Forest Plan Management Areas and Other Areas of Public Interest.....</i>	37
Recommended Wilderness Areas (RWAs) .....	37
Inventoried Roadless Areas.....	38
Management Areas C1, C6, and C8S .....	39
Management Areas C3 and C4.....	41
<i>Rationale for Other Components of the Travel Management Plan .....</i>	41

---

Bicycles.....	41
Over-snow Vehicles.....	42
Forest Plan Amendment .....	42
Seasonal Restrictions - "Date Combination Package" .....	42
Access for Dispersed Camping and Parking.....	42
Lands Acquired in the Beaver-Cedar Land Exchange (Former DAW Lands).....	43
User-Suggested Routes.....	43
<b>CONSIDERATION OF THE ISSUES .....</b>	<b>44</b>
<i>Significant Issues</i> .....	44
Effects on Motorized/Non-motorized Recreation and Wilderness Character .....	44
Wildlife Habitat .....	44
<i>Non-Significant Issues</i> .....	46
<b>ALTERNATIVES STUDIED IN DETAIL .....</b>	<b>46</b>
<i>Alternative A: No Action</i> .....	47
<i>Alternative B: Minimal Travel Management Rule Implementation</i> .....	47
<i>Alternative C: Motorcycle Loop Trails and Wildlife Habitat</i> .....	47
<i>Alternative C Modified: Alternative C With Additional Motorized Trail Opportunities</i> .....	47
<i>Alternative D: Wildlife and Recommended Wilderness Emphasis</i> .....	47
<b>ENVIRONMENTALLY PREFERRED ALTERNATIVES .....</b>	<b>48</b>
<b>ALTERNATIVES CONSIDERED BUT NOT STUDIED IN DETAIL .....</b>	<b>48</b>
<i>Proposed Action</i> .....	48
<i>Road and Trail Construction, Reconstruction, Decommissioning, or Obliteration</i> .....	48
<i>Summer Cross-Country Travel Areas</i> .....	49
<i>No Off-Route Access for Dispersed Camping</i> .....	49
<i>Motorized Travel in Inventoried Roadless Areas</i> .....	49
<b>PUBLIC INVOLVEMENT .....</b>	<b>50</b>
SCOPING .....	50
DEIS COMMENTS .....	51
<b>CONSIDERATION OF PUBLIC AND OTHER AGENCY COMMENTS .....</b>	<b>51</b>
<i>Comments on the Proposed Action</i> .....	52
<i>A Petition to Restrict Motorized Travel Due to Adverse Effects</i> .....	52
<i>Comments on the DEIS</i> .....	52
<i>Collaboration and Consultation</i> .....	53
<b>DETERMINATION OF NON-SIGNIFICANT FOREST PLAN AMENDMENT.....</b>	<b>53</b>
<b>RELATED DECISIONS NOT SUPERCEDED .....</b>	<b>54</b>
<b>FINDINGS REQUIRED BY OTHER LAWS, REGULATIONS, AND POLICY .....</b>	<b>55</b>
CONSISTENCY WITH FOREST PLAN .....	55
CONSISTENCY WITH THE FOREST PLAN LAWSUIT SETTLEMENT .....	55
TRAVEL MANAGEMENT; DESIGNATED ROUTES AND AREAS FOR MOTORIZED USE (36 CFR 212, 251, 261); USDA FOREST SERVICE (2005) .....	56
<i>General Criteria for Designation of Roads Trails and Areas</i> .....	56
Effects on Natural and Cultural Resources.....	56
Public Safety.....	56
Provision of Recreational Opportunities .....	56
Access Needs.....	57
Conflicts Among Uses of National Forest System Lands .....	57
The Need for Maintenance and Administration of Roads, Trails, and Areas that Would Arise if the Uses Under Consideration are Designated .....	57
The Availability of Resources for that Maintenance and Administration .....	57
<i>Specific Criteria for Designation of Trails and Areas</i> .....	58
Damage to Soil, Watershed, Vegetation, and Other Forest Resources.....	58
Harassment of Wildlife and Disruption of Wildlife Habitats .....	58

---

*Clearwater National Forest Travel Planning Record of Decision*

---

Conflicts Between Motor Vehicle Use and Existing or Proposed Recreational uses of National Forest System Roads.....	58
Conflicts Among Different Classes of Motor Vehicle Uses of National Forest System Lands or Neighboring Federal Lands .....	58
Compatibility of Motor Vehicle Use With Existing Conditions in Populated Areas, Taking Into Account Sound, Emissions, and Other Factors.....	59
<i>Specific Criteria for Designation of Roads.....</i>	59
<i>Speed, Volume, Composition, and Distribution of Traffic on Roads; Compatibility of Vehicle Class with Road Geometry and Surfacing .....</i>	59
RIGHTS OF ACCESS .....	59
<b>IMPLEMENTATION .....</b>	<b>59</b>
<b>ADMINISTRATIVE REVIEW AND APPEAL OPPORTUNITIES.....</b>	<b>60</b>
<b>CONTACT PERSON .....</b>	<b>61</b>
<b>SIGNATURE AND DATE .....</b>	<b>62</b>



## **INTRODUCTION**

The detrimental effects of indiscriminate off-road motorized travel are nationally recognized. The Chief of the Forest Service identified unmanaged recreation, including OHV use, as one of the four greatest threats to forests of all kinds in the United States. This prompted a proposal for the national “Travel Management Rule” that was eventually adopted in 2005.

On November 9, 2005, the Forest Service published the final rule, “Travel Management; Designated Routes and Areas for Motor Vehicle Use” in the Federal Register (36 CFR Parts 212, 251, 261, 295 [Travel Management: Designated Routes and Areas for Motor Vehicle Use; Final Rule](#) (Federal Register 2005: 70FR68264)). The Rule requires each National Forest to complete a local analysis before the Rule can be implemented. It requires each National Forest to designate those roads, trails, and areas where motorized travel will be permitted, while minimizing effects on resources and values identified in the Clearwater Forest Plan. The Rule also requires Forests to display designated roads, trails, and areas on a Motor Vehicle Use Map (MVUM). Once the MVUM is published, public summer motor vehicle use on the Clearwater National Forest will be allowed only on the designated routes displayed on the map. The MVUM will show routes designated for non-winter public motorized travel, along with permitted vehicles and use seasons.

The final rule does not require that over-snow vehicles such as snowmobiles be limited to designated routes, but it does provide that they may be allowed, restricted, or prohibited. I have elected to include over-snow vehicles in this analysis so that suitable areas, routes, and seasons for their operation can be provided as envisioned in the Clearwater Forest Plan.

## **MINIMIZATION**

When designating National Forest System trails and areas on National Forest System lands, the 2005 Travel Rule requires Forests to consider effects on the following, with the objective of minimizing:

- 1) Damage to soil, watershed, vegetation, and other forest resources;
- 2) Harassment of wildlife and significant disruption of wildlife habitats;
- 3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and
- 4) Conflicts among different classes of motor vehicle uses of National Forest system lands or neighboring Federal lands.

For purposes of this project, I would like to clarify my interpretation of the term “minimize.” It is my interpretation that meeting Forest Plan standards, moving forest resources toward the goals and objectives described in the Forest Plan, and complying with all state and federal regulations will minimize effects on Forest resources. Since all

of the action alternatives analyzed in the EIS would meet these requirements, any of them would minimize effects on Forest resources if selected.

## **BACKGROUND**

Executive Order (EO) 11644 (February 8, 1972), “Use of Off-Road Vehicles on the Public Lands,” as amended by EO 11989 (May 24, 1977), directs Federal agencies to ensure that the use of off-road vehicles on public lands will be managed to protect resources, to promote the safety of Forest users, and to minimize conflicts among the various Forest uses.

The 1987 Clearwater National Forest Plan was prepared when motorized use levels were considerably lower than they are today. The spectrum of motorized and non-motorized recreation opportunities was not explored in depth, since user conflicts and resource issues were few. There was little distinct land area allocation between motorized and non-motorized uses, other than for Wilderness. This regulatory structure required analysis, formal decisions, and Forest Supervisor’s orders to implement restrictions on motorized travel. This situation, coupled with a management approach that lagged far behind the increase in motorized use, over time led to the establishment of motorized uses in many areas on the Forest where it was not specifically restricted. In the current climate, and with an eye toward the future of the Forest, its resources, and its users, there is a need to identify routes suitable for motorized, non-motorized, and non-mechanized travel.

The Clearwater National Forest transportation system has been continuously monitored since the Forest Plan was published in 1987, and over time, adjustments have been made. The existing travel plan represents many years of management decisions based on monitoring, public comments, and the need to minimize effects on resources. Motorized recreationists currently use some roads and trails that are not restricted to motorized travel, but are not part of the official Clearwater National Forest transportation system. There is a need to identify and evaluate those routes, and consider them for possible adoption into the designated motorized system. On the other hand, some other routes are currently part of the official transportation system, but are not travelable with vehicles due to vegetation growth or loss of the road or trail template. Routes that are not travelable in their current condition would not be designated for motorized travel.

## **PURPOSE AND NEED FOR ACTION**

### ***2005 TRAVEL MANAGEMENT RULE: DESIGNATION OF MOTORIZED ROUTES***

*The Existing Condition:* The 2005 Travel Guide describes the existing condition for the analysis presented in the Clearwater National Forest Travel Planning EIS. It represents almost three decades of monitoring and adaptive decision-making. The 1987 Clearwater Forest Plan did not prohibit cross-country motorized travel, except in a few specific Management Areas such as B1 (Selway-Bitterroot Wilderness) and the non-motorized

portions of A3 (Lochsa Face, Coolwater Ridge, and Moose Mountain areas). Currently, motorized recreationists use some routes that are not part of the official Clearwater National Forest Transportation system. Some of these routes are referred to as “user-created.” Although routes that are not part of the Clearwater National Forest Transportation system may not have been authorized by the Forest Service, they may not have violated the Forest Plan, travel guide, or other restrictions when they were created.

***The Desired Condition:*** All routes available for public motorized travel must be a part of the transportation system and must be designated open for motorized travel, including the type of vehicle and season of use, according to 36 CFR 212.

***Need:*** **There is a need to designate the type of vehicle and season of use for all routes that will be used by motorized traffic, and to eliminate unmanaged cross-country motorized traffic.**

## ***SEASONAL RESTRICTIONS***

***The Existing Condition:*** The Clearwater National Forest Travel Guide currently lists seasons of use for motor vehicles, including over-snow vehicles, on system roads and trails. There are more than 35 different date combinations for the different seasonal use restrictions. Both the public and the Forest Service find the variety of seasonal restrictions confusing.

***The Desired Condition:*** Minimize the number of different seasonal restrictions to only those necessary to provide for resource protection and opportunities in accordance with Forest Plan goals and objectives.

***Need:*** **There is a need to combine similar seasonal restrictions where resource protection objectives can be achieved while still providing for a variety of recreational opportunities.**

## ***SYSTEM TRAILS***

***The Existing Condition:*** In contrast to the planned road system, the existing trail system evolved from trails built or used for fire control, access to Forest Service stations, or activities such as mining, hunting, and grazing. The 1987 Forest Plan provided direction for trail use, but was developed when motorized trail use was limited. Since then, trail vehicle numbers and capabilities have increased dramatically. However, the Forest Plan did provide goals, objectives, and standards for trails in each Management Area.

***The Desired Condition:*** The system of trails on the Forest should be managed to meet the goals, objectives, and standards for each Forest Plan Management Area.

***Need:*** **There is a need to evaluate and identify a system of motorized trails that provide for a variety of recreational opportunities while meeting Forest Plan Management Area direction.**

## **OVER-SNOW VEHICLES**

*The Existing Condition:* At the present time, cross-country over-snow vehicle use is not restricted except in Management Areas where motorized use is prohibited by the Forest Plan, Wilderness Areas, and some small restricted areas that have been previously identified for resource protection. Many existing over-snow vehicle restrictions are route-based. Over-snow vehicle use is allowed on some routes in big game winter range on the Lochsa Ranger District.

*The Desired Condition:* The desired condition is to meet Forest Plan goals and objectives for big-game winter habitat without unnecessarily restricting over-snow vehicle use.

**Need: There is a need to restrict motorized over-snow travel on routes within big game winter range in the Lochsa drainage.**

## **BICYCLES**

*The Existing Condition:* Some trails and roads currently have bicycle restrictions, and the objectives for those restrictions are not clear. Some MAs in the Forest Plan include direction for the management of mechanized uses, and bicycles are a form of mechanized travel that has not been previously managed in these areas.

*The Desired Condition:* The desired condition is to meet Forest Plan goals and objectives without unnecessarily restricting bicycle recreational opportunities.

**Need: There is a need to remove bicycle restrictions that do not serve a clearly identifiable purpose, and to manage mechanized travel as necessary to address Forest Plan goals for certain Management Areas.**

## **RECOMMENDED WILDERNESS**

*The Existing Condition:* The Forest Plan recommends some areas (Management Area B2) to be considered for future wilderness designation, and provides goals, objectives, and standards for the management of those areas (Forest Plan p. III-36-39). Lands allocated to MA B2 meet the criteria for being considered, by Congress, for wilderness designation in the future. Currently, summer motorized travel is allowed on some trails, and over-snow vehicles and mechanized vehicles like bicycles are allowed in all of the recommended wilderness areas.

*The Desired Condition:* Areas that were recommended for wilderness designation should be managed to protect and preserve their wilderness character, consistent with the goals and objectives described for these areas in the Clearwater Forest Plan. Forest Plan forest-wide management direction includes a) Maintain potential wilderness values on those areas that are being recommended for classified wilderness (Forest Plan Forest-wide Goal, p. II-1), and b) Manage recommended additions to the wilderness system to prevent changes in character that would be inconsistent in wilderness until Congress makes classification decisions (Forest Plan Forest-wide Standard p. II-23). Forest Plan direction

---

for MA B2 includes a) Manage each recommended wilderness to protect its wilderness character (Forest Plan Goal, p. III-36), and b) Manage all uses to maintain wilderness qualities and retain semi-primitive settings (Forest Plan Standard, p. III-36).

***Need: There is a need to evaluate the motorized and mechanized activities that currently occur in recommended wilderness areas, and to manage those uses so that they do not adversely impact the wilderness character of those areas.***

## **ALTERNATIVE DEVELOPMENT**

The Clearwater National Forest's 2005 Travel Guide was released to the public in July 2005. It described what a designated system of motorized routes on the Clearwater National Forest would look like, and invited the public to provide comments. The 2005 Travel Guide was the basis for the Existing Condition described in the Travel Planning FEIS. Public involvement efforts have been ongoing since 2005. The Forest developed a proposed action that addressed the Purpose and Need for Action described above, while incorporating public input received during the pre-scoping phase.

On November 13, 2007, a legal notice announcing the proposed action was advertised in the *Lewiston Morning Tribune* (the Clearwater National Forest's newspaper of record), initiating the formal scoping period. A Notice of Intent to prepare an Environmental Impact Statement was published in the Federal Register on November 28, 2007. To provide ample opportunity for all interested parties to comment on the proposal, the scoping period was extended through February 2008. More than 4,000 comment documents were received.

The original proposed action was the Forest's initial effort to develop an action that would satisfy the requirements of the 2005 Travel Management Rule, while addressing Forestwide resource needs and concerns related to motorized travel on the Clearwater National Forest. However, in response to the large number of comments that were received during the scoping period, Alternatives B, C, and D were developed by the Interdisciplinary Team (IDT) and the original proposed action was not carried forward to be analyzed in detail in the Draft Environmental Impact Statement (DEIS).

The DEIS analyzed four alternatives, including No Action. Alternative A, the "No Action" alternative, represents the existing condition, based on the 2005 Travel Guide. Alternative B is the "Minimal Travel Management Rule Implementation" alternative. Alternative B would take only the actions necessary to implement the 2005 Travel Management Rule. Alternative C, the "Motorcycle Loop Trails and Wildlife Habitat" alternative, would respond to public comments about providing motorized single-track and loop trail opportunities, while moving Wildlife and Recommended Wilderness resource conditions toward the goals and objectives described in the Forest Plan. Alternative D is the "Wildlife and Recommended Wilderness Emphasis" alternative. It would respond to public comments about protecting wildlife habitat and recommended wilderness characteristics. It would also respond to public comments about providing less motorized access than the proposed action. All of these alternatives were carried forward for analysis in the Final Environmental Impact Statement (FEIS).

Two site-specific Forest Plan amendments were proposed in all of the DEIS alternatives. One amendment would modify the periods of restriction for on-road use described in Appendix F of the 1987 Forest Plan. This proposed amendment has been carried forward in the FEIS as an action common to all action alternatives; it is described in Appendix D of the FEIS. The other site-specific Forest Plan amendment that was proposed in the DEIS would have removed current Forest Plan elk habitat potential standards in selected areas. Based on an updated effects analysis for wildlife, the proposed elk habitat amendment was not carried forward into the FEIS.

The DEIS was advertised for public comment from July 17, 2009 through October 2, 2009; 545 comment documents were received. In response to comments on the DEIS, the IDT developed Alternative C Modified for analysis in the FEIS. Alternative C Modified includes additional motorized trail opportunities, compared to Alternative C. Alternative C Modified would respond to requests for more motorized loop trails, while minimizing effects on wildlife habitat in Management Areas C1, C6, and C8S by implementing seasonal restrictions on some trails.

The action alternatives that were developed by the IDT for analysis in the FEIS respond to public comments that were received during scoping and comments that were received for the DEIS, as well as the purpose and need for action that has been described for this project. The alternatives are described in detail in the FEIS in Chapter 2 and in the Appendices.

## **DECISION AND REASONS FOR THE DECISION**

### ***DECISION CRITERIA***

In making my decision for the Clearwater National Forest Travel Management Plan, I focused on the following criteria:

#### **Summer Recreation Opportunities**

I considered the degree to which each alternative would provide well-distributed opportunities for motorized recreational uses and quiet, non-motorized uses of the trail system outside of Wilderness. I evaluated each alternative based on the following considerations:

- Would the alternative provide opportunities for both motorized and non-motorized recreational travel to destinations such as lakes, peaks and vistas?
- Would the alternative provide opportunities for backcountry trail trips of varying length on single track trails for both motorcycles and non-motorized users?
- Would the alternative provide ATV opportunities on both roads and ATV trails?
- Would the alternative provide opportunities for full-sized OHVs like SUVs, 4x4's, and UTVs to explore the forest on roads?

- Would the alternative minimize damage to forest resources, wildlife and wildlife habitats, conflicts between motor vehicle use and existing or proposed recreational uses of National Forest lands, and conflicts among different classes of motor vehicle uses?

### **Winter Recreation Opportunities**

I considered the degree to which each alternative would provide well-distributed opportunities for both snowmobiling and quiet, non-motorized winter recreation such as cross-country skiing and snowshoeing. I evaluated each alternative based on the following considerations:

- Would the alternative provide groomed and marked snowmobile opportunities for trips of varying length in a variety of settings?
- Would the alternative provide cross-country ski and snowshoeing opportunities in quiet, non-motorized settings?
- Would the alternative provide opportunities for snowmobiles on existing roads in a variety of settings?
- Would the alternative provide opportunities for cross-country snowmobile travel off of roads?
- Would the alternative minimize damage to forest resources, wildlife and wildlife habitats, conflicts between motor vehicle use and existing or proposed recreational uses of National Forest lands, and conflicts among different classes of motor vehicle uses?

### **Resource Protection**

I considered the degree to which each alternative would achieve desired conditions for other resources, particularly wildlife species that are affected by human uses and areas recommended for Wilderness by the Forest Plan. I evaluated each alternative based on the following considerations:

- Would the alternative be consistent with laws, regulations, policy, the Forest Plan, and other direction applicable to managing other resources, thereby minimizing adverse effects on Forest resources?
- Would the alternative move conditions toward the goals for management areas in the Forest Plan?
- Would the alternative be consistent with existing or anticipated conservation strategies for species listed as Threatened or Endangered?

- Would the predicted effects of the alternative fall within accepted parameters or identified thresholds of maintenance and protection that are supported by research or monitoring information?

### **Forest Plan Goals and Objectives**

I considered the degree to which each alternative would move Forest resources closer to the goals and objectives described in the 1987 Clearwater Forest Plan.

### ***DECISION***

After careful consideration of the potential effects of the alternatives disclosed in the FEIS, I have selected Alternative C Modified as the Travel Management Plan for the Clearwater National Forest. My decision is described in detail below, supplemented by the maps and information included in the FEIS.

Alternative C Modified was added to the alternative array for the FEIS in response to comments received for the DEIS. Alternative C Modified was based on Alternative C, so many features of these two alternatives are the same. However, Alternative C Modified responds to issues and concerns about opportunities for motorcycle loop trips to a greater degree than Alternative C. Like Alternative C, Alternative C Modified will minimize effects on Forest resources, while addressing Forest Plan goals for wildlife and providing quality motorcycle loop trips in areas of the forest that were of greatest interest, including Weitas Creek, Cayuse Creek, and Pot Mountain.

The items described in the FEIS under “Actions Common to All Action Alternatives” will be implemented.

Alternative C Modified road actions and bicycle actions will be the same as those described in the FEIS for Alternative C.

Over-snow motorized vehicle use will be restricted yearlong in Management Area B2, and on Fish Lake Trail 419 the same as in Alternative C.

Restrictions will be different from Alternative C for some trails; these are described in Table ROD-1 below, and in Table 2-3 in the FEIS. The “Actions Common to All Action Alternatives” described in Chapter 2 of the FEIS will apply to Alternative C Modified, but the “Actions Common to Alternatives B, C, and D” will not.

All of the action alternatives would comply with Forest Plan standards as well as all state and Federal environmental regulations, thereby minimizing adverse effects on Forest resources and users.

### **Screening Criteria for User-Suggested Routes**

The 1987 Clearwater Forest Plan did not prohibit cross-country travel. Currently, motorized recreationists use some routes that are not part of the official Clearwater National Forest Transportation system. Comments received during scoping and the

---

public comment period for the Draft EIS suggested that some of these routes should be added to the official transportation system. Alternative C Modified includes some of these “user-created” routes. To minimize potential adverse effects on Forest resources and users, I selected these routes based on the following criteria:

- Selected user-suggested routes had to be free of unmanageable resource issues, with maintainable grades that would not require relocation and free of obstacles that would require reconstruction.
- User-suggested routes selected for analysis had to go somewhere that would be of general interest to many people, and did not simply dead-end at a location that would be of interest to relatively few people.
- Selected user-suggested routes had to meet the goals and objectives for motorized and non-motorized areas described in the Forest Plan.
- Because construction or reconstruction would be better analyzed at a more site-specific scale, selected user-suggested routes had to physically exist at the present time in a condition that would be suitable for most users.
- User-suggested routes were not selected if they were already part of the initial designated road or trail system; in other words, they were not already in the 2005 Travel Guide.
- User-suggested routes that were selected had to be accompanied by a map showing the route location.

**Table ROD-1: Single-Track Trails (106, 167, 191, 445, 594, and 632 (N. Section)) That Would Change in Alternative C Modified, Compared to Alternative C:**

<b>Trail</b>	<b>Miles</b>	<b>Alternative A (No Action)</b>	<b>Alternative B</b>	<b>Alternative C</b>	<b>Alternative C Modified*</b>	<b>Alternative D</b>
106	7.1	Open Yearlong	Open Yearlong	Open 9/1 – 11/15	Closed Yearlong	Closed Yearlong
167 (N. Section)	14.8	Open Yearlong	Open Yearlong	Closed Yearlong	Open 8/1 – 11/15	Closed Yearlong
191	13.2	Open Yearlong	Open Yearlong	Open 9/1 – 11/15	Open 8/1 – 11/15	Closed Yearlong
445	5.3	Open Yearlong	Open Yearlong	Closed Yearlong	Open Yearlong	Closed Yearlong
594	.9	Open Yearlong	Open Yearlong	Closed Yearlong	Open Yearlong	Closed Yearlong
632 (N. Section, from Road 555 to Windy Ridge Trail)	2.7	Open Yearlong	Open Yearlong	Open Yearlong	Closed Yearlong	Closed Yearlong
691	1	Open Yearlong	Open Yearlong	Open 9/1 – 11/15	Open 8/1 – 11/15	Closed Yearlong

\*For all other trails and roads, Alternative C Modified will be the same as Alternative C. Alternatives A, B, and D would not change in the FEIS. They are included in this table only for reference purposes.

### **Alternative C Modified Road Actions**

Road actions for summer uses remain the same as for Alternative C.

### **Alternative C Modified Trail Actions**

To protect wilderness character, motorized travel will be restricted yearlong on all trails in Management Area B2, except for Fish Lake Trail 419. Fish Lake Trail 419 will remain open to summer motorized traffic.

Alternative C Modified will include user-suggested motorized trails that passed the screening criteria, and that contribute to loop opportunities, in Management Areas E1/E3 and motorized portions of Management Areas A3 and C8S.

Alternative C Modified will not include user-suggested motorized routes in Management Areas B2, C1, or C6 since additional motorized use would run counter to Management Area goals for those areas.

Alternative C Modified will restrict motorized use on most trails within Management Areas C1 and C6. The motorized trails that would be retained would be those that would minimize potential adverse effects on soil, watershed, vegetation, wildlife, and other resources in Management Areas C1 and C6. Motorized use in Management Area C1 will

be allowed only during the fall, in keeping with Management Area goals to minimize summer disturbance and provide for motorcycle use associated with big game hunting.

Retaining motorized use on selected trails in Management Area C8S will minimize effects on wildlife by retaining large blocks of secure habitat, while continuing to provide motorized loop opportunities.

Trails 31 and 32 in Management Area E1 will be closed to protect riparian habitat and fish in Eldorado Meadows.

### **Alternative C Modified Over-Snow Vehicle Actions**

Route-based restrictions for over-snow vehicles that would be dropped in Alternatives B, C, and D will be retained in Alternative C Modified, with some modifications as shown in Table ROD-2 below and Table 2-4 in the FEIS. Instead of the variety of seasonal restrictions shown in Alternative A, the restriction dates will be simplified. These simplifications are intended to make the restrictions and the Motor Vehicle Use Map clearer.

Table ROD-2 shows the variety of seasonal restrictions that are currently in place for roads and trails, as well as the restrictions that will be implemented under Alternative C Modified. For example, a road that is currently restricted from 10/1 to 5/15 will be restricted Yearlong under Alternative C Modified. At first glance, it may appear that a yearlong closure is more restrictive than a 10/1 to 5/15 closure. However, 5/16 through 9/30 is the snow-free season, when motorized over-snow recreation is not possible. Extending the restricted season to include snow-free months will not reduce motorized winter recreation opportunities.

**Table ROD-2: Alternative C Modified Route-Based Restrictions for Over-Snow Vehicles**

Type of Route (Road or Trail)	Alternative A (Current) Restriction	Alternative C Modified (Proposed) Restriction
Road	0	0
Road	10/1 – 12/1	10/1 – 11/15
Road	10/1 – 5/15	Yearlong
Road	11/1 – 4/1	Yearlong
Road	11/1 – 5/15	Yearlong
Road	12/1 – 4/15	Yearlong
Road	12/1 – 5/15	Yearlong
Road	4/1 – 11/30	10/1 – 11/15
Road	6/1 – 12/1	10/1 – 11/15
Road	Yearlong	Yearlong
Trail	0	0
Trail	10/1 – 5/15	Yearlong
Trail	12/1 – 5/15	Yearlong
Trail	5/15 – 12/1	10/1 – 11/15
Trail	Yearlong	Yearlong

### **Alternative C Modified – Conditions for Motorized Travel to Dispersed Campsites**

Dispersed camping is very popular across the Forest and there are numerous existing campsites. Many of the potential impacts associated with dispersed camping are related to motor vehicle use. Some of the potential impacts associated with this activity may include driving across streams or down stream banks, developing multiple tracks into or between campsites as a result of repetitive OHV travel, and pioneering new campsites and motorized tracks to them.

In response to public comments, a standard set of conditions has been developed that will apply Forest-wide. The conditions below are designed to meet the intent of the Travel Rule and to minimize the potential adverse effects on Forest resources and users associated with motor vehicle travel to dispersed campsites:

- Motorized travel to dispersed campsites along designated routes is included as designated route travel as long as the conditions for that travel are met. When the conditions below are not met, the motorized travel is illegal.
- To meet the intent of the rule, motorized travel to dispersed campsites along designated routes would be permitted within 300 feet of a designated route during the period when that route is open to motorized traffic. The 300 foot distance is measured perpendicular to the designated route. Campsites, even where they currently exist, that are beyond the 300 foot distance would be off-limits to motor vehicles.
- Since the intent is to minimize damage to Forest resources while providing for camping access, it would not be permissible to roam around with a motor vehicle off the designated route while looking for a campsite. Campers are expected to explore and evaluate campsites by non-motorized means and travel to them with their vehicle using the most clearly defined existing track. Cutting corners on the established track or taking shortcuts back to the main road or trail would not be permitted. Again, since the intent is to provide for camping access, repetitive recreational riding around in the campsite or along the access route would not be permitted.
- To minimize adverse effects to Forest resources, barriers of logs, rocks, or earth, gates, and/or signs have been or may be placed to restrict vehicles from sensitive or damaged areas such as wet areas, streamside zones, redundant tracks, or for other resource protection purposes. Moving, going over, going around, or in any way circumventing these restriction devices would not be permitted.
- Any motorized travel that causes resource damage is prohibited (36CFR261). Examples of resource damage associated with motorized travel to dispersed campsites include but are not limited to:
  - Cutting, harming or unreasonably disturbing vegetation

- Using more than one track to access the campsite
- Crossing streams, driving on stream banks, or riding in any wet area off the established track where rutting occurs.

## **ACTIONS COMMON TO ALL ACTION ALTERNATIVES, INCLUDING ALTERNATIVE C MODIFIED**

The following actions were described in the FEIS as common to all action alternatives, and are included in Alternative C Modified.

- Cross-country motorized summer travel off of designated routes will be prohibited.
- The Travel Planning analysis will not include the construction, reconstruction, or decommissioning of roads or trails. These actions would be better addressed at a more site-specific scale.

### **Roads Actions Common to All Action Alternatives**

The following roads actions were described in the FEIS as common to all action alternatives, and are included in Alternative C Modified.

Existing road restrictions have normally been developed during smaller-scale project analyses, using detailed site-specific information, and will not be reconsidered in this broad-scale analysis except in specific situations as described below

- System roads that were not displayed in the 2005 Travel Guide because they are generally overgrown or otherwise impassable would not be designated as motorized routes. In the Travel Planning reports (see Appendix B); a code of “Overgrown Not in Travel Guide” identifies these roads. Not designating these roads for motorized travel, even though they were not previously restricted, reflects the existing situation, rather than an actual change in usable road miles.
- The “date combination package,” consisting of proposed changes to seasonal road restrictions that are intended to reduce the number of use seasons, is included. See Appendix B, “All Travel Codes Defined,” for a detailed description of the proposed date combinations that would be implemented.
- Restrictions and designations proposed for roads on the lands formerly owned by DAW Forest Products Company in the upper North Fork River drainage are included. These roads were not in the 2005 Travel Guide, and have not been previously considered in project-level analyses, because they had been in private ownership (see Appendix B).
- Restriction changes that have been proposed to make restrictions consistent on related roads are included in actions common to all action alternatives.

### **Trails Actions Common to All Action Alternatives**

The following trails actions were described in the FEIS as common to all action alternatives, and are included in Alternative C Modified.

Existing trail restrictions that have mostly been developed during smaller-scale project analyses will not be reconsidered except in specific situations as described below.

System trails that are in “storage” status (have not been maintained for 10 or more years), and that are generally overgrown and impractical for motorized travel, will not be designated for motorized use. In the Travel Planning Reports (see Appendix B), a code of “STO Trail/Maint Cost” identifies the storage trails that are not proposed for motorized use. With few exceptions these trails are not travelable with motor vehicles now and not designating them for motorized use represents little actual change in motorized opportunity. The “date combination package,” consisting of all the changes to seasonal trails restrictions that have been proposed to reduce the number of use seasons, will be implemented. See Appendix B for a detailed description of the proposed date combinations that will be implemented. Also see Appendix B for restriction changes and the reasons for those changes.

Error corrections to the 2005 Travel Guide for Trail 330 (Sand Mt), Trail 607 (Morgan Gul), and Trail 3610 (Disalto Cr) are included in all action alternatives.

### **Bicycle Actions Common to All Action Alternatives**

The following bicycle actions were described in the FEIS as common to all action alternatives, and are included in Alternative C Modified.

Appendix B lists all system trails where bicycle travel will be restricted.

Two new bicycle restrictions are common to all action alternatives. They are on Trails 790 and 790-A near the Lolo Pass visitor center.

### **Over-snow Vehicles Actions Common to All Action Alternatives**

The following over-snow vehicles actions were described in the FEIS as common to all action alternatives, and are included in Alternative C Modified.

Cross-country travel by motorized over-snow vehicles will continue to be permitted.

To minimize adverse effects on wildlife, over-snow motorized vehicle use will be prohibited Forest-wide from October 1 through November 15 annually to provide for big game security during the core of the big game hunting seasons. This would replace a variety of route-based, seasonal restrictions that had the same purpose.

The reports in Appendix B do not show area restrictions to over-snow travel. See the Motorized Winter Use Map in Appendix A for that information. Area-based over-snow motorized vehicle restrictions will be retained for Forest Plan Management Areas B1

(Wilderness), A3 (Those parts identified as Non-Motorized Recreation), and A2 (Elk Creek Falls), as well as in several specific areas that were previously described in the Travel Guide.

Van Camp Trail 16 will be restricted yearlong in all action alternatives.

All currently groomed routes will be retained for over-snow vehicle winter travel.

### **Forest Plan Amendment**

The following forest plan amendment was described in the FEIS as common to all action alternatives, and is included in Alternative C Modified. It would modify the periods of restriction for on-road use described in Appendix F of the 1987 Forest Plan.

The periods of restriction listed under Item IV, “ON-ROAD USE,” for Items IV. D. 2 and IV. D. 3 would be modified as described below:

- 1) Item IV. D. 2 would be changed to “Areas subject to erosion and/or watershed damage may be restricted seasonally, with the period of restriction to be determined based upon a site-specific review. Where conditions or levels of use by certain vehicles would not cause significant damage, such vehicles may be exempted from restrictions.”
- 2) Item IV. D. 3 would be changed to “Key wildlife habitat – YEARLONG TO ALL VEHICLES. Where habitat is of seasonal importance, use will be constrained for only the period of time appropriate to protect wildlife from undue harassment, to be determined based upon a site-specific review.”

Based on a more detailed review of the Forest Plan and its Record of Decision since the DEIS was published, I have concluded that the standards for Elk Habitat Effectiveness in the Forest Plan were applicable only to motorized traffic on roads, not on trails. Therefore, in this decision I have decided not to proceed with a forest plan amendment that was included in the DEIS for Alternatives B, C, and D that would have removed these standards in certain backcountry areas.

### **Tribal Treaty Rights**

All of the action alternatives would maintain access to areas important to all Native American Tribes who use the Clearwater National Forest, and would preserve local Native American culture by providing for the continued ability to practice inherent tribal treaty rights and traditional uses of the forest.

### **Endangered Species Act Section 7 Consultation**

Consultation with the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) as required by Section 7 of the Endangered Species Act has been completed. Each agency has issued a Biological Opinion for the Clearwater National Forest Travel Planning proposal.

The following Terms and Conditions are included in the USFWS Biological Opinion:

#### **2.8.4 Terms and Conditions**

1. In addition to the provisions in the proposed Monitoring Plan, the Forest will monitor the 14 motorized stream crossings on bull trout streams on a yearly basis for 5 years. If monitoring results indicate that continued use of these crossings is resulting in increasing levels of impacts at the crossings (e.g., increasing levels of rehabilitation work is required) the Forest will take measures to reduce the use of the impacted crossings. These measures may include closing the crossing, or installing a crossing structure such as a bridge or puncheon. A separate section 7 consultation will be needed for any of these measures that require a NEPA decision and may affect listed species.
2. The Forest will conduct bull trout redd surveys and fish demographic surveys at the four crossings with the highest potential for occupancy by spawning and early rearing bull trout (Liz, Windy, Corral, and Johnagan Creeks). Should the Forest find redds or juvenile bull trout at these (or any of the other 10 stream crossings), the Forest will close the crossing and reinitiate consultation with the Service.

The following Terms and Conditions are included in the NOAA Biological Opinion:

#### **2.8.3.2. Terms and Conditions**

To be exempt from the prohibitions of section 9 of the ESA, the CNF and its cooperators, including the applicant, if any, must fully comply with conservation measures described as part of the proposed action and the following terms and conditions that implement the RPMs described above. Partial compliance with these terms and conditions may invalidate this take exemption, result in more than anticipated, and lead NMFS to a different conclusion regarding whether the proposed action will result in jeopardy or the destruction or adverse modification of designated critical habitats.

1. To implement RMP #1, the CNF shall:
  - a. Maintain hardened fords on trails that are open to motorized use in streams occupied by steelhead. Hardening shall be done in a manner that minimizes erosion of approaches to the stream and minimizes creation of suspended sediment when vehicles cross the streams.
2. To implement RMP #2, the CNF shall:
  - a. Devise a monitoring plan to assess incidental take at the stream fords open to motorized use. The plan shall assess turbidity caused by vehicles crossing the fords to determine if:

- (1) Turbidity equals or exceeds 25 NTUs above background at a distance of 275 feet downstream from the fords for a duration of 6 hours or more within a 24-hour period, on 10 or more days during a single season of use;
  - (2) Turbidity is increased by 25 NTU or more for any duration at a distance greater than 275 feet.
- b. Submit all monitoring reports annually by March 15, to: NMFS, North Idaho Branch Office, 104 Airport Road, Grangeville, Idaho 83530.

## ***REASONS FOR THE DECISION***

### **General Rationale**

In making my decision, I considered a variety of choices within specific areas, and for specific routes. From a broad, Forest-wide perspective, I was guided by the following criteria:

#### ***Summer Recreation Opportunities***

One of my objectives was to provide well-distributed opportunities for both OHVs and exclusive non-motorized uses of the Clearwater National Forest outside of Wilderness, while moving toward Forest Plan goals and objectives for other resources.

Some people who commented on this project expressed interest in particular destinations like lakes, and ridgelines or peaks that provide expansive views. For persons seeking quiet recreation these opportunities are provided in areas like the Mallard Larkins, Moose Mountains, and Great Burn where there will be no motorized use. Motorized routes to similar features will be maintained in places like the Lolo Motorway, Fish Lake, the Elizabeth Lakes area, and ridgeline routes in Clarke Mountain, Sheep Mountain, and to a number of lookouts.

During scoping and the comment period for the DEIS, recreationists mentioned that motorized users desire ATV and/or motorcycle trail rides of varying lengths within a reasonable travel distance from local communities.

They also mentioned that non-motorized users desire similar duration hiking, horseback riding, and mountain biking opportunities within the same distances of local communities. Commenters mentioned that trails open to motorized use do not provide the type of experience many non-motorized users are looking for. Motorcyclists as well as non-motorized users prefer relatively narrow or single track trails and both groups appreciate trails that provide travel in a loop instead of back and forth on the same route. Places like the Mallard Larkins, Great Burn, and Selway Bitterroot additions that are recommended for wilderness designation in the Forest Plan will provide the bulk of the exclusively non-motorized opportunities. Trails that are open seasonally to motorcycles

in parts of Weitas, Fourth of July, and Junction Creeks will provide loop opportunities for motorcycles during part of the season (8/1 to 11/15) while providing an exclusive non-motorized experience earlier in the summer. Long loop opportunities for motorcyclists of varying skill levels will be retained in places like Pot Mountain/Sheep Mountain and seasonally in Weitas Creek.

Many of the existing backcountry motorcycle opportunities are in Forest Plan management areas that emphasize goals for wildlife and/or fisheries, and some are in areas recommended for wilderness. In most of these areas I have attempted to retain motorcycle opportunities including loops, and to include motorcycle trails that commenters told me were most important to them. But there is a direct conflict between uses in these areas, and in making my decision I have given considerable weight to the primary Forest Plan goals for these management areas. This means that motorcycle opportunities will be reduced in the backcountry and non-motorized opportunities will increase.

Past monitoring has indicated that potential damage to wildlife resources could be minimized by restricting motorized travel on Weitas Creek Trail 626. Other ATV trails are relatively unaffected by the selected actions.. Motorized recreationists who enjoy travel on National Forest System Roads will also see few effects: there will be some minor seasonal adjustments, and a few roads on lands acquired from DAW Corporation will be restricted. The vast majority of the currently travelable road system will remain available to motorized traffic.

My decision will reduce motorized opportunities, compared to the existing situation. Based on comments and discussions I've received during the travel planning process, I know that many motorized users, especially motorcyclists, will strongly disagree with my decision. Other interests may disagree with the decision as well, thinking that restrictions to motorized uses, particularly for motorcycles in the backcountry, do not go far enough. My decision represents my best effort at resolving these competing interests: motorized recreation opportunities and other management area goals. Meeting Forest Plan standards, and striving to move resource conditions closer to Management Area goals and objectives, will minimize damage to soil, watershed, vegetation, and wildlife resources, while reducing conflicts between motor vehicle uses and existing or proposed recreational uses on National Forest System lands.

### ***Winter Recreation Opportunities***

My objective was to provide well-distributed opportunities for snowmobiling while moving toward Forest Plan goals and objectives for other resources. Moving toward Forest Plan goals and objectives will minimize potential adverse effects on Forest resources. Again, public comments indicated that there is a need for winter recreation opportunities in both motorized and non-motorized settings.

Opportunities for snowmobile and other over-snow vehicle trips along groomed routes remain unchanged from the current situation and this is where most motorized winter

activity occurs. Similarly, no groomed ski trails are converted to motorized use in my decision.

For over-snow vehicle users who travel roads that are not groomed, few changes will be apparent. My decision to restrict over-snow vehicles Forest-wide during the core of the big game hunting seasons from 10/1 to 11/15 does not affect the winter recreationist and will affect few hunters in typical fall weather. I have decided not to modify or remove a variety of scattered over-snow vehicle restrictions with this decision, although those changes were analyzed in Alternatives B, C, and D. Since a number of these restrictions were implemented as a result of site specific analyses, I will defer any reconsideration of them to analysis and decision with future projects as they come along.

Much of the Forest remains open to cross-country travel with over-snow vehicles during winter once the snow is deep enough to make this travel possible. Some snowmobilers desire a high altitude remote experience that might include hill climbing or “high marking”. Commenters expressed concerns over the loss of opportunities like this if areas that were recommended for Wilderness in the Forest Plan were restricted to motorized vehicles. In making my decision to eliminate most motorized travel in recommended wilderness I have given the most weight to the goal of retaining wilderness character. (“Manage recommended additions to the wilderness system to prevent changes in character which would be inconsistent in wilderness until Congress makes classification decisions,” (FP pg. II-23)) This will minimize the potential for adverse effects to Forest resources and conflicts between uses. Though similar opportunities for high elevation snowmobile use exist regionally, the Great Burn area and some other locations on the Powell District will be missed by those who have snowmobiled there. The change will create quiet environments for non-motorized winter users though I recognize that sheer remoteness will limit the numbers of non-motorized users to these areas.

### ***Resource Protection***

My most important objective was to manage motorized uses as necessary to minimize potential adverse effects to Forest resources. Moving conditions closer to the goals and objectives in the Forest Plan, and managing motorized travel so that it complies with laws, regulations, policy, and Forest Plan direction, will accomplish this. This objective creates the sideboards within which recreation opportunities may be provided. In summary, travel opportunities were limited as follows:

- Eliminate motorized and bicycle travel in recommended wilderness except for summer motorized travel on Fish Lake Trail 419.
- Manage motorized use in MAs C1, C6, and C8S to minimize effects on wildlife and fisheries resources while moving closer to goals and objectives in the Forest Plan.
- Retain motorized uses to the greatest extent possible in MAs where motorized uses are consistent with goals and objectives in the Forest Plan.

There is often an inverse relationship between the level of human uses of the Forest, and the condition of other resources, as is evidenced by the effects analysis disclosed in Chapter 3 of the FEIS. For example, as motorized use increases, wildlife habitat security often decreases. Generally speaking, adverse environmental impacts were a factor I considered in not choosing the other alternatives. Impacts on Recommended Wilderness, wildlife, and fisheries were also factors in my decision not to choose Alternative B. Beyond that, my decision was largely based on my desire to provide an appropriate mix of recreation opportunities, while minimizing adverse effects by complying with laws, regulations, policy, and the Forest Plan.

### ***Forest Plan Standards, Goals, and Objectives***

In addition to laws, regulations, and policy, the Forest Plan provides overarching direction for the management of Forest resources. All selected actions must comply with Forest Plan standards. To move resource conditions toward Forest Plan goals and objectives, however, it is sometimes necessary to strike a compromise between different resources. For example, reducing motorized use to minimize effects on wildlife security habitat may have adverse effects on motorized recreation opportunities. My goal is to move resource conditions closer to the goals and objectives outlined in the Forest Plan by achieving the best possible balance between recreational opportunities including motorized recreation and the various resources that may be affected by motorized travel. I believe that the seasonal restrictions for motorized travel on trails in certain management areas that were developed by the IDT for Alternative C Modified represent the best compromise between allowing access for recreation and hunting while protecting wildlife habitat. The seasonal restrictions for specific routes and areas are described in detail in Appendix A and Appendix B of the Final EIS.

Forestwide standards are described in the Forest Plan on pages II-20 through II-40. Forest Plan standards for individual Management Areas are described on pages III-3 through III-77. PACFISH and INFISH were amended to the Clearwater Forest Plan in 1995. PACFISH and INFISH standards also apply to this project.

**Table ROD-3: Compliance With Forest Plan Standards**

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
General	Forest-wide	Comprehensive area transportation planning. (FP pg. II-21)	The selected actions will accomplish this.
Recreation and Visual	Forest-wide	Use the Recreation Opportunity Spectrum (ROS) and Recreation Opportunity Guide (ROG) as guides to provide a full array of recreation. (FP pg. II-21)	See the FEIS, Appendix E for a discussion of the effects analysis for Recreation and the use of ROS for this analysis.
Recreation and Visual	Forest-wide	Designate areas, roads, and tracts for off-road vehicle (ORV) use in accordance with management area goals and standards. (FP pg. II-21).	The selected actions are consistent with direction outlined in Appendix F of the Forest Plan. Please see specific items elsewhere

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
			in this table for a discussion of MA-specific Forest Plan standards.
Recreation and Visual	Forest-wide	Include analysis of the trails to determine whether to abandon or retain; and if retain, whether to relocate temporarily or permanently when conducting environmental analysis in areas that contain system trails. (FP pg. II-22)	The Travel Planning analysis addressed the designation of trails for motorized use. It did not address trail construction, reconstruction, decommissioning, or obliteration. These actions would be better analyzed at a smaller scale. (FEIS pg. 2-75)
Recreation and Visual	Forest-wide	Manage the Lolo Pass and North-South winter sports areas for winter recreational opportunities (cross-country skiing, snowmobiling, snowshoeing, etc). Regulate ORV use to minimize user conflicts and public safety hazards. (FP pg. II-22)	Over-snow motorized travel and ORV use are addressed in the Travel Planning EIS.
Recreation and Visual	Forest-wide	Regulate use of roads, trails, and specified areas along with designating areas for ORV use per Executive Order 11644. (FP pg. II-22)	The selected actions include road- and trail-specific restrictions that are described in detail in Appendix B of the FEIS.
Cultural Resources	Forest-wide	Standard b. Identify and evaluate appropriate sites for nomination to the National Register of Historic Places, primarily in conjunction with surveys of potential impact project areas, but also backlog areas on a priority basis. (FP pg. II-22)	Ongoing inventory and evaluation in accordance with the Programmatic Agreement.
Cultural Resources	Forest-wide	Standard c. Protect cultural resources from vandalism and other human depredation and natural destruction through signing, patrolling and/or monitoring. (FP pg. II-22)	Signing, monitoring, and public education.
Cultural Resources	Forest-wide	Standard g. Ensure that Forest actions are not detrimental to the protection and preservation of Indian Tribes' religious and cultural sites and practices and treaty rights. (FP pg. II-23)	Ongoing inventory and evaluation in accordance with the Programmatic Agreement. Government-to-government consultation has occurred.
Wilderness	Forest-wide	Manage recommended additions to the wilderness system to prevent changes in character which would be inconsistent in wilderness until Congress makes classification decisions. (FP pg. II-23)	To protect wilderness character, the selected actions will eliminate most motorized travel in recommended

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
			wilderness areas.
Wildlife and Fish	Forest-wide	Provide the proper mix of hiding and thermal cover, forage, and protection from harassment during critical periods on big-game summer range (primarily elk), in accordance with criteria contained in the "Guidelines for Evaluating and Managing Summer Elk Habitat in Northern Idaho." (FP pg. II-23)	The selected actions will provide large blocks of secure habitat by restricting motorized use on specific trails and by implementing seasonal restrictions on some motorized trails within key elk habitat.
Wildlife and Fish	Forest-wide	Manage use of motorized vehicles off roads, on roads, and on trails in areas of key wildlife habitat features such as elk licks, wallows, and calving areas to accomplish habitat objectives. (FP pg. II-23)	The selected action eliminates cross country motorized travel by limiting motor vehicles to designated routes.
Water	Forest-wide	Manage water quality and stream conditions to assure that National Forest management activities do not cause permanent or long-term damage to existing or specified beneficial uses. (FP pg. II-27)	The selected actions will provide large blocks of secure habitat by restricting motorized use on specific trails and provides calving security in the most critical calving areas by implementing seasonal restrictions on some motorized trails.
Water	Forest-wide	Apply best management practices to project activities to ensure water quality standards are met or exceeded. (FP pg. II-27)	Evaluation of effects
Water	Forest-wide	Manage all water in the Forest under appropriate Clearwater Forest Plan Appendix K standards to maintain the physical and biological stability of streams on the Forest. (FP pgs. II-27 to II-28)	Adherence to standards
Water	Forest-wide	Design, construct, and operate recreation facilities, including trails and dispersed sites, in a manner that does not retard or prevent attainment of RMOs and avoids	Project will reduce future risks to aquatic resources by: Limit motorized vehicle use to designated routes of the transportation system. Regulate motorized vehicle use in riparian areas and stream crossings including specific conditions for motorized travel to dispersed campsite

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
		adverse effects on listed anadromous fish (inland native fish). Complete Watershed Analysis prior to construction of new recreation facilities in RHCAs. For existing recreation facilities in RHCAs, assure that the facilities or use of the facilities will not prevent attainment of RMOs or adversely affect listed anadromous fish (inland native fish). Relocate or close recreation facilities where RMOs cannot be met or adverse effects on listed anadromous fish (inland native fish) avoided. (PACFISH/INFISH)	habitat) for streams meeting objectives and will not retard recovery of streams not currently meeting objectives. Project will reduce future risks to aquatic resources by: Limit motorized vehicle use to designated routes of the transportation system. Regulate motorized vehicle use in riparian areas and stream crossings including specific conditions for motorized travel to dispersed campsites.
Water	Forest-wide	Address attainment of RMOs and potential effect on listed anadromous fish (inland native fish) and critical habitat in Wild and Scenic Rivers, Wilderness, and other Recreation Management Plans. (PACFISH/INFISH)	Project will not change stream conditions (i.e. substrate, temperature, spawning and rearing habitat) for streams meeting objectives and will not retard recovery of streams not currently meeting objectives. Project will reduce future risks to aquatic resources by: Limit motorized vehicle use to designated routes of the transportation system. Regulate motorized vehicle use in riparian areas and stream crossings.
Wilderness and Unroaded	Forest-wide	Manage recommended additions to the wilderness system to prevent changes in character which would be inconsistent in wilderness until Congress makes classification decisions. (FP pg. II-23)	Motorized and mechanized travel in Recommended Wilderness will not be permitted except for summer motorized travel on Fish Lake Trail 419.
Facilities (Trails)	Forest-wide	Restrict use of roads as needed to prevent resource damage and close roads and restrict the use of ORVs to protect road beds and to protect wildlife from undue harassment. Restrictions may be seasonal or yearlong to accomplish resource management objectives. (FP pg. II-34)	Motor Vehicle Use Map will specify routes available for motorized travel including type of vehicle and season of use.

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
Facilities (Trails)	Forest-wide	<p>Prohibit ORV use on trails which enter wilderness when:</p> <ul style="list-style-type: none"> <li>• The boundary is not well defined</li> <li>• User conflicts or unsafe conditions will result from ORV use</li> <li>• Cross-country use of ORVs is prohibited in the potential recreation and scenic river corridor segments of Kelly Creek, Cayuse Creek and the North Fork of the Clearwater (FP pgs. II-34, II-36)</li> </ul>	This is the existing condition, and the selected actions will not change it.
Elk Creek Falls	A2 Facilities	Do not permit vehicle use off roads. (FP pg. III-5)	The selected actions do not permit motorized travel off of designated routes.
Dispersed Recreation Areas	A3 Recreation	Manage recreational use and management activities to the lowest level necessary to maintain a semiprimitive setting. (FP pg. III-7)	The selected actions include criteria for permitting motorized travel to dispersed campsites.
Dispersed Recreation Areas	A3 Recreation	Manage the Lochsa Face, Coolwater Ridge and Moose Mountain areas as semiprimitive, non-motorized recreational settings. (FP pg. III-7)	This is the existing condition, and the selected actions will not change it.
Dispersed Recreation Areas	A3 Recreation	Manage the Elizabeth Lakes and North Lochsa Slope areas as semiprimitive, motorized recreational settings. (FP pg. III-8)	This is the existing condition, and the selected actions will not change it.
Dispersed Recreation Areas	A3 Facilities	Do not construct new Forest system roads. (FP pg. III-9)	The selected actions will not construct new system roads.
Lolo Trail National Historic Landmark Corridor	A6 Facilities	Provide and maintain a variety of trail settings from developed to primitive. (FP pg. III-22)	This is the existing condition, and the selected actions will not change it.
Middle Fork of the Clearwater River – Wild and Scenic River, Recreational Segment	A7 Recreation	Provide developed and dispersed recreational opportunities in a rural or roaded natural- appearing setting as landownership patterns permit.	This is the existing condition, and the selected actions will not change it.
Middle Fork of the Clearwater River – Wild and Scenic River, Recreational Segment	A7 Recreation	Permit camping in dispersed areas within site capability. (FP pg. III-26)	The selected actions include conditions for motorized travel to dispersed campsites.
Selway-	B1	Prohibit any motorized vehicle use except at	This is the existing

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
Bitterroot Wilderness	Facilities	the emergency airfield at Fish Lake. (FP pg. III-34)	condition, and the selected actions will not change it.
Recommended Wilderness	B2 Recreation	Manage all uses to maintain wilderness qualities and retain semiprimitive settings. (FP pg. III-36)	The selected actions protect wilderness character by eliminating most motorized travel in Recommended Wilderness Areas.
Recommended Wilderness	B2 Facilities	Do not construct new Forest system roads. (FP pg. III-39)	The selected actions will not construct new system roads.
Key Big-game Summer Range	C1 Recreation	Manage for dispersed recreation in a semiprimitive motorized setting oriented to big-game hunting activities. (FP pg. III-40)	The selected action provides for motorized opportunities on some trails in this MA primarily in late summer and fall, thereby avoiding disturbance to calving elk which are the major focus of this MA.
Key Big-game Summer Range	C1 Facilities	Do not construct new Forest system roads. (FP pg. III-42)	The selected actions will not construct new system roads.
Key Big-game Summer Range	C1 Facilities	Permit trail bike use on trails to extent that use does not damage trails, result in unsafe conditions for other users, or prevent achievement of fish and wildlife management goals. (FP pg. III-42)	The selected action provides for trail bike use on some trails within the MA under seasonal restrictions in key elk habitat.
Big-game Winter Range	C3 Recreation	Manage for dispersed recreation in a roaded natural setting on areas that occur within or adjacent to management areas designated for development. Limit motorized vehicle use during winter periods when big-game animals are vulnerable to harassment. (FP pg. III-43)	Route-based restrictions for over-snow vehicles will be retained in big game winter range, as described in Table ROD-2.
Big-game Winter Range	C3 Facilities	Close roads to all motor vehicles when conflicts with big-game winter use could occur. (FP pg. III-45)	Winter Use Map will specify routes available for over-snow vehicles. Several route restrictions in winter range are added.
Big-game Winter Range	C3 Facilities	Do not construct roads for management of the area. Roads needed for mineral development or to access adjacent areas are permitted, excepted as noted in c. below. .... Construct no new Forest system roads in C3 areas associated with MAs C1, A3, and C6. (FP pg. III-45)	The selected actions will not construct new system roads.
Big-game Winter Range	C4 Recreation	Manage for dispersed recreation in a roaded natural setting. (FP pg. III-47)	This is the existing condition, and the

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
and Suitable Timber-Producing Land			selected actions will not change it.
Big-game Winter Range and Suitable Timber-Producing Land	C4 Recreation	Manage motorized vehicle use during the winter when big game is vulnerable to harassment, and at any time when conflicts may occur with timber management. (FP pg. III-47)	Motor Vehicle Use Map will specify routes available for motorized travel including type of vehicle and season of use
Big-game Winter Range and Suitable Timber-Producing Land	C4 Facilities	Close roads and trails to motor vehicles and ORV use when potential conflicts with big-game winter use could occur. (FP pg. III-48)	Motor Vehicle Use Map will specify routes available for motorized travel including type of vehicle and season of use.
High Fishery Stream Values	C6 Recreation	Manage for dispersed recreation in a semiprimitive motorized setting. (FP pg. III-50)	Opportunities for dispersed camping are retained subject to conditions for motorized travel to dispersed sites.
High Fishery Stream Values	C6 Facilities	Do not construct new Forest system roads. (FP pg. III-51)	The selected actions will not construct new system roads.
High Fishery Stream Values	C6 Facilities	Permit trail bike use on trails to extent use does not damage trails, result in unsafe conditions for other users, or prevent achievement of fish and wildlife management goals. (FP pg. III-51)	The selected action provides for trail bike use on some trails within the MA under seasonal restrictions in key elk habitat. Most trails adjacent to streams or with multiple fords are not designated for motorized use.
Big-game Summer Range	C8S Recreation	Provide opportunities primarily for nonmotorized dispersed recreation in a roaded natural setting. (FP pg. III-53)	This standard is associated with, and mitigation for timber harvest and road construction that was envisioned for C8S in the Forest Plan. With only minor and very localized exceptions that development has not taken place and the Roaded Natural setting does not exist. The MA becomes primarily non-motorized (79% of trails) as a result of restrictions

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
			implemented with the Travel Plan.
Big-game Summer Range	C8S Wildlife and Fish	Manage big-game summer range for a minimum of 75 percent of elk habitat potential. (FP pg. III-53)	Roads constructed since the Forest Plan are restricted to motorized use to achieve the standard. This MA overall meets the 75% standard.
Big-game Summer Range	C8S Wildlife and Fish	Avoid or provide mitigation for special wildlife areas such as big-game calving areas, wallows, travel routes, and licks when designing roads and timber sales. (FP pg. III-53)	The selected actions do not include road construction or timber sales. .
Big-game Summer Range	C8S Facilities	Plan and implement transportation systems to avoid: 1) Crossing of major fishery streams where possible or to provide for mitigation if required to cross. 2) Special big-game habitat components such as calving areas, licks, wallows, and concentration areas or to provide for mitigation if required to cross. (FP pg. III-55)	The selected actions do not include road or trail construction. No new stream crossings will be created. Selected trails are not designated for motorized use or are restricted seasonally to avoid impacts on big game habitat.
Big-game Summer Range	C8S Facilities	Prohibit public use of motorized vehicles on all new roads constructed in the management area, except permit snowmobiles during the winter period (December 1 through March 1). (FP pg. III-55)	Roads constructed since the Forest Plan are already restricted to motorized vehicles. The selected actions do not include road construction. Selected actions will not change the existing condition for snowmobiles.
Big-game Summer Range	C8S Facilities	Permit trail bike use on trails suitable for trail bikes until the area is roaded, at which time the entire area will be closed to all public use of motor vehicles. (FP pg. III-55)	The road construction envisioned by the Forest Plan for this area (FP pg. III-56) has not yet occurred. Trail bike use is still permitted on selected trails.
Timber Producing Land	E1 Recreation	Manage a roaded natural setting for dispersed recreation. (FP pg. III-57)	This is the existing condition and the selected actions will not change it.
Timber Producing Land	E1 Wildlife and Fish	Manage for a minimum of 25 percent maximum elk potential habitat effectiveness. During plan implementation and further analysis, determine whether remaining areas of E1 have potential for providing elk habitat. When analysis shows elk potential is limited by factors other than National Forest management,	Selected actions do not reduce Elk Habitat Effectiveness for MA E1 Forestwide and it remains around 45%.

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
		determinations may be made not to manage for elk. When habitat conditions warrant, managers are urged to exceed the 25 percent habitat standard. (FP pg. III-58)	
Timber Producing Land on Steep or Unstable Landscapes	E3 Facilities	Restrict public use of motor vehicles as needed, to protect road facilities. (FP pg. III-62)	The Date Combination Package (FEIS pg. 2-64 and Appendix B) is included in the selected actions. Changes to existing seasonal restrictions for roads and trails would simplify the number of use seasons; however, the resulting seasons of restriction would continue to protect road and trail facilities.
Research Natural Areas	M1 Recreation	Permit use of motor vehicles only on Forest trails where use would not adversely affect RNA values. (FP pg. III-65)	This is the existing condition, and the selected actions would not change it.
Research Natural Areas	M1 Facilities	Prohibit new road or trail construction within the boundaries of all RNAs and unique areas with the following exceptions: <ol style="list-style-type: none"> <li>1) Provide possible road access through the proposed Bull Run RNA to access adjacent private land.</li> <li>2) Provide possible road access through the proposed Aquarius RNA north of the Clearwater River, if needed.</li> <li>3) Conduct maintenance of existing roads and trails within RNAs with the least possible impact on the particular RNA values. (FP pg. III-66)</li> </ol>	This is the existing condition, and the selected actions would not change it.
Riparian Areas	M2 Wildlife and Fish	Maintain streamside vegetation to provide adequate cover and habitat components for fish. (FP pg. III-69)	An aquatic monitoring plan has been developed (FEIS Appendix F) to ensure that fish habitat at stream crossings is not adversely affected.
Riparian Areas	M2 Facilities	Design mitigation measures that will effectively reduce sediment from road construction, use, and maintenance. (FP pg. III-71)	An aquatic monitoring plan has been developed (FEIS Appendix F) to ensure that fish habitat at stream crossings is not adversely affected.
Riparian	M2	Design stream crossings for protection of	An aquatic monitoring

<b>Resource</b>	<b>Area</b>	<b>Standard</b>	<b>Compliance Will Be Achieved By</b>
Areas	Facilities	water resource values such as fish passage, non-erosive velocities, channel stability, to avoid ponding and flooding, and to provide erosion control of road fills and surfaces. (FP pg. III-72)	plan has been developed (FEIS Appendix F) to ensure that fish habitat at stream crossings is not adversely affected.

## **Rationale by Forest Plan Management Areas and Other Areas of Public Interest**

### ***Recommended Wilderness Areas (RWAs)***

The Clearwater Forest Plan (1987) identified 16 inventoried roadless areas (IRAs) totaling 950,311 acres of which 198,200 acres were recommended for wilderness designation; portions of Hoodoo, Mallard Larkins, North Fork Spruce - White Sand, and Sneakfoot (Forest Plan Record of Decision p. 11). Areas recommended for wilderness in the Clearwater Forest Plan (1987) are defined in the plan as Management Area (MA) B2 (Forest Plan p. III-36-39). Lands allocated to MA B2 meet the criteria for being considered, by Congress, for wilderness designation in the future.

Of the four RWAs, Hoodoo (Great Burn) and Mallard-Larkins are contiguous to areas on other National Forests that have also been recommended for wilderness designation and the others are contiguous to the existing Selway Bitterroot Wilderness. For Hoodoo and Mallard-Larkins the current management of motorized and mechanized (bicycle) transportation, as well as non-motorized travel, is not consistent across Forest boundaries.

The 1987 Clearwater Forest Plan identified RWAs only as Semi-Primitive (without the typical “motorized” or “non-motorized” suffix) in the Recreation Opportunity Spectrum discussion and did not address bicycles. This indicates that either motorized or non-motorized uses are acceptable in B2 and that the Forest Service has the discretion to determine how to balance wilderness character with motorized use. This travel plan effort provides the opportunity to make decisions that provide that balance.

Motorized and mechanized use in these RWAs has increased over the years as technology for motorized and mechanized equipment has advanced and this trend is likely to continue. The primary goal for RWAs in the Forest Plan is: “Manage recommended additions to the wilderness system to prevent changes in character which would be inconsistent in wilderness until Congress makes classification decisions,” (FP pg. II-23). I believe there is a need to address current and projected motorized and mechanized recreation uses in areas recommended for wilderness. To meet the primary goal for recommended wilderness and to balance wilderness character with motorized use, I have decided to exclude motorized and mechanized vehicles from all areas of recommended wilderness with the exception of the Fish Lake Trail 419. I believe that this action best addresses the overall intent of the Forest Plan regarding the future of these areas.

I am making one exception and that is for summer use of the Fish Lake Trail which is centralized in a small, localized area along the boundary of the Hoodoo (Great Burn) RWA. I am doing this for a couple of reasons: First, this trail is established on a former dozer road that once supported large vehicle traffic. This trail was included in the Hoodoo recommended wilderness in the 1987 Forest Plan. Shortly after that forest plan was completed, a group of volunteers worked extensively to convert the former dozer road into an ATV trail that provides short and gentle access to Fish Lake. They worked carefully to install resource protection facilities to limit motorized use to the access trail and campsite specific parking areas. These resource protection measures are currently enforced under a Forest Supervisor Order. In addition, the resource impacts to wilderness character are limited to the area accessing Fish Lake. Over 110,000 acres of the Hoodoo IRA would be unaffected by this motorized access. In the meantime, the trail provides access to Fish Lake for many people who don't have the capability to ride on most ATV trails. Second, although the Forest Plan recommendation for wilderness included this trail, the most recent revision of wilderness legislation crafted by a member of the Idaho Congressional delegation did not. I am restricting winter use of this trail in its entirety; however, as the trail itself without access to adjoining lands and without a notable winter destination provides little in the way of a snowmobile opportunity and more likely would facilitate motorized intrusions into adjacent restricted lands.

Continued motorized and mechanized use of the Fish Lake Trail is a compromise that will allow some motorized and mechanized recreational uses to continue that have become established since the Forest Plan was published, while moving other areas within RWAs closer to the goals established in the Forest Plan. This approach is consistent with management decisions that have been made for adjoining Forests.

### ***Inventoried Roadless Areas***

The Clearwater Forest Plan (1987) designates 16 inventoried roadless areas (IRAs) totaling 950,311 acres, of which 198,200 acres are recommended for wilderness designation. Four of these IRAs, Hoodoo, Mallard Larkins, North Fork Spruce - White Sand, and Sneakfoot contain areas recommended for wilderness designation. Roadless Area mapping was revised according to national protocol (36 CFR 219.17 Evaluation of Roadless Areas and FSH 1919.12 Land and Resource Planning Handbook). The revised Roadless Areas were used in the development of the 2008 Idaho Roadless rule. The Forest Plan IRA areas are used in this analysis to compare alternatives (GIS acres were used in area restriction and RNA calculations). Table 3-16 in the FEIS displays the acreage associated with the 16 IRAs including the 4 IRAs that contain recommended wilderness (RWA) acres.

The Forest Plan guidance for IRAs is found within the direction for each management area. There is no specific management area that encompasses all IRAs.

The Forest Plan includes the following forest-wide management direction:

- a. Maintain the natural integrity of those lands designated for unroaded management, and provide the management of their key resources

(dispersed recreation, big-game summer range, anadromous and resident fishery habitat) found within each area (FP Forest-wide Goal p. II-1)

With few exceptions, the 1987 Forest Plan is discretionary regarding motorized v. non-motorized use in IRAs.

Currently, management of IRAs is also covered by Idaho Roadless Rule. The Idaho Roadless Rule was promulgated on October 16, 2008 (73 FR 61456). It formally designated roadless areas of Idaho and established direction for them under a series of management “themes”. As noted in the rule in 36 CFR Part 294.26(a), the rule does not provide any direction regarding travel management and specifically relegates travel decisions to the individual National Forests. However, the rule does guide the assessment of roadless area character and that guidance was used along with the Forest Plan to identify the roadless lands considered in this Travel Plan.

### ***Management Areas C1, C6, and C8S***

Forest Plan standards, goals, and objectives in these MAs emphasize fish and wildlife habitat though the plan recognizes motorized recreation, primarily in the form of motorbikes, as a legitimate use. The effects of motorized traffic on wildlife and wildlife habitat have long been recognized. Here I am faced with a classic set of important yet competing interests. In making my decision I considered the relative importance of trails in these MAs to motorized users as well as their likely effects on fish and wildlife. I will address my rationale for each management area separately as there are notable differences.

Management area C1 is represented in only one location (Mostly the Fourth of July Junction, and Barnard Creek drainages of the North Fork District) and recognizes the best big game summer range and most important elk calving areas on the Forest. Clearly the most important goal for this area is to provide quality big game summer range. People who commented on the initial proposed action and draft EIS often noted the importance of trails within or adjacent to this MA to completing motorcycle loop trips including providing loops appropriate for lesser skilled motorcycle riders. Other comments noted the serious decline in elk herds on the North Fork and concern for motorized traffic effects to this low elk population. Even though there are only a couple trails within the core of this MA, the only way I can see to provide a motorized trail opportunity here is to limit amount and timing of motorized traffic. Accordingly, I have decided to completely exclude all non-winter motorized uses from Trail 106. To provide for the much desired motorcycle loop opportunities I am restricting Trail 191 and 691 within the core of the management area and part of Trail 167 on the southern/western edge to a season from 8/1 to 11/15 annually. This season avoids the primary calving and weaning periods for elk. Further restricting the single remaining trail of any length (191) within the interior of this MA would render the MA essentially non-motorized which I believe would be counter to the semi-primitive motorized setting envisioned by the Forest Plan.

Management area C6, though it also has high wildlife goals, is more focused on protecting water quality and fish habitats from the effects of human activity. This MA

occurs in several locations around the forest but significant changes in motorized opportunity are proposed only in the Cayuse Creek drainage on the North Fork and Powell Districts. In consideration of the primary goals of protecting streams and water quality, the selected alternative would restrict nearly all motorized travel along the major streams of Cayuse, Rasberry and Monroe Creeks. Restricting motorized travel here reduces the traffic across a number of stream fords along these trails. Opportunity for motorcycle trips are retained along the ridgelines including Lunde Ridge and Lookout Peak/Windy Bill. An ATV opportunity to visit Scurvy Lookout is also retained.

Management Area C8S is an interesting situation. C8S areas occur in multiple locations around the Forest and had a combination of wildlife, fishery, and timber goals. The areas affected by the Travel Plan include Upper North Fork/Vanderbilt, Osier/Pollock Ridge, Pot Mountain, and Weitas Creek. The 1987 Clearwater National Forest Plan envisioned that much of the then roadless country would be developed with road systems and timber harvest and that development was expected to occur in C8S, not in the C1, C6, B2, or A3 MAs. Some of the goals for this management area were set with the expectation that C8S areas would be developed. These include closing all new roads to motorized traffic and even closing all trails to motorized traffic once the area had been developed. But, the future envisioned for these C8S areas in the plan has not occurred and is unlikely to. So, rather than a developed “roaded natural” landscape envisioned by the Forest Plan, with few exceptions, we are dealing with a semi-primitive landscape with little development to mitigate for. All new roads constructed in C8S have been restricted to motorized traffic as soon as they were built. But the trail system in C8S receives motorized traffic, primarily motorcycles, wherever the physical condition of the trail permits it. People who commented on the Travel Plan at various stages raised several issues often including the importance of C8S areas to big game but also the importance of the single track trails to a backcountry motorcycle experience. Motorcyclists particularly valued the Pot Mountain and Weitas Creek areas and the opportunity to make loop trips that are possible for riders of various skill levels.

As a way to address the competing wildlife and recreation goals, the ID team looked to provide large blocks of secure habitat while retaining opportunities for the most important motorcycle loops, particularly those that can complete a loop without extensive road travel. Eliminating motorized use on a single trail, 373, accomplishes that for the Upper North Fork/Vanderbilt area and restricting two trails secures the Osier/Pollock country. Neither of these routes connects as well into loops as trails elsewhere in C8S. In Pot Mountain and Weitas, most connector trails will be restricted to retain the large blocks of secure habitat but the primary loop routes will remain open to motorcycles. Within Weitas Creek there are several areas of considerable importance to wildlife including big game and trails in a couple of these locations are also critical links in a loop. Alternative C, the preferred alternative in the draft EIS did not retain these links for motorcycle traffic. Based on comment, I have decided to provide these connections for motorcycle travel but in doing so I must demonstrate how this decision would minimize effects on wildlife. The majority of changes from Alternative C to the selected Alternative C Modified are associated with these issues. Trail 167 across Cook Mountain and down to Fourth of July Pack bridge will be available to motorcycles but only during the period from 8/1 to 11/15 each year. This trail traverses an important wildlife area on

the border of C8S and C1 MAs. This seasonal restriction will avoid the core of the calving and weaning period for elk that was of greatest concern. Trail 632 which had been open to motorcycles in Alternative C will be restricted in Alternative C Modified. This eliminates loop traffic on Road 555 relegating it to back and forth use which historically is not as popular.

I feel that Alternative C Modified best minimizes effects on wildlife habitat while providing motorized recreation opportunities.

### ***Management Areas C3 and C4***

These management areas define the big game winter range on the Forest and occur primarily within roaded country. Management direction in the Forest Plan recognizes the potential for big game to adversely affected by motorized traffic during the winter period and provide for restrictions as necessary to avoid those affects. There are two major big game wintering areas on the Forest, the Lochsa River/US Highway 12, and the North Fork Clearwater River/Forest Roads 247/250/255. The winter situations are decidedly different and I recognize that difference in this decision.

The entire Lochsa corridor is highly accessible to vehicles of all types during the winter owing to the presence of US Highway 12. Most Forest roads or sections of roads within the winter range have been restricted to motorized travel during winter. The Travel Plan analysis has identified several unrestricted roads in this area and these will be restricted to all motorized traffic in winter as part of this decision.

The North Fork corridor on the other hand, is far from communities and roads leading to the North Fork are not plowed in winter. Snow depths on those access roads preclude travel by wheeled vehicles. In the past these roads have not been restricted to motor vehicles in winter as distance from town and difficulty of travel even with snowmobiles has effectively limited the motorized traffic to few vehicles. When the Forest Service or Idaho Department of Fish and Game have observed severe snow conditions we have restricted all motorized travel in these winter range areas by a special order.

Some commenters have asserted that the winter range roads on the North Fork should be closed to all vehicles in winter based MA C3/C4 direction. I believe that the intent of that direction is met by the current approach and that big game is adequately protected. I will continue to implement special restrictions when snow conditions warrant additional protection.

### **Rationale for Other Components of the Travel Management Plan**

#### ***Bicycles***

While there is little mountain bike use within the areas recommended for wilderness by the Forest Plan with the exception of Trail 419 to Fish Lake, owing to the difficult trail conditions, bicycle travel is a non-conforming use in wilderness. To retain the wilderness character of these areas I have decided to exclude bicycles with the single exception of the Fish Lake Trail. See the RWA section for further discussion of this issue.

---

Restrictions to bicycles on a number of other roads and trails across the forest will be removed with this decision. The remaining areas of the forest will provide a wide variety of bicycle opportunities of varying challenge and in a variety of settings.

### ***Over-snow Vehicles***

For over-snow vehicles, the proposed action and purpose and need use the Forest level scale to appropriately address and analyze this use. However, in response to public comments, areas being proposed for restriction to over-snow vehicle use in adjacent high alpine areas were also evaluated. Unlike summer use, winter use is an area-based, rather than route-based, opportunity for motorized vehicles; therefore, expanding the evaluation area beyond the Forest boundary is prudent. The results of this evaluation show that on the Lolo NF, the adjacent portion of the Great Burn roadless area has been restricted for many years to over snow vehicles. Eliminating over-snow vehicle use in the Great Burn area will result in consistent management practices across the boundary between these National Forests. All IRAs, with the exception of the ones recommended for wilderness designation (Hoodoo, Mallard Larks, North Fork Spruce-White Sand and Sneakfoot Meadows) remain open to snowmobiling so there will continue to be opportunities for over-snow motorized recreation in back-country areas.

The minimization criteria described in the 2005 Travel Rule and EO 11644 do not apply to roads.

See the “Winter Recreation Opportunities” section earlier in this Record of Decision for additional discussion regarding rationale for the decision.

### ***Forest Plan Amendment***

The selected actions include one forest-wide Forest Plan amendment. It will modify the periods of restriction for on-road use described in Appendix F of the 1987 Forest Plan. The full text and description of the proposed restriction period amendment is included in Appendix D of the FEIS. This amendment will allow management flexibility to implement seasonal restrictions that are appropriate based on site-specific conditions.

### ***Seasonal Restrictions - “Date Combination Package”***

The “date combination package,” consisting of proposed changes to seasonal road and trail restrictions, is intended to reduce the number of use seasons. The date adjustments are minor and will not result in a loss of resource protections at the local level. These adjustments will make the MVUM clearer to read, without significantly affecting resource conditions. See Appendix B of the FEIS, “All Travel Codes Defined,” for a detailed description of the proposed date combinations that would be implemented.

### ***Access for Dispersed Camping and Parking***

Dispersed camping may well be the most popular recreational activity on the Clearwater National Forest and my goal was to continue to provide for this opportunity while minimizing potential adverse effects on other resources. The Travel Management Rule

---

allows for motorized travel to dispersed campsites to be included in the designation under certain conditions and allows for parking along designated routes. It is consistent with the Travel Management Rule, and with travel management decisions that have been made or will be made on adjoining National Forest lands, to continue to provide motorized access to dispersed campsites and for parking. For these reasons, I have chosen to permit motorized travel dispersed campsites in certain areas and under certain conditions, as described in Chapter 2 of the FEIS under “Alternative C Modified – Conditions for Motorized Travel to Dispersed Campsites.” Alternative C Modified will minimize effects on Forest resources and users, while allowing motorized travel to dispersed campsites to continue. An alternative that would allow motorized travel on designated routes only, without permitting off-route travel to existing campsites, was discussed in Chapter 2 of the FEIS under “Alternatives Considered But Not Analyzed in Detail.”

### ***Lands Acquired in the Beaver-Cedar Land Exchange (Former DAW Lands)***

For the most part, I am not reconsidering road restrictions as part of the Travel Planning process because the vast majority of them have come from past project-level decisions. Roads on lands formerly owned by DAW Forest Products Company in the upper North Fork River drainage are an exception. Since they had been on privately owned lands, they were never evaluated for travel management purposes and did not appear in the 2005 Travel Guide. The decision will add these roads to the Forests transportation system and designate them for or restrict them to motorized travel as necessary to protect resources. Please see the FEIS, Appendix B, for more detailed information about the restrictions that will be implemented for these roads.

### ***User-Suggested Routes***

Before and during the formal scoping period for the Travel Planning EIS, we asked for public suggestions for routes that should be evaluated in the Travel Plan. The suggested routes were screened against several criteria to make sure they fit within the scope of the Travel Plan analysis. The screening criteria are described in detail under the description of Alternative B in the FEIS. In short, we were looking for routes that were not already part of the system as described in the Travel Guide (since these routes would automatically be evaluated), routes that physically existed already since the Travel Plan is not analyzing construction or reconstruction, and routes that would be of general interest. Some suggested routes did not meet these criteria and were not included in any of the alternatives in the EIS. Those that met the criteria were included in one or more of the alternatives with most included in Alternative B as shown in Table 2-1 of the FEIS.

In deciding which routes to adopt into the system I relied on the primary goals for the management area where they were located. If the route contributed to those goals or moved the area toward the areas desired condition it would be adopted. Most of the suggestions, however, were in management areas like C1, C6, C8S, or B2 where a reduction in motorized traffic seemed to be warranted to address the goals for those management areas. As a result, only Trail 9012, the Swede Creek Connector on the Lochsa District, is adopted into the transportation system as part of this decision.

## **CONSIDERATION OF THE ISSUES**

Significant issues result from the anticipated effects of implementing a proposed action based on environmental effects. Issues are unresolved conflicts regarding effects of the proposed action that are identified during internal and external scoping efforts. In Section 1501.7, the Council on Environmental Quality NEPA regulations requires the Forest to “...identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3)...”

The following significant issues were used to develop the alternative array in the FEIS.

### **Significant Issues**

#### ***Effects on Motorized/Non-motorized Recreation and Wilderness Character***

Comments associated with areas recommended for wilderness by the Forest Plan generally fell into two camps: either supportive of protecting wilderness character and ultimately supportive of Congressional action to designate areas as wilderness, or supportive of motorized use and either discounting its effect on wilderness character or opposing the very idea of wilderness designation.

The bottom line here is that the Forest Plan after considerable analysis of values, public comment and discussion did recommend several areas for wilderness designation. Through that rigorous analysis, the Forest Service found compelling reasons that elevated them above all the other roadless areas on the Forest and led to the wilderness recommendation in the Forest Plan. Therefore, until such time as Congress designates these areas as Wilderness or clearly rejects them, I feel that I need to adopt a management scheme for those areas that provides a balance of uses and interests across the Clearwater National Forest while protecting the very values that resulted in them being recommended.

Motorized and mechanized vehicles continue to increase in capability and popularity and given this trend, increased pressure on areas recommended for Wilderness seems inevitable unless those uses are restricted. I think that continuing or expanding use of vehicles will do nothing but reduce the chances of these areas being designated as Wilderness. Accordingly, I am deciding to restrict all motorized use and bicycle use in these areas with the exception of summer use on the Fish Lake Trail. See the Recommended Wilderness Area section for more discussion.

#### ***Wildlife Habitat***

Most people who commented on the DEIS and during scoping believed that motorized recreation has adverse effects on fisheries and wildlife habitat, although some commenters felt that motorized recreation generally does not adversely affect wildlife or their habitat. I believe backcountry motorized opportunities can be retained while minimizing effects on wildlife and wildlife habitat by completely avoiding the most sensitive areas, or by managing use seasonally to minimize the effects of motorized

traffic. The selected actions represent the best possible way to provide motorized recreation opportunities while minimizing effects on wildlife habitat and moving wildlife resources closer to the goals and objectives outlined in the Clearwater Forest Plan. See the discussion for Management Areas C1, C6, and C8S later in this ROD for more information about this issue.

The Forest Plan recognized that motorized traffic can be a major impact on elk use of summer habitat. It provided standards for certain management areas and for the use of a model to estimate elk habitat effectiveness (EHE). The standard applies to motorized traffic on roads, not motorized trail traffic. Table ROD-4 shows the evaluation of elk habitat effectiveness for the applicable management areas. Some management areas (B2, A3, C6, C8S) appear in multiple distinct locations around the forest and these are noted as to their location.

**Table ROD-4: Elk Habitat Effectiveness**

Management Area Group	Forest Plan Standard	Elk Habitat Effectiveness
A3 Motorized – North Lochsa Slope	100	100
A3 Motorized - Elizabeth Lakes	100	100
A3 Non-Motorized – Lochsa Face	100	100
A3 Non-Motorized - Coolwater	100	100
A3 Non-Motorized – Moose Mountains	100	100
B1 Wilderness	100	100
B2 – Great Burn	100	100
B2 – Mallard Larkins	100	100
B2 – Selway Bitterroot Additions	100	100
C1 – Junction Mountain	100	100
C6 – Cayuse Creek	100	100
C6 – Colt Killed Creek	100	100
C6 – Fish Creek	100	100
C8S - Coolwater	75	95
C8S – Fish Creek	75	75
C8S – Moose Creek	75	95
C8S – Pot Mountain	75	90
C8S – Powell Area	75	90
C8S – Upper North Fork/Meadow Creek	75	80
C8S – Weitas Creek	75	75
E1,E3	25	45

It is my interpretation that the evaluation of EHE for MAs that are not expected to be developed (A3, B 1, B2, C1, and C6) would not consider roads adjacent to or within those MAs that existed at the time of the Forest Plan decision. The Forest Plan ROD assumed 100% EHE for these areas, yet the effect of motorized traffic on roads even on the perimeter of the MA would make that unattainable. The prominence of these roads,

including FR 500, the Lolo Motorway, FR 360 Elk Summit, FR 720 Fly Hill, and FR 250 Pierce-Superior, among others, leads me to believe that these roads are "grandfathered" into the existing condition and their effects on EHE must be discounted in the evaluation of EHE. I find no discussion or indication in the Forest Plan that any of these roads were considered for restriction or decommissioning to achieve the 100% EHE assumed for the adjacent MAs.

A similar situation exists in MA C8S where roads existed in the interior and along the boundaries of many C8S areas at the time the Forest Plan was analyzed and adopted. These are also prominent roads and the Forest Plan offers no indication that any of them were to be restricted or decommissioned despite the fact that their effects make compliance with the 75% EHE standard for C8S unattainable (even with all new roads constructed since the Forest Plan restricted) in a number of the Elk Habitat Effectiveness Analysis Units.

Since the Travel Plan is a Forest-wide effort, I relied on the overall EHE for an entire Management Area with the effects of pre-Forest Plan roads discounted (with caveats noted above) in determining whether the Forest Plan standard for that MA has been met.

### **Non-Significant Issues**

Non-significant issues were carried through the effects analysis, but were not used to develop alternatives to the proposed action. Many resource values are sensitive to travel management decisions, and the severity of the potential effects on each resource varies by alternative. Some of the potential effects of travel management decisions include changes in the type of use on National Forest Trails and developed ATV trail systems; effects on soil and watershed resources; effects on habitat used by aquatic species; establishment or spread of invasive plants and aquatic nuisance species; and effects on historic properties. A detailed effects analysis in the FEIS addresses these resource concerns.

Non-significant issues that met one or more of the following criteria were not carried through the analysis:

- Outside the scope of the proposed action;
- Already decided by law, regulation, Forest Plan, or other higher level decision;
- Irrelevant to the decision to be made; or
- Conjectural and not supported by scientific or factual evidence.

### ***ALTERNATIVES STUDIED IN DETAIL***

The action alternatives were developed based on significant issues raised by the public and other agencies. Each alternative would respond differently to the issues that were identified through scoping, public comments, and the analysis process. Each alternative would produce different environmental effects.

### **Alternative A: No Action**

Alternative A, the “No Action” alternative, represents the existing condition, based on the 2005 Travel Guide. The No Action alternative provides a baseline for comparing the effects of the action alternatives. The No Action alternative would not meet the purpose and need for action for the Travel Planning project because it would not implement the 2005 Travel Management Rule.

### **Alternative B: Minimal Travel Management Rule Implementation**

Alternative B would take only the actions necessary to implement the basic requirements of the 2005 Travel Management Rule. This alternative would provide the most motorized recreation opportunities, compared to existing conditions. However, of the alternatives analyzed, it would do the least to move fish, wildlife, and Recommended Wilderness closer to the goals and objectives described in the Clearwater Forest Plan.

### **Alternative C: Motorcycle Loop Trails and Wildlife Habitat**

Alternative C would respond to public comments about providing motorized single-track and loop trail opportunities, while moving Wildlife and Recommended Wilderness resource conditions toward the goals and objectives described in the Forest Plan. This alternative was the Preferred Alternative in the Draft EIS. Based on public comments received for the Draft EIS, I felt that Alternative C would further minimize potential effects on Forest resources if it were modified slightly.

### **Alternative C Modified: Alternative C With Additional Motorized Trail Opportunities**

Alternative C Modified includes additional motorized trail opportunities, compared to Alternative C. Alternative C Modified would minimize effects on wildlife habitat in Management Areas C1, C6, and C8s, while responding to requests for more motorized loop trails, by implementing seasonal restrictions on some trails. This alternative provides opportunities for non-motorized and motorized recreation in a variety of settings while addressing Forest Plan goals, objectives, and standards for wildlife.

### **Alternative D: Wildlife and Recommended Wilderness Emphasis**

Alternative D would respond to public comments about protecting wildlife habitat and recommended wilderness characteristics. It would also respond to public comments about providing less motorized access than the proposed action. Alternative D would do more than the other alternatives to move wildlife and Recommended Wilderness resources toward the goals and objectives outlined in the Clearwater Forest Plan; however, these changes would move motorized recreation opportunities away from Forest Plan goals and objectives. Also, of the alternatives analyzed, Alternative D would do the least to address public concerns about providing a wide range of motorized recreation opportunities.

## ***ENVIRONMENTALLY PREFERRED ALTERNATIVES***

Alternatives B, C, C Modified, and D would improve environmental conditions over current Forest Travel Management, and therefore would be environmentally preferable to Alternative A (No Action).

## ***ALTERNATIVES CONSIDERED BUT NOT STUDIED IN DETAIL***

NEPA requires the Forest Service to analyze a reasonable range of alternatives. It would not be possible to analyze all possible alternatives for motorized travel on the Clearwater National Forest, nor is the Forest Service required to do so. I consider the action alternatives that are analyzed in detail in this FEIS to be an adequate range of alternatives to address the purpose and need for action, and to move toward Forest Plan goals and objectives for a variety of resources, while addressing public comments that were received in response to the proposed action that was advertised for scoping and the alternatives presented in the DEIS. In this section of the ROD, I will briefly describe other alternative scenarios that were considered by the IDT, but were not analyzed in detail.

The Travel Management Rule requires National Forests to consider the existing road and trail systems and designate routes that will be open for motorized travel. The results of this process will not constitute the ultimate or final transportation system for the Clearwater NF. Over time, after this initial route designation is made and the MVUM is published, routes may be added to or removed from the system and additional designations of motorized routes may be considered. Future proposals to change the designated system will require site-specific analysis. Future changes to the system will also need to be consistent with the Clearwater Forest Plan.

### **Proposed Action**

In response to the purpose and need for action, a proposed action was developed and advertised for public scoping beginning in November 2007. The public scoping period was extended through February 2008. The Forest received more than 4,000 comment documents.

The proposed action was the Forest's initial effort to develop an action that would satisfy the requirements of the 2005 Travel Management Rule, while addressing Forestwide resource needs and concerns related to motorized and mechanized travel. However, in response to the large number of comments that were received during the scoping period, other alternatives to the proposed action were developed by the IDT, and the original proposed action was not carried forward to be analyzed in detail.

### **Road and Trail Construction, Reconstruction, Decommissioning, or Obliteration**

Because of the potential resource impacts that can result from the construction of new roads and trails, or the reconstruction of existing routes, those activities would be better

---

analyzed in detail at the site-specific level. I chose not to include construction, reconstruction, decommissioning, or obliteration in the alternatives that were analyzed in detail.

Prior to and during scoping for this project, many people offered proposals for new routes including short links to connect existing routes to create loop opportunities. These proposals could not be considered in the Travel Plan, which concentrates on designation of routes, not their construction or reconstruction. Ideas for new system routes can be considered in future projects focused on smaller geographic areas. Projects of this scale, similar to many completed in the past, are far better able to consider the site-specific effects of trail construction or reconstruction and evaluate effects on things like threatened, endangered or sensitive species and cultural resources. The Forest Service is committed to considering public suggestions to improve or modify the motorized system in the future, consistent with the Forest Plan, and as budgets, available personnel and time permit.

### **Summer Cross-Country Travel Areas**

The 2005 Travel Management Rule allows National Forests to designate areas where summer cross-country motorized travel could be allowed. However, because no suitable areas for this kind of activity were identified by the IDT or proposed in public comments, I chose not to include any cross-country travel areas in the alternatives analyzed in detail.

### **No Off-Route Access for Dispersed Camping**

An alternative that would allow motorized travel on designated routes only, without permitting travel to adjacent dispersed campsites, was discussed on in Chapter 2 of the FEIS under “Alternatives Considered But Not Analyzed in Detail.” That alternative would not meet my goal of continuing to provide motorized access to dispersed campsites or opportunities to park vehicles along designated routes. My decision to include motorized travel to adjacent dispersed campsites in the designation under certain conditions is consistent with travel planning decisions that have been made, or will be made, on adjacent National Forests.

### **Motorized Travel in Inventoried Roadless Areas**

I considered eliminating motorized travel from all Inventoried Roadless Areas (IRAs). An alternative that would accomplish this was not analyzed in detail because it would not be consistent with the goals and objectives for most of the management areas involved. Areas where the Forest Plan specifically prohibits motorized travel (A3 Non-Motorized, B1 etc.) are currently non-motorized and would remain so. Alternative D does substantially reduce but does not eliminate motorized use in IRAs.

## **ROAD RESTRICTION CHANGES OTHER THAN THE “DATE COMBINATION PACKAGE”**

I considered additional road restriction changes beyond the “Date Combination Package”, and the designations or restrictions for roads on former DAW land that are common to all action alternatives, but decided not to evaluate them in detail with the Travel Planning analysis. Most of the existing road restrictions are well founded on past project analyses and forest plan standards associated with these roads are already met. Evaluation of the need for road restrictions and even of the need for the roads themselves is a component of most large vegetation or watershed improvement projects. Since these are smaller scale analyses than the Travel Plan, they allow for a more focused, site specific look at conditions and needs in the project area and we will continue to evaluate the need for road restrictions with these projects. Accordingly I am not defining a minimum road system for the Forest with this Travel Plan decision. The evaluation of the Forest road system will continue to be accomplished both with project NEPA analyses and with other evaluations that will cover areas not included in projects. That process will ultimately identify a minimum road system.

## **INVENTORIED ROADLESS AREAS**

I considered eliminating all motorized travel from Inventoried Roadless Areas (IRAs). Alternative D does eliminate all motorized use in parts of IRAs recommended for wilderness (management area B2) in the Clearwater Forest Plan but does not eliminate motorized use in all IRAs. However, an alternative that would eliminate motorized uses from IRAs outside of MA B2 was not analyzed in detail because this would not be consistent with the goals and objectives for the management areas involved.

## **PUBLIC INVOLVEMENT**

### **SCOPING**

The Clearwater National Forest 2005 Travel Guide was released to the public in July 2005. The 2005 Travel Guide provided the public with a preview of how the Forest Service would approach travel management in the future. It described the roads and trails in the 2005 guide as the Clearwater National Forest’s idea of a designated system, and invited comments about what a designated system should include. A formal news release was advertised in July 2006, encouraging anyone interested in travel on the Clearwater National Forest to get involved in the travel planning effort. The Forest requested suggestions for motorized routes that already existed on the ground, but were not part of the initial designated system described in the 2005 Travel Guide. Public information packets were available at the Supervisor’s Office and at each Ranger District Office, and included forms to be used for suggesting additional routes that might not appear on the current designated system. Additional information about travel planning, the Travel Management Rule, and how to suggest a route for consideration has been posted on the Clearwater National Forest website since 2006. The Clearwater National Forest Travel

Planning EIS has been listed in the Schedule of Proposed Actions (SOPA) since April 2007.

Beginning in 2006 and continuing through 2010, representatives from the Clearwater National Forest met with county commissioners, local outfitters and guides, the Nez Perce Tribe, the Idaho Department of Fish and Game, Congressional staff, and various industry and recreational groups to share information about the Clearwater National Forest's travel planning effort and to solicit participation by interested individuals.

On November 13, 2007, a legal notice announcing the proposed action was advertised in the *Lewiston Morning Tribune* (the Clearwater National Forest's newspaper of record), initiating the formal scoping period. Legal notices were also published in the *Clearwater Progress* and the *Clearwater Tribune*, local newspapers based in Kamiah and Orofino, on November 15, 2007. A Notice of Intent to prepare an Environmental Impact Statement was published in the Federal Register on November 28, 2007. To provide ample opportunity for all interested parties to comment on the proposal, the scoping period was extended through February 2008.

Open Houses were held in Moscow, Idaho on December 17, 2008, in Kamiah, Idaho on December 18, 2008, and in Orofino, Idaho on December 19, 2008. Forest Service representatives were present at the Open Houses to share information about the Clearwater National Forest's travel planning project with interested persons, and to answer questions. Forms were available at the Open Houses so that attendees could easily submit comments and suggestions.

The Forest received over 4,000 scoping comments, including letters, emails, and comments that were presented at the Open Houses.

## ***DEIS COMMENTS***

The DEIS was advertised for public comment beginning July 17, 2009. The comment period was extended through October 2, 2009. 545 comment documents were received, containing more than 3,000 individual comments. The IDT evaluated these comments to identify the significant issues that drove alternative development for the FEIS. Issue identification and alternative development are discussed in more detail in the FEIS in Chapter 2.

## ***CONSIDERATION OF PUBLIC AND OTHER AGENCY COMMENTS***

As discussed above, thousands of comment documents were received during the scoping period and during the extended comment period for the DEIS. The IDT has prepared responses to the comments that were received for the DEIS, and they are available in Appendix H of the FEIS. It would be impractical to elaborate here about how each of the comments was considered, but I would like to provide a general overview.

### **Comments on the Proposed Action**

To allow ample time for all interested parties to comment, the proposed action was advertised for public scoping from November 2007 through February 2008. Over 4,000 comment documents were received during the scoping period. Scoping comments ranged from comments asking that no motorized uses be allowed on the Clearwater National Forests, to comments asking that the existing motorized system be dramatically expanded. Because of the large number of comments that were received and the wide range of issues that were brought up, the IDT developed an array of alternatives that would best address those issues while moving Forest resources toward Forest Plan goals and objectives, and the proposed action itself was not carried forward in the DEIS for detailed analysis. The proposed action is discussed in Chapter 2 of the FEIS under "Alternatives Considered but not Studied in Detail."

### **A Petition to Restrict Motorized Travel Due to Adverse Effects**

In August 2009, during the development of the Travel Plan, the Forest received a petition referencing the Administrative Procedures Act and the National Travel Rule and several Executive Orders alleging that "...the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat, or cultural or historic resources of particular areas or trails of the public lands ...." This document identified numerous trails and areas around the Forest where these effects were supposedly occurring and petitioned the Forest to immediately restrict motorized travel in those locations. The Forest reviewed conditions on the ground and did not identify anything that would be considered a "considerable adverse effect" or require immediate restriction to motor vehicles. The Forest responded to the petitioners with this information and also addressed other elements of the petition on December 15, 2009. While not specifically submitted as a comment on the Travel Plan, I did consider the content of the petition in the development of the plan as the information and/or concerns are pertinent to this effort.

### **Comments on the DEIS**

Again, to allow ample time for interested parties to comment, the DEIS was advertised for public comment from July 2009 through October 2009. 545 comment documents were received, reiterating many of the issues that had been raised during scoping. The comments on the DEIS were analyzed by a contractor experienced in this work and by the IDT. Based on the issues raised, the IDT modified Alternative C to address requests for more motorized trail opportunities, while continuing to protect wildlife habitat and move Forest resources toward Forest Plan goals and objectives. Alternatives B, C, and D were carried forward for analysis in the FEIS, as well. The variety of actions included in this array of alternatives meets the requirement under NEPA to analyze an adequate range of alternatives. Many of the changes presented in the FEIS resulted from comments that were received for the DEIS.

## **Collaboration and Consultation**

Consultation with the Nez Perce Tribe, the State Historic Preservation Officer, and Federal Regulatory agencies was ongoing throughout the NEPA process. Collaboration with State and Local governments was an important part of the NEPA process as well. A representative from Idaho Department of Parks and Recreation participated on the IDT. The public involvement log in the project file for the EIS documents many meetings with representatives from the Idaho Department of Fish and Game and local County Commissioners that were held during the development of the EIS.

## **DETERMINATION OF NON-SIGNIFICANT FOREST PLAN AMENDMENT**

The selected actions under Alternative C Modified include a single amendment to the Forest Plan to provide for road restriction seasons tailored to site specific conditions. It is described in detail in the Final EIS in Volume 2, Appendix D.

The National Forest Management Act (NFMA) regulations allow for amending Forest Plans (16 USC 1604(f)(4), 36 CFR 219.10(f), 1982). My decision amends the Clearwater Forest Plan to remove direction that is outdated, does not effectively provide limitations on management activities, or could be in conflict with the concept of establishing a forest-wide travel planning area and route-by-route management direction. NFMA regulations require the decisionmaker to determine whether the amendment would result in a significant change to the Forest Plan based on an analysis of the objectives, guidelines, and other contents of the Plan.

Based on the analysis and other information provided in the FEIS, I have determined that my amendment decision is not significant. The Forest Service handbook at FSH 1909.12(5.32) provides a list of factors to be considered in making this determination. These include: timing; location and size; goals, objectives and outputs; and management prescriptions. These are my conclusions for each of these factors:

Timing: This Forest Plan amendment is to become effective immediately, or at such time that any stay of this decision is lifted. It also applies indefinitely.

Location and Size: This Forest Plan amendment modifies Appendix F of the 1987 Forest Plan, and applies Forest-wide.

Goals, Objectives, and Outputs: This Forest Plan amendment does not alter the long-term relationships between the levels of goods and services projected by the Forest Plan. Appendix F of the Forest Plan pertains to travel management or road and trail facilities. No concerns about this amendment were identified during the public comment period, and there are no identified consequences associated with implementing it.

I have determined that my decision to amend the Clearwater Forest Plan does not alter the desired future condition of the land, nor does it affect the level of goods and services

---

targeted by the plan. The goods and services to be managed under the Forest Plan include recreation, scenery, water, fish and wildlife habitat, threatened and endangered species habitat, timber, livestock forage, fire protection, and cultural resources. The standard I am removing is applicable to travel management, access, and the transportation network. As I discussed above, the current standard is not effective and is no longer needed in light of the decisions made through the Travel Plan. I could find no basis to conclude that this amendment will have any bearing on providing the goods and services of the Forest Plan. The selected amendment is described in detail in the Final EIS in Volume 2, Appendix D.

The purpose of this amendment is to modify Clearwater Forest Plan Appendix F, Forest Travel Planning. The periods of restriction listed under Item IV, “ON-ROAD USE,” for Items IV. D. 2 and IV. D. 3 would be modified as described below:

- 1) Item IV. D. 2 would be changed to “Areas subject to erosion and/or watershed damage may be restricted seasonally, with the period of restriction to be determined based upon a site-specific review. Where conditions or levels of use by certain vehicles would not cause significant damage, such vehicles may be exempted from restrictions.”
- 2) Item IV. D. 3 would be changed to “Key wildlife habitat – YEARLONG TO ALL VEHICLES. Where habitat is of seasonal importance, use will be constrained for only the period of time appropriate to protect that habitat, to be determined based upon a site-specific review.”

## **RELATED DECISIONS NOT SUPERCEDED**

The Travel Planning analysis has spanned more than four years from initial scoping to this decision. During that time, a number of other projects have made travel management decisions in specific project areas within the Clearwater National Forest. Several reports included in the Travel Planning FEIS display road and trail restrictions and designations that this decision will not change. They are included to promote understanding of the complete motorized travel picture on the Forest. As previously noted in the FEIS, the Travel Planning analysis did not reconsider earlier travel decisions made with the North Lochsa Face ROD (2000) or Upper Palouse ATV DN (2005), with the exception of adjusting some seasonal restriction dates to improve consistency across the Forest.

Nothing in this Travel Plan decision overrules or supercedes travel restrictions or designations made in recent decisions for the following projects:

- Cherry Dinner ROD, 3/3/08
- Yakus Creek ROD, 5/22/08
- Swede Thinning DN, 9/9/08
- Corralled Bear DN, 12/2/08
- Low Gap 373 Road Reroute DN, 2/8/10
- Walde Placer Rd Decommissioning DN, 5/21/10

- Powell Divide Veg DN, 12/3/10
- Preacher Dewey Thin DN, 1/3/11
- Robo Elk Veg ROD, 4/18/11
- Lochsa Thin DN, 5/18/11
- Smith Rd Decommission DN, 6/22/11
- Orogrande OHV DN, 9/1/11
- Deer Cr. Meadow Restoration DN, 9/5/11
- Lodge Point Thin DN, 9/30/11

## **FINDINGS REQUIRED BY OTHER LAWS, REGULATIONS, AND POLICY**

### ***CONSISTENCY WITH FOREST PLAN***

The National Forest Management Act implementing regulations require me to ensure that my decision is consistent with the Clearwater Forest Plan (36 CFR 219.10(e); 1982). See Table ROD- 3 in this document for a brief summary of how the selected actions comply with Forest Plan standards. In some cases the Forest Plan contains goals, objectives, and/or standards that might appear to be conflicting for different resources in the same management area. In those cases, I have described my interpretation of the intent of the Forest Plan in the project file and the rationale for my decision in this Record of Decision. Based on the analysis in the FEIS, I have concluded that, with the exception of the Forest Plan amendment described earlier in this document, my decision is consistent with the Forest Plan.

### ***CONSISTENCY WITH THE FOREST PLAN LAWSUIT SETTLEMENT***

I have reviewed the September 13, 1993, Stipulation of Dismissal agreement between The Wilderness Society et al., and the Forest Service. I find that the Travel Plan project complies with the 1993 Stipulation of Dismissal, as follows:

1. The settlement agreement primarily addresses timber harvest, and road construction and the effects of those activities on roadless areas, old growth, and water quality. No timber harvest or road construction is proposed in the Travel Plan.
2. The Forest agreed in the settlement to manage certain areas in relation to timber harvest and road construction under the direction for management area B2 which precludes both these activities. Commenters have asserted that this B2 management approach requires that motorized travel be excluded from those areas. That is not the case as Forest Plan direction for management area B2 does not preclude motorized travel.

## **TRAVEL MANAGEMENT; DESIGNATED ROUTES AND AREAS FOR MOTORIZED USE (36 CFR 212, 251, 261); USDA FOREST SERVICE (2005)**

The Forest Service regulations for travel management at 36 CFR 212.15 identify criteria for designation of National Forest System roads, National Forest System trails, and areas on National Forest System lands for motorized use. They require me to consider the following:

### **General Criteria for Designation of Roads Trails and Areas**

#### ***Effects on Natural and Cultural Resources***

I considered the effects on both natural and cultural resources in the development of the Travel Plan. In fact, the development of the National Travel Rule and this Travel Plan were based primarily on concern for these resources. The elimination of summer cross country travel is a giant step in protecting resources of all types. The Clearwater Travel Planning FEIS addresses the effects of five alternatives (including No Action) on natural and cultural resources. Refer to Chapters 2 and 3.

#### ***Public Safety***

I considered public safety in the course of all route designations. Many safety issues were considered and addressed in the course of designing, constructing, and maintaining the roads and trails that form the transportation system. Since the Travel Plan does not propose new route construction, all the alternatives are similar with respect to the route standards and conditions involved. With respect to route designation, the remaining issues about safety are mostly related to the types of traffic using a route and their seasons of use. The most common safety concern involves routes with heavy traffic travelling at vastly different speeds, and on narrow routes for one or more of the traffic types. An example of this is on trails groomed and promoted for cross country skiing, and the concern is addressed by restricting over-snow vehicles on those routes. Trails with motorized and non-motorized traffic are another example and the selected alternative provides more trails that are strictly non-motorized thereby reducing the conflict. Though not a part of this Travel Plan, special short-term restrictions will be implemented in areas of where heavy truck traffic or logging operations conflict with safe use of specific roads or trails by the public

#### ***Provision of Recreational Opportunities***

Providing recreation opportunities is one of the primary purposes for the Travel Plan. The analysis and this decision considered providing for a variety of winter and summer motorized and non-motorized opportunities. Refer to the FEIS, Chapter 1: Purpose and Need for Action, and the recreation section of the rationale for my decision in this Record of Decision.

## **Access Needs**

Access for the public, adjacent landowners, owners of private property within the Forest boundary, and holders of other valid existing rights was considered in the designation process. My decision provides for reasonable, legal access either directly as part of the designation or allows for it to be provided through other means specific to the situation such as via special use permits, plans of operation or other instruments.

## ***Conflicts Among Uses of National Forest System Lands***

My decision criteria, beginning on page ROD-12 of this ROD, demonstrate my desire to provide well-distributed opportunities for both OHVs and exclusive, quiet, non-motorized uses of the Clearwater National Forest trail system. My rationale for this decision, beginning on page ROD-13 of this ROD, also demonstrates my efforts to provide a balance of recreation opportunities in a variety of settings. The Recreation section in Chapter 3 of the FEIS addresses conflicting uses.

## ***The Need for Maintenance and Administration of Roads, Trails, and Areas that Would Arise if the Uses Under Consideration are Designated***

With the exception of a single short trail, this decision does not designate any roads or trails for motorized uses that are not already open to such uses. No areas are designated for motorized summer use off of designated routes. As a result, the administration of the transportation system does not become any more complex than it is at present. A few roads on lands acquired in the Beaver-Cedar land exchange are not designated for motorized use thereby reducing their traffic generated maintenance workload. I have considered that making some trails non-motorized may reduce the level of volunteer maintenance of the trail system. Transportation system implementability was discussed in the FEIS in the Roads and Seasonal Restrictions section of Chapter 4.

## ***The Availability of Resources for that Maintenance and Administration***

I recognize the potential for declining budgets for road and trail maintenance and considered this in designating routes for motorized traffic. I addressed this by not designating some roads and trails that are known to be overgrown, and by an overall reduction in the number of roads and trails open to motorized traffic. But roads and trails that are restricted to motorized traffic still generate a maintenance workload unrelated to traffic. I believe that significant road maintenance cost savings are more likely to be gained not with this Travel Plan but with smaller scale projects that can evaluate road systems in the project area and identify surplus roads that can be decommissioned. The forest has and will continue to complete these evaluations and decommission surplus roads. I also noted from public comments and considered that resources for maintenance of some previously motorized trails may not be available once the trails are no longer designated for motorized use.

## **Specific Criteria for Designation of Trails and Areas**

In addition to the general criteria discussed previously, for designation of trails and areas the travel rule requires that I consider the items below with the objective of minimizing effects.

### ***Damage to Soil, Watershed, Vegetation, and Other Forest Resources***

By not designating areas for off-route use of summer vehicles, my decision restricts motorized traffic to designated routes – and for purposes of this section that means trails. That limitation of itself minimizes the effects to most resources. The trail system, regardless of traffic type, still has the potential to affect these resources. My decision to restrict motorized traffic on several hundred miles of trail further reduces the effect on resources. Effects on a variety of resources are addressed in Chapter 3 of the FEIS.

### ***Harassment of Wildlife and Disruption of Wildlife Habitats***

Effects on wildlife and their habitats and the Forest Plan goals and standards that address wildlife were the greatest consideration in deciding which trails and how many trails should be designated for motorized use in most of the management areas where trails are the primary transportation system. My decision addresses this issue not only by reducing motorized trail mileage but it makes the largest reduction in those areas with the highest Forest Plan goals for wildlife. And, more important than just a reduction in motorized mileage, the decision restricts motorized travel completely or seasonally on routes of greatest importance to wildlife. The rationale for my decision is described in more detail earlier in this document, particularly for Forest Plan management areas, C1, C6, and C8S which have a wildlife emphasis. The effects of the alternatives on wildlife and wildlife habitat were discussed in detail in Chapter 3 of the FEIS.

### ***Conflicts Between Motor Vehicle Use and Existing or Proposed Recreational uses of National Forest System Roads***

Refer to the Decision and Reasons for the Decision sections of this ROD. These sections demonstrate my desire to minimize effects on Forest resources while providing well-distributed opportunities for both OHVs and non-motorized uses of the Clearwater National Forest trail system. The rationale for my decision demonstrates my efforts to manage conflicts between motor vehicle use and other recreational uses. The Recreation section in Chapter 3 of the FEIS also addresses effects to recreational uses.

### ***Conflicts Among Different Classes of Motor Vehicle Uses of National Forest System Lands or Neighboring Federal Lands***

A desire for additional ATV routes was often expressed in public comments but the construction or reconstruction needed to accommodate ATV's puts this suggestion outside the scope of this Travel Plan. A potential vehicle conflict exists on ATV trails as they are open to both ATV's and motorcycles. I considered this potential in the designation process and believe it is minimized as most motorcyclists expressed a desire to travel on single track trails where ATV's are not permitted in their comments. Any

vehicle conflicts associated with adjacent federal lands are minimal as no motorized trails cross from the Clearwater onto adjacent National Forests and no areas are designated for off-route motor vehicle use on adjacent National Forests near their boundary with the Clearwater National Forest.

### ***Compatibility of Motor Vehicle Use With Existing Conditions in Populated Areas, Taking Into Account Sound, Emissions, and Other Factors***

Most of the Clearwater National Forest is removed from population centers. There are no areas designated for off route motor vehicle use on the Forest and there are very few trails of any type near communities. Where those trails exist, the communities involved have been supportive of motorized trails and I have concluded that there are minimal if any effects on communities as a result of nearby motorized trail uses.

### **Specific Criteria for Designation of Roads**

In addition to the general criteria discussed previously, the travel rule requires that I consider the specific criteria below in designating roads for motorized use.

#### **Speed, Volume, Composition, and Distribution of Traffic on Roads; Compatibility of Vehicle Class with Road Geometry and Surfacing**

My decision will result in a designated road system that provides for use by recreational, commercial, and administrative traffic and manages that traffic to protect resources as well as the road users themselves. Most roads on the forest were developed to provide access for timber harvest and so their design vehicle is typically a logging truck; or in the case of major roads, a lowboy. Smaller vehicles are capable of negotiating these roads unless restricted by regulation or vegetation. Most surfaced roads are open to full-size vehicles unless restricted for wildlife issues. Most unsurfaced roads are either closed yearlong or seasonally to large vehicles to prevent surface damage. Some unsurfaced roads remain open to smaller vehicles like ATV's or motorcycles because these lighter vehicles are less likely to damage the surface even in wet weather.

### ***RIGHTS OF ACCESS***

I recognized valid existing rights and rights of use of National Forest System Roads and Trails to access private property as part of the designation process. Existing access to intermingled and adjacent landowners is retained. Seasonal restrictions designed to protect resources associated with this access are retained though seasons may be slightly modified.

### ***IMPLEMENTATION***

Implementation of the Travel Plan is scheduled to begin in the summer of 2012 upon signing a special order pursuant to 36 CFR 261, and release of the Motor Vehicle Use Map and Over-snow Vehicle use map.

## **ADMINISTRATIVE REVIEW AND APPEAL OPPORTUNITIES**

This decision is subject to appeal pursuant to 36 CFR 215.11. Only individuals or organizations that submitted substantive comments during the comment period may appeal under this rule. A written appeal must be submitted within 45 days following the publication date of the legal notice of this decision in the Lewiston Morning Tribune. It is the responsibility of the appellant to ensure that their appeal is received in a timely manner. The publication date of the legal notice of the decision in the newspaper of record is the exclusive means for calculating the time to file an appeal. Appellants should not rely on date or timeframe information provided by any other source.

Paper appeals must be submitted to:

- USDA Forest Service, Northern Region, Attn: Appeal Deciding Officer, P.O. Box 7669, Missoula, MT 59807; or
- USDA Forest Service, Northern Region, Attn: Appeal Deciding Officer, 200 East Broadway, Missoula, MT 59802.

Office hours are 7:30 a.m. to 4:00 p.m., MST; Fax (406)-329-3411.

Electronic appeals must be submitted to [appeals-northern-regional-office@fs.fed.us](mailto:appeals-northern-regional-office@fs.fed.us). For electronic appeals, the subject line should contain the name of the project being appealed. An automated response will confirm that your electronic appeal has been received. Electronic appeals must be submitted in Microsoft Word, Word Perfect, or Rich Text Format (RTF).

It is the appellant's responsibility to provide sufficient project- or activity- specific evidence and rationale, focusing on the decision, to show why the decision should be reversed. The appeal must be filed with the Appeal Deciding Officer in writing. At a minimum, the appeal must meet the content requirements of c6 CFR 215.14, and include the following information:

- The appellant's name and address, with a telephone number, if available;
- A signature, or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the appeal);
- When multiple names are on an appeal, identification of the lead appellant and verification of the identity of the lead appellant upon request;
- The name of the project or activity for which the decision was made, the name and title of the Responsible Official, and the date of the decision;
- The regulation under which the appeal is being filed, when there is an option to appeal under either 36 CFR 215 or 36 CFR 251, subpart C;

- Any specific change(s) in the decision that the appellant seeks and rationale for those changes;
- Any portion of the decision with which the appellant disagrees, and explanation for the disagreement;
- Why the appellant believes the Responsible Official's decision failed to consider the substantive comments; and
- How the appellant believes the decision specifically violates law, regulation, or policy.

If no appeal is received, implementation of this decision may occur on, but not before, five business days from the close of the appeal filing period. If an appeal is received, implementation may not occur for 15 days following the date of appeal disposition.

Offer to meet: When an appeal is received under the rule, the Responsible Official (me), or my designee, must contact the appellant and offer to meet and discuss resolution of the issues raised in the appeal (36 CFR 215.17). If the appellant accepts the offer, the meeting must take place within 15 days after the closing date for filing an appeal (i.e., 45 to 60 days from the publication date of the legal notice of this decision in the Lewiston Morning Tribune). These meetings, if they take place, will be open to the public. For information about if, when, and where such a meeting is scheduled, please visit the following web site:

<http://www.fs.usda.gov/goto/r1/appeal-meetings>

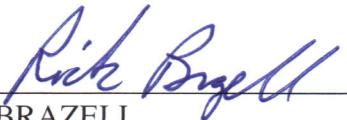
My decision to amend the Clearwater Forest Plan is also appealable under 36 CFR 217. Written appeals under this rule must also be submitted within 45 days following the publication date of the legal notice of this decision in the Lewiston Morning Tribune, Lewiston, Idaho, and should be sent to the same addresses indicated above for appeals under 36 CFR 215. Under the 36 CFR 217 rule there is no requirement that I make an offer to meet with the appellant. Appeals cannot be filed under both 36 CFR 215 and 36 CFR 217.

## **CONTACT PERSON**

For additional information concerning this decision or the Forest Service appeal process, contact

- Kathy Rodriguez, North Fork District Ranger, Clearwater National Forest Supervisor's Office, 12730 Highway 12, Orofino, Idaho 83544; 208-476-8223; or
- Lois Hill, Interdisciplinary Team Leader, Kamiah Ranger Station, 903 3<sup>rd</sup> Street, Kamiah, Idaho 83536; 208-935-4258.

## SIGNATURE AND DATE

  
\_\_\_\_\_  
RICK BRAZELL  
Forest Supervisor

Date: 11-10-11



United States  
Department of  
Agriculture

Forest  
Service

Clearwater National Forest  
12730 Highway 12  
Orofino, Idaho 83544-9333  
208-476-4541  
Fax: 208-476-8329

Nez Perce National Forest  
104 Airport Road  
Grangeville, Idaho 83530  
208-983-1950  
Fax: 208-983-4099

---

File Code: 2670

Date: December 15, 2010

Mr. David Mabe  
Idaho State Habitat Director  
NOAA Fisheries  
10095 West Emerald  
Boise, ID 83704

Dear Mr. Mabe:

We would like to conclude formal consultation and acquire a biological opinion regarding the proposed travel plan for the Clearwater National Forest. As noted in the Biological Assessment (BA), the proposed activities have been determined to may affect, likely to adversely affect (LAA) steelhead trout. However, the proposed project is not likely to destroy or adversely modify designated critical habitat.

In addition to the ESA consultation, we would like to acquire concurrence regarding Essential Fish Habitat for spring Chinook salmon and coho salmon. Effects on salmon EFH would be the same as those described for steelhead trout and bull trout within the biological assessment.

On December 14, 2010, the Level One team agreed to consultation closure via email. The enclosed BA details the project design and specific mitigation measures that will be implemented to avoid impacts to the aquatic resources.

If you need any further information or have questions regarding this request for consultation, please contact Pat Murphy at this office at 476-8208.

Sincerely,

RICK BRAZELL  
Forest Supervisor

cc: Bob Ries, NOAA Fisheries - Moscow, Clay Fletcher, USFWS - Boise



Caring for the Land and Serving People

Printed on Recycled Paper





United States  
Department of  
Agriculture

Forest  
Service

Clearwater National Forest  
12730 Highway 12  
Orofino, Idaho 83544-9333  
208-476-4541  
Fax: 208-476-8329

Nez Perce National Forest  
104 Airport Road  
Grangeville, Idaho 83530  
208-983-1950  
Fax: 208-983-4099

File Code: 2670

Date: December 15, 2010

Mr. Brian Kelly  
State Supervisor  
Idaho Fish and Wildlife Office  
U.S. Fish and Wildlife Service  
1387 South Vinnell Way, Suite 368  
Boise, ID 83709

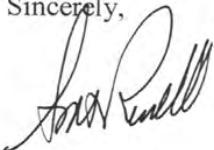
Dear Mr. Kelly:

We would like to conclude formal consultation and acquire a biological opinion regarding the proposed travel plan for the Clearwater National Forest. As noted in the Biological Assessment (BA), the proposed activities have been determined to may affect, likely to adversely affect (LAA) bull trout. However, the proposed project is not likely to destroy or adversely modify designated critical habitat.

On December 14, 2010, the Level One team agreed to consultation closure via email. The enclosed BA details the project design and specific mitigation measures that will be implemented to avoid impacts to the aquatic resources.

If you need any further information or have questions regarding this request for consultation, please contact Pat Murphy at this office at 476-8208.

Sincerely,

  
*Rick Brazell*  
FOR RICK BRAZELL  
Forest Supervisor

cc: Clay Fletcher, USFWS - Boise; Bob Ries, NOAA Fisheries - Moscow



Caring for the Land and Serving People

Printed on Recycled Paper



**BIOLOGICAL ASSESSMENT FOR THE CLEARWATER NATIONAL FOREST  
TRAVEL PLAN**

**FEDERALLY LISTED SPECIES**

**Wildlife**

Gray Wolf – *Canis lupus*

Canada Lynx - *Lynx canadensis*

**Fish**

Snake River Fall Chinook Salmon - *Oncorhynchus tshawytscha*

Steelhead Trout - *Oncorhynchus mykiss*

Bull Trout - *Salvelinus confluentus*

**Plants**

Water Howelia - *Howellia aquatilis*

U.S. Forest Service

Clearwater National Forest

Orofino, Idaho

**Final Version – December 14, 2010**

Prepared and Approved By:

/s/ *Patrick K. Murphy*

Date: December 14, 2010

Patrick K. Murphy

Forest Fisheries Biologist

/s/ *Dan Davis*

Date: December 14, 2010

Dan Davis

Forest Wildlife Biologist

/s/ *Mike Hays*

Date: December 14, 2010

Mike Hays

Forest Botanist

## TABLE OF CONTENTS

Introduction.....	3
Background Information.....	3
Identification of Action – Project Proposal.....	4
Identification of Action Area .....	9
Identification of Listed Species and Critical Habitat.....	10
Status of Listed Species.....	11
Effects Analysis .....	23
Determinations .....	42
Essential Fish Habitat.....	44
Literature Cited.....	45
Appendix A – Gray Wolf and Canada Lynx Biological Assessment.....	50
Appendix B – Aquatic Monitoring Plan .....	60
Appendix C – Stream Crossings and Riparian Trail Miles Tables.....	67
Appendix D – Maps.....	72
Appendix E - Field Notes – Stream Crossings.....	73

## Introduction

This biological assessment addresses potential effects to designated Threatened and Endangered Species from the implementation of the forest-wide Travel Planning Project. The proposed activities are located within the Clearwater National Forest, within Clearwater, Idaho, Shoshone and Latah counties, Idaho.

The Endangered Species Act of 1973 directs federal agencies to conserve Endangered and Threatened Species and to ensure that federal actions authorized, funded, and carried out are not likely to jeopardize their continued existence or result in the destruction or adverse modification of critical habitat. In response to Section 7(c) of the Endangered Species Act and Forest Service Manual (FSM) 2670, this biological assessment displays the potential effects of the proposed activities upon Threatened and Endangered Species that are known or may occur in the area. The analysis area used to evaluate effects of the project proposal is the portion of the Clearwater River subbasin within the Clearwater National Forest and the Palouse River drainage (lower Snake River subbasin).

Starting in 2001, NMFS has required the Forest to address the potential effects of proposed activities on salmon habitat. Therefore, this biological assessment will also evaluate potential effects of proposed activities within the anadromous watersheds within the Forest (Lochsa River, Middle Fork Clearwater, Potlatch River and Lolo Creek drainages) on Essential Fish Habitat, in accordance with applicable requirements of section 305(b) of the Magnuson-Stevens Act and its implementing regulations, 50 CFR Part 600.920.

As required by the Endangered Species Act, specific habitat needs for Threatened and Endangered species of wildlife, fish and plants in regards to the proposed project were analyzed and documented in this biological assessment.

## Background Information

Executive Order (EO) 11644 (February 8, 1972), "Use of Off-Road Vehicles on the Public Lands," as amended by EO 11989 (May 24, 1977), directs Federal agencies to ensure that the use of off-road vehicles on public lands will be managed to protect resources, to promote the safety of Forest users, and to minimize conflicts among the various Forest users.

Nationally, the Forest Service currently manages about 300,000 miles of National Forest System (NFS) roads that are open to motor vehicle use, and about 133,000 miles of NFS trails. Only a portion of those trails are open to motor vehicle use. This transportation system ranges from paved roads designed for passenger cars to single-track trails used by motorcycles. Many roads that were designed for high-clearance vehicles such as log trucks and sport utility vehicles are also used by all-terrain vehicles (ATV's) and other off-highway vehicles (OHV's) that are not normally found on city streets. Almost all NFS trails are also used for non-motorized activities such as hiking, biking, and horseback riding, alone or in combination with motorized uses.

In addition to the managed system of roads and trails, many Forests also have user-created roads and trails. These routes are generally found in areas where cross-country travel by motor vehicles has not been prohibited. There has been no national inventory of user-created routes, but they are estimated to number in the tens of thousands of miles.

The 1987 Clearwater National Forest Plan was prepared when motorized use levels were considerably lower than they are today. The spectrum of motorized and non-motorized recreation opportunities was not explored in depth, since user conflicts and resource issues were few. There was little distinct land

area allocation between motorized and non-motorized uses, other than for Wilderness. This regulatory structure required analysis, formal decisions, and Forest Supervisor's orders to implement restrictions on motorized travel. This situation, coupled with a management approach that lagged far behind the increase in motorized use, over time led to the establishment of motorized uses in many areas on the Forest where it was not specifically restricted. In the current climate, and with an eye toward the future of the Forest, its resources, and its users, there is a need to identify routes suitable for motorized, non-motorized, and bicycle travel.

Motorized recreationists currently use some roads and trails that are not restricted to motorized travel, but are not part of the official Clearwater National Forest transportation system. There is a need to identify and evaluate those routes, and consider them for possible adoption into the designated motorized system. On the other hand, some other routes are currently part of the official transportation system, but are not travelable with vehicles due to vegetation growth or loss of the road or trail template. Routes that are not travelable in their current condition would not be designated for motorized travel.

### **Identification of Action - Project Proposal**

The environmental analyses for Travel Planning Project will be documented via final environmental impact statement (FEIS) during the summer 2010. A Record of Decision (ROD) will be prepared and signed in late summer. More detailed information regarding the existing conditions and majority of provisions within the project proposal can be found in the Travel Planning Draft Environmental Impact Statement (U.S.D.A. Forest Service – Clearwater National Forest 2009). Updates, responses to comments and specifics regarding the project proposal will be included in the FEIS and/or ROD.

### **Purpose and Need**

#### *Designation of Motorized Routes*

*The Existing Condition:* The 1987 Clearwater Forest Plan did not prohibit cross-country motorized travel, except in a few specific Management Areas such as B1 (Selway-Bitterroot Wilderness) and the non-motorized portions of A3 (Lochsa Face, Coolwater Ridge, and Moose Mountain areas). Currently, motorized recreationists use some routes that are not part of the official Clearwater National Forest Transportation system. Some of these routes are referred to as "user-created." Although routes that are not part of the Clearwater National Forest Transportation system may not have been authorized by the Forest Service, they may not have violated the Forest Plan, travel guide, or other restrictions when they were created.

*The Desired Condition:* All routes available for public motorized travel must be a part of the transportation system and must be designated open for motorized travel, including the type of vehicle and season of use, according to 36 CFR 212.

*Need:* There is a need to designate the type of vehicle and season of use for all routes that will be used by motorized traffic, and to eliminate unmanaged cross-country motorized traffic off of designated routes.

#### *Seasonal Restrictions*

*The Existing Condition:* The Clearwater National Forest Travel Guide currently lists seasons of use for motor vehicles, including over-snow vehicles, on system roads and trails. There are more than 35 different date combinations for the different seasonal use restrictions. Both the public and the Forest Service find the variety of seasonal restrictions confusing.

*The Desired Condition:* Minimize the number of different seasonal restrictions to only those necessary to provide for resource protection and recreational opportunities.

*Need:* There is a need to combine similar seasonal restrictions where resource protection objectives can be achieved while still providing for a variety of recreational opportunities.

#### ***System Trails***

*The Existing Condition:* In contrast to the planned road system, the existing trail system evolved from trails built or used for fire control, access to Forest Service stations, or activities such as mining, hunting, and grazing. The 1987 Forest Plan provided direction for trail use, but was developed when motorized trail use was limited. Since then, trail vehicle numbers and capabilities have increased dramatically. However, the Forest Plan did provide goals, objectives, and standards for trails in each Management Area.

*The Desired Condition:* The system of trails on the Forest should be managed to meet the goals, objectives, and standards for each Forest Plan Management Area.

*Need:* There is a need to evaluate and identify a system of motorized trails that provide for a variety of recreational opportunities while meeting Forest Plan Management Area direction.

#### ***Over-snow vehicles***

*The Existing Condition:* At the present time, cross-country over-snow vehicle use is not restricted except in Management Areas where motorized use is prohibited by the Forest Plan, Wilderness Areas, and some small restricted areas that have been previously identified for resource protection. The over-snow vehicle restrictions that currently exist are route-based. Over-snow vehicle use is allowed on some routes in big game winter range on the Lochsa Ranger District. At the same time, there are routes in high-elevation areas that have over-snow vehicle restrictions that do not have clear objectives.

*The Desired Condition:* The desired condition is to protect overwintering big-game animals from the potential effects of winter motorized recreation without unnecessarily restricting over-snow vehicle use.

*Need:* There is a need to restrict motorized over-snow travel on routes within big game winter range in the Lochsa drainage. There is a need to remove over-snow vehicle restrictions that are not serving a clearly identifiable purpose.

#### ***Mountain Bikes***

*The Existing Condition:* Some trails and roads currently have mountain bike restrictions, and the objectives for those restrictions are not clear.

*The Desired Condition:* The desired condition is to meet Forest Plan goals and objectives without unnecessarily restricting mountain bike recreational opportunities.

*Need:* There is a need to remove mountain bike restrictions that do not serve a clearly identifiable purpose. In addition, there is a need to eliminate unmanaged bicycle traffic off of designated routes.

#### ***Recommended Wilderness***

*The Existing Condition:* The Forest Plan recommends some areas (Management Area B2) to be considered for future wilderness designation, and provides goals, objectives, and standards for the management of those areas. Currently, summer motorized travel is allowed on some trails, and over-snow vehicles and bicycles like motorbikes are allowed in all of the recommended wilderness areas.

*The Desired Condition:* Areas that were recommended for wilderness designation should be managed to protect and preserve their wilderness character, consistent with the goals and objectives described for these areas in the Clearwater Forest Plan.

*Need:* There is a need to evaluate the motorized and bicycle activities that currently occur in recommended wilderness areas, and to manage those uses so that they do not adversely impact the

wilderness character of those areas.

### Project Proposal

The project proposal would designate motorized routes for summer and winter travel on the Clearwater National Forest. The project proposal (alternative C modified) would respond to requests for more motorized loop trails, while balancing the need to protect wildlife habitat in Management Areas C1, C6, and C8S, by implementing seasonal restrictions on some trails. The changes that would result from implementation of the project proposal for each category of routes is summarized in Table 1.

Table 1. Comparison of miles of designated roads and trails open for motorized travel between existing and the project proposal.

Indicator	Existing Condition (Alternative A)	Project Proposal (Alternative C Modified)
Acres open to OHV cross-country travel	1,372,959	0
Miles of motorized road routes open either year-round or seasonally	2,972	2,961
Miles of motorized trail routes open either year-round or seasonally	697	496
Miles of motorized trail routes in Inventoried Roadless Areas open either year-round or seasonally	447	253
Miles of bicycle/mechanized routes on roads open either year-round or seasonally	4,344	4,354
Miles of bicycle/mechanized routes on trails open either year-round or seasonally	1,153	988
Acres open to snow machine travel	1,515,903	1,319,623
Miles of motorized trail routes open seasonally	170	201
Miles of motorized trail routes open to both ATV's and motorcycles	191	185
Miles of motorized trail routes open only to motorcycles	506	315

Specifics regarding the project proposal are summarized below for summer and winter periods. Additional information can be found in the FEIS.

#### *Summer Period (non-snow period)*

The following provisions would apply to the project proposal for activities during the summer period:

- Cross-country motorized and bicycle summer travel off of designated routes would be prohibited, except as described under Off-Route Exceptions.
- Off-Route Exceptions :
  - Motor vehicle use off of designated roads or trails for the purpose of dispersed camping is permitted for up to 300 feet from the centerline of the road or trail for the time period of allowed use on the road or trail. Campsite selection must be completed by non motorized means, and then accessed by the most direct route (no more than 300 feet) without causing resource damage. Cutting, damaging, or harming (such as driving over) trees or vegetation is not allowed to access dispersed camping spots. Moving, going around, going over, or going past barriers on roads (ie gates, rocks, berms, barriers, signs, etc.) is not allowed.
- The Travel Planning analysis will not include the construction, reconstruction or decommissioning of roads or trails. These actions would be better addressed at a more site-specific scale.

- The Forest Plan amendment that would modify the periods of restriction for on-road use described in Appendix F of the 1987 Forest Plan would be included in all action alternatives. All of the action alternatives would maintain access to areas important to Native American Tribes who use the Clearwater National Forest, and would preserve local Native American culture by providing for the continued ability to practice inherent tribal treaty rights and traditional uses of the forest.
- Specific changes to trails in the project proposal are listed in Table 2.

Table 2. Single-Track Trails that would change in project proposal.

Trail #	Existing Condition (Alternative A)	Project Proposal (Alternative C Modified)
106	Open Yearlong	Closed Yearlong
167 (N. Section)	Open Yearlong	Open 8/1 – 11/15
191	Open Yearlong	Open 8/1 – 11/15
632 (N. Section, from Road 555 to Windy Ridge Trail)	Open Yearlong	Closed Yearlong

\*For all other trails and roads, Alternative C Modified will be the same as Alternative C. See DEIS Appendix B, Report 501.

#### *Winter Period*

The following provisions would apply to the project proposal for activities during the winter period:

- Area-based restrictions for over-snow vehicles will be the same as described in the DEIS on Pages 2-11, 2-13, 2-14, and 2-19. The forest-wide closure for over-snow vehicles would be implemented from 10/1 through 11/15 for all action alternatives in order to restrict travel during the hunting season. Recommended Wilderness (MA B2) would be closed in project proposal yearlong to over-snow vehicles.
- Route-based restrictions for over-snow vehicles would be retained in the project proposal as shown in the DEIS for existing condition (alternative a), with some modifications. Instead of the variety of seasonal restrictions currently used, the restriction dates would be simplified. These simplifications are intended to make the restrictions and the Motor Vehicle Use Map clearer. Although some of the changes appear more restrictive on paper, please note that over-snow recreational opportunities would not be affected by restrictions during the snow-free portions of the year. Table 3 shows the current restrictions compared to project proposal:

Table 3. Comparison of current and proposed restrictions for over-snow vehicles.

Type of Route (Road or Trail)	Existing Condition (Alternative A Restriction)	Project Proposal (Alternative C Modified Restriction)
Road	0	0
Road	10/1 – 12/1	10/1 – 11/15
Road	10/1 – 5/15	Yearlong
Road	11/1 – 4/1	Yearlong
Road	11/1 – 5/15	Yearlong

Road	12/1 – 4/15	Yearlong
Road	12/1 – 5/15	Yearlong
Road	4/1 – 11/30	10/1 – 11/15
Road	6/1 – 12/1	10/1 – 11/15
Road	Yearlong	Yearlong
Trail	0	0
Trail	10/1 – 5/15	Yearlong
Trail	12/1 – 5/15	Yearlong
Trail	5/15 – 12/1	10/1 – 11/15
Trail	Yearlong	Yearlong

### *Project Proposal for ESA Consultation*

Based on the project proposal (Alternative C-modified) described above the following actions were changes in the existing conditions that may affect the aquatic resources:

- Designate 2,961 miles of road for existing motorized uses (year-round or seasonal) and prohibit motorized use on 11 miles of road that are currently open to such use.
- Designate 496 miles of trail for existing motorized uses (year-round or seasonal) and prohibit motorized use on 201 miles of trail that are currently open to such use.
- Retain motorized trail fords across 12 fish-bearing streams while prohibiting motorized travel across 548 stream crossings (fish bearing and non-fish bearing) as part of the 201 mile motorized trail reduction noted above.
- Prohibit cross-country motorized travel in riparian areas as part of a prohibition to cross country travel across that part of the Clearwater NF (1,372,959 acres) that is currently open to such use.
- Provide for motorized access to existing dispersed campsites (including some in riparian areas) under specific travel conditions that include requirements to select sites by non-motorized means, travel to sites by the most direct route without causing resource damage, not driving over trees or vegetation and not circumventing barriers. Monitor conditions in riparian areas along streams with listed fish species and propose campsite or route rehab as warranted. Any new motorized routes to campsites or elsewhere will need to be evaluated in a separate NEPA analysis.
- Provide for oversnow-vehicle travel on 1,319,623 acres that are currently open to this use and prohibit oversnow-vehicle use on 196,280 acres that are currently open to such use.
- The Travel Plan and associated provisions are expected to guide the Forest for the long-term (over ten years). However, site specific changes are expected and these will be addressed in future NEPA documents and subsequent ESA consultations.

The primary reason for travel planning is to designate roads and trails for particular uses and eliminate or designate cross-country motorized and bicycle travel. This is essentially a planning process and will only designate existing roads and trails as open or closed to motorized traffic. The project proposal and the associated analyses did not evaluate the needs to construct, reconstruct and decommission roads or trails on the Clearwater National Forest. The Forest has completed a forest-wide road analysis to validate the needs for arterial, collector and important local roads. Plans to construct new routes, reconstruct existing routes and/or decommission routes will be covered in separate, site-specific NEPA analysis and ESA consultations.

The project proposal primarily involves changes to cross country motorized and bicycle travel, trail use and snowmobile use (Table 1). In addition to the elimination of cross country travel via motorized vehicles and bicycles, the total miles of trails open to motorized travel will be reduced by 29 percent. No new motorized routes will be permitted thereby avoiding impacts in the riparian areas. Finally, the total area open to snowmobile use was reduced by 13 percent. Overall the project proposal does not propose any new ground-disturbing activities and will actually reduce the amount of acreage subjected to a higher risk of various resource impacts.

### ***Monitoring***

The following monitoring activities would be completed during the first two complete field seasons following the authorization of the travel plan. A report will be prepared following the second field season. The report will note any existing and potential problems, immediate actions taken during the interim to minimize or avoid the impacts, and any pending or potential actions that the Forest will address administratively or through the NEPA process. If monitoring finds impacts to listed species are occurring, the action (i.e. motorized use of a stream crossing and/or access route into the dispersed site) will be immediately curtailed until a remedial plan is formed and subsequent ESA consultation is completed. See aquatic monitoring plan in appendix B.

- Continue to monitor selected motorized trail crossings to determine if travel (motorized and non-motorized) is causing direct or indirect aquatic impacts to ESA listed fish species.
- Determine if existing dispersed recreational sites located within the Riparian Habitat Conservation Areas (RHCAs) and within drainages that have ESA listed fish species are meeting the standards and guidelines established to meet or not retard the attainment of the Riparian Management Objectives (as defined in PACFISH and INFISH amendments to the Forest Plan).

### **Identification of Action Area**

The project proposal for the Travel Planning Project will address travel management and Off-Highway Vehicle (OHV) use Forest-wide. However, the project proposal will not reanalyze travel planning decisions that have been made recently, or will be made soon, for these other projects on the Clearwater National Forest:

- North Lochsa Face Recreation and Access Management Record of Decision, 2000 within the lower Lochsa River subbasin (Pete King Creek, Canyon Creek, Deadman Creek and Fish Creek drainages).
- Upper Palouse ATV Decision Notice, 2005 within the lower Snake River subbasin (Palouse River drainage).
- Corralled Bear Record of Decision, December 2008 (Final) within the mainstem Clearwater River subbasin (Potlatch River drainage).
- Cherry Dinner Record of Decision, March 2008 (Final) within the mainstem Clearwater River subbasin (Potlatch River drainage).
- Orogrande OHV Decision Notice, Fall 2010 (Estimated) within the upper North Fork Clearwater River subbasin (Orogrande Creek drainage).
- Robo Elk Record of Decision, Fall 2010 (Estimated) within the lower North Fork Clearwater River subbasin (Elk Creek drainage).

## Identification of Listed Species and Critical Habitat

The U.S. Fish and Wildlife Service (USFWS) provided an updated species list for the Clearwater National Forest on July 8, 20010 (CONS-250c). This list identifies three threatened species. The following species were included in the list: bull trout, Canada lynx and water howellia. In addition, fall Chinook salmon and steelhead trout were listed in previous species lists for the Clearwater National Forest; these species are still listed as threatened species and are administered by NOAA Fisheries. The gray wolf was relisted as threatened 10-J experimental/non-essential in July 2010.

### **Threatened Wildlife Species – Gray Wolf (*Canis lupus*)**

See Appendix A for the Biological Assessment for Gray Wolf

### **Threatened Wildlife Species - Lynx (*Lynx canadensis*)**

See Appendix A for the Biological Assessment for Lynx

### **Threatened Fish Species - Fall Chinook Salmon (*Oncorhynchus tshawytscha*)**

The Snake River spring/summer Chinook salmon and fall Chinook salmon were listed as threatened on April 22, 1992 (57 FR 14653; 57 FR 23458, June 3, 1992) and listings reissued on June 28, 2005 (70 FR 37160, June 28, 2005). Spring/summer Chinook salmon were also not listed in the Clearwater River subbasin. Critical habitat was designated for Snake River sockeye salmon, Snake River spring/summer Chinook salmon, and Snake River fall Chinook salmon on December 28, 1993 (58 FR 68543; and 64 FR 57399, October 25, 1999).

The National Marine Fisheries Service (NMFS) Federal Register (issued 12/28/93) identified a reach of the mainstem Clearwater River as critical habitat for Snake River fall Chinook salmon. Critical habitat for the fall run chinook includes only the mainstem of the Clearwater River up to the Idaho/Clearwater county line below the town of Greer, Idaho. Distance from the proposed activities in the upper Potlatch River, upper Lolo Creek or Middle Fork/Lochsa River drainages to the areas designed as critical habitat within Clearwater River is over 25 miles. Consequently, no critical habitat for this species occurs within the Clearwater National Forest. Under the ESA, the Forest Service must assess cumulative impacts from federally authorized or funded projects on the Clearwater National Forest to fall Chinook salmon populations in both the lower Clearwater River and Palouse River below the falls.

### **Threatened Fish Species - Steelhead Trout (*Oncorhynchus mykiss*)**

Steelhead trout in the Snake River basin have been listed as threatened under the ESA with an effective listing date of October 17, 1997 ( 62 FR 43937, August 18, 1997) and proposed for revision on June 14, 2004, (69 FR 33102). The revised Snake River steelhead ESU proposed for relisting as the Snake River Basin /*O. mykiss* /ESU, which includes both resident and anadromous forms within the range of the existing steelhead ESU, and also includes the North Fork Clearwater River drainage upstream of Dworshak Dam. The ESA listed status for Snake River Basin steelhead trout was finalized on January 5, 2006 via final rule in the Federal Register (71 FR 834). The final rule was consistent with the initial ruling (August 18, 1997) in that the listed Snake River Basin steelhead ESU included all anadromous forms in the Clearwater River subbasin excluding the resident forms upstream of Dworshak Dam in the North Fork Clearwater River subbasin.

Critical habitat for the Snake River Basin /*O. mykiss* /ESU was proposed on December 14, 2004 (69 FR 74572). On September 2, 2005, critical habitat for the Snake River Basin steelhead trout was designated

via final rule (70 FR 52630). Streams designated for critical habitat designation are identified in the September 2, 2005 Federal Register by their corresponding fifth-field hydrologic unit codes.

The final rule for steelhead trout critical habitat includes the mainstem Clearwater River and Middle Fork Clearwater River including the Potlatch River, Orofino Creek and Lolo Creek drainages. The non-anadromous areas on the Forest (North Fork Clearwater River (upstream Dworshak Dam) and upper Palouse River subbasins) were not included. The Lochsa River including most of its tributaries were designed as critical habitat. The project area (Clearwater National Forest) includes all of these sites.

#### **Threatened Fish Species - Bull Trout (*Salvelinus confluentus*)**

On July 10, 1998, bull trout were listed as a threatened species within the Snake River under ESA (63 FR 31647). On November 29, 2002, a proposed rule to designate critical habitat for the Klamath and Columbia River populations of bull trout was published in the Federal Register (67 FR 71235). A final rule designating critical habitat for these populations was published on October 6, 2004 (69 FR 59996). The Final Rule excluded PACFISH/INFISH areas among others. The USFWS was challenged on the Final Rule on December 14, 2004 in a complaint filed by the Alliance of the Wild Rockies and Friends of the Wild Swan. The USFWS subsequently requested a voluntary partial remand to reconsider the Final Rule. On September 26, 2005, a new Final Rule was published in the Federal Register (70 FR 56212). The Final Rule excluded areas that were already covered by approved conservation agreements and habitat management plans; the Clearwater River Subbasin was excluded from critical habitat designation. Based on a court granted voluntary remand of the 2005 final designation, the USFWS issued a new proposed rule for bull trout critical habitat on January 14, 2010 (75 FR 2270). Subsequently, the USFWS issued the final rule for bull trout critical habitat effective November 17, 2010.

The final rule for bull trout critical habitat includes the mainstem Clearwater River and Middle Fork Clearwater River; no tributaries were listed in these two subbasins (i.e. Potlatch River, Orofino Creek and Lolo Creek). Within the North Fork Clearwater River and Lochsa River subbasins, proposed critical habitat were noted for 72 and 41 tributaries including two lakes respectively. The project area (Clearwater National Forest) includes 52 of the sites within the North Fork Clearwater River drainage (Isabella Creek upstream) and all of the sites within the Lochsa River drainage.

#### **Threatened Plant Species – Water Howelia (*Howellia aquatilis*)**

Water howellia was proposed for listing as a threatened species in 1993 (U.S.D.I Fish and Wildlife Service 1993) and was listed as a threatened species in 1994 (U.S.D.I Fish and Wildlife Service 1994). No critical habitat has been designated for this species. A draft recovery plan has been prepared (Shelly and Gamon 1996). The most recent range-wide status assessment of water howellia was reported by Mincemoyer (2005). The water howellia is currently part of a 5-year review process (U.S.D.I Fish and Wildlife Service 2007).

### **Status of Listed Species**

#### **Threatened Fish Species - Fall Chinook Salmon (*Oncorhynchus tshawytscha*)**

Within the Clearwater River subbasin, fall Chinook salmon migrate and spawn primarily in the mainstem Clearwater River. This race of salmon does not spawn in streams on the Clearwater National Forest; spawning only occurs in larger rivers. Snake River fall Chinook salmon were historically less well-distributed across the Snake River basin than spring Chinook, although the Snake River basin was considered to support the highest production of fall Chinook salmon in the entire Columbia River basin

(Fulton 1968). The historic importance of the Clearwater River in providing spawning and early rearing habitat is presently unclear. Currently, the mainstem Clearwater River below the North Fork Clearwater River supports most spawning and rearing of fall Chinook salmon in Idaho, facilitated by cold water releases from Dworshak Reservoir.

Numbers of fall Chinook salmon returning to the Snake River and tributaries declined precipitously during the 1960s and 1970s as approximately 80 percent of their historic habitat was eliminated or severely degraded by the construction of the Hells Canyon complex (1958-1967) and lower Snake River dams (1961-1975) (U.S.D.C. NOAA Fisheries 2006). Counts of naturally-produced adult Snake River fall Chinook salmon at Lower Granite Dam were about 1,000 fish in 1975 and ranged from 78 to 905 fish (with an average of 489 fish) over the ensuing 25-year period through 2000 (U.S.D.C. NOAA Fisheries 2005a). The estimated annual return for the period 1938 - 1949 was 72,000 fish (Bjornn and Horner 1980 as cited in U.S.D.C. NOAA Fisheries 2006). Numbers of natural-origin fall Chinook have increased over the last few years, with estimates at Lower Granite Dam of 2,652 in 2001, 2,095 fish in 2002, and 3,895 fish in 2003 (U.S.D.C. NOAA Fisheries 2005a).

The majority if not all of the fall Chinook salmon spawning documented over the last 21 years has occurred within the designated critical habitat reaches of the Clearwater River, mostly downstream of the North Fork Clearwater River. Some limited spawning has been observed in the reach around Orofino Creek, the area near the Lolo Creek confluence and upstream of the critical habitat near the confluence of the South Fork Clearwater River. These are assumed sporadic and not considered viable/natural sustaining populations (due to natural constraints regarding rearing habitat, water temperatures during incubation and early rearing). Fall Chinook salmon do use the mainstem Middle Fork Clearwater River as a migration corridor to the lower Selway River where a fall Chinook salmon rearing facility is located. Some limited spawning has been documented by the Nez Perce Tribe within the lower Selway River (Nez Perce Tribe 2009).

Spawning ground surveys conducted by the Nez Perce Tribe from 1988-2008 have documented an increasing trend in the number of redds in the Clearwater River subbasin. While the earlier surveys documented less than 100 redds between 1988-1998 with only four redds located in 1990 and 1992, surveys in the past 11 years have found between 179 and 941 redds (Garcia 2000; Nez Perce Tribe 2003, 2004, 2005, 2006, 2007, 2008, 2009). The majority of redds were located downstream of the North Fork Clearwater River; less than five percent in any one year were located upstream of the North Fork Clearwater River confluence. The most recent year with summarized data (2008) the Tribe found 941 redds in the mainstem Clearwater River. During 2008, only 22 of the 941 redds documented in the mainstem Clearwater River were found between the North Fork Clearwater River and the South Fork Clearwater River. Increased spawning success over the past ten years has been attributed to supplementation efforts in the subbasin.

Stream flows within the upper mainstem Potlatch River and Lolo Creek are very low during fall and early winter and would not support fall Chinook spawning. In 2000, the Nez Perce Tribe has documented fall Chinook salmon and coho salmon spawning in the lower mainstem Potlatch River (approximately 20 miles downstream of USFS lands). No documentation is available to indicate any fall Chinook salmon production in the upper Potlatch River and Lolo Creek drainages.

#### **Threatened Fish Species - Steelhead Trout (*Oncorhynchus mykiss*)**

Fish assemblages within the mainstem Clearwater River and its tributaries have undergone a change in composition of species and relative numbers over the last 100 years. Ricker (1959) noted that the largest and most important spawning population of Chinook salmon in the world was once present in the Columbia River Basin. Approximately 39 percent of all Columbia River spring Chinook salmon, 45

percent of the summer Chinook salmon and 55 percent of all the steelhead trout originated in the Idaho portion of the upper Snake River drainage (Mallet 1974). Historical numbers of Chinook salmon and steelhead trout entering the Clearwater River subbasin prior to the 1900's are assumed to be substantial, but no documentation is available (Nez Perce Tribe and Idaho Fish and Game Department 1990).

The construction the Lewiston Dam in 1927 and the operation (1927-1973) with inadequate adult fish passage in the initial years virtually eliminated or destroyed the Chinook salmon runs and severely reduced the steelhead trout runs into the Clearwater River subbasin (Murphy and Metsker 1962, Mallet 1974, Nez Perce Tribe and Idaho Department of Fish and Game 1990, Murphy and Johnson 1990). The construction of the eight dams on the lower mainstem Snake and Columbia rivers between 1936 and 1975 has also reduced the anadromous fish production within the Clearwater River subbasin including fall Chinook salmon in the mainstem Clearwater River.

The construction of Dworshak Dam on the North Fork Clearwater River in 1974 eliminated anadromous fish production within 26 percent of the Clearwater River subbasin and most likely affected downstream rearing of salmonids in the mainstem Clearwater River.

In the Clearwater River subbasin, run estimates for wild and natural steelhead trout have ranged from a low of near 1,000 in 1975-77 to a high of 8-9,000 in 1982-83 (Nez Perce Tribe and Idaho Department of Fish and Game 1990). Escapement of wild steelhead trout over Lower Granite Dam has been estimated about 1000 adults of the B-run stock for the 1993-94 and 1994-95 run years (IDFG 1995). At that time, IDFG estimates that approximately 80% (800 fish) are destined for the upper Clearwater River drainages (Lochsa River and Selway River drainages).

**Life History:** Steelhead trout are present throughout the Snake River basin in most tributaries that are accessible and of sufficient size to support fish. Wild, indigenous steelhead trout, unaltered by hatchery stocks, are rare and present in 25 percent of the current steelhead trout distribution. Within the Central Idaho Mountains, recent steelhead trout runs are described as critically low. Key factors to the decline of steelhead trout in the Pacific Northwest include predation and competition from introduced fish, blocked access to historical habitat, passage mortality at major dams, habitat degradation, hatchery interactions, and harvest.

Snake River Basin steelhead trout are summer steelhead trout, as are most inland steelhead trout, and comprise two groups, A-run and B-run, based on migration timing, ocean-age, and adult size. Snake River Basin steelhead trout enter fresh water from June to October and spawn during the following spring from March to May. B-run fish, which occur in the Clearwater River Basin, enter fresh water from late August to October, passing Bonneville Dam after August 25. A-run steelhead trout are thought to be predominately age-1-ocean, whereas B-run steelhead trout are thought to be predominately age-2-ocean (Busby et al. 1996, as reported in U.S.D.C. NOAA Fisheries 2006). Both types are present in Clearwater River subbasin; within the Clearwater National Forest, B-run steelhead trout are found in streams in the Lolo Creek, Middle Fork Clearwater River and Lochsa River drainages and A-run steelhead trout in the lower mainstem Clearwater River tributaries including the Potlatch River drainage. Unlike other Pacific salmon, steelhead trout are capable of spawning more than once before they die. However, most steelhead trout in the Clearwater Basin survive to spawn only once.

Spawning and initial rearing of juvenile steelhead trout generally take place in moderate gradient (generally 3-5%) streams. Females dig redds and deposit 1,500 to 6,000 eggs in pea to baseball size gravel. The eggs hatch in about 35-50 days, dependent upon water temperature. The alevins remain in the gravel 2 to 3 weeks until the yolk sac is absorbed, then emerge as fry in late spring, and begin to actively feed. Egg to fry survival is usually near 15%. Snake River Basin steelhead trout usually smolt as 2 or 3 year olds and migrate to the ocean.

Productive steelhead trout habitat is characterized by complexity, primarily in the form of large and small wood and/or boulders and rock. Juveniles will take advantage of microhabitats to seek refuge from high water velocity and/or temperatures. Juveniles may move around in a basin to take advantage of favorable habitat. Fry prefer protected and complex edge habitat with low velocity (<0.3 ft/s). They are seldom observed in water over 15 inches deep. Summer rearing takes place primarily in the faster parts of small and deep scour pools with some form of surface cover and wood or medium to large substrate (cobble or boulders). Other important habitat components for juveniles are pools with "bubble curtains", undercut/scoured areas, and pocket water in deep riffles and rapids. Winter rearing occurs more uniformly at lower densities across a wide range of fast and slow habitat types. Small tributaries and lakes are probably important winter habitat. As juveniles get older, some tend to move downstream to rear in larger tributaries and mainstem rivers.

***Historical Population Condition in the Potlatch River:*** Historically, the Potlatch River drainage contributed substantially to the spring chinook and steelhead production within the mainstem Clearwater River drainage. The drainage was most likely second to Lolo Creek in spring chinook production. Anadromous and resident fish production occurred throughout the Potlatch River drainage. Habitat conditions within the mainstem Potlatch River (upstream of Boulder Creek), East Fork Potlatch River and West Fork Potlatch River were probably the most conducive to spring chinook, coho salmon and steelhead production. No permanent migration barriers to anadromous fish were present within the mainstems of the Potlatch River, West Fork Potlatch River or East Fork Potlatch River. Johnston (1993) reported that reviews of historical documents and interviews with residents from the late 1800's and early 1900's indicate that salmon (spring chinook) and steelhead (B-run size) migrated into the upper Potlatch River system. In the 1920's and 1930's, residents of the upper Potlatch River area reported to Johnston (1993) that lamprey followed the steelhead trout up the Potlatch River, upstream of Bovill, Idaho.

Within lower Potlatch River tributaries of Big Bear, Corral and Hog Meadow creeks, steelhead trout most likely inhabited Corral Creek (Johnston 1993). Steelhead also reared in Hog Meadow Creek if migration barriers were not present downstream on non-USFS lands. Previous surveys have noted that a barrier in the lower Bear Creek drainage (approximately five miles upstream of the confluence with the Potlatch River) was a migration barrier for anadromous fish and prevented anadromous fish production within the upper Bear Creek drainage (Fuller et al. 1985, Johnson 1985). However, more recent work by the IDFG has indicated that the stream feature is most likely a partial barrier with adult steelhead trout migrating into the upper reaches of the Big Bear Creek drainage (Bowersox 2008).

Within the East Fork Potlatch, Little Boulder Creek, Moose Creek and West Fork Potlatch River and upper mainstem Potlatch River, steelhead trout probably spawned and reared in all accessible streams. Johnston (1993) documented accounts of people catching steelhead in Mallory Creek, Laguna Creek, and Feather Creek. The streams within the lower gradient meadows reaches provided meandering stream channels with good bank stability, cover, cool water temperatures and excellent pool habitat which would equate to good populations of westslope cutthroat trout; the populations probably exceeded five fish (age 2+ and older)/100 squared meters of stream habitat. Lower tributaries most likely provided fair to good habitat for A-run steelhead and small resident fish populations; lower summer stream flows and higher summer water temperatures within these lower tributaries as well as the mainstem may have limited fish production. While warmer water temperatures within the lower mainstem of Potlatch River most likely limited rearing during the summer months, this area provided critical overwintering habitat for anadromous and resident fish.

***Historical Population Condition in the North Fork Clearwater River:*** Information regarding the historic fish species assemblages within the mainstem North Fork Clearwater River and its tributaries is lacking; some anecdotal information is available on which species (mostly salmonids) were present in a few tributaries, but little information is available on the ranges for each fish species, the relative

abundance, and the quality of the habitat. Bjornn (1977) noted that the North Fork Clearwater River historically produced 33 to 50 percent of the total steelhead trout production in the Clearwater River subbasin.

The overall production was probably very good to excellent in the lower elevation tributaries as these provided more productive habitats due to longer growing season, and more nutrient being recycled through the systems; as compared to the relatively sterile granitic streams within the headwaters of the North Fork Clearwater River drainage. Between 1957 and 1961, the number of adult steelhead trout spawning within the North Fork Clearwater River drainage, upstream of the proposed Dworshak Reservoir, was estimated at about 9,500 fish (U.S.D.I. Fish and Wildlife Service. 1962). The estimated run size into the North Fork drainage represented between 29 and 45 percent of the total count of adult steelhead trout passing over the Lewiston Dam (into the Clearwater River subbasin) for the 1957-58 through 1960-61 run years.

***Historical Population Condition in the Orofino Creek:*** Steelhead trout most likely spawned and reared in the lower mainstem and tributaries of Orofino Creek that were accessible downstream of the lower migration barrier (approximately four miles upstream from the confluence with the Clearwater River).

***Historical Population Condition in Lolo Creek:*** Historically, the Lolo Creek drainage contributed substantially to the spring Chinook salmon and steelhead production within the mainstem Clearwater River drainage. Steelhead trout inhabited most of the Lolo Creek drainage; steelhead ranged beyond the lower stream reaches that spring Chinook salmon inhabited.

The migration barrier in the lower reach of Eldorado Creek may have limited migration of steelhead trout dependent upon stream flows. Similar to the situation within the Potlatch River drainage, the lower 20 miles of the mainstem of Lolo Creek flows through a basalt canyon which influences the summer water temperatures and stream flows. Some anadromous and resident fish rearing occurred in this lower reach yearlong, but the primary function involved migratory corridor and providing over winter rearing habitat for outmigrating smolts. Large pools with the larger substrate within this lower segment of Lolo Creek provided excellent conditions for over winter rearing of fish. While warmer water temperatures within the lower mainstem of Lolo Creek most likely limited rearing during the summer months, the upper Lolo Creek drainage, including Yakus Creek provided critical over wintering habitat for anadromous and resident fish.

***Historical Population Condition in Middle Fork Clearwater River:*** Historically, steelhead trout routinely used the mainstem Middle Fork Clearwater River in the winter and early spring as holding areas and migrated into the Lochsa River and Selway River drainages for spawning. Within the Middle Fork Clearwater River, some of the larger tributaries accessible to steelhead trout were used for spawning and rearing. With the exception of the Clear Creek drainage on Nez Perce National Forest, most of the tributaries within the Middle Fork Clearwater River drainage are relatively small and provided limited habitat for steelhead trout production. Limited spawning habitat for steelhead may have occurred in the lowest reach of Little and Big Smith creeks prior to the construction of US Highway 12. Rearing was likely also limited rearing in Little Smith, Big Smith, and Bridge creeks due to small stream size and lack of preferred habitat. Swan and Lowell creeks provided no habitat due to natural barriers just upstream from their mouths. Three Devils Creek is likely too small to have ever provided habitat for this species.

***Historical Population Condition in Lochsa River:*** Historically, the Lochsa River System was a significant producer of summer steelhead trout in the Clearwater River subbasin. Espinosa (1983) estimated that the Lochsa river system (within the Forest) is capable of producing 250,000 steelhead trout smolts at full seeding and habitat capability.

**Existing Population Condition in Clearwater River subbasin:** Present distribution includes the Salmon River and Clearwater River subbasins. Wild, indigenous steelhead trout, unaltered by hatchery stocks, are rare and present in 25 percent of the current steelhead trout distribution. Within the Central Idaho Mountains, recent steelhead trout runs are described as critically low. Key factors to the decline of steelhead trout in the Pacific Northwest include predation and competition from introduced fish, blocked access to historical habitat, passage mortality at major dams, habitat degradation, hatchery interactions, and harvest.

Within the Clearwater National Forest steelhead trout currently spawned and reared in the Potlatch River drainage, Lolo Creek drainage, several small tributaries within the Middle Fork Clearwater River and the mainstem Lochsa River and numerous streams that are accessible during the spring migration period.

**Existing Population Condition in the Potlatch River:** Juvenile steelhead rearing has been documented in most the Potlatch River drainage; production has been considered very low due to the low densities observed during the surveys and fair to poor habitat conditions. On USFS lands, steelhead spawning has been monitored in the East Fork Potlatch River since 1992. These surveys have shown a consistently low number of redds from three to nine. During the 2007 spawning period, one survey conducted in May found seven redds. Very little spawning has been observed in the West Fork Potlatch River, presumably due to fine textured substrates in the alluvial meadow systems of that drainage.

The low abundance of steelhead trout observed in the upper tributaries on USFS lands have led to the conclusion that the Potlatch River drainage had low adult steelhead trout escapement. Recent surveys by the Idaho Department of Fish and Game (IDFG) have found that adult steelhead migration into several tributaries is much higher than previously thought (Brindza and Schriever 2006). IDFG trapped about 120 adult steelhead trout in the lower reaches of the Little and Big Bear Creek drainages in 2005. Population estimates using these trap counts indicate that in 2005 the estimated adult escapement in these two drainages was approximately 266 fish. Comparison with a relatively pristine and wild steelhead stronghold drainage, Fish Creek (tributary in the Lochsa River subbasin), Brindza and Schriever (2006) noted that even though the lower Potlatch River drainage is fairly degraded, the data indicates that the Potlatch River drainage has a high potential for steelhead trout production. Survival estimates of juvenile steelhead trout migrating out of the Bear Creek drainage also support this conclusion as the juvenile trap data noted high survival rates.

As noted above, steelhead trout spawning and rearing most likely occurred within the lower Corral Creek drainage. Although a 1993 fish population survey Clearwater BioStudies, Inc. (1994a) did not observe any steelhead trout at 18 snorkeling sites within the Corral Creek drainage (including the East Fork Corral Creek and West Fork Corral Creek), a follow-up survey in 2005 (Clearwater BioStudies, Inc. 2006) found juvenile steelhead/rainbow trout in one snorkeling site in the mainstem Corral Creek (upstream of the West Fork Corral Creek). Steelhead trout migration into the upper Corral Creek drainage (upstream of the railroad culvert migration barrier approximately two miles from confluence with the Potlatch River) has been questionable prior to 2007. The IDFG and several partners (Idaho Department of Lands, Latah County Soil and Water Conservation District and the Natural Resources Conservation Service removed the barrier in 2007 to improve access for steelhead trout. Fish population surveys have observed steelhead trout upstream of the former barrier in the West Fork Corral Creek (Bowersox 2008).

Fish population surveys conducted by the IDFG in 2005 found noted good densities of juvenile steelhead trout in the Big Bear Creek drainage (Brindza and Schriever 2006); no surveys were conducted in the upper tributaries (i.e. East Fork Big Bear Creek). During the same summer, Clearwater BioStudies, Inc.(2006) found juvenile rainbow/steelhead trout at six of the nine snorkeling sites in the East Fork Big Bear Creek. Densities of age 1+ rainbow/steelhead trout ranged from 2.1 to 10.0

fish/100m<sup>2</sup> which indicate fair to good production. IDFG suspects that a portion of the steelhead adults migrating upstream into the Big Bear Creek drainage are migrating upstream of a partial mitigation barrier in the lower Big Bear Creek. The juvenile rainbow/steelhead trout within the East Fork Big Bear Creek are most likely progeny of wild steelhead trout (Bowersox 2008).

**Existing Population Condition in the North Fork Clearwater River:** Dworshak Dam located approximately two miles upstream from the confluence with the mainstem Clearwater River is a complete migration barrier to anadromous and inland fish. USFS lands are located approximately 15 miles (Elk River drainage) and 50 miles upstream of the Dam. Although, rainbow/steelhead trout occur in various densities in the North Fork Clearwater River and larger tributaries, these fish are not anadromous fish. These fish are most likely residual steelhead trout. Based on information presented in Quigley et al. (1997) and Campbell and Cegelski (2004) the focus of identifying unique populations of interior redband trout should focus upstream of fish migration barriers. With the exception resident interior redband trout (of steelhead progeny) interior redband trout populations that have been isolated from steelhead trout (allopatric redband trout) have not been documented nor are expected in the upper North Fork Clearwater River drainage.

**Existing Population Condition in the Orofino Creek:** No documentation of steelhead trout in upper Orofino Creek within USFS lands are known. Steelhead trout rearing conditions in lower Orofino Creek are rated as poor due to high water temperatures and overall poor habitat conditions. Steelhead trout spawning and rearing have been documented in Whiskey Creek, a tributary downstream of the lower migration barrier, Orofino Creek Falls.

**Existing Population Condition in Lolo Creek:** The Lolo Creek drainage produces very few steelhead trout due to overall low adult escapement and habitat conditions. Steelhead trout production is most likely a combination of wild/natural and hatchery production as adult and juvenile plantings have occurred over the past 20 years. Juvenile steelhead rearing has been documented and spawning has been observed in the upper mainstem of Lolo Creek. The overall number of redds observed has been relatively low. Very little spawning has been observed in the Musselshell Creek drainage, presumably due to fine textured substrates in the alluvial meadow systems of that drainage. Although steelhead habitat is available in the Eldorado Creek drainage, natural-returning steelhead trout have only been observed a few times. The Eldorado Falls may still present a partial migration barrier during various stream flows.

The status of steelhead trout populations have been documented during the past 30 years for the Lolo Creek drainages by the Forest, Idaho Department of Fish and Game (IDFG) and the Nez Perce Tribe. Steelhead trout spawning within Lolo Creek was first documented by Murphy and Metsker (1962) during 1959 and 1960 surveys. They also noted that adult steelhead trout were observed spawning in June 1960 in the headwaters of Lolo and Yoosa creeks. The earliest report regarding redd counts was when a Forest contractor reported that 88 steelhead redds were identified within the mainstem Lolo Creek during their July 1988 stream survey (Clearwater BioStudies, Inc. 1988). The report noted that the redds were found upstream of Musselshell Creek and downstream of Yoosa Creek; most of the redds were associated with the recent enhancement structures in the upper mainstem portion and near or in side channels in the lower mainstem portion. Steelhead trout mostly spawn in the mainstem of Lolo Creek (from Musselshell Creek to Yoosa Creek) and any accessible tributaries in upper Lolo Creek drainage and Yoosa Creek drainage. Some limited spawning may also occur in the Musselshell Creek and Eldorado Creek drainages, although spawning data is unavailable and population data shows low numbers of juvenile steelhead.

Fish population surveys over the past 23 years have documented juvenile steelhead trout at most sampling sites throughout the mainstem Lolo Creek (U.S.D.A. Forest Service - Clearwater National Forest 2008). A summary of the available fish population data shows that between 1985 and 2007, a

total of 642 snorkel stations were surveyed within the mainstem Lolo Creek and steelhead trout juveniles were observed at 83 percent of these stations. The probability of finding steelhead trout in the tributary streams was lower at approximately 63 percent, but overall 81 percent of the 1001 monitoring sites indicated presence of steelhead trout.

Information suggests that steelhead trout production over the last 23 years has been in a static to downward trend within the Lolo Creek system. Densities observed in 2006 continued to point to a downward trend as the densities were below the 18-year average (1988-2005) of 2.21 age 1+ fish/100 m<sup>2</sup>. The absence of steelhead age 1+ fish and very low numbers of age 0+ and age 2+ fish in 2007 underscores the very low adult escapement and/or spawning in the Lolo Creek drainage. As in past years, the recent population data continues to indicate that steelhead trout production is very low in Lolo Creek. The less than optimal downstream survival of adults and juveniles has influenced the production, but the overall impacts are unknown at this time. In general, natural steelhead adults migrating and spawning within the Lolo Creek drainage is considered very low (most likely under 100 spawning pairs) in any given year.

***Existing Population Condition in Middle Fork Clearwater River:*** Adult steelhead trout continue to hold in the mainstem Middle Fork Clearwater River during the winter period and spring months. Although, some rearing of juvenile steelhead trout may occur within the mainstem Middle Fork Clearwater River, production most likely occurs within the few tributaries that provide spawning habitat.

***Existing Population Condition in Lochsa River:*** The Lochsa River System has been a significant producer of summer steelhead trout in the Clearwater River subbasin. Espinosa (1983) estimated that the Lochsa river system (within the Forest) is capable of producing 250,000 steelhead trout smolts at full seeding and habitat capability. In the Clearwater River subbasin, run estimates for wild and natural steelhead trout have ranged from a low of near 1,000 in 1975-77 to a high of 8-9,000 in 1982-83 (Nez Perce Tribe and Idaho Department of Fish and Game 1990). More recent escapement of wild steelhead trout over Lower Granite Dam has been estimated about 1000 adults of the B-run stock for the 1993-94 and 1994-95 run years (IDFG 1995). IDFG estimates that approximately 80% (800 fish) are destined for the upper Clearwater River drainages (Lochsa River and Selway River drainages).

Efforts to restore steelhead trout populations with hatchery supplementations were of short duration (1972-1982). Over seven million steelhead fry (age 0+) and about 2,500 excess adult steelhead trout (from Dworshak National Fish Hatchery) have been outplanted in the Lochsa River drainage. The past steelhead trout releases into the Lochsa River drainage most likely did not affect the overall wild populations as the releases consisted of relatively low numbers of fish of an early life stage. The survivability of these fish to returning adults would be minimal and inconsequential to the overall spawning population of any one year.

Current management does not include any hatchery supplementation within the Lochsa River drainage. Current adult returns are considered to be mostly (if not all) wild steelhead trout progeny. Currently, the entire Lochsa River population, including those in the analysis area, is designated as "wild" by the IDFG since no hatchery fish are currently being planted in the system. During the early 1980's, a change in policy to manage the Lochsa River drainage for wild steelhead trout production ended stocking hatchery steelhead into the Lochsa River drainage.

The Lochsa River drainage produces low to moderate numbers of steelhead trout due to overall low adult escapement. Fish population inventories have found juvenile steelhead rearing and in most cases indicating spawning occurred in most of the major tributaries accessible to steelhead migration within the Lochsa River subbasin. Other smaller tributaries may have sporadic spawning and/or rearing as fish population surveys on most of the streams were only conducted during a single survey. Besides a few

major drainages that have strong populations of wild steelhead trout (Fish Creek and Boulder Creek in the lower Lochsa River drainage), the adults returns are scattered in small numbers to numerous drainages.

**Existing Habitat Conditions and Environmental Baseline:** Historical and current information regarding the physical and biological characteristics of the Potlatch River, Lolo Creek, North Fork Clearwater River and Lochsa River watersheds are presented in the Section 7 Watershed Biological Assessments for these drainages (U.S.D.A. Forest Service - Clearwater National Forest 2000a, 1998, 2000b and 1999 respectively). These biological assessments also summarized the overall presence/absence, relative abundance, habitat conditions, current trends and the environmental baseline for steelhead trout in the major drainages.

Since the 1997, no natural or anthropogenic events occurred within these drainages on USFS lands that caused substantial changes to the aquatic environment. Instream conditions and riparian conditions have not shown any substantial changes due to climatic, spring stream flows, erosion (sedimentation due to surface and mass wasting events), and management activities (i.e. roads, vegetative treatments, mining and grazing). Although several years (2000, 2003, 2006-2007) of relatively large wildfires have occurred in the upper North Fork Clearwater River and Lochsa River drainages, the effects were localized and did not lead to substantial changes to aquatic conditions.

#### **Threatened Fish Species - Bull Trout (*Salvelinus confluentus*)**

Historical range of bull trout in the Snake River basin approximated that of Chinook salmon (Rieman and McIntyre 1993); available evidence indicates bull trout range is about half what it used to be.

**Life History:** Bull trout are found in cold-water streams, rivers, and lakes. Bull trout exhibit both resident and migratory life history strategies (Rieman and McIntyre, 1993). Resident bull trout complete their entire life cycle in the tributary or nearby stream in which they spawn and rear, whereas migratory bull trout spawn and rear in tributary streams, then move to a larger stream or river and grow larger before returning to a small stream to spawn. Resident adults range from 150 to 300 millimeters in length while migratory fish commonly exceed 600 millimeters. Resident and migratory forms may be found together, and either form may give rise to offspring exhibiting either resident or migratory behavior (Rieman and McIntyre, 1993).

Spawning occurs in clear, headwater streams with a gravel or rubble bottom. Most information indicates bull trout mature when they are between five and seven years of age and they may spawn each year or in alternate years. In the spring, migratory adults return to spawning streams from rivers or lakes. Spawning occurs from mid-August to November and begins when stream temperatures fall between 5 and 9 degrees Celsius. Eggs hatch in January and the fry remain within the gravel until early spring. Migratory, adfluvial juveniles migrate to the lakes and larger rivers by mid-summer. Migratory, fluvial juveniles may rear in tributary streams for three to four years before recruiting to larger streams and rivers.

**Historical Population Condition in the Clearwater River Subbasin:** Bull trout were most likely present throughout the Clearwater River subbasin. However, bull trout were historically less well-distributed throughout their range than other salmonid species, and although they were found in a variety of habitats, distribution was patchy, and spawning and juvenile rearing appeared to be restricted to the coldest stream reaches. Bull trout are believed to be a glacial relict (McPhail and Lindsey 1986), and their distribution probably contracted and expanded periodically with natural climate change. Like westslope cutthroat, bull trout were most likely present in the non-migratory resident variety and the

larger adfluvial type that migrates to the larger rivers. The range of bull trout within the lower mainstem Clearwater River drainage was probably confined to the upper Potlatch River and Lolo Creek drainages; other tributaries may have had smaller resident populations. Fluvial and resident populations were most likely found in nearly all accessible tributaries within the North Fork Clearwater River and Lochsa River drainages. The overall abundance of these fish was dependent upon the food source (juvenile chinook salmon, steelhead trout, cutthroat trout and other fish species) as well as the overall habitat conditions for the specific streams.

**Existing Population Condition in the Clearwater River Subbasin:** Within the Clearwater National Forest bull trout currently spawn and rear in the several accessible tributaries within the Lochsa River and North Fork Clearwater River. Larger fluvial bull trout rear in the mainstems Lochsa River and North Fork Clearwater River while spawning in various tributaries. Two small populations of adfluvial bull trout have been identified in the two high mountain lakes (both named Fish Lake) within the upper North Fork Clearwater River and lower Lochsa River drainages. A more recent adfluvial population has developed as a result of Dworshak Reservoir.

**Existing Population Condition in the Potlatch River:** Surveys have indicated that bull trout are either very rare or nonexistent within the Potlatch River drainage; there is no evidence of any viable populations currently inhabiting the drainage. Within the Potlatch River drainage, one juvenile bull trout was observed in 1990 during a fish population survey in Feather Creek, a tributary of the West Fork Potlatch River (Clearwater BioStudies, Inc. 1991). Another sighting was documented by USFS personnel in the same area of Feather Creek the following summer. These observations were judged to be very unusual due to the strong brook trout populations and high summer water temperatures within the upper Potlatch River system. In 1995, an intensive fish population survey was conducted within the Feather Creek drainage and other areas within the upper Potlatch River drainage to document the presence/absence of bull trout and other salmonid species. The surveys did not report any observations of bull trout in the upper Potlatch River system (Clearwater BioStudies, Inc. 1996). During the summers of 2003 and 2004, IDFG conducted fish population surveys via electrofishing and snorkeling on 17 streams throughout the Potlatch River drainage; the surveys did not find any bull trout at the 134 monitoring sites (Bowersox and Brindza 2006). In summary, a stray bull trout or two may be present within the cooler tributaries of the Potlatch River drainage, but there is no evidence of any viable populations currently inhabiting the drainage.

**Existing Population Condition in the North Fork Clearwater River:** Current data suggests that bull trout populations are depressed in the mainstem North Fork Clearwater River and its fish bearing streams. Historical and current information regarding the physical and biological characteristics of the North Fork Clearwater River watershed are presented in the Section 7 Watershed Biological Assessment for the North Fork Clearwater River Drainage, dated January 31, 2000 (U.S.D.A. Forest Service - Clearwater National Forest 2000b). This biological assessment also summarized the overall presence/absence, relative abundance, habitat conditions and current trends for bull trout in the North Fork Clearwater River drainage. Another two documents summarized the status of bull trout using presence/absence data within the North Fork Clearwater River drainage (Murphy et al. 1995 and Clearwater Basin Bull Trout Technical Advisory Team 1998).

Adult bull trout routinely use the North Fork Clearwater River in the winter and early spring and ascended the river as temperature increased in the spring for summer rearing and fall spawning activities. Presently, bull trout occur throughout the North Fork Clearwater River subbasin, however, recent fish population data shows the major populations to be located within the upper North Fork Clearwater River drainage (upstream Long Creek), Lake Creek, Long Creek, Skull Creek, upper Kelly

Creek, and upper Weitas Creek drainages. Small resident populations and/or fluvial populations may occur within numerous major fish bearing streams. Recent surveys have only documented individuals in Cayuse, Isabella, Quartz, Rock, Elizabeth, Hidden and Stolen, Swamp and Osier creeks; no major spawning and early rearing areas have been identified in these streams. There is a potential for bull trout adults or sub-adults to occur in any accessible tributary, since fluvial adult and subadult bull trout are very nomadic. They may use streams in the analysis area or any of their accessible tributaries as foraging or refuge habitat.

***Existing Population Condition in the Orofino Creek:*** USFS lands within the Orofino Creek drainage are located approximately 10 to 30 miles upstream of two natural rock cataracts/falls that are complete migration barriers to anadromous and inland fish. No recent documentation of bull trout in upper Orofino Creek are known. Bull trout rearing conditions in lower Orofino Creek are rated as poor due to high water temperatures and overall poor habitat conditions. It is highly probable that if streams in the Orofino Creek drainage ever had bull trout, either habitat degradation or hybridization with introduced brook trout, eliminated bull trout.

***Existing Population Condition in the Lolo Creek:*** Westslope cutthroat trout is the dominant fish species in the headwater streams, with strong populations of brook trout in the Musselshell Creek drainage a few scattered populations in the Yoosa Creek drainage. The Lolo Creek drainage was probably within the historical range of bull trout, but the populations have since reduced to a few individuals. Between 1974 and 2007, very few bull trout have been observed through fish population monitoring via snorkeling and electrofishing surveys in the Lolo Creek drainage. The State of Idaho (1998) reported in the "Lower Clearwater River Bull Trout Problem Assessment" that several bull trout have been observed in the mainstem of Lolo Creek between 1987 and 1994. USFWS, BLM, IDFG and Nez Perce Tribe monitoring efforts have observed individual bull trout during snorkeling surveys in the mainstem Lolo Creek and/or monitoring the Nez Perce Tribe's juvenile trapping facility (upstream of Eldorado Creek) in 1987, 1990, 1993-1995, 1998-2000, and 2003-2004. In these years, a total of 19 bull trout were observed. No observations of bull trout have been documented by these agencies or the Forest during monitoring activities in 1996-1997, 2001-2002 and 2005-2007. Bull trout have not been observed in the Eldorado Creek, Musselshell Creek or Yoosa Creek drainages; the extent of bull trout spawning/production is assumed very low to nonexistent. Habitat conditions and warmer temperature regimes limit bull trout production in the Lolo Creek drainage.

Overall, the fish population data does not indicate any bull trout spawning and early rearing in the Lolo Creek drainage. However, fish population surveys over the past 23 years have documented juvenile bull trout at a few sampling sites throughout the mainstem Lolo Creek (U.S.D.A. Forest Service - Clearwater National Forest 2008). A summary of the available fish population data shows that between 1985 and 2007, a total of 642 snorkel stations were surveyed within the mainstem Lolo Creek and bull trout juveniles or sub-adults were observed at nine monitoring sites. The probability of finding bull trout in the tributary streams is very minimal as no occurrences of bull trout were documented at the 363 monitoring sites.

***Existing Population Condition in Middle Fork Clearwater River:*** Historically, adult bull trout routinely used the mainstem Middle Fork Clearwater River in the winter and early spring and migrated into the Lochsa River and Selway River drainages as temperature increased in the spring for summer rearing and fall spawning activities. Current data suggests that bull trout populations continue to use the mainstem Middle Fork Clearwater River during the winter period. With the exception of its largest tributary, Clear Creek, fish population surveys have not documented bull trout spawning or rearing within tributaries located on the Clearwater National Forest.

**Existing Population Condition in Lochsa River:** The status and distribution of bull trout in the Lochsa River was recently completed for the Upper Columbia River EIS. Population status as defined as "strong" or depressed" populations were determined for all sub-watersheds in the Lochsa River drainage. Current data indicates that bull trout populations are present and considered "depressed" in most of the tributaries of the upper Lochsa River, upstream of migration barriers that have blocked anadromous fish migration. The only exception was Waw'aalamnine (Squaw) Creek, which had a "strong" population due to the moderately high densities of juvenile bull trout and major evidence of bull trout spawning.

Adult bull trout routinely use the Lochsa River in the winter and early spring and ascended the river as temperature increased in the spring for summer rearing and fall spawning activities. Current data suggests that bull trout populations are depressed in the mainstem Lochsa River and its fish bearing streams. Presently, bull trout occur throughout the Lochsa River subbasin however, recent fish population data shows the major populations to be located mostly within the upper Lochsa River drainage (upstream Post Office Creek), Waw'aalamnine (Squaw) Creek, Storm Creek, and upper Crooked Fork Creek and Colt Killed Creek drainages. Small resident populations and/or fluvial populations occur within a few smaller fish bearing streams including, Beaver, Haskell, Rock, Shotgun, Imnamatnoon (Papoose), Wendover, Badger and Fox creeks. Small resident populations and/or fluvial populations may also occur within the major fish bearing streams in the lower Lochsa River drainage, but surveys have only documented individuals in Fish Creek, Fire Creek, Bald Mountain Creek; no major spawning and early rearing areas have been identified. There is a potential for bull trout adults or sub-adults to occur in any accessible tributary, since fluvial adult and subadult bull trout are very nomadic. They may use streams in the analysis area or any of their accessible tributaries as foraging or refuge habitat.

**Existing Habitat Conditions and Environmental Baseline:** Historical and current information regarding the physical and biological characteristics of the Potlatch River, Lolo Creek, North Fork Clearwater River and Lochsa River watersheds are presented in the Section 7 Watershed Biological Assessments for these drainages (U.S.D.A. Forest Service - Clearwater National Forest 2000a, 1998, 1999 and 2000b respectively). These biological assessments also summarized the overall presence/absence, relative abundance, habitat conditions and current trends for bull trout in the respective drainages. Another two documents summarized the status of bull trout using presence/absence data within the North Fork Clearwater River drainage (Murphy et al. 1995 and Clearwater Basin Bull Trout Technical Advisory Team 1998).

Since the 1997, no natural or anthropogenic events occurred within these drainages on USFSS lands that caused substantial changes to the aquatic environment. Instream conditions and riparian conditions have not shown any substantial changes due to climatic, spring stream flows, erosion (sedimentation due to surface and mass wasting events), and management activities (i.e. roads, vegetative treatments, mining and grazing). Although several years (2000, 2003, 2006-2007) of relatively large wildfires have occurred in the upper North Fork Clearwater River and Lochsa River drainages, the effects were localized and did not lead to substantial changes to aquatic conditions.

#### **Threatened Plant Species – Water Howellia (*Howellia aquatilis*)**

Water howellia is an annual plant, reproducing entirely by seed. The plant is predominantly a winter annual with germination taking place in the fall and seedlings over-wintering and resuming growth in the spring. Emergent flowers bloom soon after the stems reach the water surface and are present from June into August. Seed dispersal starts in June from submerged flowers and extends until late summer from emergent flowers (Shelly and Gamon 1996). Spread of seeds by waterfowl or other animals

between ponds, though possible, has not been documented.

The most common habitat for *Howellia aquatilis* is small, vernal, freshwater wetlands and ponds with an annual cycle of filling with water and drying up late in the season. At the Latah County, Idaho site, vegetation is a mosaic of riparian shrubland and meadows with inclusions of mature conifers. This site is located on the floodplain of the Palouse River near the small town of Harvard, where water *howellia* has been observed in a few, closely-adjacent ponds. Water *howellia* populations and pond water depths at the site have been monitored since 1999. This site is privately owned and has been used for cattle grazing in the past, but is not currently grazed (Lichhardt and Mosely 2000). Extensive searches in 1988, the early 1990s, and especially 1994 failed to locate any additional occurrences in Idaho (Shelly and Mosely 1988, Shelly and Gamon 1996). Surveys in 2008 identified some additional sites near the original location in similar habitats.

The quality habitat found in the Harvard area does not occur on the Clearwater National Forest. However, potentially suitable habitat providing vernal pools and wetlands can be found elsewhere on the Palouse Ranger District. As compared to the occupied habitats, these sites would only provide marginal habitat. The riparian shrub habitats and meadows in the upper Palouse Basin may provide habitat, but the potentially suitable habitat is adjacent, and not likely on Forest Service lands. The extensive meadow country in the headwaters of the Potlatch Basin may also provide habitat, but most of these areas have been surveyed closely in the past with negative results. Potentially suitable habitats may occur in the extensive swamps of Elk Creek near Elk River where seasonally variable water levels and pools occur. This habitat has never been surveyed for water *howellia* and is generally not accessible.

### Effects Analysis

The primary reason for travel planning is to designate roads and trails for particular uses and eliminate or designate cross-country motorized and bicycle travel. This is essentially a planning process and will only designate existing roads and trails as open or closed to motorized traffic. The project proposal and the associated analyses did not evaluate the needs to construct, reconstruct and decommission roads or trails on the Clearwater National Forest. The Forest has completed a forest-wide road analysis to validate the needs for arterial, collector and important local roads. Plans to construct new routes, reconstruct existing routes and/or decommission routes will be covered in separate, site-specific NEPA analysis and ESA consultations.

The project proposal primarily involves changes to cross country motorized and bicycle travel, trail use and snowmobile use (Table 1). In addition to the elimination of cross country travel via motorized vehicles and bicycles, the total miles of trails open to motorized travel will be reduced by 29 percent. No new motorized routes will be permitted thereby avoiding impacts in the riparian areas. Finally, the total area open to snowmobile use was reduced by 13 percent. Overall the project proposal does not propose any new ground-disturbing activities and will actually reduce the amount of acreage subjected to a higher risk of various resource impacts.

### Threatened Fish Species - Fall Chinook Salmon (*Oncorhynchus tshawytscha*)

**Effects of Project Proposal:** Since fall Chinook salmon do not spawn within streams located within the Clearwater National Forest, direct or indirect impacts to fall Chinook salmon spawning, incubation and early rearing are not expected. Incidental rearing and migration of fall Chinook salmon does occur within the mainstem Middle Fork Clearwater River drainage within the Forest's boundary. However no changes to existing motorized routes are proposed within the Middle Fork Clearwater River drainage. The potential impacts from the proposed motorized activities on the other fish populations (i.e. steelhead trout and bull trout) and their habitats are expected to be insignificant and discountable in the majority of

the drainages. Therefore, the potential effects to fall Chinook salmon in the mainstem Clearwater River and Middle Fork Clearwater River are considered nonexistent (see below).

**Cumulative Effects:** The effects of the Travel Plan on fish bearing streams upstream of fall Chinook salmon habitat are expected to be nonexistent or negligible and thereby insignificant, and will not lead to cumulatively significant impacts when other Federal or State and private actions are considered. The proposed Travel Plan would eliminate unrestricted cross-country motorized travel and decrease the potential for wetland, riparian, and streambank degradation and associated erosion and sedimentation. These off-route restrictions would reduce the current potential for adverse cumulative effects from motorized use on the Forest. In addition to cross-country travel restrictions, the Travel Plan would reduce motorized trail densities (upland and riparian), the miles of trail in riparian areas open to motorized use, and the number of motorized stream crossings. These actions would also reduce the cumulative effects of motorized use on riparian and aquatic conditions. Any cumulative effects would be most noticeable at the site scale, becoming progressively less discernable at the subwatershed, watershed and sub-basin scales.

#### **Threatened Fish Species - Steelhead Trout (*Oncorhynchus mykiss*)**

**Potential Effects of Motorized Travel:** The greatest potential for the transportation system to impact watershed resources is at the stream crossings (U.S.D.A. Forest Service 2003). Stream crossings include fords, culverts, puncheons and bridges. Potential impacts related to use (motorized and non-motorized) at stream crossings include erosion at the site, delivery of surface erosion and delivery of other pollutants, such as chemical spills, oils, or herbicides (Ouren et al. 2007). Road and trail approaches to stream crossings may provide a direct conduit to the stream for eroded soils if located on steep grades (Taylor 1999). Inadequate drainage structures exacerbate sedimentation, and often present barriers to passage for fish and other aquatic organisms (Furniss et. al. 1991). Besides the potential impacts to habitat conditions (i.e. substrate conditions, stream banks and riparian vegetation) stream crossings on fish-bearing streams may have direct impacts to fish populations. The primary concern would involve potential disturbances to spawning areas (redds) via motorized use.

Crossing streams via motorized vehicles and motorized use within riparian areas have the potential to affect steelhead trout directly by impacting spawning activities (including redds) and displacement of fish or indirectly through altered habitat conditions. Redd disturbance would have the greatest impacts to steelhead trout populations. Erosion and subsequent sediment delivery to streams at the stream crossings may degrade substrate conditions at the stream crossing area and various distances downstream. Vegetative removal activities to maintain stream crossings also have the potential to also affect steelhead trout indirectly through altered habitat conditions.

#### **Effects of Project Proposal:**

##### *Impacts from Motorized Use of Roads*

The proposed Travel Plan authorizes minor changes for roads regarding allowable use and timing restrictions; no new construction or decommissioning is proposed. Since all the general road densities do not notably differ among the existing conditions and the proposed Travel Plan, the effects of motorized use of roads on aquatic resources are anticipated to be similar to those currently observed in the existing condition.

Stream crossings via road fords and associated motorized use have the potential to cause changes in stream bank integrity, quantity and quality of instream cover and substrate conditions at the crossing

sites. Within the subbasins with steelhead trout habitat, only one stream crossing via road ford is available for motorized use. This ford is located within the Wendover Campground on Wendover Creek and is scheduled to be upgraded to a low water bridge crossing in 2010. Other than issues regarding undersized culverts and fish passage on existing roads (which are outside the scope of the Travel Plan) motorized use of stream crossings on existing roads as proposed in the Travel Plan are expected to have minimal effects on the aquatic resources.

#### *Impacts from Motorized Use of Trails*

The proposed Travel Plan would lower the trail density open to motorized traffic compared to existing conditions. These reductions in motorized trail densities are most notable in the upper North Fork Clearwater River subbasin (outside the current extent of steelhead trout). A slight decrease in trail densities would occur in the mainstem Clearwater River subbasin; no change is planned in the other two anadromous areas on the Forest (Middle Fork Clearwater River and Lochsa River subbasins).

The proposed Travel Plan substantially reduces the number of stream crossing open to motorized use compared to the existing conditions. The majority of the existing 1,091 stream crossings (71 percent) are located within non-anadromous drainages (North Fork Clearwater River and Palouse River subbasins). Under the proposed Travel Plan the existing “undefined” trails across the Forest would be classified as non-motorized. Most of the 288 existing “undefined” stream crossings which currently have no closure on them and may or may not be receiving any motorized use (274) would be closed to motorized use. In addition the proposed Travel Plan would reduce the number of stream crossings open to motorized use from 817 to 543 (34 percent reduction). Within the steelhead trout range the proposal would reduce the number of stream crossings in the mainstem Clearwater River and Lochsa River subbasins by 25 and 36 percent respectively; no change would occur in the Middle Fork Clearwater River subbasin (Appendix C – Table 1).

The proposed Travel Plan would maintain three motorized crossings on streams inhabited with steelhead trout. Stream crossings on Fish Creek, Ceanothus Creek and Poker Creek are most likely fords which may or may have spawning habitat at the crossings. Map #10 (Appendix D) shows the locations of these stream crossings.

#### *Impact from Motorized Use within Riparian Areas*

Roads and trails open to motorized travel in riparian areas can be considered a primary source of sediment and associated effects on aquatic species and habitat. Compared to the previous indicators that evaluated effects of overall road and trail densities (upland and riparian), effects analysis through this indicator likely provides a more critical evaluation of the potential effects of the proposed Travel Plan on aquatic resources since it is focused on stream-adjacent riparian route designations.

The proposed Travel Plan has slightly less miles of road in riparian areas open to motorized traffic than existing conditions. This difference is less than 1% for the entire project area and a maximum difference of 1.6% at the HUC4 scale in the upper North Fork Clearwater River subbasin. At the HUC5 scale, differences in motorized road miles between existing conditions and the proposed Travel Plan are also very limited. The maximum difference in motorized road miles across the entire project area is in the Skull Creek watershed (UNFC sub-basin) where motorized trail miles are reduced from 15 miles to 11 miles, with no change in miles adjacent to fish-bearing streams. These slight differences at the HUC4 and HUC5 scale are considered marginal and that effects of the proposed Travel Plan on erosion, sedimentation, and aquatic resources from motorized travel on the road system would similar to those observed in the existing condition.

Trail miles open to motorized travel in riparian areas can be primary source of sediment especially in roadless areas. As with road density analysis, the effects of overall trail density (upland and riparian) does not provide adequate information regarding effects to the aquatic environment; effects analysis of the trail miles open to motorized travel in riparian areas most likely provides a more critical evaluation of the potential effects of the proposed Travel Plan on aquatic resources since it is focused on stream-adjacent riparian trail designations. The proposed Travel Plan would reduce the total miles of trails open to motorized use in the riparian areas (Appendix C – Table 2). Within the steelhead trout range the proposal would reduce the number of miles of riparian trail open to motorized use within the Lolo Creek drainage 62 percent (eight miles to three miles) and in the mainstem Clearwater River and Lochsa River subbasins by 44 and 31 percent respectively; no change would occur in the Middle Fork Clearwater River subbasin.

The primary concern with motorized use of the trails is the potential of fish spawning at stream crossings which would increase the risks of direct or indirect effects to localized fish populations; motorized use may directly affect fish by redd disturbance or indirectly via sedimentation if the redd is immediately downstream of the crossing (see *spawning/incubation/early rearing* section below).

Motorized use of the trail stream crossings also has the potential to cause changes in stream bank integrity, quantity and quality of instream cover and substrate conditions at the crossing sites. In most cases, the changes to these three habitat components are localized and are limited in scope, both spatially and temporally across the Forest and in any specific drainage. Stream fords (which are relatively few across the Forest – see below) have hardened approaches to minimize erosion and subsequent sedimentation; the trail maintenance program provides a mechanism to mitigate adverse changes or trends in trail conditions. The “footprint” of these approaches on the stream banks are usually maintained to the trail width with vegetative alterations extending a few feet on either side of the trail. Therefore, the overall changes in water quality conditions (i.e. turbidity and suspended sediment levels) that may occur at the crossing sites are expected to be relatively minor in scale and duration. Any substrate changes and redistribution of fine sediment produced by motorized use would be localized and not measurable in stream reaches downstream of the crossing location. No additional effects to other habitat conditions (i.e. pool habitat, woody debris, water temperatures, etc...) are expected as a result of motorized use of the existing trail crossings.

The relatively low number of stream fords on fish bearing streams indicates that motorized use of these fords may have localized effects to individual streams but overall effects to any one drainage (HUC5) is expected to be minimal. For example, out of the 543 stream crossings that may have motorized travel under the proposed Travel Plan, the majority of the crossings (90-95 percent) have culverts or puncheons to avoid travel into the stream channel. The number of stream fords across fish-bearing and nonfish-bearing streams is estimated from 26 to 51 (5 -10 percent when the 28 bridges are excluded). Approximately 87-88 crossings are located on fish-bearing streams (16 percent).

Three stream crossings on streams that have been documented as fish bearing within steelhead trout watersheds were evaluated in 2010. These included mainstem Fish Creek, Ceanothus Creek and Poker Creek (trails #2240, #229 and #225) within the Fish Creek drainage. The field reviews did not find any notable spawning habitat at the stream crossings (Appendix E). Soil disturbance was observed to be within the expected size and magnitude and limited to the trail. The larger streams did not show any changes in substrate conditions at the trail stream crossings as compared to upstream or downstream stream reaches. At several smaller crossings, instream conditions (i.e. substrate conditions) showed localized substrate disturbance (primarily loosen materials with some pockets of fine sediment). Other than expected widening of the stream channel at the crossing, none of the stream crossings showed any notable stream channel alterations that can be attributed from past erosion events as a result of motorized or non-motorized use.

The field review also evaluated another four potentially fish-bearing streams within the Fish Creek

drainage that had trail fords; although some may have potential for westslope cutthroat trout (especially downstream of the crossings) none of these streams were large enough to provide habitat for steelhead trout or bull trout at the stream crossings. Similar to the larger crossings, impacts were restricted to the crossings and were relatively minor; some hardening of the approaches will be recommended during future trail maintenance work.

In addition to the motorized trail crossings, authorization of existing dispersed recreation sites within the riparian conservation areas (RCAs), as defined by PACFISH and INFISH amendments to the Forest Plan, may cause impacts to listed or sensitive fish species. Some of these existing recreational sites extend to or below the normal high water area and may cause channel alterations or sedimentation especially if vehicles are permitted into these areas. Under the proposed Travel Plan, motorized travel would only be allowed on existing tracks leading to existing dispersed recreation sites and off-route stream crossings would be prohibited. The establishment of new off-route tracks or dispersed recreation sites would be prohibited. Compared to the existing condition, the more restrictive off-route motorized travel exceptions is expected to substantially reduce the risk of riparian and streambank degradation, erosion, sedimentation, and aquatic habitat disturbance due to off-route motorized travel and dispersed recreational use (see *rearing* section below).

The use of existing recreation sites (primarily the access) within the riparian areas may retard the recovery of vegetative conditions in relatively small areas within the riparian areas, but effects to stream channels (i.e. stream banks, sedimentation) is expected to be nonexistent or minimal on most streams. In most cases, the riparian recreation sites are located along the mainstem rivers (i.e. Lochsa River and North Fork Clearwater River) or larger streams which do not have spawning habitat adjacent to the sites. As stated in the monitoring plan, the Forest will evaluate existing access routes into dispersed campsites within the riparian areas of streams with listed fish species to document the site and determine if any corrective actions are necessary. Where problems exist or occur in future the Forest will correct through appropriate actions (i.e. administratively or through the NEPA process). The documentation of the sites will be crucial to determine if any additional access routes to existing sites and new access routes to new dispersed sites are created in future years. During 2010, Forest assessed large portions of the mainstem North Fork Clearwater River (along roads #247 and #250) and Orogrande Creek (road #250) and identified over 50 recreation sites within the riparian areas (with motorized access). Of these sites, the Forest found that 14 sites needed some restoration action (via the placement of boulders and/or re-vegetation) to avoid an expanding “footprint” of the site and subsequent impact to streams.

#### *Assessment of the Potential Changes to the Environmental Baseline*

As noted above, the environmental baseline for various streams across the Forest have been summarized in previous documents using the Matrix of pathways and indicators of watershed conditions adapted for the Clearwater River Subbasin and Lower Salmon River. The potential and expected changes to these indicators during and following the implementation of the proposed Travel Plan are summarized below.

- *Effects to Watershed Condition Indicators:* Of the seven indicators, a positive response (restore) is expected on the riparian vegetation condition and the sediment yield indicators across the Forest; the elimination of cross county travel, reduction of motorized travel in riparian areas and the reduction of motorized trail miles (including stream crossings and riparian trails) expected to substantially reduce the risk of riparian and streambank degradation, erosion, sedimentation, and aquatic habitat disturbance due to off-route motorized travel and dispersed recreational use. No changes to watershed road density, streamside road density, landslide prone road density, peak/base flow and water yield indicators would occur.

- *Effects to Channel Condition Indicators:* The reduction of motorized trail stream crossings and trails within riparian areas would allow a positive response in the three indicators: width/depth ratio, streambank stability and floodplain connectivity. Although existing channel conditions and dynamics would be maintained at existing trail stream crossings, monitoring of selected critical trails, prompt restoration of problem areas and general trail maintenance are expected to reduce the risks to these indicators.
- *Effects to Water Quality Indicators:* No short-term (10-20 years) measurable changes in stream temperatures are expected due to the reduction of activities within the riparian conservation area (RCA). Slight-to-moderate restoration in overall riparian conditions are expected in some RCA's due to the elimination of cross county travel, reduction of motorized travel in riparian areas and the reduction of motorized trail miles (including stream crossings and riparian trails). The passive and active riparian restoration activities (outside the scope of this project) are expected to provide for long-term improvements (20-50 years) in stream temperatures (lower summer water temperatures).

A long-term decrease in suspended sediment is expected in most streams due to the elimination of cross county travel, reduction of motorized travel in riparian areas and the reduction of motorized trail miles (including stream crossings and riparian trails). Any substrate changes and redistribution of fine sediment produced by motorized use would be localized and not measurable in stream reaches downstream of the crossing location (see *Impact from Motorized Use within Riparian Areas* section above).

Due to the reduction of motorized stream trails and subsequent stream crossings, the chemical contaminants – nutrients indicator is expected to be slightly improved; lower risks of chemical contamination.

- *Effects to Habitat Access Indicators:* No activity is proposed which would create a barrier to adult or juvenile aquatic species.
- *Effects to Habitat Elements Indicators:* No changes in indicators regarding cobble embeddedness, percent surface fines, percent fines by depth are expected within any stream reach of fish-bearing streams. Any substrate changes and redistribution of fine sediment produced by motorized use would be localized and not measurable in stream reaches downstream of the crossing location (see *Impact from Motorized Use within Riparian Areas* section above).

Slight positive changes in indicators regarding large woody debris, pool frequency, off-channel habitat and habitat refugia are expected due to reduction of activities (i.e. motorized trail within riparian areas and stream crossings) and within the RCA.

- *Effects to Take Indicators:* No changes to the harassment, redd disturbance or juvenile harvest indicators for steelhead trout and bull trout are expected. The field reviews did not find spawning habitat at the trail crossings in the streams that have potential habitat for steelhead trout and bull trout. In addition the field reviews found marginal rearing habitat (holding areas) at the trail crossings which would substantially reduce the likelihood of harassment or injury to steelhead trout or bull trout juveniles via motorized vehicles. Due to limited changes to existing motorized roads, no road fords, and reduction in motorized trail stream crossings, the proposed Travel Plan is expected to reduce the risks to the take indicators. As a precautionary measure the Forest will monitor the 14 trail crossings on fish bearing streams to determine if future travel (motorized and non-motorized) at these stream crossings is causing direct or indirect aquatic

impacts on steelhead trout and bull trout (see Appendix B - Monitoring Plan). .

The effects to the take indicators via access to existing recreation sites within the riparian areas is also expected to be unchanged or slightly reduced via closures and site rehabilitation. It is recognized that people can harm fish from using soaps or detergents near water, and harass fish by throwing rocks, and playing in the stream. These indirect effects of travel management due to the authorization of access within the riparian areas are not expected to change. However, the effects are limited in scope and magnitude based on the locations of the dispersed sites. The majority of the dispersed sites are located along the mainstem rivers (i.e. Lochsa River, North Fork Clearwater River) or larger streams (downstream of critical spawning and rearing areas) which substantially reduce the likelihood of these indirect effects. Similar to the trail crossings, the Forest will monitor dispersed recreational sites and associated access to determine if existing dispersed recreational sites located within the Riparian Habitat Conservation Areas (RHCAs) and within drainages that have ESA listed fish species are meeting the standards and guidelines established to meet or not retard the attainment of the Riparian Management Objectives (as defined in PACFISH and INFINSH amendments to the Forest Plan).

- *Effects to Specific Bull Trout Indicators:* Due to limited changes to existing motorized roads, no road fords, and reduction in motorized trail stream crossings, the proposed Travel Plan is expected to reduce the risks to the five take indicators for bull trout. The field reviews did not find spawning habitat at the 14 trail crossings in the streams that have potential habitat for bull trout. In addition the field reviews found marginal rearing habitat (holding areas) at the trail crossings which would substantially reduce the likelihood of harassment or injury to bull trout juveniles via motorized vehicles. As a precautionary measure the Forest will monitor the 14 trail crossings on fish bearing streams to determine if future travel (motorized and non-motorized) at these stream crossings is causing direct or indirect aquatic impacts on bull trout (see Appendix B - Monitoring Plan). .

#### *Assessment of Potential Changes to Steelhead Trout*

*Spawning/incubation/early rearing:* As noted above, the primary concern regarding steelhead trout spawning is the potential to directly impact redds (via redd trampling or sedimentation) by motorized travel at stream crossings. However, field reviews did not find any notable spawning habitat at three stream crossings that would be maintained for motorized use within the Fish Creek drainage (Appendix E - Field notes #1 and #3). Due to the shallow nature of the trail crossings (i.e. no pools or deep runs for fish to hold), the risk of directly harming a fish is highly unlikely unless a fish happens to swim by when a motorcycle is crossing the stream.

Although motorized use of the trail stream crossings has the potential to cause changes in habitat conditions, such as stream bank integrity, quantity and quality of instream cover and substrate conditions at the crossing sites, the impacts are restricted to a small area relative to any stream reach and are considered to have minimal impacts to spawning, incubation and early rearing due to (1) hardened approaches and drainage improvements to minimize erosion and subsequent sedimentation, and (2) annual trail maintenance program. The field reviews found that soil disturbance was observed to be within the expected size and magnitude and limited to the trail. The three streams did not show any changes in substrate conditions at the trail stream crossings as compared to upstream or downstream stream reaches. Other than expected widening of the stream channel at the crossing, none of the stream crossings showed any notable stream channel alterations that can be attributed from past erosion events as a result of motorized or non-motorized use.

Based on these field reviews direct impacts to steelhead trout spawning and direct and indirect impacts to steelhead trout spawning habitat are expected to be non-existent or negligible due to the continual

motorized use of the trails within the Fish Creek drainage.

In addition to the motorized trail crossings, authorization of existing dispersed recreation sites within the riparian conservation areas (RCAs), as defined by PACFISH and INFISH amendments to the Forest Plan, may cause impacts to steelhead trout spawning, incubation and early rearing. Some of these existing recreational sites extend to or below the normal high water area and may cause channel alterations or sedimentation especially if vehicles are permitted into these areas. However the impacts of motorized use on most existing routes within the riparian areas are not expected to be of sufficient magnitude to affect steelhead trout spawning. In most cases, the riparian recreation sites are located along the mainstem rivers (i.e. Lochsa River) or larger streams which do not have spawning adjacent to the sites. Where sites are located on moderate to smaller streams with potential steelhead trout spawning habitat, the use of these sites during the spawning period is restricted by snow conditions on most years. In addition, the high stream flows during the spawning through incubation period reduce the risks of redd disturbance.

*Rearing:* Similar to impacts listed above for the spawning, incubation and early rearing period, impacts of motorized trail crossings to steelhead trout rearing is expected to be negligible due to (1) low number of crossings as fords, (2) marginal rearing habitat (holding areas) at the stream crossings, (3) hardened approaches and drainage improvements to minimize erosion and subsequent sedimentation, and (4) annual trail maintenance program. As noted above, under the proposed Travel Plan, motorized travel would only be allowed on existing tracks leading to existing dispersed recreation sites and off-route stream crossings would be prohibited. The establishment of new off-route tracks or dispersed recreation sites would be prohibited. Access to dispersed recreational sites (within the riparian areas) that are authorized under the Travel Plan will be inventoried to avoid user-created unauthorized sites and evaluated to assess impacts and restoration needs.

The use of existing recreation sites within the riparian areas may retard the recovery of vegetative conditions in relatively small areas within the riparian areas, but effects to stream channels (i.e. stream banks, sedimentation) is expected to be nonexistent or minimal on most streams. Where problems exist the Forest will correct through appropriate actions (i.e. administratively or through the NEPA process).

**Cumulative Effects:** As defined in 40 CFR 1508.7, “cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.”

Aquatic habitats on the Clearwater National Forest have been affected over the years by many types of activities. Road construction and maintenance, timber harvest, domestic livestock grazing, mining, trail construction and maintenance, road decommissioning, and instream restoration are all activities that have affected habitat and fish. Anadromous fish are also affected in varying degrees by conditions off the forest, including habitat in the mainstem rivers adjacent to the Forest, the Snake River, Columbia River, Columbia River estuary, and Pacific Ocean.

Past activities have indirectly affected aquatic resources through changes in watershed condition, sediment delivery and deposition, water temperature, large woody debris, recruitment, and surface and subsurface flow regimes. Direct effects have resulted from domestic livestock grazing in streamside areas, establishment of crossing structures at road/stream intersections and trail/stream intersections (e.g. culverts and bridges), construction of roads and trails in streamside areas, and in-channel mining. Many road/stream crossings become barriers to the migration of fish and other aquatic organisms. Road and trail stream crossings, fords in particular, are often sources of sedimentation. Watershed and instream restoration activities have been implemented to ameliorate the adverse effects of these actions in many

areas. These activities include road/trail crossing upgrades, road/trail decommissioning, stream channel reconstruction, large woody debris placement, riparian planting, and riparian fencing. These activities have occurred in various tributaries in the Lochsa River, North Fork Clearwater River, and mainstem Clearwater River (including the Lolo Creek and Potlatch River drainages).

Specifically changes to substrate conditions, summer water temperatures and various habitat conditions have been degraded in various degrees dependent upon the land ownership. Over the past decade, watershed and instream restoration activities have been implemented to ameliorate the adverse effects of previous land management actions in many areas. These activities include road/trail crossing upgrades, road/trail decommissioning, stream channel reconstruction, large woody debris placement, riparian planting, riparian fencing, PACFISH riparian buffers and the adherence of the PACFISH standards and guidelines. These activities have occurred in various tributaries in the Lochsa River, North Fork Clearwater River, and mainstem Clearwater River (including the Lolo Creek and Potlatch River drainages). The recovery trend regarding the aquatic resources is expected to be a slow process which will occur over many decades, especially considering improvements to substrate conditions and summer water temperatures. To avoid offsetting this improving trend, the Travel Plan was designed to avoid actions that would affect stream habitat conditions (i.e. sedimentation, riparian vegetation alterations, and stream flow alterations).

Current activities on USFS lands were analyzed in regards to the proposed Travel Plan and the associated cumulative effects to the aquatic resources. Ongoing activities include road maintenance, trail maintenance, road decommissioning, culvert replacement, fire suppression, noxious weed control, prescribed fire, and implementation of projects associated with Abes Animal, Cherry Dinner, Corralled Bear, Middle Black, Yakus, Robo Elk, White White and other smaller vegetative treatment projects. Cumulative effects were evaluated in each of the environmental analyses for these projects, and each project was designed to maintain or accelerate an improving trend in watershed and stream conditions. Permanent and temporary road construction has been completed or is scheduled under some of these projects; however, the road construction activities were designed to minimize or avoid effects to the aquatic resources (i.e. riparian areas, stream channel and water quality). Conversely, they included substantial miles of road decommissioning and other watershed and stream improvement projects. Road decommissioning results in reduced access to motorized vehicles.

The Forest has been working over the past couple decades to identify and minimize watershed impacts from riparian roads. Projects to minimize road effects have included closing roads to access, decommissioning unneeded roads, and upgrading drainage and surfacing on open collector or arterial roads. In addition, the Forest has been replacing fords in fish bearing streams on open roads with bridges or other structures.

Reasonably foreseeable actions include implementation of various administrative activities (i.e. road and trail maintenance, maintenance of developed recreation sites, noxious weed control), various fuel reduction, vegetation management and prescribed burning projects throughout the Lochsa River and North Fork Clearwater River drainages, Forest-wide pre-commercial thinning, Forest-wide road decommissioning and fish passage projects. These projects may result in short-term increases in sediment yield.

The effects of the Travel Plan on fish bearing streams are expected to be non-existent or negligible and thereby insignificant, and will not lead to cumulatively significant impacts when other Federal or State and private actions are considered. Although most indications point to an increasing trend in motorized use, the increased use and any subsequent impacts will be restricted to authorized routes; undesired impacts will be assessed and corrected via the trail maintenance program. The effects of the increased use is expected to be offset by the various changes proposed in the Travel Plan. As previously described above, the proposed Travel Plan would eliminate unrestricted cross-country motorized travel and

decrease the potential for wetland, riparian, and streambank degradation and associated erosion and sedimentation. These off-route restrictions would reduce the current potential for adverse cumulative effects from motorized use on the Forest. In addition to cross-country travel restrictions, the Travel Plan would reduce motorized trail densities (upland and riparian), the miles of trail in riparian areas open to motorized use, and the number of motorized stream crossings. These actions would also reduce the cumulative effects of motorized use on riparian and aquatic conditions. Cumulative effects of the action alternatives would be most noticeable at the site scale, becoming progressively less discernable at the subwatershed, watershed and subbasin scales.

**Cumulative Effects regarding State and Private Lands:** As defined in 50 CFR 402.02, cumulative efforts are “those effects of future state and private activities, not involving Federal activities that are reasonably certain to occur within the action area of the Federal action subject to consultation”. Activities on non-Forest lands (i.e. Idaho state lands, Nez Perce tribe, private lands) in the watersheds analyzed in this travel plan may contribute to cumulative effects. Activities that may influence erosion and sedimentation on the non-Forest lands include motorized use of roads and trails, cross-country motorized travel, timber harvests, prescribed burning, grazing, agriculture, and residential development. Idaho state lands and private lands are the most common non-Forest lands in the HUC5 watersheds used in this travel plan. Timber and grazing activities on Idaho State lands are subject to administrative inspection and guidance and are required to follow BMPs to reduce adverse effects to soil and water quality (i.e. erosion, sedimentation). It is expected that the potential for cumulative effects associated with state lands and private lands would be greater than on federal land. Based on land ownership percentages at the HUC5 subbasin scale, the potential for cumulative effects from non-Forest lands would be lowest in the Lochsa and Upper North Fork Clearwater subbasins where only 5% of the land area is in non-Forest ownership. The other HUC5 sub-basins have greater than 87% of the land area in non-Forest ownership, thus the potential for cumulative effects on aquatic resources from activities on non-Forest lands is considerable in these sub-basins. Overall, the potential and expected effects of the activities proposed under the Travel Plan are considered insignificant individually and will not lead to cumulatively significant impacts when other State and private actions are considered.

**Designated Critical Habitat – Steelhead Trout:** On September 2, 2005, critical habitat for the Snake River Basin steelhead trout was designated by NOAA Fisheries (U.S.D.C. NOAA Fisheries 2005) via final ruling published in the Federal Register (70 FR 52630). Within the proposed Travel Plan area (Clearwater National Forest), several subbasins and their tributaries were designated as critical habitat. These include the Potlatch River and Lolo Creek within the mainstem Clearwater River subbasin (17060306), Middle Fork Clearwater River subbasin (17060304) and the Lochsa River subbasin (17060303).

The designation of the mainstem and tributaries of the Clearwater River as critical steelhead trout habitat requires the Forest to confer with the NOAA Fisheries on any agency action which is likely to result in the destruction or adverse modification of proposed critical habitat. Regulations implementing Section 7(a) (2) of the ESA define destruction or adverse modification of critical habitat as alteration of primary constituent elements “that appreciable diminishes the value of critical habitat for both the survival and recovery of a listed species” (50 CFR 402.02). Of the six primary constituent elements listed in the proposed rule, three elements pertain to the Clearwater River subbasin (freshwater spawning sites, freshwater rearing sites, and freshwater migration corridors). Any potential impacts, regarding these three primary constituent elements requires the Forest to confer with the NOAA Fisheries. The potential impacts for the proposed Travel Plan are summarized below:

- “*Freshwater spawning sites with water quantity and quality conditions and substrate supporting spawning; incubation and larval development*”. As noted in the effects analysis above, the

proposed Travel Plan will have minimal effects to designated habitat in nearly all streams. Field reviews did not observe any notable spawning habitat at the three stream crossings that could have or potential could have steelhead trout spawning. Therefore, no impacts to steelhead trout redds (including incubation and larval development) are expected within the range of steelhead trout. Due to the shallow nature of the trail crossings (i.e. no pools or deep runs for fish to hold), the risk of directly harming a fish is highly unlikely unless a fish happens to swim by when a motorcycle is crossing the stream. The relative low number of stream crossings (3) regarding possible fords on fish bearing streams is expected to have minimum risks to spawning sites when considering the range of steelhead trout across the Forest.

- “*Freshwater rearing sites with:*
  - i. *Water quantity and floodplain connectivity to form and maintain physical habitat conditions and support juvenile growth and mobility;*
  - ii. *Water quality and forage supporting juvenile development; and*
  - iii. *Natural cover such as shade, submerged and overhanging large wood, log jams and beaver dams, aquatic vegetation, large rocks and boulders, side channels, and undercut banks.*” The changes to the riparian zone along streams with motorized trails and stream crossings are considered negligible in relation to the effects on rearing habitat. No changes to water quantity and floodplain connectivity are expected. Slight-to-moderate restoration in overall riparian conditions are expected in some RCA’s due to the elimination of cross county travel, reduction of motorized travel in riparian areas and the reduction of motorized trail miles (including stream crossings and riparian trails). Non-compliance of the cross country restriction and subsequent impacts to riparian areas including stream crossings will most likely occur on a limited basis during the first several years of the Plan; enforcement and prompt restoration is expected to minimize the effects. The adverse effects of these unauthorized routes are not expected to offset the benefits of the Travel Plan.
- “*Freshwater migration corridors free of obstruction and excessive predation with water quantity and quality conditions and natural cover such as submerged and overhanging large wood, aquatic vegetation, large rocks and boulders, side channels, and undercut banks supporting juvenile and adult mobility and survival.*” Activities proposed under the Travel Plan will not create any impediments to steelhead trout migration. No short-term changes in natural cover and shade are expected on streams with existing crossings. Due to the reduction in motorized trail crossings and motorized use within the riparian areas, long-term improvements of rearing habitat in terms of riparian conditions, potential large woody debris and subsequent acting woody debris, pool quantity and quality is expected. The use of motorized vehicles within the riparian areas elevates the risk of chemical contamination of streams via fuel spills (vehicles mishaps) or leakage of fuel or other petroleum products (especially at stream crossings). However, the authorized motorized vehicles for trails (motorcycles and ATV’s) have a limited fuel supply (between two and four gallons) which reduces the likelihood of substantial impacts due a mishap involving a fuel spill at a stream crossing. Additionally, vehicles are equipped with safety mechanisms to avoid fuel spillage if vehicles are overturned or on their side. Similarly motorized vehicles accessing dispersed recreational sites are not expected to have measurable impacts to water quality especially when vehicles are restricted to the access route and “foot print” of the dispersed site. As noted in a previous section, the Forest will evaluate existing access routes into dispersed campsites within the riparian areas of streams with listed fish species to document the site and determine if any corrective actions are necessary. Where problems exist or occur in future the Forest will correct through appropriate actions (i.e. administratively or through the NEPA process). Where needed, restoration actions (via the placement of boulders

and/or re-vegetation) to avoid an expanding “footprint” of the site and subsequent impact to streams will be completed. In general, due to the reduction of motorized stream trails and use within riparian areas, elimination of cross country travel and a reduction of stream crossings, the risks of chemical contaminants within the riparian areas are expected to be reduced.

#### **Threatened Fish Species - Bull Trout (*Salvelinus confluentus*)**

**Potential Effects of Motorized Travel:** The greatest potential for the transportation system to impact watershed resources is at the stream crossings (U.S.D.A. Forest Service 2003). Stream crossings include fords, culverts, puncheons and bridges. Potential impacts related to use (motorized and non-motorized) at stream crossings include erosion at the site, delivery of surface erosion and delivery of other pollutants, such as chemical spills, oils, or herbicides (Ouren et al. 2007). Road and trail approaches to stream crossings may provide a direct conduit to the stream for eroded soils if located on steep grades (Taylor 1999). Inadequate drainage structures exacerbate sedimentation, and often present barriers to passage for fish and other aquatic organisms (Furniss et. al. 1991). Besides the potential impacts to habitat conditions (i.e. substrate conditions, stream banks and riparian vegetation) stream crossings on fish-bearing streams may have direct impacts to fish populations. The primary concern would involve potential disturbances to spawning areas (redds) via motorized use.

Crossing streams via motorized vehicles and motorized use within riparian areas have the potential to affect bull trout directly by impacting spawning activities (including redds) and displacement of fish or indirectly through altered habitat conditions. Redd disturbance would have the greatest impacts to bull trout populations. Erosion and subsequent sediment delivery to streams at the stream crossings may degrade substrate conditions at the stream crossing area and various distances downstream. Vegetative removal activities to maintain stream crossings also have the potential to also affect bull trout indirectly through altered habitat conditions.

#### **Effects of Project Proposal:**

##### *Impacts from Motorized Use of Roads*

The proposed Travel Plan authorizes minor changes for roads regarding allowable use and timing restrictions; no new construction or decommissioning is proposed. Since all the general road densities do not notably differ among the existing conditions and the proposed Travel Plan, the effects of motorized use of roads on aquatic resources are anticipated to be similar to those currently observed in the existing condition.

Stream crossings via road fords and associated motorized use have the potential to cause changes in stream bank integrity, quantity and quality of instream cover and substrate conditions at the crossing sites. Within the subbasins with bull trout habitat, only two stream crossings via road ford is available for motorized use. One ford is located within the Wendover Campground on Wendover Creek and is scheduled to be upgraded to a low water bridge crossing in 2010. The other ford is located on USFS road #555 and crosses Johnagan Creek (Weitas Creek drainage) approximately 5.2 miles upstream of the mouth. Other than issues regarding undersized culverts and fish passage on existing roads (which are outside the scope of the Travel Plan) motorized use of stream crossings on existing roads as proposed in the Travel Plan are expected to have minimal effects on the aquatic resources.

##### *Impacts from Motorized Use of Trails*

The proposed Travel Plan would lower the trail density open to motorized traffic compared to existing

conditions. These reductions in motorized trail densities are most notable in the upper North Fork Clearwater River subbasin. The proposed Travel Plan would lower the motorized trail density in the upper North Fork Clearwater River subbasin sub-basin by 44% compared existing conditions. A slight decrease in trail densities would occur in the mainstem Clearwater River subbasin; no change is planned in the Middle Fork Clearwater River and Lochsa River subbasins.

The proposed Travel Plan substantially reduces the number of stream crossing open to motorized use compared to the existing conditions. The majority of the existing 1,091 stream crossings (71 percent) are located within the North Fork Clearwater River and Palouse River subbasins (Appendix C – Table 1). Under the proposed Travel Plan the existing “undefined” trails across the Forest would be classified as non-motorized. Most of the 288 existing “undefined” stream crossings which currently have no closure on them and may or may not be receiving any motorized use (274) would be closed to motorized use. In addition the proposed Travel Plan would reduce the number of stream crossings open to motorized use from 817 to 543 (34 percent reduction). Within the bull trout range the proposal would reduce the number of stream crossings in the North Fork Clearwater River by 66 percent and the mainstem Clearwater River and Lochsa River subbasins by 25 and 36 percent respectively; no change would occur in the Middle Fork Clearwater River subbasin.

The proposed Travel Plan would maintain 52 motorized crossings on fish bearing streams that may be inhabited with bull trout. The majority of these crossings are located in smaller headwater streams within the upper North Fork Clearwater River subbasin; the locations within these higher gradient smaller streams substantially reduce the likelihood of conflicts with bull trout (Appendix D). In the anadromous portion of the Forest, stream crossings on Fish Creek, Ceanothus Creek and Poker Creek would be maintained; these crossings are most likely fords which may or may have spawning habitat at the crossings. Map #10 (Appendix D) shows the locations of these stream crossings. No motorized trail stream crossings on potential bull trout streams are proposed in the Palouse River, Orofino Creek, Lolo Creek or Middle Fork Clearwater River drainages.

#### *Impact from Motorized Use within Riparian Areas*

Roads and trails open to motorized travel in riparian areas can be considered a primary source of sediment and associated effects on aquatic species and habitat. Compared to the previous indicators that evaluated effects of overall road and trail densities (upland and riparian), effects analysis through this indicator likely provides a more critical evaluation of the potential effects of the proposed Travel Plan on aquatic resources since it is focused on stream-adjacent riparian route designations.

The proposed Travel Plan has slightly less miles of road in riparian areas open to motorized traffic than existing conditions. This difference is less than 1% for the entire project area and a maximum difference of 1.6% at the HUC4 scale in the upper North Fork Clearwater River subbasin. At the HUC5 scale, differences in motorized road miles between existing conditions and the proposed Travel Plan are also very limited. The maximum difference in motorized road miles across the entire project area is in the Skull Creek watershed (upper North Fork Clearwater River subbasin) where motorized trail miles are reduced from 15 miles to 11 miles, with no change in miles adjacent to fish-bearing streams. These slight differences at the HUC4 and HUC5 scale are considered marginal and that effects of the proposed Travel Plan on erosion, sedimentation, and aquatic resources from motorized travel on the road system would similar to those observed in the existing condition.

Trail miles open to motorized travel in riparian areas can be primary source of sediment especially in roadless areas. As with road density analysis, the effects of overall trail density (upland and riparian) does not provide adequate information regarding effects to the aquatic environment; effects analysis of the trail miles open to motorized travel in riparian areas most likely provides a more critical evaluation

of the potential effects of the proposed Travel Plan on aquatic resources since it is focused on stream-adjacent riparian trail designations. The proposed Travel Plan would reduce the total miles of trails open to motorized use in the riparian areas (Appendix C – Table 2). The most notable differences are located within the upper North Fork Clearwater subbasin, where substantially fewer miles of riparian trail open to motorized use is expected to reduce existing erosional sources and risks of sedimentation and adverse impacts to aquatic habitat and species. Specific to the upper North Fork Clearwater River subbasin, the greatest differences by HUC5 are in the Cayuse Creek watershed, where trail miles open to motorized use would be reduced from the existing 29 miles to 3 miles in the proposed Travel Plan. In the Kelly Creek watershed, trail miles open to motorized use would be reduced from the existing 12 miles to none in the proposed Travel Plan. Substantial differences in motorized riparian trail miles are also seen in Weitas Creek where motorized riparian trail miles would be reduced from 49 miles to 17 miles. In Skull Creek, the existing 8 miles of riparian trail currently open to motorized use would be closed to motorized use. In the upper North Fork Clearwater River subbasin, and particularly within the specific HUC5 watersheds mentioned above, the proposed Travel Plan will likely decrease the risk of riparian and streambank degradation, erosion, sedimentation and aquatic habitat disturbance through the notable reductions in trail miles open to motorized use and associated off-route motorized use.

The proposed Travel Plan would also reduce the total miles of trails open to motorized use in the riparian areas within the other drainages on Forest. The miles of trail within the Lolo Creek drainage will be reduced from eight miles to three miles. The proposal would reduce the number of miles of riparian trail open to motorized use in the mainstem Clearwater River and Lochsa River subbasins by 44 and 31 percent respectively; no change would occur in the Potlatch River, Orofino Creek and Middle Fork Clearwater River drainages.

Motorized use of the trail stream crossings has the potential to cause changes in stream bank integrity, quantity and quality of instream cover and substrate conditions at the crossing sites. In most cases, the changes to these three habitat components are localized and are limited in scope, both spatially and temporally across the Forest and in any specific drainage. Stream fords (which are relatively few across the Forest – see steelhead discussion) have hardened approaches to minimize erosion and subsequent sedimentation; the trail maintenance program provides a mechanism to mitigate adverse changes or trends in trail conditions. The “footprint” of these approaches on the stream banks are usually maintained to the trail width with vegetative alterations extending a few feet on either side of the trail. Therefore, the overall changes in water quality conditions (i.e. turbidity and suspended sediment levels) that may occur at the crossing sites are expected to be relatively minor in scale and duration. Any substrate changes and redistribution of fine sediment produced by motorized use would be localized and not measurable in stream reaches downstream of the crossing location. No additional effects to other habitat conditions (i.e. pool habitat, woody debris, water temperatures, etc.) are expected as a result of motorized use of the existing trail crossings.

The relatively low number of stream fords on fish bearing streams indicates that motorized use of these fords may have localized effects to individual streams but overall effects to any one drainage (HUC5) is expected to be minimal. For example, out of the 543 stream crossings that may have motorized travel under the proposed Travel Plan, the majority of the crossings (90-95 percent) have culverts or puncheons to avoid travel into the stream channel. The number of stream fords across fish-bearing and nonfish-bearing streams is estimated from 26 to 51 (5 -10 percent when the 28 bridges are excluded). Approximately 87-88 crossings are located on fish-bearing streams (16 percent).

Of the 52 stream crossings on fish bearing streams within the range of bull trout, 14 crossings were identified as stream fords. These 14 stream crossings on streams that have been documented as fish bearing within bull trout watersheds were evaluated in 2010. These included anadromous watersheds, mainstem Fish Creek, Ceanothus Creek and Poker Creek (trails #2240, #229 and #225) within the Fish

Creek drainage that was discussed in the steelhead trout section; the field reviews did not find any notable spawning habitat at the stream crossings (Appendix E). Another 11 fords on fish bearing streams were field reviewed; these included the Gravey Creek and Rock Creek (2) stream crossings (old road crossings for ATV and motorcycle) and eight tributaries to Weitas Creek (Liz Creek, Windy Creek, Ball Creek, Corral Creek, Smith Creek, Johnagan Creek, Larch Creek (Hemlock tributary) and Hemlock Creek) that have motorcycle use on trails #20 and #104. None of these 11 fords had any notable spawning habitat for bull trout at the stream crossing.

Similar to the Fish Creek crossings, soil disturbance was observed to be within the expected size and magnitude and limited to the trail. The larger streams did not show any changes in substrate conditions at the trail stream crossings as compared to upstream or downstream stream reaches. At several smaller crossings, instream conditions (i.e. substrate conditions) showed localized substrate disturbance (primarily loosen materials with some pockets of fine sediment). Other than expected widening of the stream channel at the crossing, none of the stream crossings showed any notable stream channel alterations that can be attributed from past erosion events as a result of motorized or non-motorized use.

The field review also evaluated another 12 potentially fish-bearing streams within the Fish Creek (4) and Weitas Creek (8) drainages that had trail fords; although some may have potential for westslope cutthroat trout (especially downstream of the crossings) none of these streams were large enough to provide habitat for bull trout at the stream crossings. Similar to the larger crossings, impacts were restricted to the crossings and were relatively minor; some hardening of the approaches will be recommended during future trail maintenance work.

In addition to the motorized trail crossings, authorization of existing dispersed recreation sites within the riparian conservation areas (RCAs), as defined by PACFISH and INFISH amendments to the Forest Plan, may cause impacts to listed or sensitive fish species. Some of these existing recreational sites extend to or below the normal high water area and may cause channel alterations or sedimentation especially if vehicles are permitted into these areas. Under the proposed Travel Plan, motorized travel would only be allowed on existing tracks leading to existing dispersed recreation sites and off-route stream crossings would be prohibited. The establishment of new off-route tracks or dispersed recreation sites would be prohibited. Compared to the existing condition, the more restrictive off-route motorized travel exceptions is expected to substantially reduce the risk of riparian and streambank degradation, erosion, sedimentation, and aquatic habitat disturbance due to off-route motorized travel and dispersed recreational use (see *rearing* section below).

The use of existing recreation sites (primarily the access) within the riparian areas may retard the recovery of vegetative conditions in relatively small areas within the riparian areas, but effects to stream channels (i.e. stream banks, sedimentation) is expected to be nonexistent or minimal on most streams. In most cases, the riparian recreation sites are located along the mainstem rivers (i.e. Lochsa River and North Fork Clearwater River) or larger streams which do not have spawning habitat adjacent to the sites. As stated in the monitoring plan, the Forest will evaluate existing access routes into dispersed campsites within the riparian areas of streams with listed fish species to document the site and determine if any corrective actions are necessary. Where problems exist or occur in future the Forest will correct through appropriate actions (i.e. administratively or through the NEPA process). The documentation of the sites will be crucial to determine if any additional access routes to existing sites and new access routes to new dispersed sites are created in future years. During 2010, Forest assessed large portions of the mainstem North Fork Clearwater River (along roads #247 and #250) and Orogrande Creek (road #250) and identified over 50 recreation sites within the riparian areas (with motorized access). Of these sites, the Forest found that 14 sites needed some restoration action (via the placement of boulders and/or re-vegetation) to avoid an expanding “footprint” of the site and subsequent impact to streams; this restoration work was completed during October 2010 at each of the 14 sites.

*Assessment of the Potential Changes to the Environmental Baseline*

See steelhead trout discussion.

*Assessment of Potential Changes to Bull Trout*

*Spawning/incubation/early rearing:* As with steelhead trout, the primary concern regarding bull trout spawning is the potential to directly impact redds (via redd trampling or sedimentation) by motorized travel at stream crossings. The road ford in upper Johnagan Creek is several miles upstream of any documented bull trout rearing (Isabella Wildlife Works 2000); no impacts to bull trout are expected with continued motorized use at this crossing. As for trails, the field reviews did not find any notable spawning habitat at 14 stream crossings that would be maintained for ATV and motorcycle use (Appendix E - Field notes). Due to the shallow nature of the trail crossings (i.e. no pools or deep runs for fish to hold), the risk of directly harming a fish is highly unlikely unless a fish happens to swim by when a ATV or motorcycle is crossing the stream. The relative low number of stream crossings (14) regarding possible fords on fish bearing streams is expected to have minimum risks to spawning sites when considering the range of bull trout across the Forest.

Although motorized use of the trail stream crossings has the potential to cause changes in habitat conditions, such as stream bank integrity, quantity and quality of instream cover and substrate conditions at the crossing sites, the impacts are restricted to a small area relative to any stream reach and are considered to have minimal impacts to spawning, incubation and early rearing due to (1) hardened approaches and drainage improvements to minimize erosion and subsequent sedimentation, and (2) annual trail maintenance program. The field reviews found that soil disturbance was observed to be within the expected size and magnitude and limited to the trail. The three streams did not show any changes in substrate conditions at the trail stream crossings as compared to upstream or downstream stream reaches. Other than expected widening of the stream channel at the crossing, none of the stream crossings showed any notable stream channel alterations that can be attributed from past erosion events as a result of motorized or non-motorized use.

Based on these field reviews direct impacts to bull trout spawning and direct and indirect impacts to bull trout spawning habitat are expected to be non-existent or negligible due to the continual motorized use of the trails within the Fish Creek, Gravey Creek, Rock Creek and Weitas Creek drainages.

In addition to the motorized trail crossings, authorization of existing dispersed recreation sites within the riparian conservation areas (RHCAs), as defined by PACFISH and INFISH amendments to the Forest Plan, may cause impacts to bull trout spawning, incubation and early rearing. Some of these existing recreational sites extend to or below the normal high water area and may cause channel alterations or sedimentation especially if vehicles are permitted into these areas. However the impacts of motorized use on most existing routes within the riparian areas are not expected to be of sufficient magnitude to affect bull trout spawning. In most cases, the riparian recreation sites are located along the mainstem rivers (i.e. Lochsa River and North Fork Clearwater River) or larger streams which do not have spawning adjacent to the sites. Where sites are located on moderate to smaller streams with potential bull trout spawning habitat, the use of these sites will be evaluated and appropriate mitigation measures implemented if potential spawning areas exist at the crossings (Appendix B – monitoring plan).

*Rearing:* Similar to impacts listed above for the spawning, incubation and early rearing period, impacts of motorized trail crossings to bull trout rearing is expected to be negligible due to (1) low number of crossings as fords, (2) marginal rearing habitat (holding areas) at the stream crossings, (3) hardened approaches and drainage improvements to minimize erosion and subsequent sedimentation, and (4) annual trail maintenance program. Of the 14 motorized trail crossings on fish bearing streams that have

the potential for bull trout rearing, only four streams (Corral Creek, Liz Creek, Johnagan Creek and Windy Creek all within the Weitas Creek drainage) have documented presence of bull trout upstream of the crossings. The use of existing recreation sites within the riparian areas may retard the recovery of vegetative conditions in relatively small areas within the riparian areas, but effects to stream channels (i.e. stream banks, sedimentation) is expected to be nonexistent or minimal on most streams. Where problems exist the Forest will correct through appropriate actions (i.e. administratively or through the NEPA process).

As noted above, under the proposed Travel Plan, motorized travel would only be allowed on existing tracks leading to existing dispersed recreation sites and off-route stream crossings would be prohibited. The establishment of new off-route tracks or dispersed recreation sites would be prohibited. Access to dispersed recreational sites (within the riparian areas) that are authorized under the Travel Plan will be inventoried to avoid user-created unauthorized sites and evaluated to assess impacts and restoration needs.

**Cumulative Effects:** See steelhead trout discussion.

**Cumulative Effects regarding State and Private Lands:** See steelhead trout discussion.

**Designated Critical Habitat:** On October 18, 2010, the final rule to designate critical habitat for the Klamath and Columbia River populations of bull trout was published in the Federal Register (75 FR 63897). Prior to this ruling, a final rule designating critical habitat for these populations was published on October 6, 2004 (69 FR 59996). The Final Rule excluded PACFISH/INFISH areas among others. The USFWS was challenged on the Final Rule on December 14, 2004 in a complaint filed by the Alliance of the Wild Rockies and Friends of the Wild Swan. The USFWS subsequently requested a voluntary partial remand to reconsider the Final Rule. On September 26, 2005, a new Final Rule was published in the Federal Register (70 FR 56212). The Final Rule excluded areas that were already covered by approved conservation agreements and habitat management plans; the Clearwater River Subbasin was excluded from critical habitat designation. Based on a court granted voluntary remand of the 2005 final designation, the USFWS issued a new proposed rule for bull trout critical habitat on January 14, 2010 (75 FR 2270). Subsequently, the USFWS issued the final rule for bull trout critical habitat effective November 17, 2010. Within the proposed Travel Plan area (Clearwater National Forest), several subbasins and their tributaries are designated as critical habitat. These include the Middle Fork Clearwater River (mainstem only) subbasin (17060304), Lochsa River subbasin (17060303) and lower and upper North Fork Clearwater River subbasins (17060307 and 17060308). Critical habitat was not designated within the Palouse River, Potlatch River, Orofino Creek or Lolo Creek drainages.

The designation of 41 and 72 tributaries within the Lochsa River and North Fork Clearwater River subbasins respectively as critical bull trout habitat requires the Forest to confer with the USFWS on any agency action which is likely to result in the destruction or adverse modification of proposed critical habitat. The USFWS recommends that the action agency address the critical habitat at the “may affect” level. Regulations implementing Section 7(a) (2) of the ESA define destruction or adverse modification of critical habitat as alteration of constituent elements “that appreciable diminishes the value of critical habitat for both the survival and recovery of a listed species” (50 CFR 402.02). The nine primary constituent elements (PCEs) listed in the final rule and any potential impacts associated with the proposed Travel Plan are summarized below:

- *Springs, seeps, groundwater sources, and subsurface water connectivity (hyporheic flows) to contribute to water quality and quantity and provide thermal refugia.* The proposed Travel Plan

is expected to have no adverse impacts to this element.

- *Migratory habitats with minimal physical, biological, or water quality impediments between spawning, rearing, overwintering, and freshwater and marine foraging habitats, including but not limited to permanent, partial, intermittent or seasonal barriers.* The proposed Travel Plan is expected to have no adverse impacts to this element. Issues regarding undersized culverts and fish passage on existing roads are outside the scope of the Travel Plan and being assessed via other projects.
- *An abundant food base, including terrestrial organisms of riparian origin, aquatic macroinvertebrates, and forage fish.* The proposed Travel Plan is expected to have no adverse impacts to this element.
- *Complex river, stream, lake, reservoir, and marine shoreline aquatic environments and processes that establish and maintain these aquatic environments, with features such as large wood, side channels, pools, and undercut banks and unembedded substrates, to provide a variety of depths, gradients, velocities, and structure.* The proposed Travel Plan is expected to have no adverse impacts to this element.
- *Water temperatures ranging from 2 to 15°C (36 to 59°F), with adequate thermal refugia available for temperatures at the upper end of this range. Specific temperatures within this range will vary depending on bull trout life-history stage and form; geography; elevation; diurnal and seasonal variation; shade, such as that provided by riparian habitat; and local groundwater influence.* No measurable adverse changes to existing riparian vegetation that is providing streamside shade in riparian areas or at stream crossings due to motorized use is expected. Slight-to-moderate restoration in overall riparian conditions are expected in some RCA's due to the elimination of cross county travel, reduction of motorized travel in riparian areas and the reduction of motorized trail miles (including stream crossings and riparian trails).
- *In spawning and rearing areas, substrates of sufficient amount, size, and composition to ensure success of egg and embryo overwinter survival, fry emergence, and young-of-the-year and juvenile survival. A minimal amount of fine sediment, generally ranging in size from silt to coarse sand, embedded in larger substrates, is characteristic of these conditions. The size and amounts of fine sediment suitable to bull trout will likely vary from system to system.*  
As noted above, the proposed Travel Plan will have minimal effects to designated habitat in nearly all streams. With the exception of stream crossings (fords) on motorized trails in the Fish Creek and Weitas Creek drainages no changes to substrate conditions within potential bull trout streams are expected. Overall changes in substrate conditions (due to turbidity and suspended sediment levels) that may occur at the crossing sites are expected to be relatively minor in scale and duration. Any substrate changes and redistribution of fine sediment produced by motorized use would be localized and not measurable in stream reaches downstream of the crossing location.. Field reviews did not observe any notable spawning habitat sufficient size substrate, stream flows and/or overall area) at the 14 stream crossings that could have or potential could have bull trout spawning. Therefore, no impacts to bull trout redds (including incubation and larval development) are expected within the range of bull trout. Due to the shallow nature of the trail crossings (i.e. no pools or deep runs for fish to hold), the risk of directly harming a fish is highly unlikely unless a fish happens to swim by when a ATV or motorcycle is crossing the stream.
- *A natural hydrograph, including peak, high, low, and base flows within historic and seasonal*

*ranges or, if flows are controlled, minimal flow departure from a natural hydrograph.* With the exception of the lower mainstem North Fork Clearwater River (Dworshak Reservoir), the hydrographs of these proposed streams for critical habitat are un-regulated and natural. The proposed Travel Plan is expected to have no adverse impacts to this element. Therefore, the streams that have or potentially have the ability to support bull trout populations will maintain favorable hydrographs.

- *Sufficient water quality and quantity such that normal reproduction, growth and survival are not inhibited.* As noted in the effects analysis above, the proposed Travel Plan is expected to have negligible impacts to water quality due to (1) low number of stream crossings as fords, (2) hardened approaches and drainage improvements to minimize erosion and subsequent sedimentation, and (3) annual trail maintenance program. The proposed Travel Plan is expected to have no adverse impacts to the water quantity element. The use of motorized vehicles within the riparian areas elevates the risk of chemical contamination of streams via fuel spills (vehicles mishaps) or leakage of fuel or other petroleum products (especially at stream crossings). However, the authorized motorized vehicles for trails (motorcycles and ATV's) have a limited fuel supply (between two and four gallons) which reduces the likelihood of substantial impacts due a mishap involving a fuel spill at a stream crossing. Additionally, vehicles are equipped with safety mechanisms to avoid fuel spillage if vehicles are overturned or on their side. Similarly motorized vehicles accessing dispersed recreational sites are not expected to have measurable impacts to water quality especially when vehicles are restricted to the access route and "foot print" of the dispersed site. As noted in a previous section, the Forest will evaluate existing access routes into dispersed campsites within the riparian areas of streams with listed fish species to document the site and determine if any corrective actions are necessary. Where problems exist or occur in future the Forest will correct through appropriate actions (i.e. administratively or through the NEPA process). Where needed, restoration actions (via the placement of boulders and/or re-vegetation) to avoid an expanding "footprint" of the site and subsequent impact to streams will be completed. In general, due to the reduction of motorized stream trails and use within riparian areas, elimination of cross country travel and a reduction of stream crossings, the risks of chemical contaminants within the riparian areas are expected to be reduced.
- *Sufficiently low levels of occurrence of nonnative predatory (e.g., lake trout, walleye, northern pike, smallmouth bass); inbreeding (e.g., brook trout); competing (e.g., brown trout) species that, if present are adequately temporally and spatially isolated from bull trout.* The proposed Travel Plan is expected to have no adverse impacts to this element.

#### **Threatened Plant Species – Water Howelia (*Howellia aquatilis*)**

**Effects of Project Proposal:** The proposed action would not have any direct or indirect effects on the water howellia because it is not known to occur, nor are typical habitats for this species found, in the analysis area. Some marginally suitable habitat does occur in the analysis area or immediately adjacent; however, the habitat is considered low potential and is not accessible to off road vehicles. Also the proposed Travel Plan would eliminate any general cross country travel in wetlands or meadows that could potentially hold vernal pools or other suitable aquatic habitats.

**Cumulative Effects:** The proposed action would not have any cumulative effects on the water howellia because there would be no direct or indirect effects.

## Determination of Effects

### Threatened Fish Species - Fall Chinook Salmon (*Oncorhynchus tshawytscha*)

**Determination:** Due to the absence of fall Chinook salmon spawning within the upper Lolo Creek and upper Potlatch River, North Fork Clearwater River and Lochsa River drainages direct impacts to fall Chinook salmon spawning and rearing are nonexistent. Incidental rearing and migration of fall Chinook salmon does occur within the mainstem Middle Fork Clearwater River drainage within the Forest's boundary. No changes to existing motorized routes are proposed within the Middle Fork Clearwater River drainage where migratory habitat is present and some incident rearing may occur. The potential impacts from the proposed motorized activities on the other fish populations (i.e. steelhead trout and bull trout) and their habitats are expected to be insignificant and discountable. Therefore, the potential effects to fall Chinook salmon in the mainstem Clearwater River are considered nonexistent. The activities proposed under the Clearwater National Forest Travel Plan would have **no effect** on recovery of fall Chinook salmon in the Clearwater River subbasin.

### Threatened Fish Species - Steelhead Trout (*Oncorhynchus mykiss*)

**Assumptions for Determination:** The analysis above indicates that the cumulative impacts (both existing and potential) regarding the existing trail system (including motorized use) would be minimal (non-measurable) to the aquatic resources including the major population groups for steelhead trout. At most of these trail stream crossings the impacts of motorized use is not expected to be of sufficient magnitude to harm, harass, or otherwise take listed fish species. However, dependent upon the location of stream fords in relation to occupied steelhead trout streams, some impacts may not be insignificant or discountable in specific drainages.

Although field reviews of the motorized trail stream crossings across streams with steelhead trout have indicated the absence of spawning habitat and sensitive rearing habitat (holding areas), travel across these fords (motorized or horse travel) could have direct impacts (fish mortality, harassment,) or indirect impacts via channel alterations or sedimentation.

In addition to the motorized trail crossings, authorization of existing dispersed recreation sites within the riparian conservation areas (RCAs), as defined by PACFISH and INFIISH amendments to the Forest Plan, may cause impacts to steelhead trout. Some of these existing recreational sites extend to or below the normal high water area and may cause channel alterations or sedimentation especially if vehicles are permitted into these areas. Similar to trail stream crossings, the impacts of motorized use on most existing routes within the riparian areas are not expected to be of sufficient magnitude to harm, harass, or otherwise take listed fish species. However, dependent upon the location of travel routes in relation to occupied steelhead trout streams, some impacts may not be insignificant or discountable in specific drainages.

Monitoring measures outlined in the *Monitoring* section and the Monitoring Plan (Appendix A) are implemented to avoid or minimize impacts to the aquatic resources. A report will be prepared following the second field season and presented to NOAA Fisheries and USFWS the following spring. The report will note any existing and potential problems, immediate actions taken during the interim to minimize or avoid the impacts, and any pending or potential actions that the Forest will address administratively or through the NEPA process.

- Continue to monitor selected motorized trail crossings to determine if travel (motorized and non-motorized) is causing direct or indirect aquatic impacts to ESA listed fish species.
- Determine if existing dispersed recreational sites located within the Riparian Habitat Conservation

Areas (RHCAs) and within drainages that have ESA listed fish species are meeting the standards and guidelines established to meet or not retard the attainment of the Riparian Management Objectives (as defined in PACFISH and INFISH amendments to the Forest Plan)

**Determination:** Overall the project proposal does not propose any new ground-disturbing activities and will actually reduce the amount of acreage subjected to a higher risk of various resource impacts. Based on the above analysis the proposed Travel Plan would reduce the potential for adverse impacts to the aquatic environment and steelhead trout streams by: (1) reducing the miles of motorized trails open by 31 percent, (2) reducing the number of motorized stream crossings by 27 percent; (3) reducing the miles of motorized trails within riparian areas by 33 percent, (4) eliminating cross country travel via motorized vehicles, and (5) reducing existing motorized routes in riparian areas with no new routes permitted. The proposed Travel Plan should provide long-term beneficial effects to steelhead trout.

Although some impacts to the aquatic resources due to motorized use (primarily regarding trails) may continue to occur in localized areas in the Fish Creek drainage the overall impacts to steelhead trout is expected to be minimal due to (1) low number of stream crossings as fords, (2) absence of spawning habitat and rearing habitat (holding areas) at the crossings, (3) hardened approaches and drainage improvements to minimize erosion and subsequent sedimentation, and (4) annual trail maintenance program. However, dependent upon the intensity and timing of the motorized activities and the presence of juvenile fish at the crossings, some impacts may not be insignificant or discountable due to direct harm or harassment by motorized use in the Fish Creek drainage. Therefore, the determination for the proposed Travel Plan is **may affect, likely to adversely affect** steelhead trout. The project is expected to have no adverse effects to steelhead trout critical habitat in the Potlatch River, Lolo Creek, Middle Fork Clearwater River and Lochsa River drainages, and **is not likely to destroy or adversely modify that habitat.**

#### Threatened Fish Species - Bull Trout (*Salvelinus confluentus*)

**Assumptions for Determination:** See steelhead trout discussion.

**Determination:** Overall the project proposal does not propose any new ground-disturbing activities and will actually reduce the amount of acreage subjected to a higher risk of various resource impacts. Based on the above analysis the proposed Travel Plan would reduce the potential for adverse impacts to the aquatic environment and bull trout streams by: (1) reducing the miles of motorized trails open by 29 percent, (2) reducing the number of motorized stream crossings by 50 percent; (3) reducing the miles of motorized trails within riparian areas by 52 percent, (4) eliminating cross country travel via motorized vehicles, and (5) reducing existing motorized routes in riparian areas with no new routes permitted. The proposed Travel Plan should provide long-term beneficial effects to bull trout.

Although some impacts to the aquatic resources due to motorized use (primarily regarding trails) may continue to occur in localized areas in a few drainages the impacts to bull trout is expected to be negligible due to: (1) low number of stream crossings as fords, (2) absence of spawning habitat and rearing habitat (holding areas) at the crossings, (3) hardened approaches and drainage improvements to minimize erosion and subsequent sedimentation, and (4) annual trail maintenance program. However, dependent upon the intensity and timing of the motorized activities and the presence of bull trout (primarily juveniles) at the, some impacts may not be insignificant or discountable due to direct harm or harassment by motorized use in specific drainages. Of the 14 motorized trail crossings on fish bearing streams that have the potential for bull trout rearing, four streams (Corral Creek, Liz Creek, Johnagan Creek and Windy Creek all within the Weitas Creek drainage) have documented presence of bull trout upstream of the crossings. Therefore, the determination for the proposed Travel Plan is **may affect, likely to adversely affect** bull trout. The project is expected to have no adverse effects to designated

bull trout critical habitat in the Middle Fork Clearwater River, Lochsa River and North Fork Clearwater River drainages, and is **not likely to destroy or adversely modify that habitat.**

#### **Threatened Plant Species – Water Howelia (*Howellia aquatilis*)**

**Determination:** Implementation of the proposed action would have **no effect** on water howellia. This determination is based on the lack of known occurrences and quality suitable habitats in the project area. Some marginal habitat likely occurs in the project area, but is not accessible to motorized vehicles.

### **EFFECTS OF THE PROPOSED ACTION ON ESSENTIAL FISH HABITAT**

In accordance with applicable requirements of section 305(b) of the Magnuson-Stevens Act and its implementing regulations (50 CFR Part 600.920), the Forest needs to evaluate potential effects of the proposed Travel Plan within the Potlatch River, Lolo Creek, Middle Fork Clearwater River and Lochsa River drainages on Essential Fish Habitat. Spring Chinook salmon are not listed under ESA within the Clearwater River basin, but spring Chinook salmon production (naturally and hatchery supplemented) occurs in the Lolo Creek, Middle Fork Clearwater River and Lochsa River drainages. With the exception of the upper Potlatch River drainage which is too small to support Chinook salmon, the other three drainages contain spring Chinook salmon habitat.

Re-introduction of coho salmon has been undertaken by the Nez Perce Tribe in tributaries of the mainstem Clearwater River, including the Lolo Creek drainage. Historically, coho most likely inhabited tributaries in the lower Clearwater River Basin including some in the lower Lochsa River subbasin. Instream activities within various streams within the Lolo Creek and Lochsa River drainages have the potential to affect spring Chinook salmon directly through displacement or indirectly through altered habitat conditions. Due to the past mining, grazing, road construction and timber harvest, habitat conditions have been degraded in some of the tributaries. Cooperative, watershed restoration activities (i.e. road decommissioning) by the Forest and Nez Perce Tribe have set the stage for long-term recovery. Over the past ten years, salmon supplementation efforts by the Nez Perce Tribe have contributed to naturally-reproducing spring Chinook runs in the drainage.

*Effects of Proposed Action:* Generally, the proposed Travel Plan is expected to have minimal to nonexistent effects on salmon habitat in the short-term, while long-term effects are likely to be beneficial. Overall the project proposal does not propose any new ground-disturbing activities and will actually reduce the amount of acreage subjected to a higher risk of various resource impacts. Based on the above analysis the proposed Travel Plan would reduce the potential for adverse impacts to the aquatic environment and spring Chinook salmon and coho salmon streams by: (1) reducing the miles of motorized trails open by 31 percent, (2) reducing the number of motorized stream crossings by 27 percent; (3) reducing the miles of motorized trails within riparian areas by 33 percent, (4) eliminating cross country travel via motorized vehicles, and (5) reducing existing motorized routes in riparian areas with no new routes permitted. Since designated critical habitat for Snake River steelhead trout in the Lolo Creek, Middle Fork Clearwater River and Lochsa River drainages are identical to the area designated as EFH for spring Chinook and coho salmon, the EFH analysis, potential adverse effects on designated critical habitat for ESA-listed species and EFH MSA-managed species are considered to be functionally equivalent. Effects on salmon EFH (spring Chinook and coho) would be the same as those described for steelhead trout and bull trout within this biological assessment. Therefore, the determination for the proposed Travel Plan is that the proposed activities **would not adversely affect EFH for spring Chinook and coho salmon.**

## Fisheries Literature and Communications

Bowersox, B. and N. Brindza. 2006. Potlatch River basin – fisheries inventory. Latah, Clearwater, and Nez Perce counties, Idaho. 2003-2004. Partial fulfillment of Latah County Soil and Water Conservation District contract. IDFG 06-16. Idaho Department of Fish and Game, Lewiston, Idaho.

Bowersox, B. 2008. Personal communications. Idaho Department of Fish and Game, Lewiston, Idaho.

Brindza, N. and E. Schriever. 2006. Potlatch River steelhead monitoring and evaluation. Annual report 2004. Pacific Coast Salmon Recovery Fund. Contract # 041-04-CW. Award # NA04NMF380307. CFDA# 11.438. Idaho Department of Fish and Game, Lewiston, Idaho.

Busby, P.L., T.C. Wainwright, G.J. Bryant, L.J. Lierheimer, R.S. Waples, F.W. Waknitz, and I.V. Lagomarsino. 1996. Status review of West Coast steelhead from Washington, Idaho, Oregon, and California. NOAA technical memorandum NMFS-NWFSC-27. Northwest Fisheries Science Center, Seattle, Washington.

Campbell, M. and C. Cegelski. 2004. Mitochondrial DNA analysis of redband trout (*Oncorhynchus mykiss gairdneri*) from tributaries to the Salmon and Snake rivers, ID. Completion report for BLM CCS #DAF020080. Lab report 04-1. Idaho Department of Fish and Game, Eagle Fish Genetics Lab. Eagle, ID.

Clearwater Basin Bull Trout Technical Advisory Team. 1998. North Fork Clearwater River Basin – Bull trout problem assessment. Prepared for the State of Idaho. Idaho Division of Environmental Quality, Lewiston, Idaho.

Clearwater BioStudies, Inc. 1988. Fish habitat characteristics and salmonid abundance in the Lolo Creek study area during summer 1988. Contract report prepared for U.S.D.A. Forest Service, Clearwater National Forest, Orofino, Idaho.

Clearwater BioStudies, Inc. 1991. Habitat conditions and salmonid abundance in selected streams within the Upper Potlatch Drainage, Palouse Ranger District, summer 1990. Contract report no. 53-0276-0-43, prepared for U.S.D.A. Forest Service, Clearwater National Forest, Orofino, Idaho.

Clearwater BioStudies, Inc. 1994a. Habitat conditions and salmonid abundance in four streams within the Corral Creek Drainage, Palouse Ranger District, spring 1993. Contract report no. 53-0276-3-5, prepared for U.S.D.A. Forest Service, Clearwater National Forest, Orofino, Idaho.

Clearwater BioStudies, Inc. 2006. Habitat conditions and salmonid abundance in selected streams within the Potlatch Creek drainage, Palouse Ranger District, summer 2005. Contract report no. 53-0276-4-84, prepared for U.S.D.A. Forest Service, Clearwater National Forest, Orofino, Idaho.

Espinosa, F.A. Jr. 1983. Background paper – fisheries resources analysis of the management situation. Clearwater National Forest, Orofino, Idaho.

Fuller, R.K., P.A. Kucera, and D.B. Johnson. 1985. A biological and physical inventory of the streams within the Nez Perce Reservation. Synopsis of three years of stream inventory on the Nez Perce Reservation. Final report submitted to the Bonneville Power Administration. Agreement number: DE-AI79-82BP33825. Project number 82-1. Department of Fisheries Management, Nez Perce Tribe, Lapwai, Idaho.

Fulton, L.A. 1968. Spawning areas and abundance of Chinook salmon *Oncorhynchus tshawytscha* in the Columbia River Basin – past and present. Special scientific report – Fisheries no. 571. U.S. Fish and Wildlife Service, Washington, D.C.

Garcia, A. P., editor. 2000. Spawning distribution of fall chinook salmon in the Snake River. Annual report 1999. Project number: 9801003. Contract number: 98-AI-37776. Bonneville Power Administration, Portland, Oregon.

Graham, Russell T., Alan E. Harvey, Martin F. Jurgensen, Theresa B. Jain, Jonalea R. Tonn, and Deborah S. Page-Dumroese. 1994. Managing coarse woody debris in forests of the Rocky Mountains. Research Paper INT-RP-477. Intermountain Research Station, Ogden, Utah.

Isabella Wildlife Works 2000. Aquatic survey report, Weitas Creek tributaries, North Fork Ranger District. Contract report # RFQ R1-5-98-22. Final report submitted to U.S.D.A. Forest Service, Clearwater National Forest, Orofino, Idaho.

Johnson, D.B. 1985. A biological and physical inventory of Clear Creek, Orofino Creek and the Potlatch River, tributary streams of the Clearwater River, Idaho. Report submitted to the Bonneville Power Administration. Agreement number: DE-AI79-83BP10068. Project number 82-1. Department of Fisheries Management, Nez Perce Tribe, Lapwai, Idaho.

Johnston, R. 1993. A preliminary examination of the archeological and historical evidence of anadromous fish on the Palouse District. U.S.D.A. Forest Service. Clearwater National Forest, Orofino, Idaho.

Kucera, P.A., J.H. Johnson and M.A. Bear 1983. A biological and physical inventory of the streams within the Nez Perce Reservation. Final report submitted to the Bonneville Power Administration. Department of Fisheries Management, Nez Perce Tribe, Lapwai, Idaho.

Lichhardt, J., and R. K. Mosely. 2000. Ecological assessment of *Howellia aquatilis* habitat at the Harvard–Palouse River flood plain site, Idaho. Idaho Department of Fish and Game. Boise, Idaho. February 2000.

Mallet, J. 1974. Inventory of salmon and steelhead resources, habitats, use and demands. Job performance report. Project F-58-R-1. Idaho Department of Fish and Game, Boise, Idaho.

McPhail, J. D. and Lindsey, C. C. 1986. Zoogeography of the freshwater fishes of Cascadia (the Columbia system and rivers north to the Stikine). in Hocutt, C.H.; Wiley, E.O. (Ed.). The zoogeography of North American freshwater fishes. New York: John Wiley.

Mincemoyer, S. 2005. Range-wide status assessment of *Howellia aquatilis* (water howellia). U. S. Fish and Wildlife Service. Helena, Montana. July 2005. Revised December 2005.

Murphy, L.W. and H.E. Metsker. 1962. Inventory of streams containing anadromous fish including recommendations for improving production of salmon and steelhead. Part II -- Clearwater River Drainage. Idaho Department Fish and Game, Boise, Idaho.

Murphy, P.K. and D.B. Johnson. 1990. Nez Perce Tribal Review of the Clearwater River Lower Snake River Compensation Plan. Working paper submitted to the U.S.D.I. Fish and Wildlife Service. Department of Fisheries Management, Nez Perce Tribe, Lapwai, Idaho.

Murphy, P.K., R.M. Jones, L. Hill, R. Edwards and K. Harvey. 1995. Biological assessment for bull trout, North Fork Clearwater River – key watershed analysis area. Clearwater River subbasin. Assessment of ongoing and proposed projects. Clearwater National Forest, Orofino, Idaho.

Nez Perce Tribe and Idaho Department of Fish and Game. 1990. Clearwater River Subbasin Salmon and Steelhead Plan. Columbia Basin System Planning. Northwest Power Planning Council, Portland, Oregon.

Nez Perce Tribe. 2003. 2002 fall Chinook spawning summary report. Memo, dated February 11, 2003 from Bill Arnsberg fisheries biologist. Nez Perce Tribal Fisheries Department, Orofino, Idaho.

Nez Perce Tribe. 2004. 2003 fall Chinook spawning summary report. Memo, dated February 9, 2004 from Bill Arnsberg fisheries biologist. Nez Perce Tribal Fisheries Department, Orofino, Idaho.

Nez Perce Tribe. 2005. 2004 fall Chinook spawning summary report. Memo, dated February 9, 2005 from Bill Arnsberg fisheries biologist. Nez Perce Tribal Fisheries Department, Orofino, Idaho.

Nez Perce Tribe. 2006. 2005 Clearwater River subbasin fall Chinook salmon redd/spawning summary. Memo, dated January 27, 2006 from Scott Kellar and Bill Arnsberg fisheries biologists. Nez Perce Tribal Fisheries Department, Orofino, Idaho.

Nez Perce Tribe. 2007. Nez Perce Tribe Chinook salmon and steelhead adult escapement and spawning ground 2006 summary report. January 2007. Nez Perce Tribal Fisheries Department, Lapwai, Idaho.

Nez Perce Tribe. 2008. Nez Perce Tribe Chinook salmon and steelhead adult escapement and spawning ground 2007 summary report. January 2008. Nez Perce Tribal Fisheries Department, Lapwai, Idaho.

Nez Perce Tribe. 2009. Nez Perce Tribe Chinook salmon and steelhead adult escapement and spawning ground 2008 summary report. February 2009. Nez Perce Tribal Fisheries Department, Lapwai, Idaho.

Petrosky, C.E. and T.B. Holubetz. 1986. Idaho habitat evaluation for off-site mitigation record. Annual Report 1985. Idaho Department of Fish and Game. Project number 83-7. Contract No. DE-AI79-84BP13381. Report prepared for Bonneville Power Administration, Portland, Oregon.

Quigley, T. M. and S. J. Arbelbide, tech. eds. 1997. An assessment of ecosystem components in the interior Columbia basin and portions of the Klamath and Great Basins: Volume 3. Gen. Tech. Rep. PNW-GTR-405. Portland, Oregon.

Ricker, W.E. 1959. Evidence For environmental and genetic influence on certain characters which distinguish stocks of the Pacific salmons and steelhead trout. J. Fish. Res. Bd. Can. Biological Station, Nanaimo, B.C. 103 pp. plus tables.

Rieman, B.E. and J.D. McIntyre 1993. Demographic and habitat requirements for conservation of bull trout. Gen. Tech. Rep. INT-302. U.S. Department of Agriculture, Forest Service, Intermountain Research Station, Ogden, Utah.

Shelly, J. S., and J. Gamon. 1996. Public and agency review draft, water howellia (*Howellia aquatilis*), recovery plan. U. S. Fish and Wildlife Service. Helena, Montana. September 1996.

Shelly, J. S., and R. K. Mosely. 1988. Report on the conservation status of *Howellia aquatilis*, a

candidate threatened species. U. S. Fish and Wildlife Service, Regions 1 and 6. December 1988.

State of Idaho. 1998. Lower Clearwater River bull trout problem assessment. Prepared by the Clearwater Basin Bull Trout Technical Advisory Team for the State of Idaho. Idaho Division of Environmental Quality, Boise, Idaho.

U.S. Department of Agriculture, U.S. Department of Interior, U.S. Department of Commerce, and Environmental Protection Agency. 1995. Ecosystem analysis at the watershed scale. Federal guide for watershed analysis. Revised August 1995. Version 2.2. Regional Ecosystem Office, Portland, Oregon.

U.S.D.A. Forest Service - Clearwater National Forest. 1997. Clearwater Subbasin ecosystem analysis at the watershed scale. Final report. Clearwater National Forest, Orofino, Idaho.

U.S.D.A. Forest Service - Clearwater National Forest. 1998. Section 7 watershed biological assessment – Lolo Creek drainage – mainstem Clearwater River subbasin. Determination of effects of ongoing and proposed activities based on the matrix of pathways and indicators of watershed condition for steelhead trout, fall Chinook salmon and bull trout. May 27, 1998. Clearwater National Forest, Orofino, Idaho.

U.S.D.A. Forest Service - Clearwater National Forest 1999. Section 7 watershed biological assessment of the Lochsa River drainage. Determination of effects of ongoing and proposed activities based on the matrix of pathways and indicators of watershed condition for steelhead trout, fall Chinook salmon and bull trout. Clearwater National Forest, Orofino, Idaho.

U.S.D.A. Forest Service - Clearwater National Forest 2000a. Section 7 watershed biological assessment - Potlatch River drainage – mainstem Clearwater River subbasin. Determination of effects of ongoing and proposed activities based on the matrix of pathways and indicators of watershed condition for steelhead trout, fall Chinook salmon and bull trout. June 26, 2000. Clearwater National Forest, Orofino, Idaho.

U.S.D.A. Forest Service - Clearwater National Forest. 2000b. Section 7 watershed biological assessment of the North Fork Clearwater River drainage. Determination of effects of ongoing and proposed activities based on the matrix of pathways and indicators of watershed condition for bull trout. Clearwater National Forest, Orofino, Idaho.

U.S.D.A. Forest Service. 2003. Roads Analysis Report. Clearwater National Forest. U.S.D.A. Forest Service. Orofino, Idaho. <http://www.fs.fed.us/r1/clearwater/rap/>

U.S.D.A. Forest Service – Clearwater National Forest 2008. Biological assessment of the Yakus Creek project. Final version May 18, 2008. Clearwater National Forest. Orofino, Idaho.

U.S.D.A. Forest Service – Clearwater National Forest 2009. Travel Planning. Draft environmental impact statement. Volumes 1-3. Clearwater National Forest. Orofino, Idaho.

U.S.D.C. NOAA Fisheries. 2005a. Updated status of Federally listed ESUs of West Coast salmon and steelhead. NOAA technical memorandum NMFS-NWFSC-66. June 2005. Edited by: T. P. Good, R. S. Waples, and P. Adams. Northwest Fisheries Science Center, Seattle, Washington.

U.S.D.C. NOAA Fisheries. 2005b. 50 CFR Part 226. Endangered and threatened species; designation of critical habitat for 12 evolutionarily significant units of West Coast salmon and steelhead in Washington, Oregon, and Idaho; final rule. Federal Register, dated September 2, 2005. Volume 70, No.

170.

U.S.D.C. NOAA Fisheries. 2006. Draft Snake River salmon and steelhead trout recovery plan. NOAA Fisheries, Boise, Idaho.

U.S.D.I. Fish and Wildlife Service. 1962. A detailed report on fish and wildlife resources affected by Brunes Eddy Dam and Reservoir project, North Fork Clearwater River, Idaho. U.S. Department of Interior. Fish and Wildlife Service, Portland, Oregon.

U.S.D.I. Fish and Wildlife Service. 1993. Endangered and threatened wildlife and plants; proposed listing of water howellia (*Howellia aquatilis*) as threatened. Proposed rule and notice of petition finding. Federal Register 58(72):19795-19800.

U.S.D.I. Fish and Wildlife Service. 1994. Endangered and threatened wildlife and plants; the plant water howellia (*Howellia aquatilis*) determined to be a threatened species. Final rule. Federal Register 59(134):35860-35864.

U.S.D.I. Fish and Wildlife Service. 2007. Endangered and threatened wildlife and plants; initiation of 5-year reviews of seven wildlife species and two plant species in the Mountain-Prairie Region. Notice of review; request for comments. Federal Register 72(74):19549-19551.

**APPENDIX A**  
**GRAY WOLF AND CANADA LYNX BIOLOGICAL ASSESSMENTS**  
**TRAVEL PLANNING PROJECT**  
**CLEARWATER NATIONAL FOREST**

**Gray Wolf**

**Regulatory Framework and Existing Situation:** The Central Idaho population of gray wolf (*Canis lupus*) is now considered Threatened 10J – experimental/ nonessential. Strategies to protect and recover populations are outlined in the Environmental Impact Statement for the Reintroduction of Gray Wolves to Yellowstone National Park and Central Idaho (U.S. Fish and Wildlife Service 1993a).

Historically, gray wolves were known to range throughout the Rocky Mountains until the mid to late 1800's. They were largely eliminated in central Idaho by the 1930's due to conflicts with mining and livestock operations, along with a reduction in their prey base. As wolf populations grew in Canada, they began to migrate into Montana. Gray wolf reproduction was again evident in western Montana by the 1980's. In January of 1995 and 1996, gray wolves were reintroduced into central Idaho as an "experimental/nonessential" population under provision 10J of the Endangered Species Act. Since the initial reintroduction, populations have steadily increased. At the end of 2009, the Northern Rockies population was estimated at 1800 wolves with over 800 in Idaho and over 100 on the Clearwater Forest (USFWS et al. 2009).

Historically, wolf population declines were due mainly to conflicts with humans. Increased roads and trails allowed for disturbance of den sites, shooting, trapping, and mortality associated with vehicle accidents (Theil 1985; Mech 1989).

Rendezvous sites are specific resting and gathering areas used by wolves during the summer and early fall. Several rendezvous sites are used with the first one generally located between 1 to 6 miles from the natal den. Wolves appear to be most sensitive to human disturbance at the first rendezvous site and become less sensitive at later sites (USDI 1987).

Wolves primarily prey on ungulates (USDI 1987). During May and June, wolves selectively prey upon newborn and young bison, moose, elk, and deer in calving/fawning areas. During the summer and fall, ungulates constitute the highest percentage of the prey.

***Winter Habitat***

In winter, wolves prey almost exclusively on deer, elk, and moose. Because they are an important prey item, factors affecting ungulate distribution and abundance can also affect wolves. Wolves are opportunistic hunters and habitat generalists. However, they tend to avoid areas of high human activity. Invasive plant species encroachment can reduce the quality and availability of suitable forage for ungulate populations wolves depend on for food. Fire exclusion has reduced early seral ungulate prey

habitat conditions that were historically maintained by natural fire regimes.

## DIRECT, INDIRECT, AND CUMULATIVE EFFECTS OF TRAVEL MANAGEMENT

### *Introduction*

Roads and trails facilitate human travel into wolf habitat, thereby increasing the potential for conflicts between wolves and humans such as disturbance of den sites, mortality associated with vehicle accidents, and increased potential for illegal shooting (Theil 1985; Mech 1989; Mech et al. 1988; Boyd and Pletscher 1999). Travel management may indirectly affect wolves through impacts to wolf prey, such as deer and elk. Because they are an important prey item, factors that affect ungulate distribution and abundance can also affect wolves. Wolf response to human disturbance depends on a variety of factors including the setting (e.g., den site), individuality of wolves, and whether the population is exploited or protected (Mech et al. 1988). Wolf packs appear sensitive to human disturbance near den sites and may abandon the site (C. Mack, pers. comm. with A. Kuehl 2005). On the Clearwater National Forest, most den sites are located away from trails and back-country campsites, so disturbance is less likely to occur. Wolves may also be sensitive to human disturbance near rendezvous sites. Wolves appear to be most sensitive to human disturbance at the first rendezvous site and become less sensitive at later sites (USDI 1987).

In general, travel management may influence wolf security and prey availability. All action alternatives for the Clearwater National Forest Travel Plan are unlikely to have a measurable impact on wolf populations or habitat. Wolf populations have been increasing substantially under the current Travel Plan, and all action alternatives would result in greater restrictions on cross-country travel.

### *The Proposed Action Alternative*

The potential for wolf mortality and harassment in the proposed action alternative would be lower than the existing situation because no cross-country travel would be allowed across the forest and motorized travel on some backcountry trails will be restricted. The over-snow restrictions in MA B2 would not likely have any affect to wolves as this area is at higher elevations with deep snow levels and would lack sufficient winter prey. The direct and indirect effects of implementing the proposed action are likely to have a nonmeasurable benefit to wolves that occur across the forest. Restriction on motorized trails to benefit elk will likely benefit wolves as well.

### *Cumulative Effects*

In the past, wolves were extirpated from the Clearwater National Forest. Wolves have reestablished territories throughout the Forest. Past actions have been taken into account in the analysis of the existing condition of wolves on the Clearwater National Forest -- in short the effects of past actions have been overcome by reintroduction and protection of wolf populations in Idaho. The current wolf population exceeds recovery goals. Most ongoing activities managed by the Clearwater National Forest are not expected to have measurable impacts on wolves since wolves are wide ranging species whose populations are expanding under these current activities. Future Forest Service actions would be analyzed under the National Environmental Policy Act (NEPA) and be required to provide suitable habitat for wolves as a Threatened Species.

Wolves are still in the process of re-establishing across the landscape; as such, past and ongoing adjacent private and other actions are not expected to strongly affect wolves at this time. Wolf predation on livestock and the subsequent removal or killing of the wolves as allowed by State and Federal law

would have a direct effect on individual wolves but would not likely affect the overall population on the Clearwater National Forest.

### ***Effects Determination***

Based on the discussion of direct, indirect, and cumulative effects presented above, the proposed Travel Plan alternative “**would not jeopardize or cause a loss of viability to the population or species**”. The proposed action would likely improve wolf habitat by eliminating motorized cross-country travel by reducing disturbance to prey species such as elk, moose, and deer.

## **Canada Lynx**

### **I. INTRODUCTION**

This Biological Assessment (BA) determines the effects of implementing the Travel Planning Rule on the Clearwater National Forest (CNF) on the Canada lynx (*Lynx canadensis*). Descriptive information in this BA is limited to assessing the existing condition for lynx habitat across the forest and determining the effects of restricting over-snow uses in Management Area (MA) B2 Forest Plan Proposed Wilderness Areas. No other actions concerning over-snow uses are proposed in the purpose and need of the Travel Plan FEIS. All proposed actions are consistent with the management direction in the Northern Rockies Lynx Management Direction Record of Decision (NRLMD), March, 2007.

### **1. OVERVIEW**

The Canada lynx is the only listed species that occurs on the forest based on the biannual Forest-wide Species Lists prepared by the U.S. Fish and Wildlife Service. The Canada lynx is listed as a “Threatened” species in non-critical, secondary, occupied habitat on the CNF.

### **2. CANADA LYNX**

#### **a. Status and Management**

The Final Rule to list the lynx as threatened under ESA by the USFWS occurred in March 2000 (65 FR 16052).

In 2000, the Canada Lynx Conservation Assessment and Strategy (LCAS) was developed to provide a consistent and effective approach to conserve Canada lynx on federal lands. During 2002, an effort was started that would amend existing Forest Plans. The final EIS for this amendment was signed March 23, 2007.

#### **b. Distribution**

The lynx has a circumboreal distribution. In North America, the Canada lynx ranges across nearly all of Canada and Alaska, and extends south into the northern, forested United States. In the western U.S., lynx are known to occur in Washington, Idaho, Montana, and Wyoming along the spine of the Rocky Mountains.

Lynx are likely present on the CNF. The latest verified lynx sighting was in the Lochsa drainage in March 2003. No denning or reproduction has been documented on the Forest. The Idaho Conservation Data Center maintains the records of lynx observations for the forest (ICDC 2010).

During 1999, a national effort was undertaken to collect lynx hair samples for DNA analysis. This survey was not intended to be a population monitoring, but rather an attempt to determine DNA variability and the presence/detection for lynx. Areas to be surveyed were selected researchers because they believed had the highest likelihood to encountering a lynx and collect a sample (Weaver 1999). No hair samples were detected on the CNF.

#### **c. Life History**

Lynx are usually more active at night than during the day. The eyes of lynx are well adapted for night hunting. Preferred winter food consists primarily of snowshoe hares, along with rodents such as red squirrels, and birds. Habitat for snowshoe hares generally consists of young conifer stands with relatively dense and interconnected canopies that provide both understory cover and food. Snowshoe hare densities in terms of patch size and spatial arrangement in north central Idaho range from 0.1 to 9.7 hectares/25 acres. Predation rates of snowshoe hares are high (>80%). Snowshoe hare populations tend to be cyclical in nature; however there is limited evidence that population cycles occur in the southern portion of their range because of high predation rates (Wirsing et al. 2002). Snowshoe hare are nocturnal during the winter (Foresman and Pearson 1999). Many decades of aggressive fire suppression have likely reduced the quality and quantity of lynx and snowshoe hare habitat by altering the amount and pattern of vegetation types and structural stages (Ruediger et al. 2000). Fire had been a dominant influence historically in the northern Rocky Mountains (Agee 1999, Gruell 1983).

Forest management practices such as commercial harvest, road construction, and post harvest thinning can influence lynx habitat and its prey. Snowshoe hares may reach highest densities in young, dense coniferous or coniferous-deciduous forest and forest with a dense understory of shrubs, aspen, and /or conifers. Red squirrels appear in the later stages of forest development when mature cone-bearing trees are common.

Timber harvest is not a substitute for natural disturbance processes. Timber harvest may result in removal of biomass, especially larger trees; selective removal of particular tree species; removal, thinning, and planting that may give a competitive advantage to certain tree species; and the construction of roads that may be used as travel routes after the project has been completed. As a result, forest composition and structure have changed in these areas, with stands generally becoming more homogeneous, composed of more shade-tolerant species with more canopy layers, and being more susceptible to severe fire, insects, and diseases (Quigley et al. 1997).

Denning habitat for lynx occurs in mature and late structural boreal forests with locally abundant large woody debris present. Fire suppression and logging have altered the mosaic of habitats needed for prey species and denning sites (USDI FWS 2000, Wisdom et al. 2000).

#### d. Threats

Major risk factors for lynx include direct human threat (shooting, trapping, vehicle collisions), as well as forage and denning cover habitat modifications (USDI FWS 2000). Lynx have evolved a competitive advantage in deep snow environments due to their large paws that allow them to hunt prey where other predators cannot because of snow conditions. However, snow trails compacted by human activity may allow other predators to access prey in deep snow conditions where historically they were excluded. Advances in snowmobile capabilities have raised concerns about intrusion into previously isolated areas. Human access into lynx habitat during winter can also increase threats, because lynx tracks can be detected by traversing vast forest areas in a short period of time by snowmobile. The legal harvest of lynx was closed in Idaho in 1996 (Lewis and Wenger 1998, McKelvey et al. 1999, Wisdom et al. 2000).

Current conditions of lynx habitat have resulted from many factors, primarily related to fire. Timber harvest has had relatively minor effects, given the small amount of activity that has occurred in high-elevation lodgepole pine and subalpine fir forests. Fire suppression, on the other hand, has occurred for many decades over the entire Forest, resulting in changes to forest structure and composition, and an increase in fuels. Fire regimes for the CNF are as follows:

- Non-lethal, – 0-35 year frequency, low severity;
- Mixed1 – 35-100 year frequency, mixed severity;
- Mixed2 – 35-100+ year frequency;
- Lethal – 200+ year frequency, stand-replacing severity.

Most lynx habitat is within the Mixed 2 and Lethal fire regimes. From 2000 to present, an estimated 5 percent (90,000 acres) of the CNF was burned by wildfire. Approximately 50% of this would have been in potential lynx habitat.

Effects to Canada lynx are analyzed based on Lynx Analysis Units (LAUs) that have been delineated across the Forest. There are no vegetative or habitat changes proposed in this action. The existing lynx habitat situation by LAU can be found at: [http://www.fs.fed.us/r1/clearwater/terra\\_org/terra.htm](http://www.fs.fed.us/r1/clearwater/terra_org/terra.htm).

## II. SPECIFIC DESCRIPTION OF THE FOREST (ENVIRONMENTAL BASELINE)

### A. CANADA LYNX

#### 1. NATURAL PHYSICAL CHARACTERISTICS

The Forest has 63 lynx analysis units (LAU). The lynx is associated with boreal subalpine fir and lodgepole forested environments. They forage on primarily snowshoe hare with minor prey; mice, voles, squirrels, and birds. Lynx are not common in Idaho and are primarily restricted to northern Idaho. Primary criteria for lynx habitat are forested elevations above 4,000 feet composed of stands of spruce, subalpine fir and lodgepole pine. Primary foraging habitat is young pole stage lodgepole pine where they prey on snowshoe hare. Denning habitat is mature spruce and subalpine fir forest with extensive downfalls. The amount of potential and suitable lynx habitat is displayed in the Table 4.

#### 2. HUMAN-CAUSED PHYSICAL CHARACTERISTICS

Current conditions of lynx habitat on the Forest have been somewhat affected by human-caused activities. Timber harvest has had relatively minor effects, given the small amount of activity that has occurred in high-elevation lodgepole pine and subalpine fir forests. Fire suppression has occurred for many decades over the entire Forest and may have resulted in changes to forest structure and composition, and an increase in fuels. Prescribed fire and natural wildfires over the past 10 years has likely improved lynx habitats.

#### 3. CUMULATIVE EFFECTS

Activities authorized under this BA are designed to minimize effects of Forest management on lynx, thereby minimizing potential cumulative effects. Two actions that may contribute to the most cumulative effects on lynx habitat in the past are fire suppression and timber harvest. Fire suppression activities over the last 75-90 years have modified forest vegetation conditions towards “climax” conditions, although recent wildfires may be offsetting many of those effects.

Timber harvest over the same period of time has had a different set of effects. Harvest has generally converted older structural stages to younger ones and reintroduced seral species through reforestation. Harvest has also increased access.

Hunting, trapping, animal damage control, and firewood gathering may have also adversely affected populations of some wildlife species. Overall, the combination of these and other effects mentioned previously have changed wildlife distribution and population from what they were before Euro-American settlement.

#### 4. DESCRIPTION AND DISTRIBUTION OF THE LISTED SPECIES

The Idaho Conservation Data Center maintains statewide records of rare animal observations (ICDC 2002). There are 18 historic records for lynx on the CNF.

#### 5. HABITAT CONDITION, TREND AND LIMITING FACTORS

Much of the estimated lynx's habitat on the CNF has not been actively managed in the past, other than to suppress wildfires that would have otherwise altered age class, stand structure, and species composition. Large-scale management activities are not anticipated in lynx habitat; succession and fire will cause most of the vegetation changes over the long term as they have in recent years. Many areas that historically had patches of trees in mixed ages, sizes, and species have been replaced by larger stands of even-aged but older trees, in or approaching climax conditions. Long-term fire suppression has generally reduced lynx foraging habitat, but has likely benefited denning habitat. Although a large amount of lynx habitat has burned within the last 10 years, it is estimated that 15-30 years may be needed for succession to advance before some of these recently burned areas turn into lynx foraging habitat (Ruediger et al. 2000). Recently burned areas are not considered suitable lynx habitat until they become re-established with sufficient vegetation to support lynx prey i.e. snowshoe hare, and cover for lynx. Large-scale management activities are not anticipated in lynx habitat; succession and fire will cause most of the vegetation changes over the long term as they have in recent years.

## III. DESCRIPTIONS OF PROPOSED ACTIONS

## FEDERAL ACTION: TRAVEL PLAN

### DESCRIPTION:

The project is fully discussed in detail in the Fisheries section of the above document.

## IV. ANALYSIS OF POTENTIAL EFFECTS

### A. EFFECTS OF MANAGEMENT DISTURBANCES

#### 1. DIRECT, INDIRECT, AND CUMULATIVE EFFECTS OF TRAVEL MANAGEMENT

##### *Motorized Access in Summer*

There is little information on the effects of roads and trails on lynx or their prey (McKelvey et al. 2000). Construction of roads may remove lynx habitat; conversely, lynx may use less-traveled roads for travel and foraging if vegetation conditions provide good snowshoe hare habitat. Preliminary information indicates that lynx do not avoid roads except those with high traffic volume (Aubry et al. 2000; Ruggerio et al. 2000a) or when road use coincides with sensitive habitat such as denning habitat (Ruggerio et al. 2000b).

The Northern Rockies Lynx Management Direction does not contain any management direction on road or trail use in lynx habitat. The Fish and Wildlife Service has concluded that roads, even with high traffic volume, constitute a low threat to lynx populations (USDI 2003).

In all action alternatives, areas open to cross-country travel would decrease. These closures to off-road travel would likely benefit lynx habitat. In addition, there will be no new road or trail construction proposed in any alternative.

##### *Winter Habitat*

Increases in winter access into lynx habitat have increased the vulnerability of lynx to harvest in areas historically isolated from humans (Todd 1985). Lynx are particularly easy to capture by trapping (Bailey et al. 1986; Mowat et al. 1999), and trapping can be a major cause of lynx mortality. There have been no documented cases of incidental trapping of lynx on the forest.

Some researchers maintain winter activities, (e.g. cross-country skiing, snowmobiling) can compact snow allowing other predators that compete with lynx to access lynx habitat (Claar et al. 1999; Bunnell et al. 2006). Lynx appear to have evolved a competitive advantage in deep snow that tends to exclude other predators during winter, a time when prey is most limiting (Buskirk et al. 2000; Ruediger et al. 2000). Other researchers note there is no solid data on the role of snow compaction and changes in competitive advantage between lynx and other species (Kolbe, 2007).

In a review of potential threats to lynx (USDI 2003), the Fish and Wildlife Service concluded: “*There is no evidence that any competition that may exist between lynx and other species exerts a population-level impact on lynx.*” and “*No evidence has been provided that packed snow trails facilitate competition to a level that negatively affects lynx.*” Research in western Montana appears to support this contention, finding that: “The overall influence of over-snow vehicle trails on coyote movements and foraging success during winter appeared to be minimal on our study area (Kolbe et al. 2007.). Other research in Utah arrived at differing conclusions (using different methodology) stating: “Our results suggest that restrictions placed on over-snow vehicles in lynx conservation areas by land management agencies because of potential impacts of coyotes may be appropriate.” (Bunnell et al. 2006).

The NRLMD has a *guideline* in lynx habitat for winter over-snow uses:

“Designated over-snow routes or designated play areas should not expand outside baseline areas of consistent snow compaction, unless designation serves to consolidate use and improve lynx habitat.”

There are approximate 115 miles of groomed over-snow vehicle baseline routes in lynx habitat on the forest. No additional groomed routes in lynx habitat are proposed in the action alternative. The CNF has no designated “play areas.”

#### ***Proposed Alternative C Modified***

The potential for lynx mortality and harassment in the proposed alternative would be slightly lower than under the existing situation, because no cross-country travel would be allowed. This would likely improve security and reduce the potential for disturbance within lynx habitat and travel corridors. Lynx habitat in MA B2 would likely improve with the proposed over-snow vehicle restrictions in Alternatives C Modified. No other changes from the existing situation are proposed in the purpose and need for this project that would affect lynx or lynx habitat or that would have any measurable impact.

#### ***Cumulative Effects***

Several past and ongoing activities may have resulted in positive effects on lynx habitat such as decisions closing areas of the Forest to off-road travel or over-snow vehicle use. The presence of roadless areas contributes to lynx refugia. Past vegetation management projects and natural wildfires may have benefited lynx habitat through creation of early seral habitat for snowshoe hares and reduced denning habitat. Projects that promote, protect, or enhance mature forests contribute towards denning habitat. The Forest Service ongoing and reasonably foreseeable actions (see Appendix C) that may cumulatively affect lynx include this Travel Plan, recreation management, and fuels projects. In general, these actions would cumulatively benefit lynx and lynx habitat.

#### ***Effects Determination***

There would be no measurable direct, indirect or cumulative impacts from implementing the proposed action. There is no management direction in the NRLMD concerning the human uses of roads or trails during summer. Winter uses are consistent with the management guidelines. Restricting over-snow vehicles in MA B2 and cross-country travel will likely have an overall beneficial effect. Therefore, the biological determination is: “**may affect, but not likely to adversely affect**” lynx or their habitat.

## **V. MITIGATION MEASURES**

No additional mitigation measures are needed other than those specified in the descriptions of the proposed actions.

## **VI. MONITORING AND EVALUATION**

The following monitoring items have been identified:

- Within one year following the implementation of the Travel Plan ROD, submit to the FWS a winter over-snow monitoring plan as required in the NRLMD. This plan should include provisions to update over-snow trail and play area uses.
- Conducted an update lynx habitat mapping process to account for natural and prescribed fire burn areas, and latest condition class across lynx habitat on the forest.

## **REFERENCES (Lynx)**

**Agge, J.K.** 2000. Disturbance ecology of North American boreal forests and associated northern mixed/subalpine forests. Pages 39-82 In Ruggiero, L.F., K.B. Aubry, S.W. Buskirk, G.M. Koehler, C.J. Krebs, K.S. McKelvey, and J.R. Squires. (Tech. Rds.) Ecology and conservation of lynx in the United States. Univ. Press of Colorado. Boulder, CO. 480 pp.

**Apps, C.D.** 1999. Space-use, diet, demographics, and topographic associations of lynx in the southern Canadian Rocky Mountains: a study. Pp. 351-371. In: Ecology and Conservation of Lynx in the United States. Ruggiero et al. Rocky Mountain Research Station. Technical Report RMRS-GTR-30WWW. <http://www.fs.fed.us/rm/pubs/rmrs-gtr030.pdf> 485 pp.

**Aubry, K.B.**, G.M. Koehler and J.R. Squires. 1999. Ecology of Canada Lynx in Southern Boreal Forests. In: Ecology and Conservation of Lynx in the United States. Ruggiero et al. Rocky Mountain Research Station. Technical Report RMRS-GTR-30WWW. <http://www.fs.fed.us/rm/pubs/rmrs-gtr030.pdf> 485 pp.

**Bailey, T.N.**, E.E. Bangs, M.F. Portner, J.C. Malioy, and R.J. McAvinchey. 1986. An apparent overexploited lynx population on the Kenai Peninsula, Alaska. Journal of Wildlife Management. 50. Pp. 279-290.

**Banci, V.A.** 1994a. Fisher (Pp. 44 and 47). In: L.F. Ruggiero, K.B. Aubry, S.W. Buskirk, L.J. Lyon, and

**W.J. Zielinski**, eds. The scientific basis for conserving forest carnivores, American marten, fisher, lynx and wolverine in the western United States. USDA For. Serv. Rocky Mt. For. and Range Exp. Stn., Gen. Tech. Rep. RM-254. Fort Collins: CO. Brittell, J. D., R. J. Poelker, S. J. Sweeney, and G. M. Koehler. 1989. Native cats of Washington. Washington Department of Wildlife, Olympia. 3pp. [www.predatorconservation.org](http://www.predatorconservation.org)

**Bunnell, K. D.**, J. T. Flinders, M. L. Wolfe, and J. A. Bissonette. 2006. Potential impacts of coyotes and snowmobiles on lynx conservation in the intermountain west. Wildlife Society Bulletin 34(3):2006. 11 pp.

**Buskirk, S.W.**, L.F. Ruggerio, and C.J. Krebs. 1999. Habitat Fragmentation and Interspecific Competition: Implications for Lynx Conservation. Rocky Mountain Research Station. Technical Report RMRS-GTR-30. 9 pp. <http://www.fs.fed.us/rm/pubs/rmrs-gtr030.pdf>

**Federal Register**, July 3, 2003. Vol. 68. No. 128, pp. 40075-40101. Final Rule: Notice of Remanded Determination of Status for the Contiguous United States Distinct Population Segment of the Canada Lynx; Clarification of Findings.

**Gruell, G.** 1983. Fire and vegetation trends in the Northern Rockies: interpretations from 1871-1982 photographs. USDA Forest Service, Intermountain Forest and Range Experiment Station. INT-158. 117 pp.

**Hodges, K. E.** 2000. The ecology of snowshoe hares in southern boreal and montane forests. Chapter 7 In Ruggiero, L.F., K.B. Aubry, S.W. Buskirk, G.M. Koehler, C.J. Krebs, K.S. McKelvey, and J.R. Squires. (Tech. Eds.) Ecology and conservation of lynx in the United States. Univ. Press of Colorado. Boulder, CO. 480 pp.

**Koehler, G. M.** 1990. Population and habitat characteristics of lynx and snowshoe hares in north-central Washington. Canadian Journal of Zoology 68. Pp. 845-851.

**Koehler, G.M.** and J.D. Brittell. 1990. Managing spruce-fir habitat for lynx and snowshoe hares. Journal of Forestry. 10. Pp. 10-14.

**Koehler, G.M.** and K. B. Aubry. 1994. Lynx. Pp. 74-98 In: L.F. Ruggerio, K.B. Aubry, S.W. Buskirk, L.J. Lyon, and W.J. Zielinski. 1994. The scientific basis for conserving forest carnivores, American marten, fisher, lynx and wolverine in the western United States. USDA For. Serv. Rocky Mt. For. and Range Exp. Stn., Gen. Tech. Rep. RM-254, Fort Collins, CO. 184 pp.

**Kolbe, J. A.**, J. R. Squires, D. Pletscher, and L. F. Ruggiero. 2007. The effect of snowmobile trails on coyote movements within lynx home ranges. Journal of Wildlife Management. 71 (5):1409-1418.

**Lewis, L.** and C.R. Wenger. 1998. Idaho's Canada lynx: pieces of the puzzle. Idaho Bureau of Land Management, Technical Bulletin No. 98-11. 21 pp.

**McKelvey, K.S.**, K.B. Aubry, J.K. Agee, S.W. Buskirk, L.F. Ruggiero, and G.M. Koehler. 2000. Lynx conservation in an ecosystem management context. In: Ecology and Conservation of Lynx in the United States. Ruggiero et al. Rocky Mountain Research Station. Technical Report RMRS-GTR30WWW. <http://www.fs.fed.us/rm/pubs/rmrs-gtr030.pdf> 485 pp.

**Mowat, G.**, K. G. Poole, and M. O'Donoghue. 1999. Ecology of Lynx in Northern Canada and Alaska. Pp. 265-306. In: L. F. Ruggiero, K. B. Aubry, S. W. Buskirk, G. M. Koehler, C. J. Krebs, K. S. McKelvey, and J. R. Squires. In: Ecology and conservation of lynx in the United States. Ruggiero et al. 1999. USDA Forest Service. Rocky Mountain Research Station. Technical Report RMRS-GTR-30WWW. <http://www.fs.fed.us/rm/pubs/rmrs-gtr030.pdf> 485 pp.

**Nordstrom, L.**, A. Hecht, M. McCollough, B. Naney, J. Trick, N. Warren, and M. Zwartjes. 2007. Recovery Outline: Contiguous United States Distinct Population Segment of the Canada Lynx. US Fish and Wildlife Service, Denver, Colorado. 25 pp.

**Quigley, T.M.**, R.W. Haynes, and R.T. Graham. Tech. Eds. 1996. Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin and Portions of the Klamath and Great Basins. Gen. Tech. Rep. PNW-GTR-382. Portland, OR. USDA, Forest Service, Pacific Northwest Research Station. 303 pp. See abstract.

**Quigley, T.M.**, and S.J. Arbelbide. Tech Eds., 1997. An Assessment of Ecosystem Components in the Interior Columbia Basin and Portions of the Klamath and Great Basins. Gen. Tech. Rep. PNWGTR-405. Portland, OR. USDA, Forest Service, Pacific Northwest Research Station. 4 volumes. See abstract.

**Ruediger, R.**, J. Claar, S. Gniadek, B. Holt, L. Lewis, S. Mighton, R. Naney, G. Patton, T. Rinaldi, J. Trick, A. Vandehey, F. Wahl, N. Warren, D. Wegner, and A. Williamson. 2000. Canada lynx conservation assessment and strategy. Amended 2003 and 2004. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Forest Service Publication #R1-00-53, Missoula MT. 142 p.

**Ruggiero, L.F.**, K.B. Aubry, S.W. Buskirk, L.J. Lyon, and W.J. Zielinski. 1994. The scientific basis for conserving forest carnivores, American marten, fisher, lynx and wolverine in the western United States. USDA Forest Service. Rocky Mtn. Forest and Range Exp. Stn: Gen. Tech. Rep. RM-254: Fort Collins CO.

**Ruggiero, L.F.**, K.B. Aubry, S.W. Buskirk, G.M. Koehler, C.J. Krebs, K.S. McKelvey, and J.R. Squires. 1999. The scientific basis for lynx conservation: qualified insights. Pp 443-454. In: Ecology and conservation of lynx in the United States. Ruggiero et al. 1999 USDA Forest Service. Rocky Mountain Research Station. Technical Report RMRS-GTR-30WWW. <http://www.fs.fed.us/rm/pubs/rmrs-gtr030.pdf> 485 pp.

**Sullivan, T.P.**, and D.S. Sullivan. 1981. Responses of a deer mouse population to a forest herbicide application: reproduction, growth, and survival. Can. J. Zool. 59:1148-1154.

**Sullivan, T.P.**, C. Nowotny, and R.A. Lautenschlager. 1998. Silvicultural use of herbicide in sub-boreal spruce forest: implications for small mammal population dynamics. Journal of Wildlife Management 62(4): 1196-206.

**Sullivan, T.P.** 1990a. Demographic responses of small mammal populations to a herbicide application in coastal coniferous forest: population density and resiliency. Can. J. Zool. 68: 874-883.

**Sullivan, T.P.** 1990b. Influence of forest herbicide on deer mouse and Oregon vole population dynamics. J. Wildlife Manage. 54(4): 566-576.

**Todd, A.** 1985. The Canada lynx: ecology and management. Canadian Trapper 3. Pp. 15-20. Abstract In: T. W. Butts, editor. Lynx (*Felis lynx*) biology and management: a literature review and annotated bibliography. 1992. USDA Forest Service: Missoula MT.

**Truska, A.** and E. Yensen. 1990. Photographic evidence of vegetation changes in Adams County, Idaho. Journal of the Idaho Academy of Science 26:18-40.

**USDA Forest Service.** 2003. Southwest Ecogroup Land and Resource Management Plan FEIS, Appendices, and ROD. USDA Forest Service: Clearwater National Forest: McCall ID.

**USDA Forest Service.** 2003a. Clearwater National Forest Land and Resource Management Plan (Forest Plan or LRMP). USDA Forest Service: Clearwater National Forest: McCall ID

**USDA Forest Service and USDI Fish and Wildlife Service.** 2005. Canada Lynx Conservation Agreement. Second Edition. R1-00-53. Missoula MT. 142 pp.

**USDI Fish and Wildlife Service.** 2006. Occupied Mapped Lynx Habitat Amendment to the Canada Lynx Conservation Assessment and Strategy. Missoula Mt. 5 pp. Attached to USDI Fish and Wildlife Service Canada Lynx Conservation Agreement with the USDA Forest Service, 2006 correspondence. Fish and Wildlife Service, Portland, Oregon. 2 pp.

**Weaver, J.L.** 1999. Results of 1998 lynx hair snagging survey and DNA analysis for northern Idaho. Unpubl. Report. 1p..

**Wirsing, A.J.**, T.D. Steury, and D.L Murray. 2002. A demographic analysis of a southern snowshoe hare population in a fragmented habitat: evaluating the refugium model. Can. J. Zool. 80:169-177.

**Wisdom, M.J.**, R.S. Holthausen, B.C. Wales, C.D. Hargis, V.A. Saab, D.C. Lee, W.J. Hann, T.D. Rich, M.M. Rowland, W.J. Murphy and M.R. Earnes. 2000. Source habitats for terrestrial vertebrates of focus in the Interior Columbia Basin: Broad-scale trends and management implications, Volume 2 – Group level results. Gen. Tech. Rep. Threatened and Endangered Species, Sensitive Species and Management Indicator Species and the level of analysis required. PNW-GTR-485. Pp. 181190; 199-208; 219-223; 237-241; 242-248; 258-265; 293-297. [www.fs.fed.us/pnw/pubs/gtr485/485v1 and 485v2a and 885v2b.pdf](http://www.fs.fed.us/pnw/pubs/gtr485/485v1 and 485v2a and 885v2b.pdf)

**APPENDIX B  
AQUATIC MONITORING PLAN  
TRAVEL PLANNING PROJECT  
CLEARWATER NATIONAL FOREST**

**Aquatic Monitoring Plan**

*Travel Planning Project*

*Clearwater National Forest*

*Final Version – August 16, 2010*

**MONITORING PROJECT SUMMARY SHEET**

**Type of Monitoring:** Implementation and Effectiveness (Water Quality & Aquatic Resources)

**Project Name:** OHV Travel Planning Project (2011-2015)

**Goal:** The goal of the best management practices and design features as described in the Environmental Impact Statement (U.S.D.A. Forest Service – Clearwater National Forest 2010<sup>1</sup>) is to meet Forest Plan standards. Specifically for aquatic resources, the Forest Plan states “manage water quality and stream conditions to assure that National Forest management activities do not cause permanent or long-term damage to existing or specified beneficial uses”. The overall goal of this monitoring project is to determine if authorized travel (motorized and non-motorized) is causing direct or indirect impacts to aquatic resources.

**Objectives:** (1) Determine if travel (motorized and non-motorized) is causing direct or indirect aquatic impacts on selected trails within drainages that have ESA listed fish species. (2) Determine if existing dispersed recreational sites located within the Riparian Habitat Conservation Areas (RHCA) and within drainages that have ESA listed fish species are meeting the standards and guidelines established to meet or not retard the attainment of the Riparian Management Objectives (as defined in PACFISH and INFISH amendments to the Forest Plan)

The analysis summarized in the biological assessment concluded that the cumulative impacts (both existing and potential) regarding the existing trail system (including motorized use) would be minimal (non-measurable) to the major population groups for steelhead trout and core areas for bull trout. However, dependent upon the location of stream fords and dispersed recreation sites in relation to occupied steelhead trout and bull trout streams, some impacts may not be insignificant or discountable in specific drainages.

The proposed project (*alternative C-modified*) shows out of the 539 stream crossings that may have motorized travel the majority of the crossings (90-95 percent) have culverts or puncheons to avoid travel into the stream channel. Approximately 86 crossings are located on fish-bearing streams (16 percent). The number of stream fords across fish-bearing and nonfish-bearing streams is estimated from 25 to 51 (5 -10 percent when the 32 bridges are excluded).

In 2010, the Forest conducted a field review of the motorized trail stream crossings on those streams that have documented presence (or potential) of steelhead trout or bull trout spawning and/or rearing. Fourteen stream crossings on streams that have been documented as fish bearing were evaluated (see Table 1). The field reviews did not find any notable spawning habitat at the stream crossings. Soil disturbance was observed to be within the expected size and magnitude and limited to the trail. The larger streams did not show any changes in substrate conditions at the trail stream crossings as compared to upstream or downstream stream reaches. At several smaller crossings, instream conditions (i.e. substrate conditions) showed localized substrate disturbance (primarily loosen materials with some pockets of fine sediment). Other than expected widening of the stream channel at a

---

<sup>1</sup> U.S.D.A. Forest Service – Clearwater National Forest 2010. OHV travel planning final environmental impact statement. Clearwater National Forest, Orofino, Idaho.

few of the smaller streams crossings, none of the stream crossings showed any notable stream channel alterations that can be attributed from past erosion events as a result of motorized or non-motorized use.

The field review also evaluated another 12 potentially fish-bearing streams that had trail fords; although some may have potential for westslope cutthroat trout (especially downstream of the crossings) none of these streams were large enough to provide habitat for steelhead trout or bull trout at the stream crossings. Similar to the larger crossings, impacts were restricted to the crossings and were relatively minor; some hardening of the approaches will be recommended during future trail maintenance work.

In addition to the motorized trail crossings, authorization of existing dispersed recreation sites within the riparian conservation areas (RHCAs) as defined by PACFISH and INFISH amendments to the Forest Plan may cause impacts to listed fish species. Some of these existing recreational sites extend to or below the normal high water area and may cause channel alterations or sedimentation especially if vehicles are permitted into these areas.

**Parameters:**

1. Stream ford monitoring.
  - a. Spawning gravels present at stream crossing
  - b. Erosion on trail approaches (sedimentation)
2. Dispersed site monitoring.
  - a. Site located within bankfull area.
  - b. Distance of site to stream.
  - c. Stream bank disturbance.
  - d. Vegetative modifications affecting bank stability, streamside shade and/or woody debris recruitment.
  - e. Erosion and/or sedimentation

**Location(s):** As per Section 7 ESA consultation process via Level One coordination, the following monitoring locations were to identify any existing or potential impacts to steelhead trout and bull trout:

Stream crossings on the following trails<sup>2</sup> will be monitored every third year to ascertain if any stream fords are causing impacts<sup>3</sup> to listed species:

Table 1. Stream Crossings to be monitored.

Subbasin	Drainage	Stream Crossing(s) Trail Number(s)	Species
Lochsa River	Fish Creek	Fish Creek, Poker Creek and Ceanothus Creek – Trails #229 and #2240	Steelhead Trout/Bull Trout
North Fork Clearwater River	Rock Creek	Rock Creek (2 crossings) Road #5259 (ATV trail)	Bull Trout

<sup>2</sup> These trails were selected due to their location along or crossing streams with known steelhead trout and/or bull trout populations.

<sup>3</sup> Field reviews will entail photos, stream channel assessment (substrate, banks) and trail condition (erosion/sedimentation). The review will note any recommendations (i.e. trail re-location, structures, erosion control etc.).

Subbasin	Drainage	Stream Crossing(s) Trail Number(s)	Species
North Fork Clearwater River	Cayuse Creek	Gravey Creek Crossing - Trail #255 (Road #587 to Road #107)	Bull Trout
North Fork Clearwater River	Weitas Creek	Corral Creek, Liz Creek, Ball Creek, Windy Creek, Smith Creek, Johnagan Creek – Trail #20 (Johnny Creek to 12 Mile Saddle)	Bull Trout
North Fork Clearwater River	Weitas Creek	Hemlock Creek, Larch Creek – Trail #104	Bull Trout

To assess whether existing recreational sites extend to or below the normal high water area and are causing channel alterations or sedimentation, the Forest will conduct a field review of existing sites along the following streams<sup>4</sup>:

Table 2. Riparian areas along roads to be evaluated and monitored.

Subbasin	Drainage	Roads (Number)	Species
Clearwater River	Lolo Creek	#100/#103 (Junction of #500 to Beaver Dam Saddle)	Steelhead Trout/Bull Trout
Clearwater River	Eldorado Creek (Lolo Creek drainage)	#500 (Junction of #100 to #524)	Steelhead Trout/Bull Trout
Lochsa River	Lochsa River/Crooked Fork Creek	US 12 (Selway River to Brushy Fork Creek)	Steelhead Trout/Bull Trout
Lochsa River	Waw'aalamnine (Squaw) Creek	#108 (US 12 upstream five miles)	Steelhead Trout/Bull Trout
Lochsa River	Badger Creek	#5621 (US 12 upstream three miles)	Steelhead Trout/Bull Trout
Lochsa River	Innamatnoon (Papoose) Creek	#568 (US 12 upstream five miles)	Steelhead Trout/Bull Trout
Lochsa River	Brushy Fork Creek	#373 (Low Gap Bridge upstream to	Steelhead Trout/Bull

---

<sup>4</sup> These roads were selected due to their location along streams with known steelhead trout and/or bull trout populations and existing dispersed recreation sites within the RCA's. Field reviews will entail photos, stream channel assessment (substrate, banks) and any recommendations regarding riparian restoration.

Subbasin	Drainage	Roads (Number)	Species
		North Fork Spruce Creek)	Trout
North Fork Clearwater River	Isabella Creek	#700/705 (North Fork Clearwater River to Isabella Creek crossing)	Bull Trout
North Fork Clearwater River	North Fork Clearwater River	#247 (Beaver Creek to Orogrande Creek)	Bull Trout
North Fork Clearwater River	Orogrande Creek, North Fork Clearwater River, Long Creek	#250 (French Mtn Saddle to Hoodoo Pass)	Bull Trout
North Fork Clearwater River	Kelly Creek, Moose Creek	#255 (North Fork Clearwater River to Independence Creek)	Bull Trout
North Fork Clearwater River	Skull Creek	#252 (North Fork Clearwater River to Collins Creek)	Bull Trout
North Fork Clearwater River	Lake Creek	#295 (North Fork Clearwater River to Fish Lake trailhead)	Bull Trout

**Frequency:** Follow-up field reviews of the 14 trail crossings on fish bearing streams will be completed every three years (i.e. 2013 and 2016) in conjunction with the Forest's stream temperature monitoring program.

The field reviews of the riparian sites will be completed once during the first two complete field seasons following the authorization of the travel plan. Any sites identified for maintenance (i.e. restoration, closure etc) will be evaluated the year following maintenance at a minimum and on a needed basis thereafter. For the remaining sites, unless recreational monitoring shows that motorized use or dispersed site use has increased 50 percent compared to existing levels, each field review will be conducted once (each existing dispersed site located along the roads noted above will be visited once).

#### **Methodology:**

1. Stream ford monitoring: Although each of the 14 stream crossings were field reviewed in 2010 and no issues regarding spawning habitat (steelhead trout and bull trout) and trail erosion were observed, each trail will be monitored every third year and the following information regarding streams crossings will be collected to assess any changes:
  - a. At all stream fords, the amount of area potentially available for spawning for steelhead trout and bull trout will be assessed using the Standard stream survey techniques (Clearwater National Forest transect methodology) as outlined in Espinosa (1988)<sup>5</sup> and including revisions from 1989-1995 (Revised Survey Methodology - Documentation for Columbia River Basin Aquatic Data Request, 1995).
    - b. Any erosion on trail approaches that is contributing sediment to the stream course will be noted.
    - c. Digital photos of each stream ford and the trail approaches will be taken.
    - d. GPS coordinates will be recorded.

---

<sup>5</sup> Espinosa, A. 1988. Clearwater stream survey methodology. Clearwater National Forest, Orofino, Idaho.

- e. Recommendations regarding minimizing impacts to spawning fish and/or substrate conditions such as, moving crossing and/or providing crossing structure, and hardening and/or drainage control at the trail approaches are recorded.
- 2. Dispersed site monitoring: Each dispersed site that currently has motorized use will be walked and the following information regarding effects to the riparian area and adjacent stream will be collected:
  - a. At each existing dispersed site, a sketch of the site in relation to the adjacent stream(s) and the established route will be completed.
  - b. The closest location of the site to the bankfull (i.e. high water mark) will be measured. Sites that extend within the high water zone will be noted.
  - c. The linear distance of bank disturbance (m) will be estimated.
  - d. The amount of vegetative modifications (expressed in m<sup>2</sup> within 150 feet of the stream(s) will be estimated.
  - e. Qualitative assessment regarding vegetative modifications affecting bank stability, streamside shade and/or woody debris recruitment.
  - f. Any erosion at the dispersed site that is contributing sediment to the stream course will be noted.
  - g. Digital photos of each stream ford and the trail approaches will be taken.
  - h. GPS coordinates will be recorded.
  - i. Recommendations regarding reduction of the site “foot print”, closure of the site to motorized travel and/or complete closure for use are recorded.

A report will be prepared following the second field season and presented to NOAA Fisheries and USFWS the following spring. The report will note any existing and potential problems, immediate actions taken during the interim to minimize or avoid the impacts, and any pending or potential actions that the Forest will address administratively or through the NEPA process.

**Duration:** The field reviews of the riparian sites will be completed during the first two complete field seasons following the authorization of the travel plan. A report will be prepared following the second field season. Access to dispersed recreational sites (within the riparian areas) that are authorized under the Travel Plan will be inventoried to avoid user-created unauthorized sites and evaluated to assess impacts and restoration needs. Dependent upon the location of the site and issues, follow-up monitoring may occur on an annual basis. If other recreational monitoring shows that motorized use or dispersed site use has increased 50 percent compared to existing levels, follow-up and/or additional field reviews may be necessary.

Follow-up field reviews of the 14 trail crossings on fish bearing streams will be completed every three years (i.e. 2013 and 2016) in conjunction with the Forest's stream temperature monitoring program.

**Data Storage:** On the J drive:  
(fsfiles/office/aquatic/inventory\_monitoring/monitoring/ohv\_travel\_planning).

**Report:** Include in Forest annual monitoring results report, annual ESA compliance report and in the fisheries project files.

**Estimated Cost:** \$7,500 – Riparian Assessment and Report; other follow-up monitoring will be associated with other monitoring activities (i.e. stream temperature monitoring).

- 2 – Biological Technicians – field surveys; dispersed sites – 10 days
- 1 - Fish Biologist/Hydrologist – field surveys; dispersed sites – 10 days
- 1 – Forest Fish Biologist – project setup, analysis and report – 3 days

**Personnel Required:** Recreational, Biological, and/or Hydrologic Technician(s) and Fishery Biologist

**Responsible Individual:** Pat Murphy

**Prepared By:** Pat Murphy

**Date:** 08/16/10

**APPENDIX C**  
**STREAM CROSSINGS AND RIPARIAN TRAIL MILES TABLES**  
**TRAVEL PLANNING PROJECT**  
**CLEARWATER NATIONAL FOREST**

Clearwater National Forest Travel Planning Record of Decision  
Attachment 1: Biological Assessment

Table 1. Comparison of number of stream crossings on trails open for motorized travel (fish bearing and non-fish bearing streams ) under the existing condition and project proposal, Clearwater National Forest Travel Planning Project.

HUC_4	HUC_5	HUC_5_NAME	Fish Bearing	Existing Condition			Project Proposal			
				Seasonal	Undefined	Yearlong	Total	Seasonal	Yearlong	Total
17060108	1706010801	Upper Palouse River	no	46	12	0	58	46	0	46
			yes	10	2	0	12	10	0	10
17060108	<b>Palouse Total</b>			<b>56</b>	<b>14</b>	<b>0</b>	<b>70</b>	<b>56</b>	<b>0</b>	<b>56</b>
17060302	1706030205	East Fork Moose Creek	no	0	0	0	0	0	0	0
			yes	0	0	0	0	0	0	0
17060302	<b>Lower Selway Total</b>			<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
17060303	1706030301	Crooked Fork Creek	no	0	1	0	1	0	0	0
			yes	0	1	1	2	0	1	1
1706030302	Colt Killed Creek		no	0	0	0	0	0	0	0
			yes	0	0	0	0	0	0	0
1706030303	Upper Lochsa River		no	0	0	0	0	0	0	0
			yes	0	1	0	1	0	0	0
1706030304	Warm Springs Creek		no	0	0	0	0	0	0	0
			yes	0	0	0	0	0	0	0
1706030305	Middle Lochsa River		no	4	0	22	26	4	22	26
			yes	1	0	0	1	1	0	1
1706030306	Fish Creek		no	25	23	0	48	25	0	25
			yes	8	4	0	12	8	0	8
1706030307	Lower Lochsa River		no	134	34	0	168	134	0	134
			yes	10	6	0	16	10	0	10
17060303	<b>Lochsa Total</b>			<b>182</b>	<b>70</b>	<b>23</b>	<b>275</b>	<b>182</b>	<b>23</b>	<b>205</b>
17060306	1706030603	Lolo Creek	no	9	0	20	29	9	7	16
			yes	1	0	2	3	1	1	2
1706030609	Upper Potlatch River		no	2	0	0	2	2	0	2
			yes	1	0	0	1	1	0	1
1706030610	Middle Potlatch River		no	4	0	0	4	4	0	4
17060306	<b>Clearwater Total</b>			<b>17</b>	<b>0</b>	<b>22</b>	<b>39</b>	<b>17</b>	<b>8</b>	<b>25</b>
17060307	1706030701	North Fork Clearwater River - Lake Creek	no	1	32	49	82	1	34	35
			yes	0	21	11	32	0	6	6
1706030702	Kelly Creek		no	0	12	45	57	1	0	1
			yes	0	7	8	15	1	0	1
1706030703	Cayuse Creek		no	0	11	51	62	0	4	4
			yes	7	3	3	13	7	1	8
1706030704	Moose Creek		no	0	2	2	4	0	0	0
			yes	0	3	25	28	10	15	25
1706030705	Upper North Fork Clearwater River - Weitas Creek		no	0	0	2	2	1	0	1

HUC_4	HUC_5	HUC_5_NAME	Fish Bearing	Existing Condition			Project Proposal					
				Seasonal	Undefined	Yearlong	Total	Seasonal	Yearlong	Total		
1706030706	Weitas Creek		no	0	47	114	161	1	75	76		
			yes	0	15	33	48	0	26	26		
1706030707	Orogrande Creek		no	0	0	25	25	0	25	25		
			yes	0	2	7	9	0	7	7		
1706030708	North Fork Clearwater River - Washington Creek		no	0	0	7	7	0	7	7		
			yes	0	0	4	4	0	4	4		
1706030709	North Fork Clearwater River - Quartz Creek		no	0	6	0	6	0	0	0		
			no	0	7	21	28	0	2	2		
1706030710	Skull Creek		yes	0	7	7	14	0	0	0		
				8	204	473	685	22	213	235		
<b>17060307 Upper North Fork Clearwater Total</b>				no	0	0	17	17	0	17		
1706030801	North Fork Clearwater River - Beaver Creek		yes	0	0	5	5	0	5	5		
			no	0	0	0	0	0	0	0		
1706030808	Elk Creek		yes	0	0	0	0	0	0	0		
				0	0	22	22	00	22	22		
<b>17060308 Lower North Fork Clearwater Total</b>				263	288	540	1091	277	266	543 <sup>1</sup>		
<b>Grand Total</b>												

<sup>1</sup> The 543 stream crossings via motorized trails includes 88 stream crossings on fish bearing streams and 455 stream crossings on non-fish bearing streams; a total of 28 stream crossings are bridges. Of the 74 and 441 stream crossings (not including bridges) on fish bearing and non-fish bearing streams respectively, approximately 5-10 percent are stream fords, the majority of the crossings are culverts or puncheons.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 1: Biological Assessment

Table 2. Comparison of number of trail miles within riparian areas that are open for motorized travel (fish bearing and non-fish bearing streams ) under the existing condition and project proposal, Clearwater National Forest Travel Planning Project.

HUC_4	HUC_5	HUC_5_NAME	Fish Bearing	Existing Condition				Project Proposal			
				Seasonal	Undefined	Yearlong	Total	Seasonal	Yearlong	Total	
17060108	1706010801	Upper Palouse River	no	6	2	0	7	6	0	6	
			yes	6	1	0	6	6	0	6	
	<b>17060108 Hangman Total</b>			<b>11</b>	<b>2</b>	<b>0</b>	<b>14</b>	<b>11</b>	<b>0</b>	<b>11</b>	
17060302	1706030205	East Fork Moose Creek	no	0	0	0	0	0	0	0	0
			yes	0	0	0	0	0	0	0	0
	<b>17060302 Lower Selway Total</b>			<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	
1706030301	Crooked Fork Creek		no	0	0	0	0	0	0	0	0
			yes	0	1	2	3	0	2	2	
1706030302	Colt Killed Creek		no	0	0	0	0	0	0	0	0
			yes	0	0	0	0	0	0	0	0
1706030303	Upper Lochsa River		no	0	0	0	0	0	0	0	0
			yes	0	0	0	0	0	0	0	0
1706030304	Warm Springs Creek		no	0	0	0	0	0	0	0	0
			yes	0	1	0	1	0	0	0	0
1706030305	Middle Lochsa River		no	0	0	2	3	0	2	3	
			yes	0	0	1	1	0	1	1	
1706030306	Fish Creek		no	1	1	0	1	1	0	1	
			yes	6	4	0	11	6	0	6	
1706030307	Lower Lochsa River		no	7	1	0	9	7	0	7	
			yes	12	4	0	17	12	0	12	
	<b>17060303 Lochsa Total .</b>			<b>28</b>	<b>14</b>	<b>6</b>	<b>48</b>	<b>28</b>	<b>6</b>	<b>33</b>	
1706030603	Lolo Creek		no	1	0	1	2	1	1	2	
			yes	0	0	5	6	0	1	1	
1706030605	Orofino Creek		no	0	0	0	0	0	0	0	
			no	0	0	0	0	0	0	0	
1706030609	Upper Potlatch River		yes	0	0	0	0	0	0	0	
			no	0	0	0	0	0	0	0	
1706030610	Middle Potlatch River		yes	1	0	0	1	1	0	0	
			no	0	0	0	0	0	0	0	
1706030611	Big Bear Creek										
				<b>3</b>	<b>0</b>	<b>6</b>	<b>9</b>	<b>3</b>	<b>2</b>	<b>5</b>	
	<b>1706030701</b>	North Fork Clearwater River - Lake Creek	no	0	2	3	5	0	3	3	
			yes	0	9	11	20	0	6	6	
1706030702	Kelly Creek		no	0	0	3	3	0	0	0	
			yes	0	2	8	9	0	0	0	
1706030703	Cayuse Creek		no	0	1	3	3	0	1	1	

Clearwater National Forest Travel Planning Record of Decision  
Attachment 1: Biological Assessment

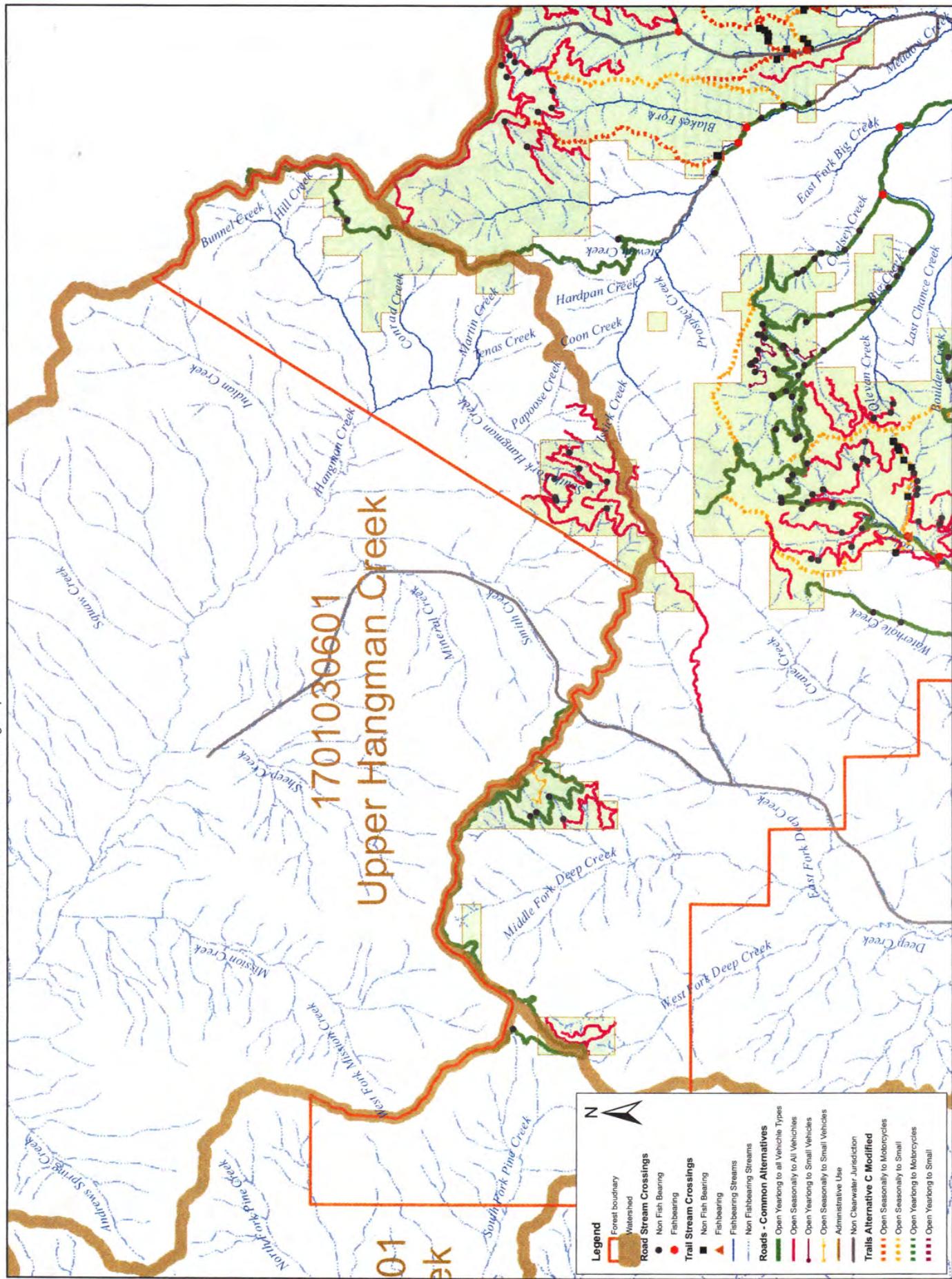
HUC_4	HUC_5	HUC_5_NAME	Fish Bearing	Existing Condition			Project Proposal		
				Seasonal	Undefined	Yearlong	Total	Seasonal	Yearlong
			yes	0	6	20	26	0	2
			no	1	0	1	2	1	0
1706030704	Moose Creek		yes	0	1	1	1	0	0
1706030705	Upper North Fork Clearwater River - Weitas Creek		no	0	1	4	4	0	3
1706030706	Weitas Creek		yes	0	0	1	1	0	1
1706030707	Orogrande Creek		no	0	2	6	8	0	2
1706030708	North Fork Clearwater River - Washington Creek		yes	0	12	29	41	0	22
1706030709	North Fork Clearwater River - Quartz Creek		no	0	0	2	2	0	2
1706030710	Skull Creek		yes	0	0	5	5	0	5
<b>17060307 Upper North Fork Clearwater Total</b>				1	40	102	144	2	48
								51	
	1706030801	North Fork Clearwater River - Beaver Creek	no	0	0	0	0	0	0
	1706030803	Lower Little North Fork Clearwater River	yes	0	0	4	4	0	4
	1706030808	Elk Creek	no	0	0	0	0	0	0
	<b>17060308 Lower North Fork Clearwater Total</b>			0	0	4	4	0	4
	<b>Grand Total</b>			43	57	119	218	44	60
								104 <sup>1</sup>	

<sup>1</sup> The 104 miles of trail within the riparian area includes 70 miles within riparian areas of fish bearing streams and 34 miles within riparian areas of non-fish bearing streams.

**APPENDIX D**  
**MAPS – MOTORIZED ROUTES AND STREAM CROSSINGS**  
**TRAVEL PLANNING PROJECT**  
**CLEARWATER NATIONAL FOREST**

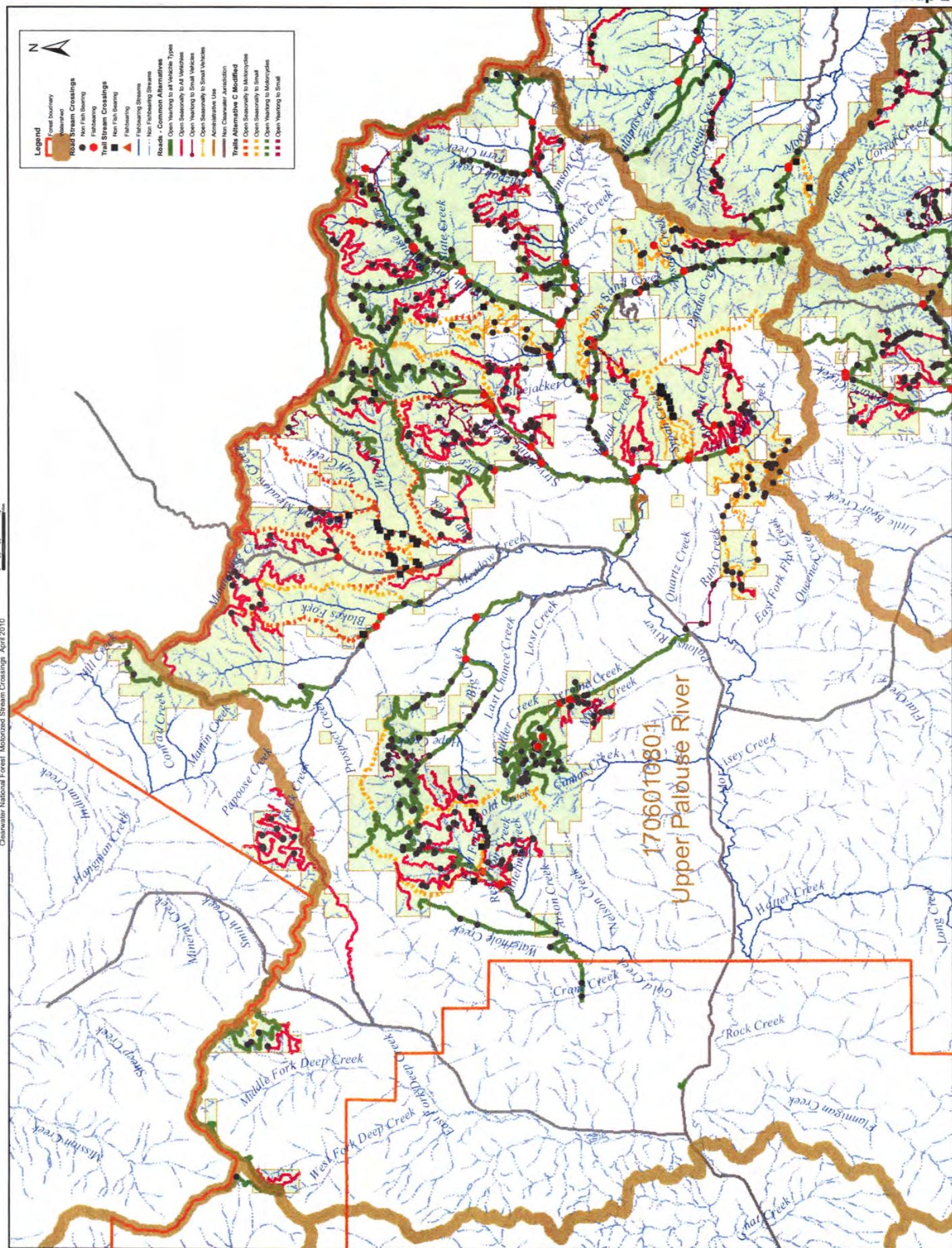
0 0.375 0.75 1.5 Miles

Clearwater National Forest Motorized Stream Crossings April 2010

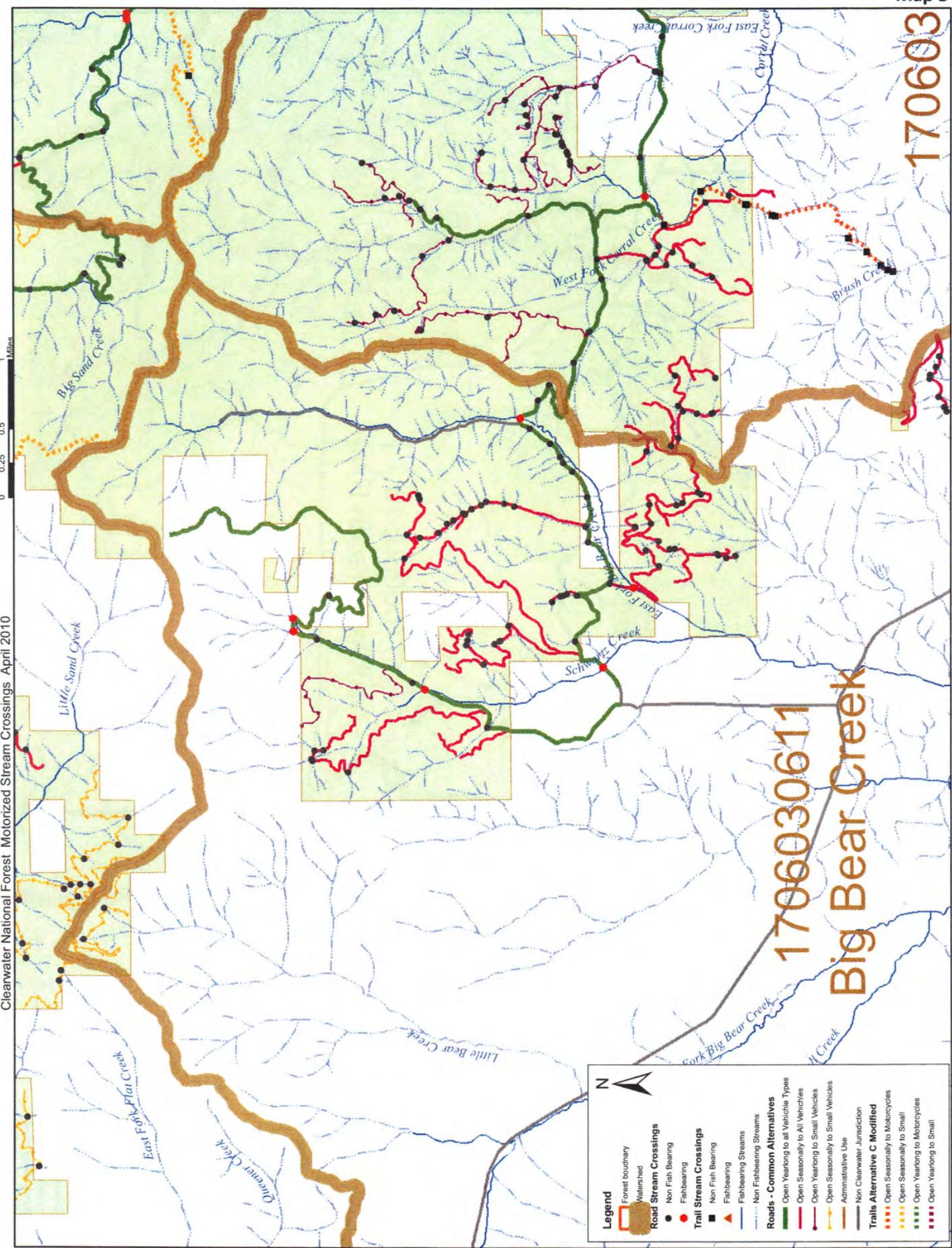


Clearwater National Forest Travel Planning Record of Decision  
Attachment 1: Biological Assessment

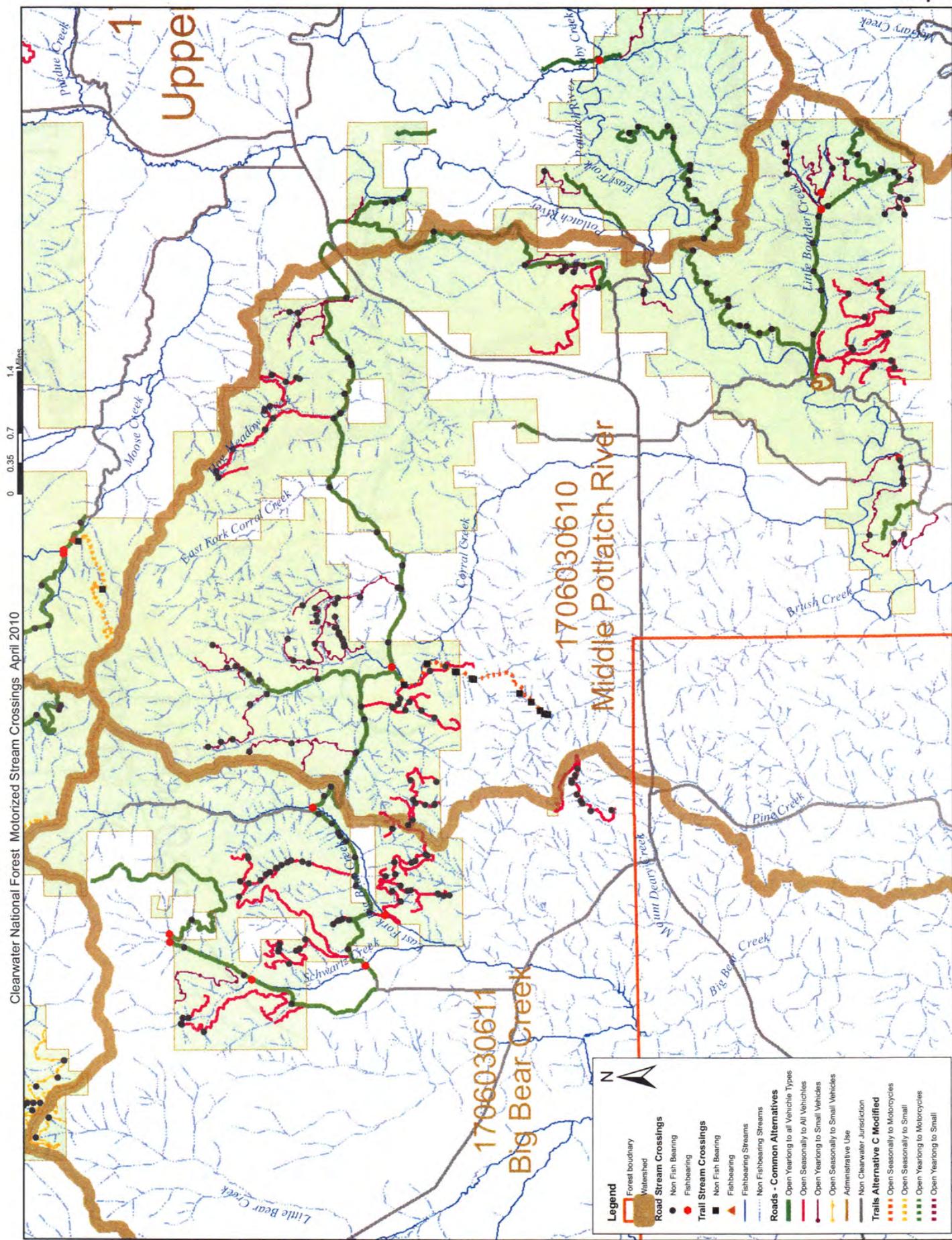
Map 2



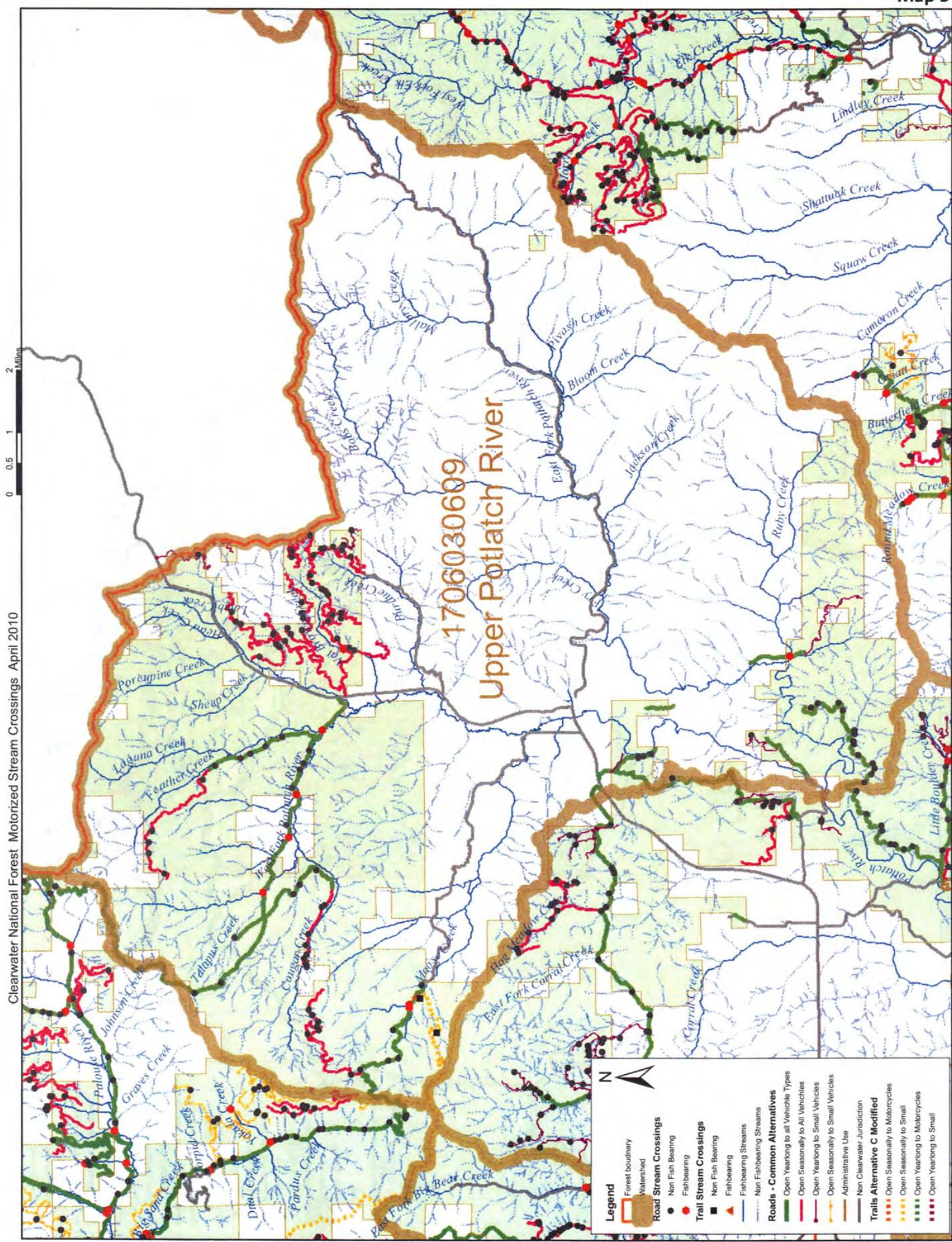
Map 3



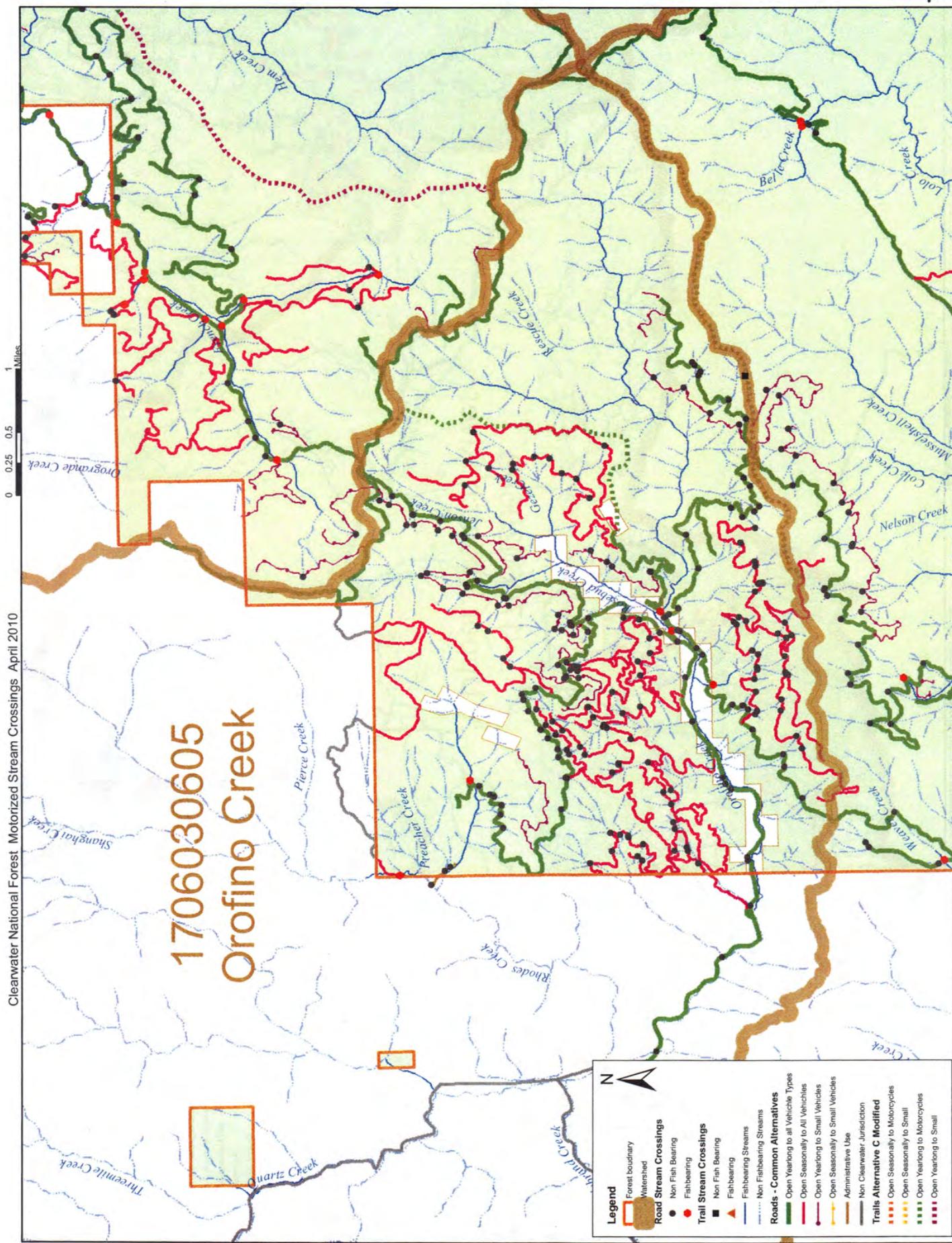
Map 4



Map 5



Map 6

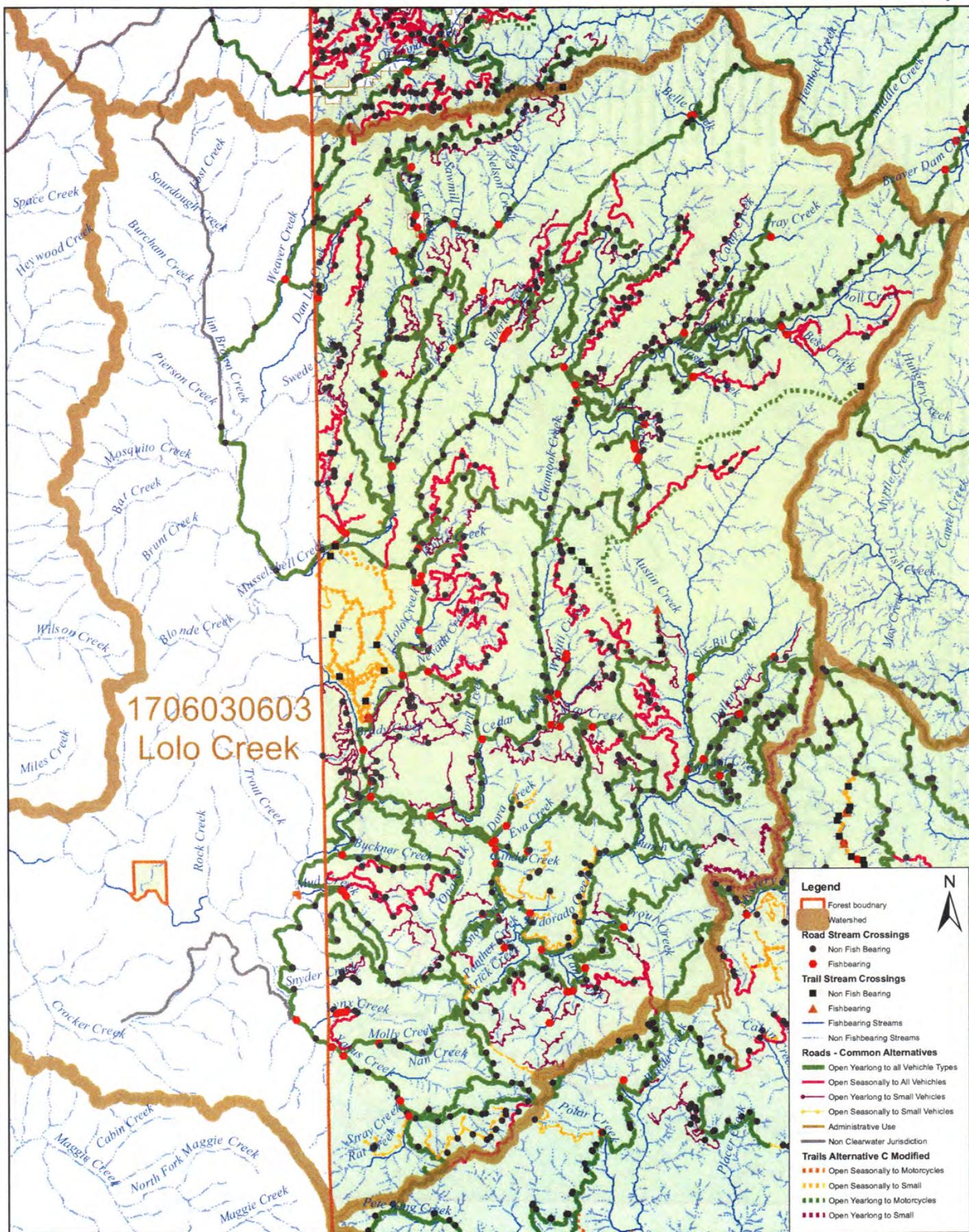


Clearwater National Forest Travel Planning Record of Decision  
Attachment 1: Biological Assessment

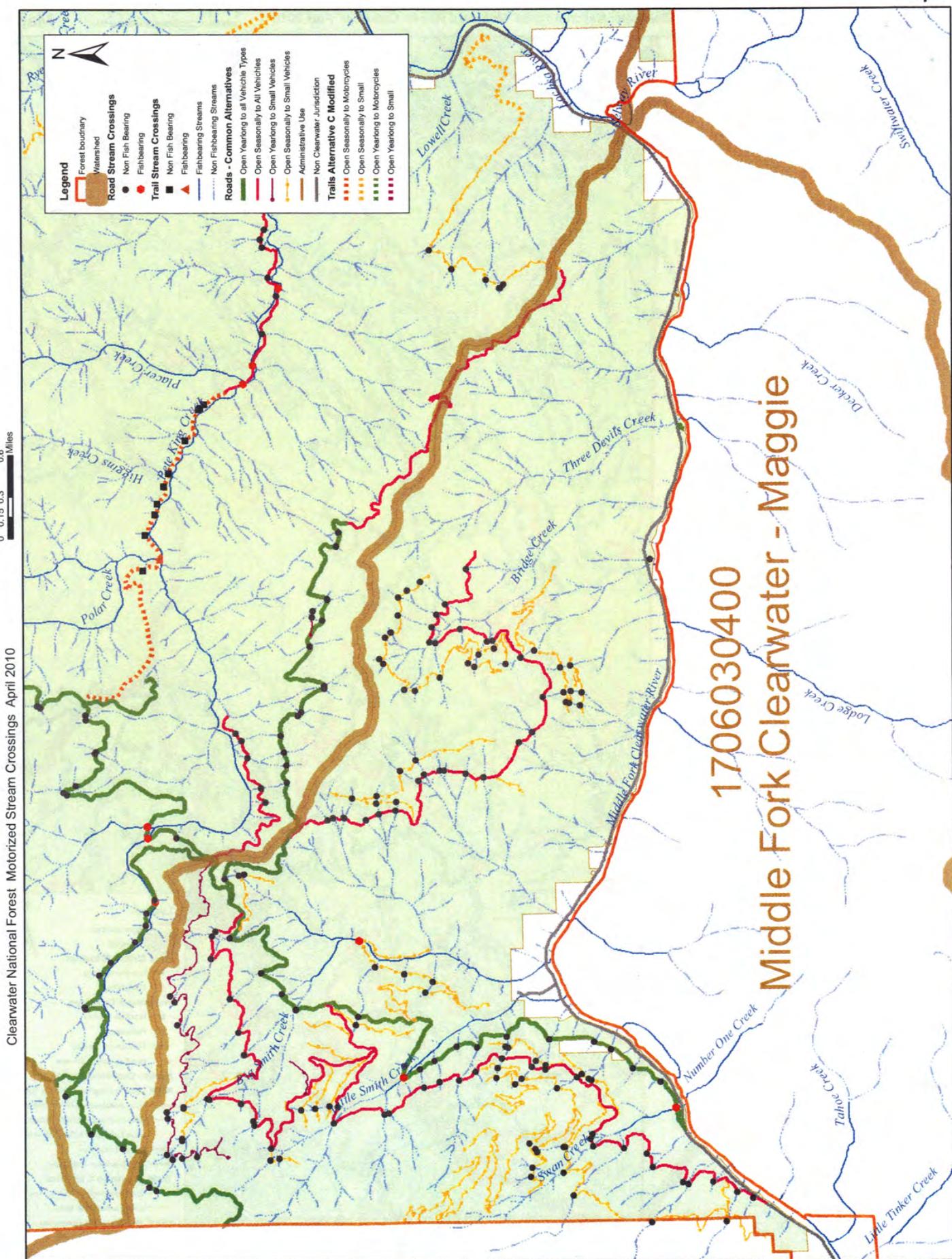
Clearwater National Forest Motorized Stream Crossings April 2010

0 0.5 1 2 Miles

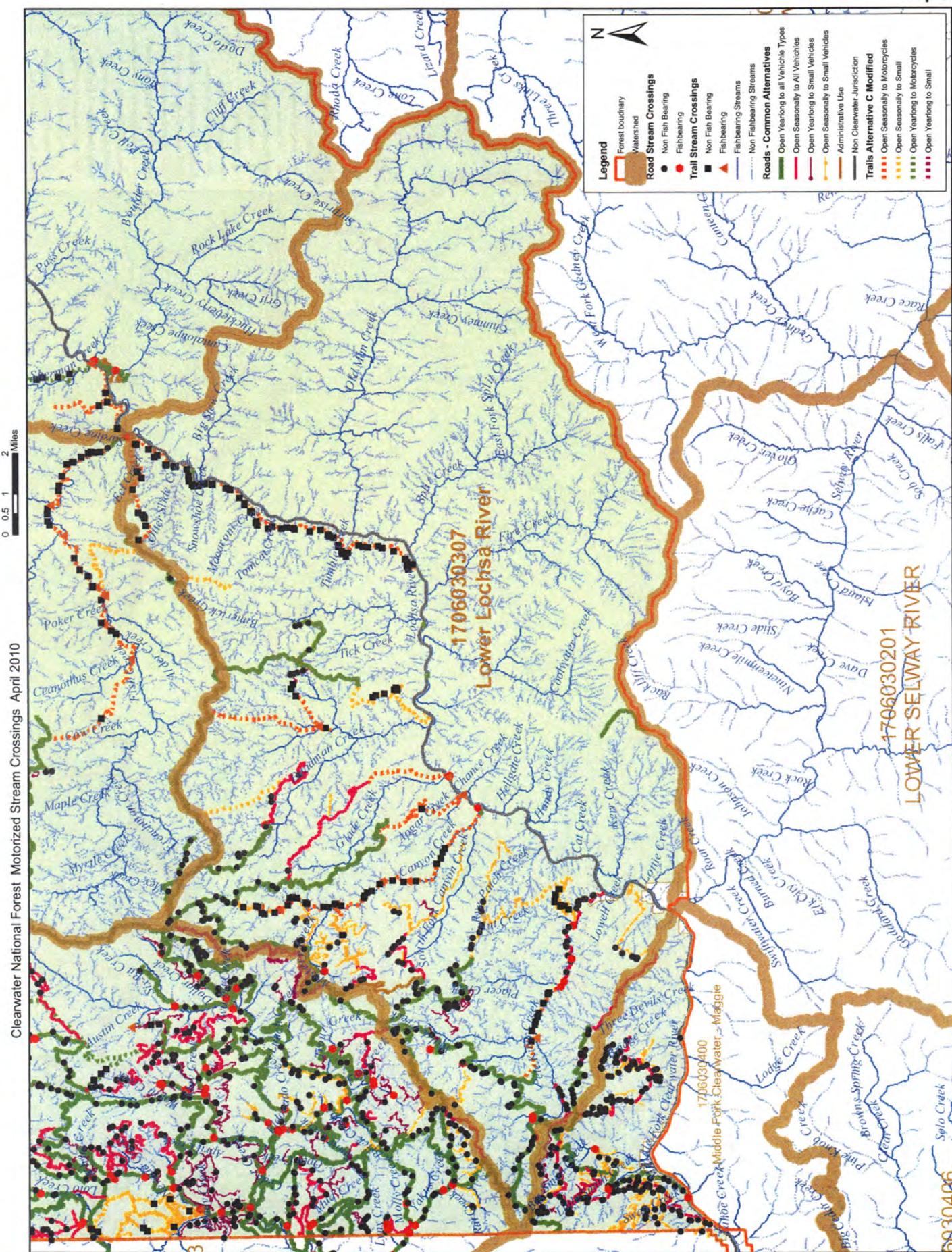
**Map 7**



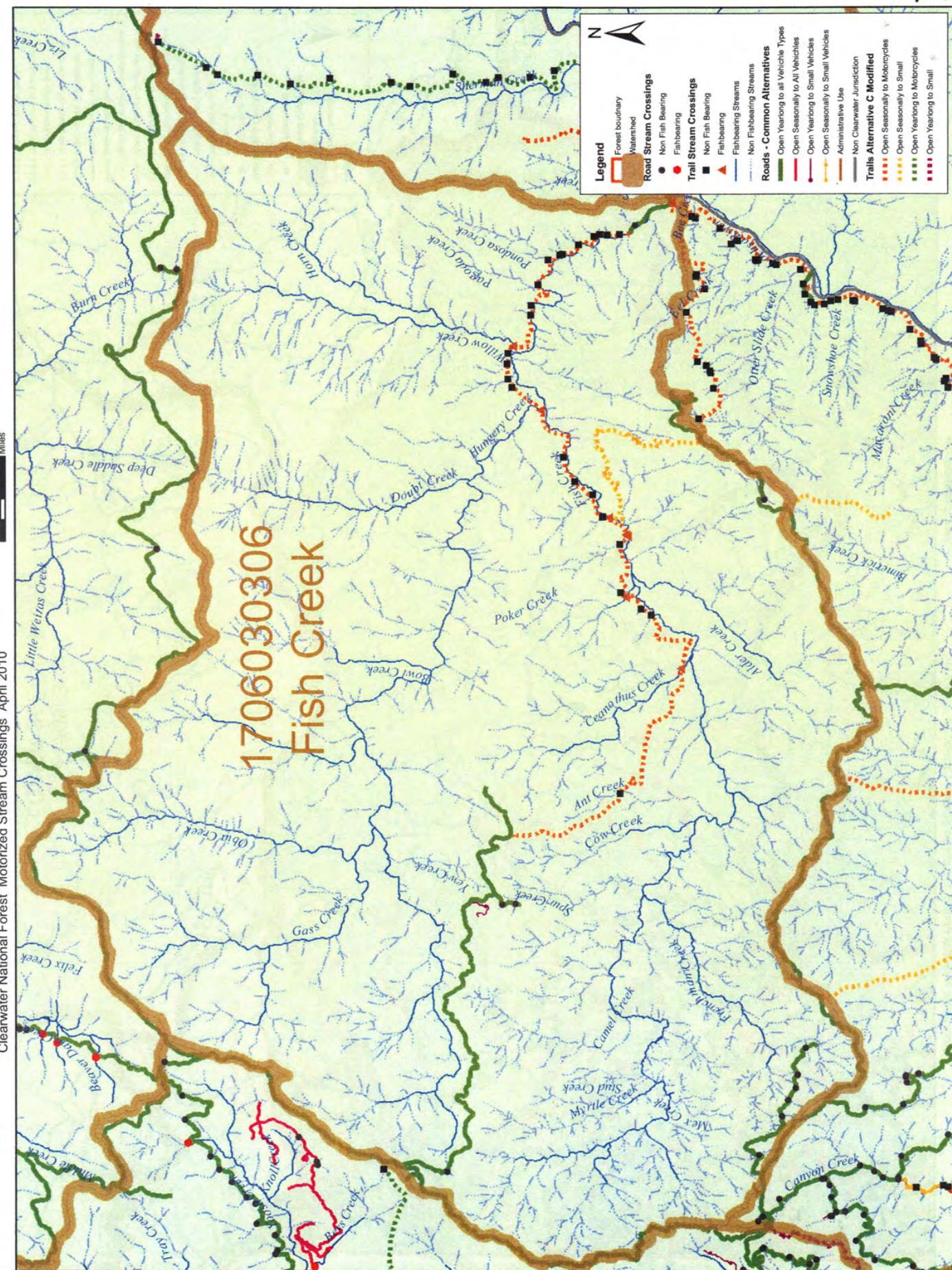
Map 8



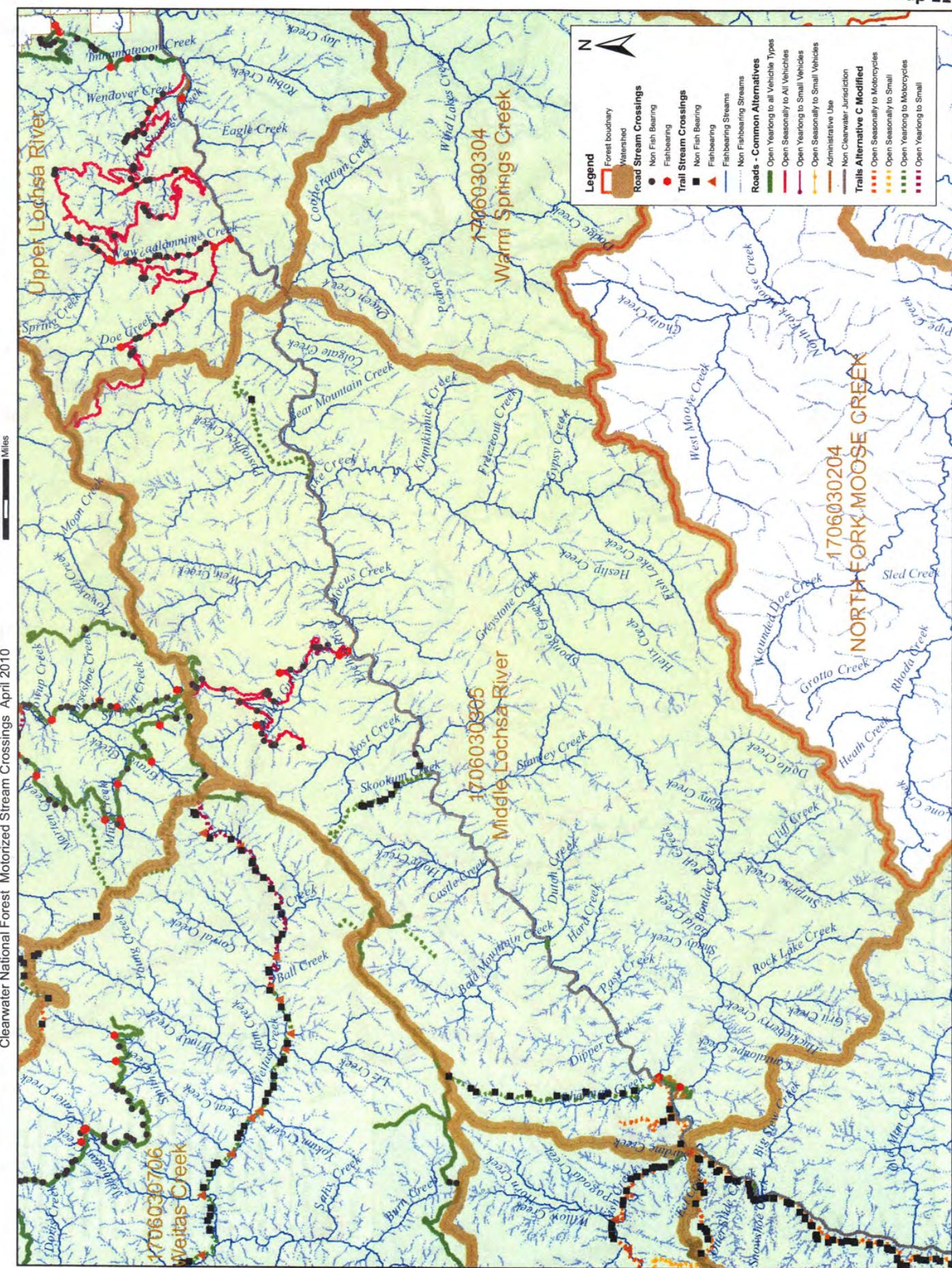
Map 9



Map 10



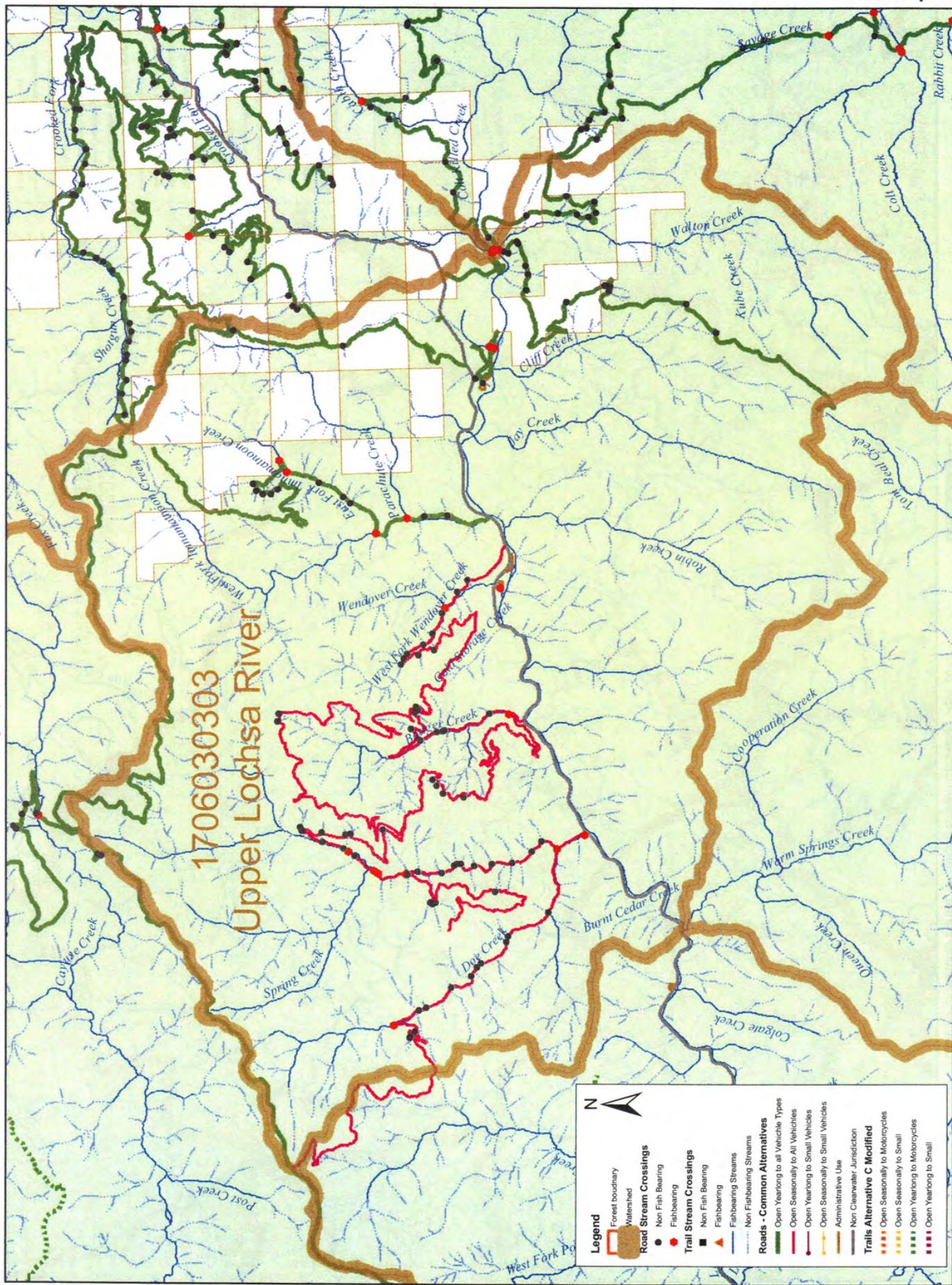
Map 11

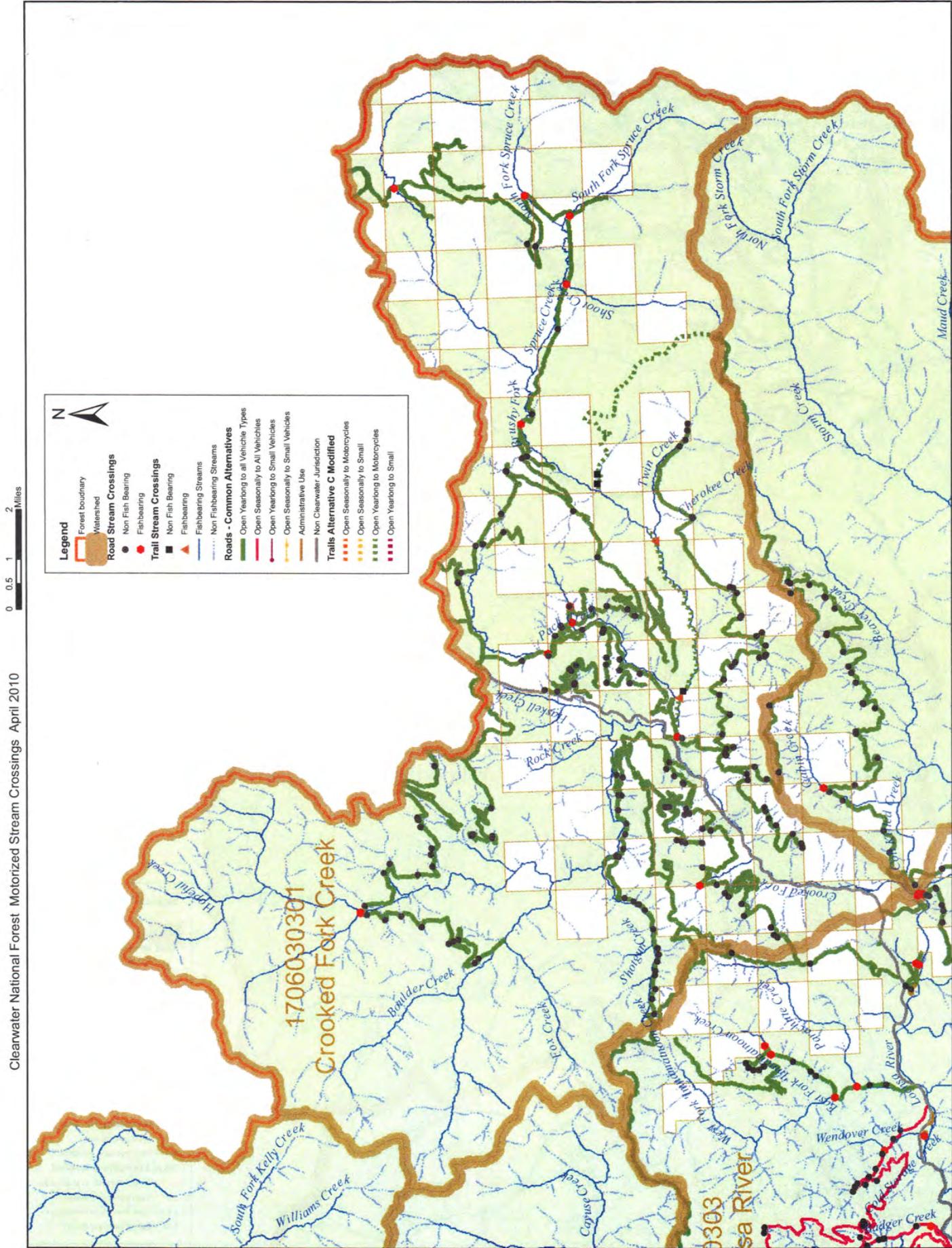


Map 12

0 .03 .06 Miles

Cleanwater National Forest Motorized Stream Crossings April 2010





Clearwater National Forest Travel Planning Record of Decision  
Attachment 1: Biological Assessment

Clearwater National Forest Motorized Stream Crossings April 2010

0 0.45 0.9 1.8 Miles

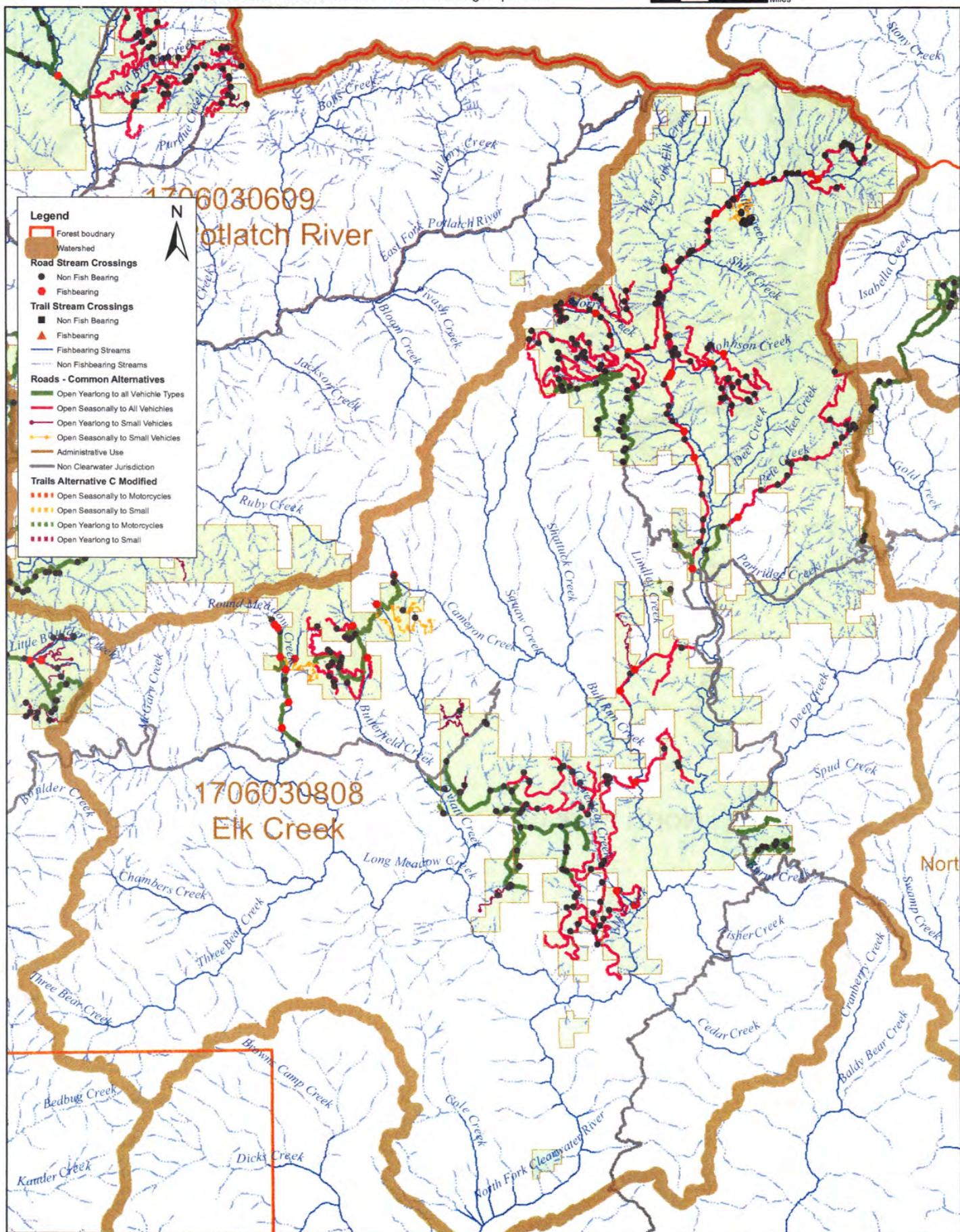
**Map 14**



Clearwater National Forest Motorized Stream Crossings April 2010

0 0.5 1 2 Miles

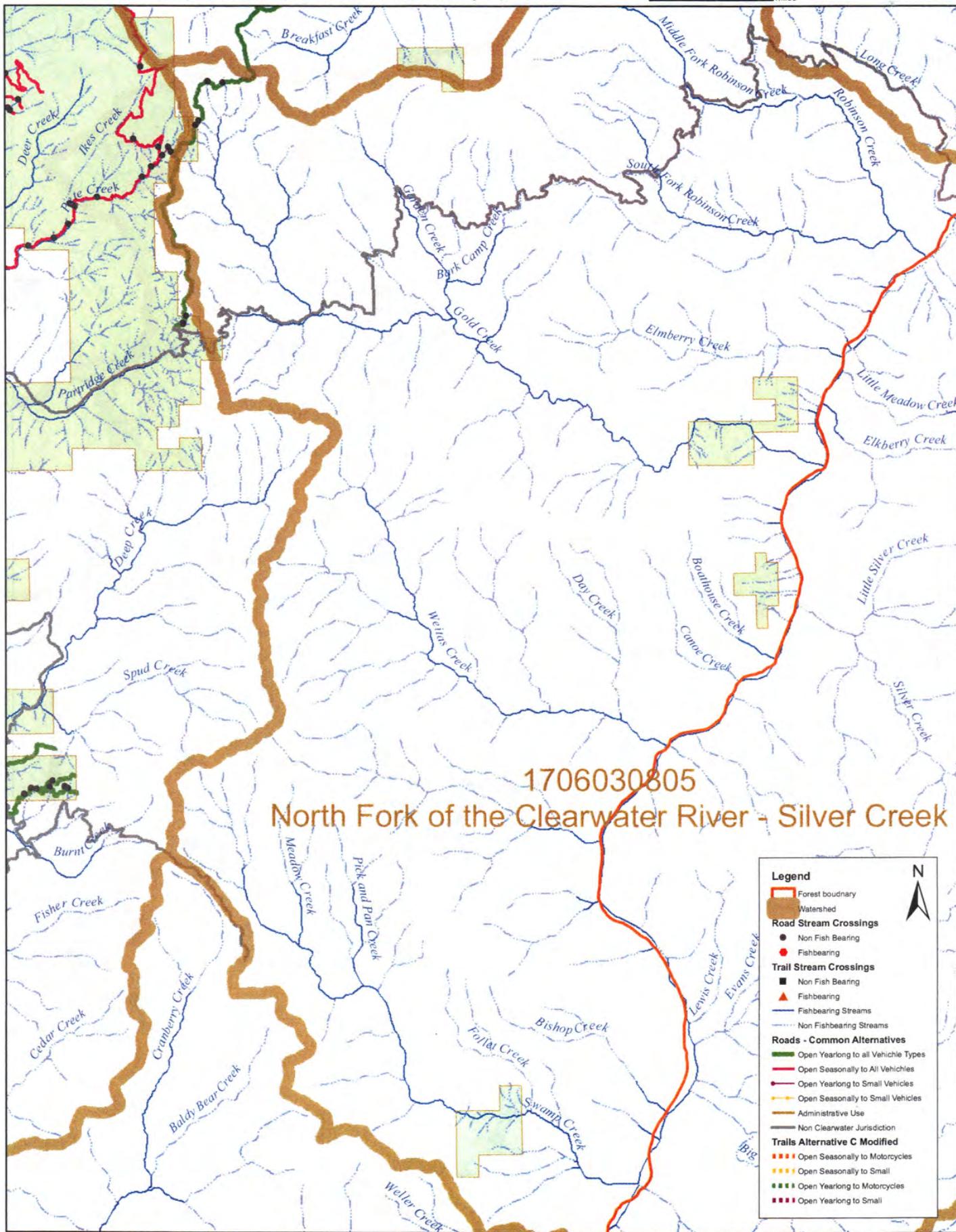
Map 15



Clearwater National Forest Motorized Stream Crossings April 2010

0 0.35 0.7 1.4 Miles

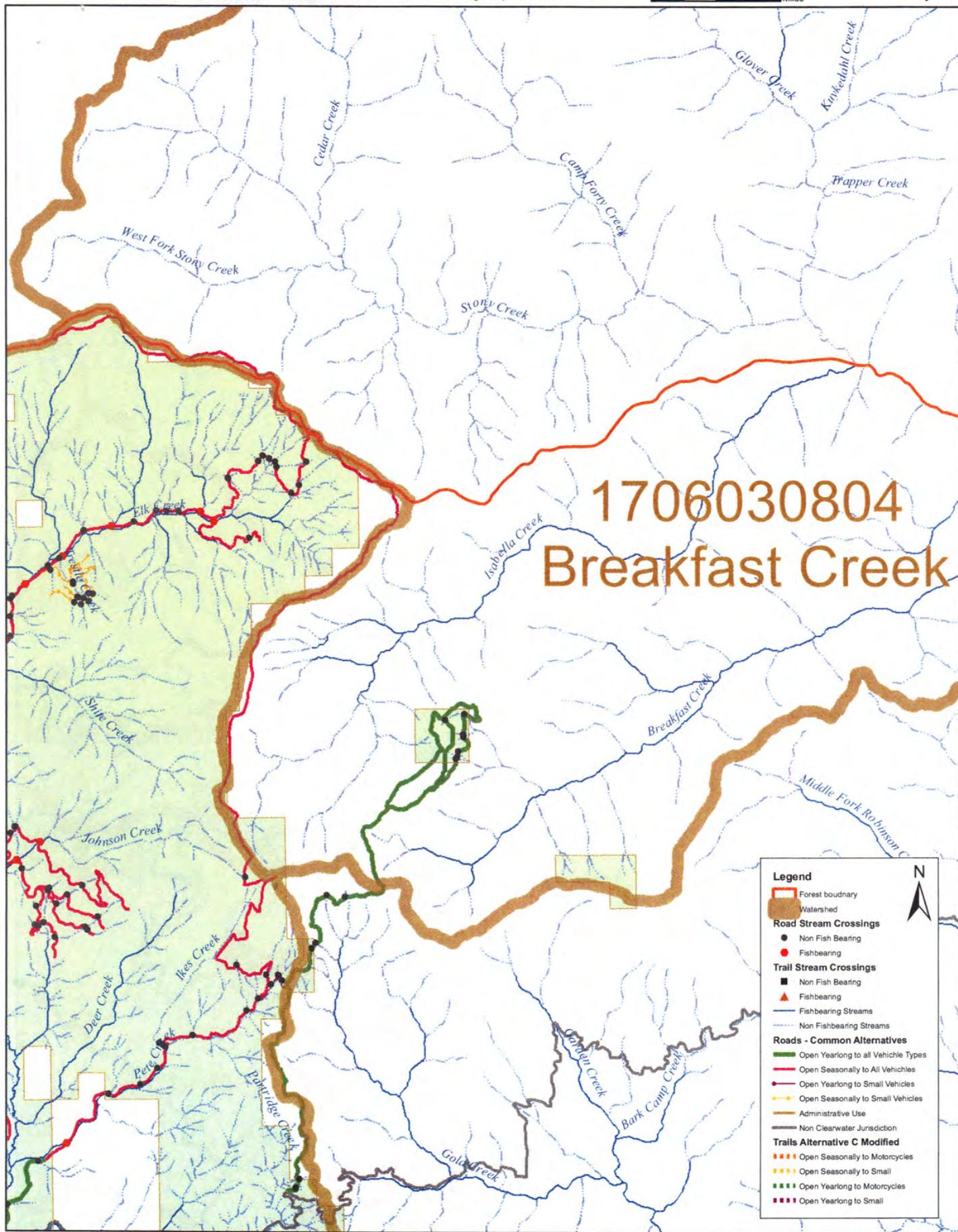
Map 16



Clearwater National Forest Motorized Stream Crossings April 2010

0 0.3 0.6 1.2 Miles

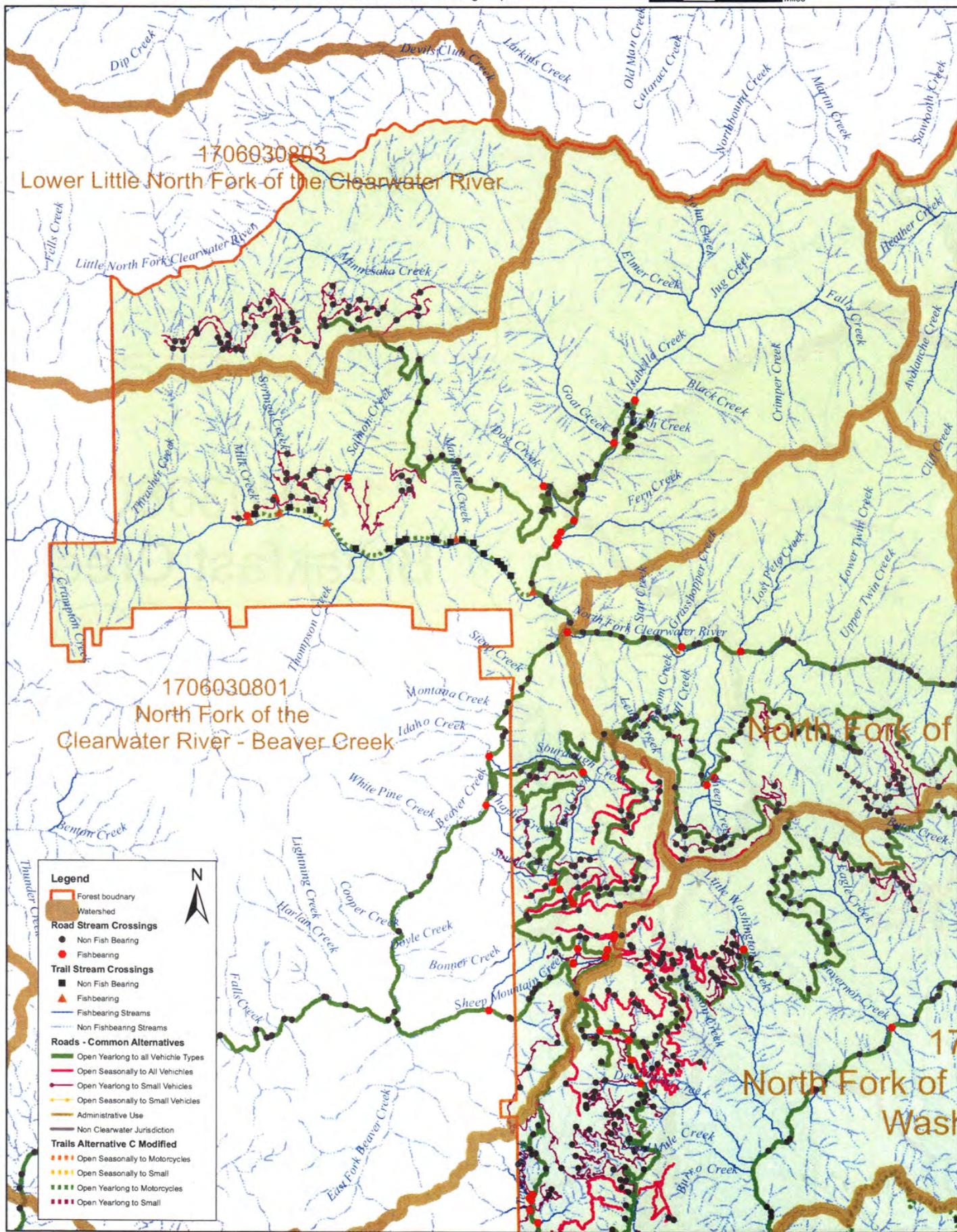
Map 17



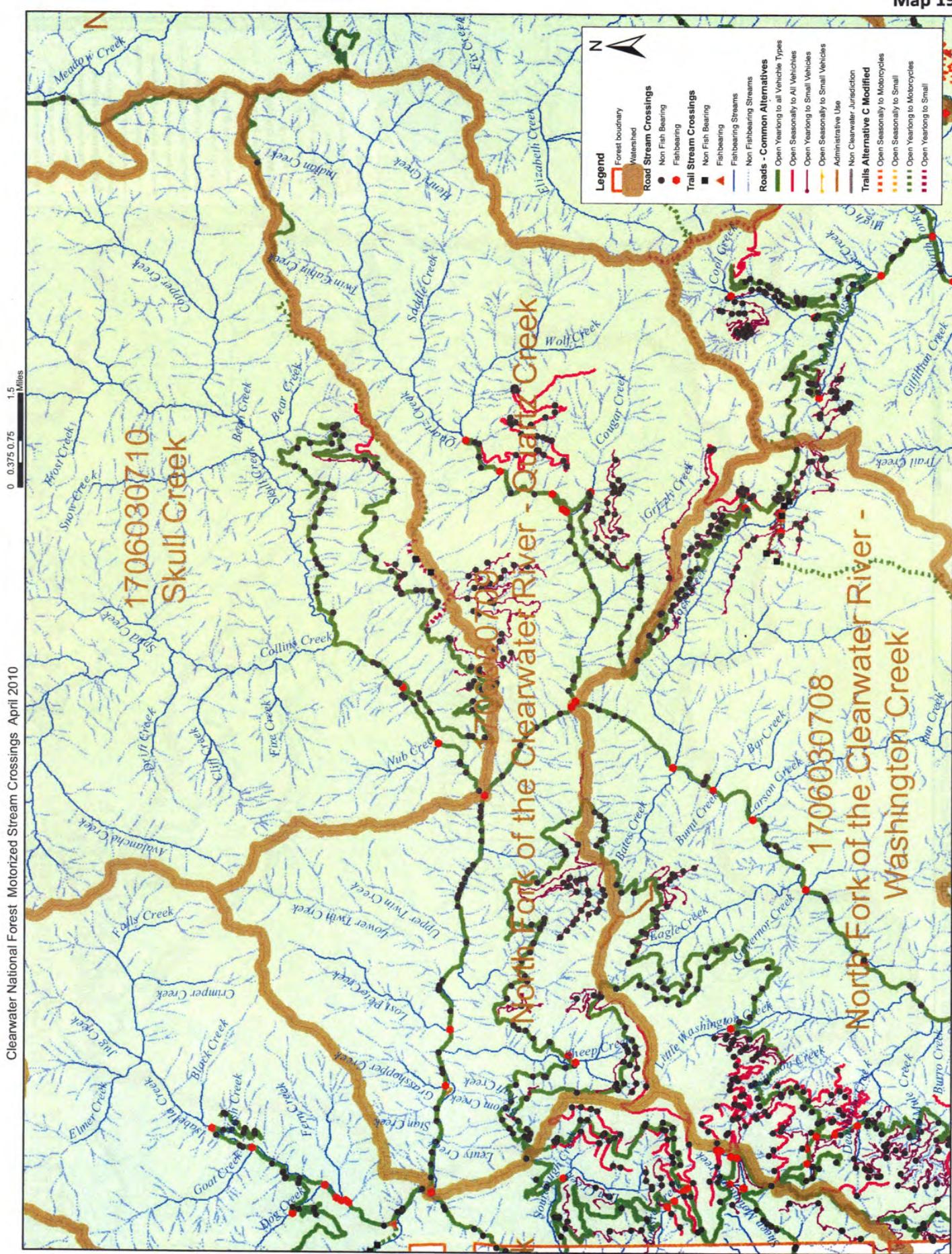
Clearwater National Forest Motorized Stream Crossings April 2010

0 0.5 1 2 Miles

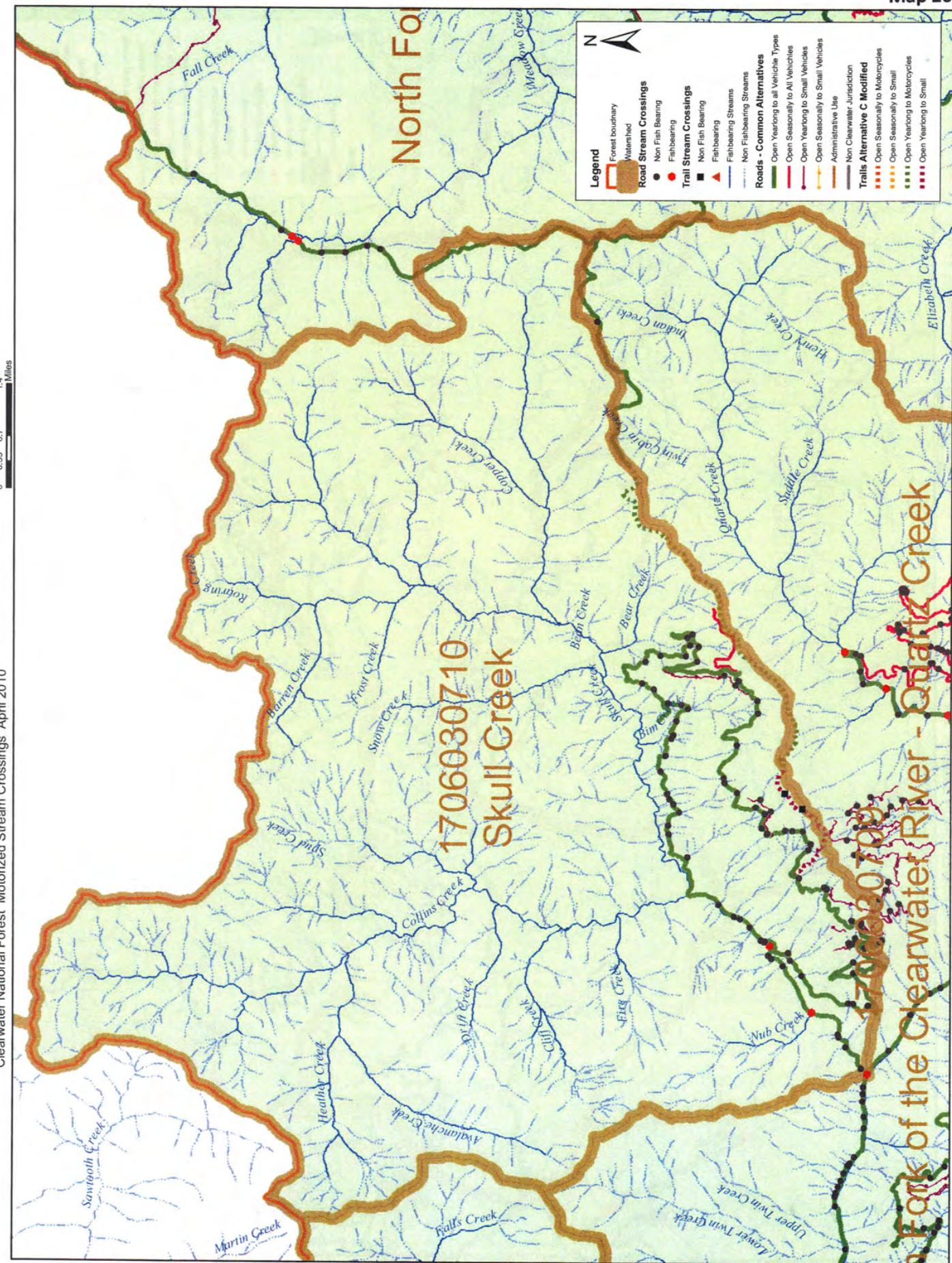
Map 18



Map 19



Map 20

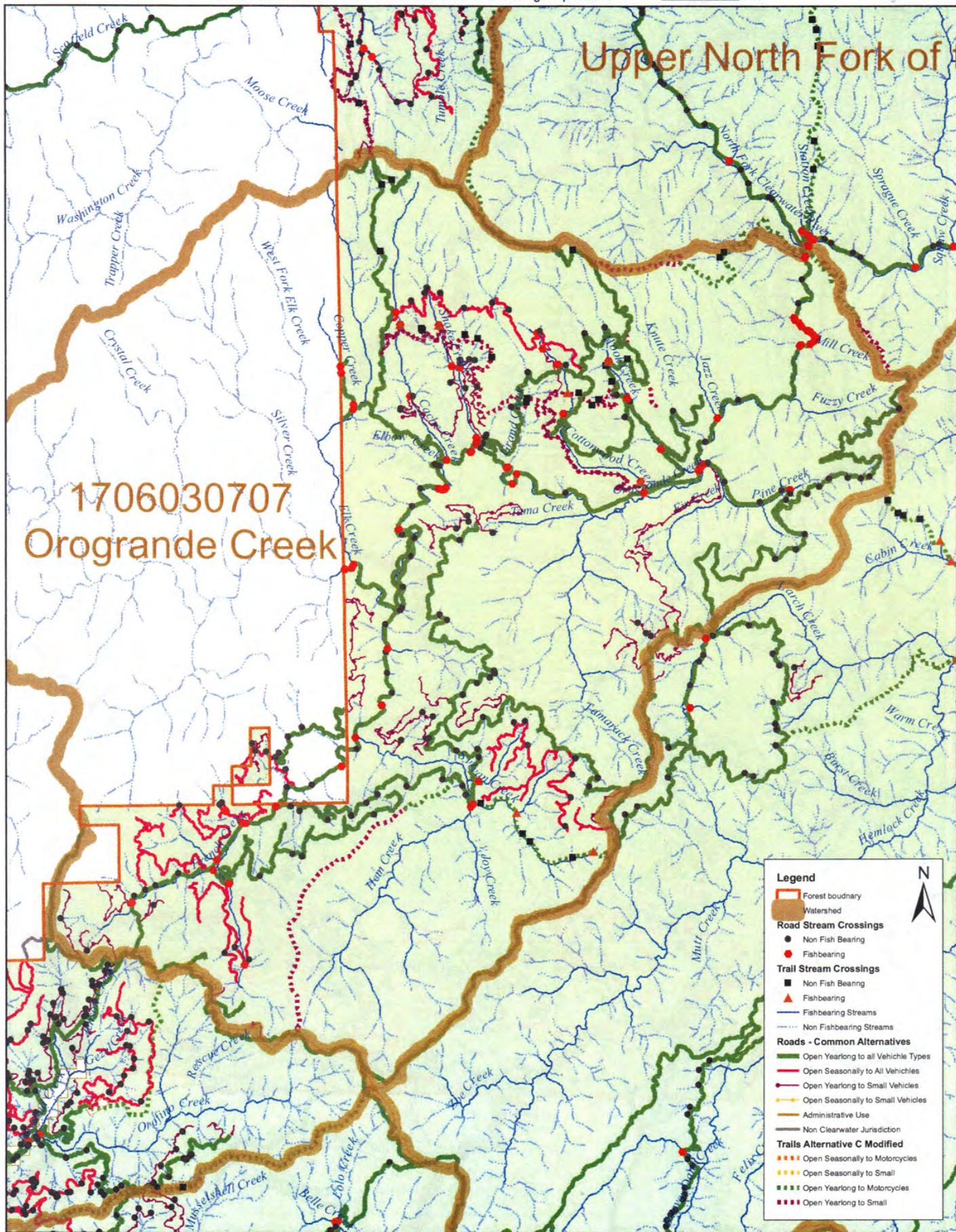




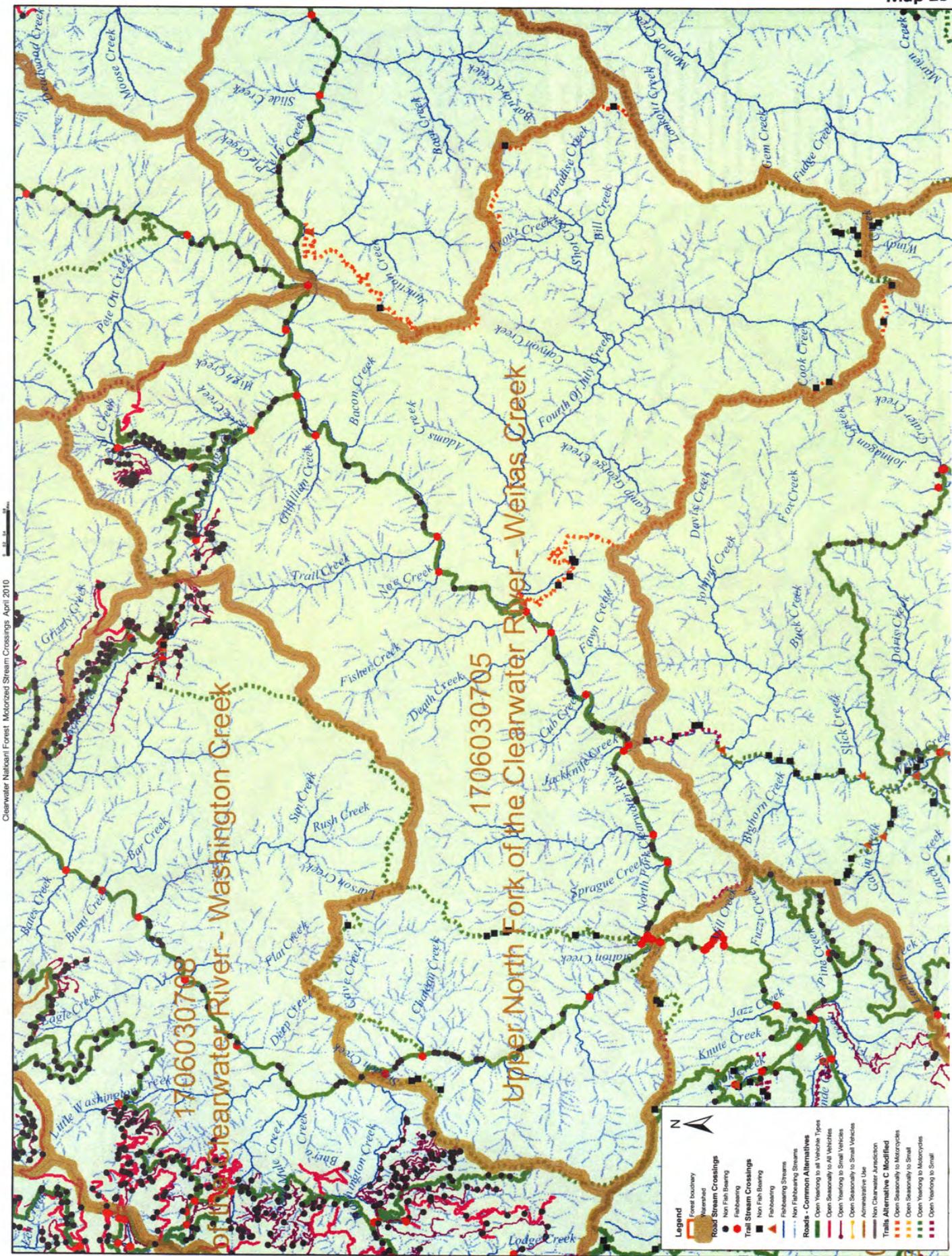
Clearwater National Forest Motorized Stream Crossings April 2010

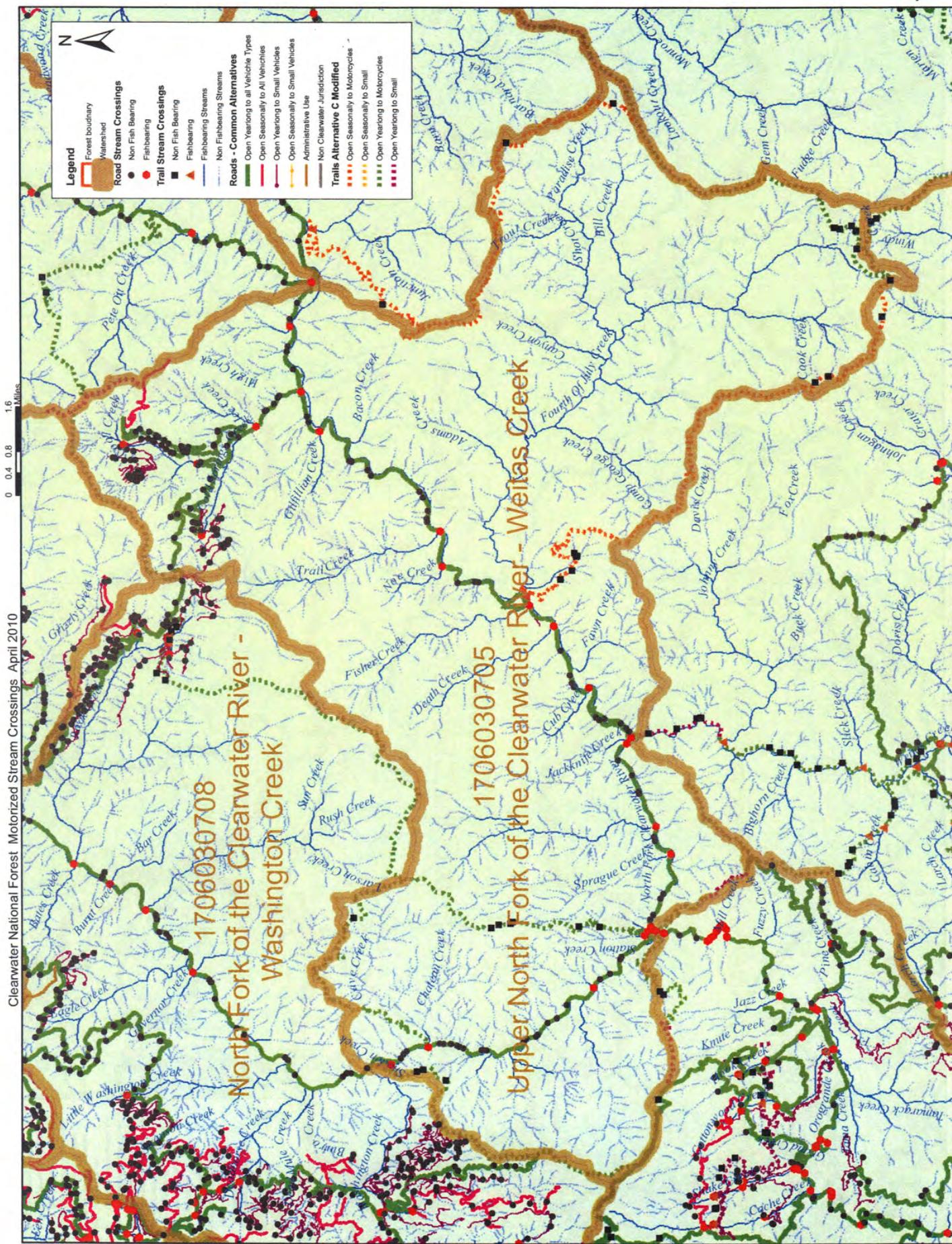
0 0.25 0.5 1 Miles

Map 22



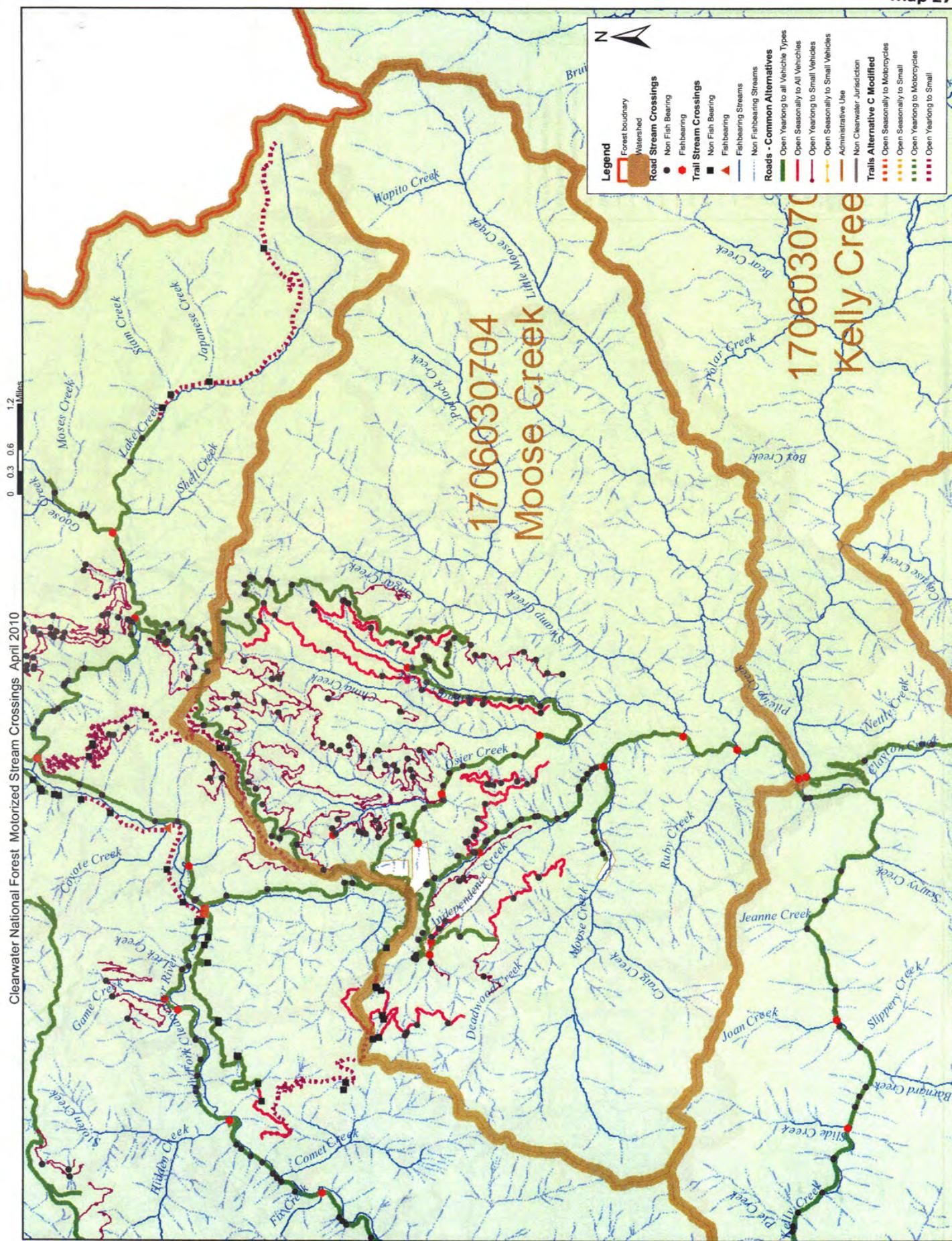
Map 23

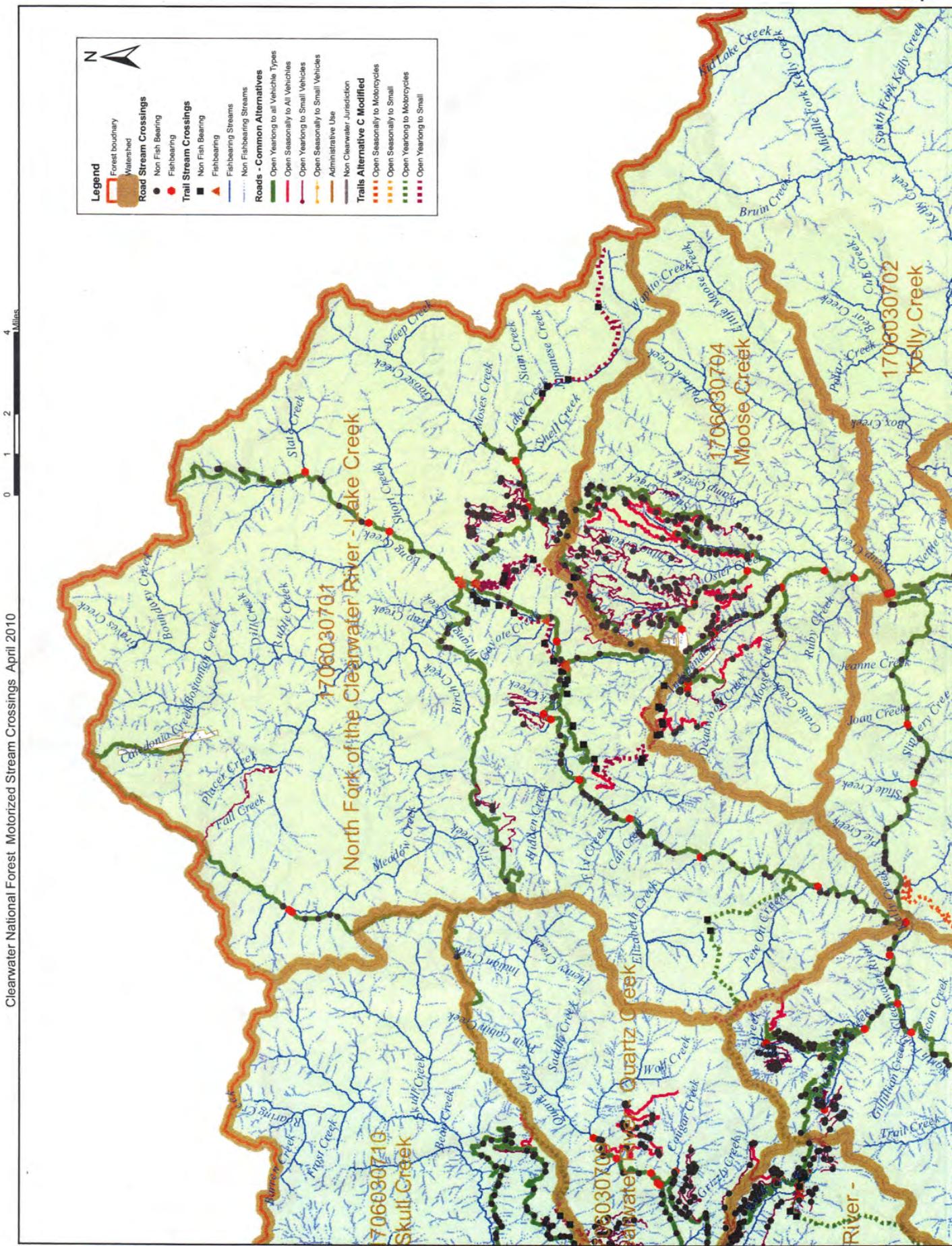




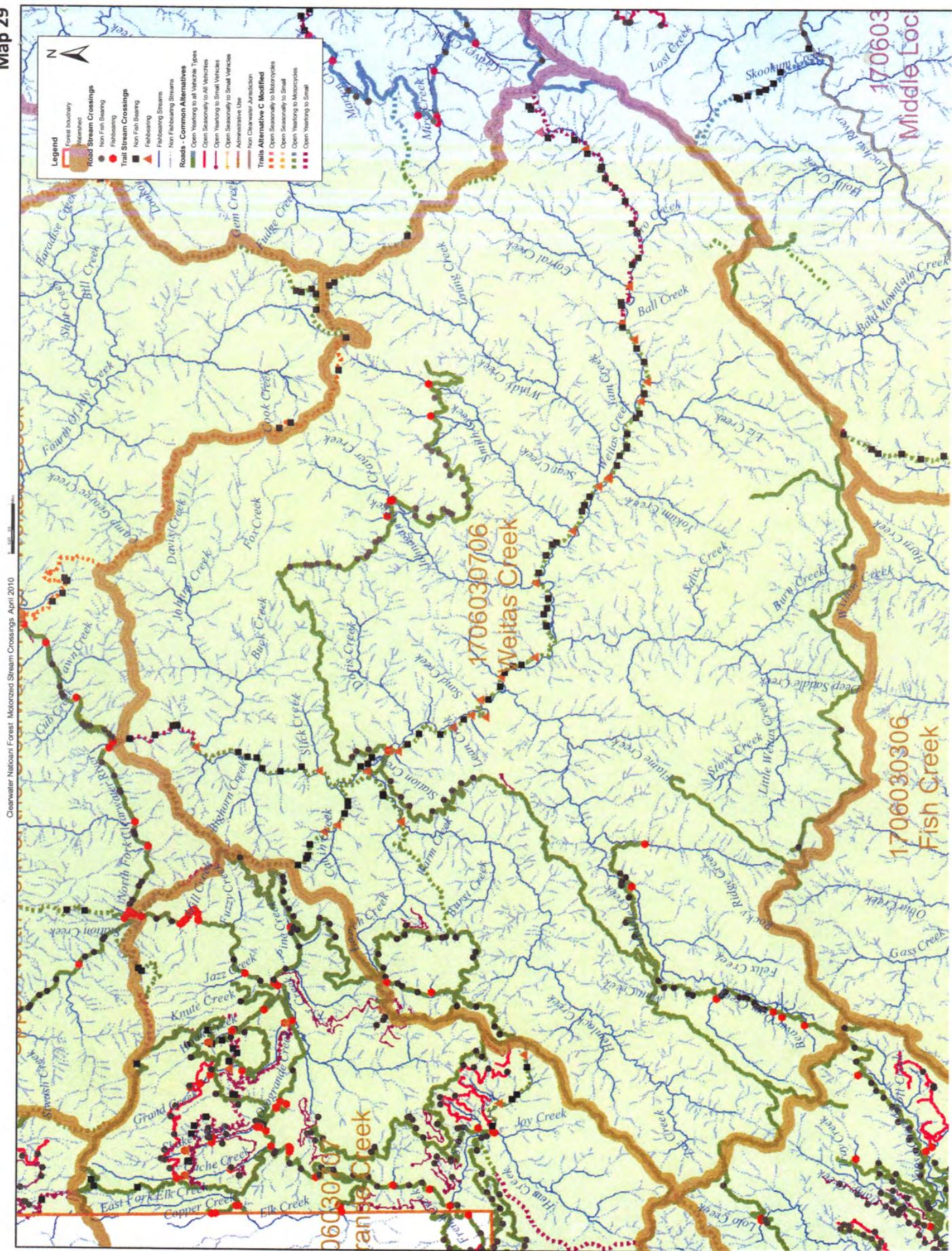


Map 27





Map 29



**APPENDIX E**  
**FIELD NOTES – STREAM CROSSINGS**  
**TRAVEL PLANNING PROJECT**  
**CLEARWATER NATIONAL FOREST**

above and below the crossing. Size of the channel is about 3 meters across with a depth of 10 cm. The approaches are gentle with little problems noted.

3. 3<sup>rd</sup> stream crossing – This is the first of two un-surveyed side tributaries of Weitas Ck. Reach #3(wts03). Substrate at the crossing is a mix of large and small cobbles, with no large concentrations of spawning gravels. The channel width at the time of this survey was about 2 meters across and 4 cm deep. The approaches were gentle with no signs of erosion.
4. 4<sup>th</sup> stream crossing - This is the second of two un-surveyed side tributaries of Weitas Ck. Reach #3 (wts03). Substrate at the crossing is cobbles with larger particle sizes down and up stream. No spawning gravels noted. Channel width was about 3 meters, and the depth at the time was 4-5 cm. The approaches were gentle with no problems.
5. Corral Creek (5<sup>th</sup> stream crossing.) – This is the first large fish bearing channel the trail crosses. It is about 15-17 meters across with a depth as deep as 30 cm. Substrate at the crossing is mostly cobbles with larger material down and below the crossing. No concentrations of spawning gravels were noted. The trail crosses at the lowest reach of Corral (crl08 in the 2005 Habitat Survey, CLEARWATER BIOSTUDIES, Inc., 3/2006). The right bank approach appears to be steeper but seems stable with little or no problems.
6. 6<sup>th</sup> stream crossing – This is the trail crossing of an un-surveyed tributary of Weitas Creek located in Reach 7(wtd07). The channel is about 3 meters across at the crossing with a large cobble substrate. No spawning gravels noted at the crossing or above/below. The right bank approach is steeper but there is no erosion problems at this time
7. Ball Creek (7<sup>th</sup> stream crossing) – This is the first crossing past the upper Weitas Ck. Trail bridge located about a ¼ mile downstream of Corral Ck. It should be noted that from 12 mile saddle to the upper bridge, the trail is located within an old jeep trail. Along this section, it is wider and can support motorized ATV as well as trail bikes. After the trail crosses the upper bridge, it becomes narrower, and is only open to trail bikes. The Ball Ck approaches are somewhat muddy, but gentle. At the crossing, Ball creek is 3 meters across and 25-30 cm deep. The substrate is a mix of sand and small gravel with a boulder/sand mix below and above the crossing. The trail crosses in the only un-surveyed reach of Ball Ck. (bal01). Cutthroat Trout parr were observed in the two established fish stations. They are located both above and below the trail crossing. The habitat survey of Ball Ck. Indicated an overall steep stream channel gradient of 15%, with high CE levels (55 %). Spawning gravel Habitat is rated poor to fair with only .6 % of the overall stream's area.
8. Liz Creek (8<sup>th</sup> stream crossing) – The trail crosses at the lowest reach of Liz Creek (liz01). Both approaches to Liz Ck. are gentle and sandy. No signs of problems. Substrate at the crossing is a mix of large cobbles and small boulders. At the time of this survey, the channel was 5 meters across and 25-30 cm deep. There wasn't any concentration of spawning gravels noted at or near the crossing. There is a log foot bridge for hiking traffic, but trail bikes would just ford it. There is an establish fish population station just below the trail crossing. The Fish Habitat and Population Survey completed in the summer of 2005 (CLEARWATER BIOSTUDIES, Inc., 3/2003) noted an observation of one 380 mm Bull Trout parr

(4+ age) as well as Cutthroat Trout parr at this station. No Bull Trout were observed at the other fish stations located upstream of the crossing, though Cutthroat continue to be observed.

9. Yokum Creek (9<sup>th</sup> stream crossing) – The crossing at Yokum is a wood plank trail bridge. There is no fording needed of the channel here.
10. Windy Creek (10<sup>th</sup> stream crossing) – This is the final crossing for this portion of the trail 174 survey. The trail crosses at the lowest reach of Windy (wnd09). This reach of Windy Creek is within a wide floodplain riparian flat, so the approaches are gentle and stable. The channel at the crossing is about 10 meters across and 20-25 cm deep. Substrate is a mix of small cobbles and gravels. It looked like there was a small 2 m<sup>2</sup> patch of spawning habitat just downstream of the right side approach. The 1999 Habitat and Fish Population Survey (CLEARWATER BIOSTUDIES, Inc., 06/2000) had observations of Bull and Cutthroat Trout within Windy Creek. However, the establish fish station just below the crossing (fwnd-20) did not note any observations of Bull Trout. They were mostly observed in the upper reaches above Young Creek. Most likely, most Bull Trout spawning occurs further upstream. The 1999 survey indicated .5% of poor to fair fall resident trout spawning habitat in this lowest reach of Windy with 1.3% of spring mix variable rated spawning habitat. Cobble embeddedness of this lowest reach is 38.

## Motorized Trail/Stream Crossing Field Review – Field Notes #2

Stream Crossing Survey - Weitas Creek Trail (Weitas Guard Station to Smith Creek) – 7/22/10 - GC

### Lean Creek

- has a trail bridge

### Sand Creek

- approximately 4' wide, 3" deep in thalweg
- approaches are stable hard-packed sand with no sign of vehicle tracks, erosion or rutting
- crossing substrate composed of very small gravel with no spawning gravels in the crossing

### Benett Creek

- approximately 5' wide, 3" deep in thalweg
- approaches are moderately stable packed sand with no recent sign of vehicle use
- approach is approximate 30% down to waters edge showing some evidence of the trail down-cutting
- crossing substrate composed of sand, small gravel, and cobbles with no spawning gravels in the crossing

### Tributary south of mouth of Little Weitas Creek

- approximately 2' wide, 1" deep in thalweg
- approaches are stable hard-packed sand with no sign of vehicle tracks, erosion or rutting
- crossing substrate composed of sand with no spawning gravels in the crossing

### Johnagan Creek

- approximately 18' wide, 12" deep in thalweg
- crossing is in a riffle
- approaches gentle with approximately 20% grade of stable hard packed sand and no recent evidence of vehicle use
- no evidence of trail eroding and down-cutting
- crossing substrate gravel/cobble mix with mostly larger cobbles with no suitable spawning gravels

### Smith Creek

- approximately 20' wide, 14" deep in thalweg
- approach on north side steep and narrow chute – fairly new due to the removal of the bridge and buffered by large boulder in bank upstream; approach on south side approximately 30% grade with loose gravel and cobbles with evidence of stream widening and trail down cutting
- crossing is in a riffle with large and small cobbles; evidence of depression possibly from motorcycle traffic across crossing
- possible spawning gravels 2x2' upstream adjacent to large boulder anchored into bank and buffered from the crossing

### Hemlock Creek

- approximately 25' wide, 12" deep in thalweg
- crossing is in a riffle
- very little slope to the north approach which may have been a braid in the main channel at one time; material is loose cobbles; south approach approximately 35% with evidence of rutting, eroding and down-cutting; south approach composed of loose cobbles and sand (upper portion)
- crossing substrate is larger cobble mix with no suitable spawning gravels

### **Motorized Trail/Stream Crossing Field Review – Field Notes #3**

On Tuesday, August 3, 2010, Les Dobson and Pat Murphy hiked up trail #2240 along Fish Creek to evaluate the stream crossings on trails #2240 and #225 that the proposed Travel Plan will continue to authorize motorized travel (motorcycles). Photos of the stream crossing sites (instream and trail approaches) were taken. Analysis conducted under the FEIS for the Travel Plan indicated that three stream crossings were definitely fish bearing streams. The trail crossing of Fish Creek (trail #229) was evaluated by Ed Kee during a previous field review. The two other crossings, Poker Creek and Ceanothus Creek, we were reviewed during this field trip.

**Poker Creek:** The stream at the crossing is a very small stream (6 feet width) with large substrate (boulder, large rubble and sand); no spawning habitat for steelhead trout or bull trout was observed at or adjacent to the trail crossing. Although the stream most likely has some westslope cutthroat trout production, the stream is too small for any notable steelhead trout or bull trout spawning and rearing (previous fish population survey conducted by Isabella Wildlife Works noted small age 0+ trout and one age 1+ rainbow in Poker Creek in 1996). The trail approaches to the stream were stable and fairly harden with native materials; no restoration measures are recommended at this time.

**Ceanothus Creek:** The stream at the crossing is a small stream which has potential for steelhead trout and bull trout rearing; no spawning habitat for steelhead trout or bull trout was observed at the trail crossing due to large substrate. In 1996, a fish population survey conducted by Isabella Wildlife Works noted low densities of juvenile steelhead trout and several adult westslope cutthroat trout in the lower reaches of Ceanothus Creek. Some spawning gravels were present downstream (75 feet). The trail approaches to the stream were stable; the trail from Poker Creek to Ceanothus Creek has not been maintained for years (brushed in and difficult to locate in some areas). Also the trail beyond Ceanothus Creek has not been maintained so very little evidence of use is present. The stream appeared very stable, lacking of fine substrate or evidence of erosion. Small amount of stream widening at the crossing.

In addition to these two fish bearing tributaries to Fish Creek, we also reviewed four other small streams between along that had trail stream crossings (Kee's review took photos of these sites). Between the trail head and Hungry Creek, two streams (Pondosa Creek and Pagoda Creek) were reviewed; Pondosa Creek is a very small stream and most likely did not have fish; definitely too small for steelhead trout and bull trout migrating into the stream and spawning. Pagoda Creek is slightly larger with a low probability of fish rearing in the stream (especially upstream of the trail crossing). Both streams were primarily sand substrate with large substrate intermixed with no spawning habitat at the trail crossing. Due to the sandy nature of the trail approaches at Pagoda Creek, we recommended that the trail approaches be harden during future trail maintenance. The other two tributaries to Fish Creek were located between Hungry Creek and Poker Creek; these two streams were very small and most likely did not have fish; too small for steelhead trout and bull trout migrating into the stream and spawning.

With the exception of the stream crossing at Pagoda Creek, the trail approaches at the stream crossings were stable and soil disturbance was observed to be within the expected size and magnitude and limited to the trail.

Patrick K. Murphy  
Forest Fisheries Biologist and Program Manager  
USDA Forest Service  
Clearwater and Nez Perce National Forests  
12730 Highway 12  
Orofino, Idaho 83544  
phone: 208-476-8208  
Fax: 208-476-8329  
[pmurphy@fs.fed.us](mailto:pmurphy@fs.fed.us)

### **Motorized Trail/Stream Crossing Field Review – Field Notes #4**

On Friday, August 13, 2010, I walked road #5259 to evaluate the stream crossings on Rock Creek that the proposed Travel Plan will continue to authorized motorized travel (ATV's and motorcycles). Photos of the stream crossing sites (instream and trail approaches) were taken. Analysis conducted under the FEIS for the Travel Plan indicated that at least one stream crossing was definitely a fish bearing stream.

Rock Creek: The first crossing (at the end of the road #5259 that is open for all vehicles) is on the mainstem of Rock Creek. The stream at the crossing is a moderate sized stream (higher gradient) which has potential for bull trout rearing; no spawning habitat for bull trout was observed at the trail crossing due to large substrate. The trail approaches to the stream were stable and fairly harden with native materials; no restoration measures are recommended at this time. The stream appeared very stable, lacking of fine substrate or evidence of erosion. Small amount of stream widening at the crossing.

Rock Creek tributary #1: The second stream is a small non-fish bearing stream with a log/wood culvert that is slowly being plugged which is forcing the stream (primarily at high flows) to flow down the trail (approximately 200-300') towards the first trail crossing. Restoration work is needed at this site to removal the wood culvert and maintain a stable stream ford. The trail approaches to the stream were stable and fairly harden with native materials.

Rock Creek tributary #2: This stream is a small fish bearing stream with large boulder and sand substrate. Although there are some gravels at the crossing site, the conditions are not conducive to bull trout spawning. The trail approaches to the stream were stable and fairly harden with native materials.

Gravey Creek: The ATV crossing has been observed during past field reviews. Gravey Creek is moderately sized stream at the crossing with primarily larger substrate materials. No bull trout spawning habitat was found at the crossing site. The trail approaches to the stream were stable and fairly harden with native materials. Photos will be taken during the fall.

Larch Creek: The motorcycle crossing has been observed (annually) during past field reviews during stream temperature monitoring. Larch Creek is small, fish-bearing stream at the crossing with primarily larger substrate materials. No bull trout spawning habitat was found at the crossing site. The trail approaches to the stream were stable and fairly harden with native materials. Photos will be taken during fall.

Patrick K. Murphy  
Forest Fisheries Biologist and Program Manager  
USDA Forest Service  
Clearwater and Nez Perce National Forests  
12730 Highway 12  
Orofino, Idaho 83544  
phone: 208-476-8208  
Fax: 208-476-8329  
[pmurphy@fs.fed.us](mailto:pmurphy@fs.fed.us)

Clearwater National Forest Travel Planning Record of Decision  
Attachment 1: Biological Assessment

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
Letter 103			The DEIS lacks sufficient information on which to make truly informed decisions. There's much work yet to be done to complete a thorough environmental analysis.	Letter 103	The comment does not present a concern that requires action by the IDT, or the desired response is not clear.
Letter 224			This is an enormous shift in responsibility from a public that formerly was expected to take care of itself, to the government, requiring specific behavior under penalty of law.	Letter 224	
Letter 243			It is the intention of the US Forest Service to create millions of acres of land into the land of non use and non management for equal recreation.	Letter 243	
1				Letter 454	
5				2021	
6				2023	
7				2027	
8				2029	
9				2031	
13				2040	
14				2043	
15				2045	
16				2055	
17				2056	
19				2064	
20				2089	
22				2091	
23				2092	
24				2093	
25				2094	
28				2095	
29				2097	
30				2098	
35				2101	
41				2105	
43				2107	
46	100 Action Not Specified	The comment does not contain enough substantive information to indicate what the desired response from the Forest might be.	...federal stimulus money for forest recovery, recreation and preservation needs to be advocated and promoted. Please plan for improving the forest, not the motor vehicle industry.	2110	The Forest is a very spiritual place to native people. It is the place that sustained us through the generations. Motorcycles in our forests – Do you ever feel shame?
48				2132	
52				2134	
54				2138	
55				2143	
56				2155	
57				2156	
58				2164	
59				2181	
63				2189	
64				2195	
66				2208	
				2211	
				2218	
				2234	

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
67				2235	
69				2324	
70				2326	
72				2328	
74				2331	
75				2368	
76				2398	
77				2409	
78				2414	
84				2462	
86				2463	
89				2469	
90				2477	
92				2479	
94				2482	
				2487	
				2488	
				2494	
				2495	
				2529	
				2532	
				2538	
				2595	
				2604	
				2605	
				2608	
				2620	
				2669	
				2675	
				2676	
				2683	
				2684	
				2692	
				2701	
				2708	
				2716	
				2745	
				2751	
				2752	
				2756	
				2765	
				2766	

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
				2767	
				2774	
				2777	
				2778	
				2783	
				2789	
				2793	
				2797	
				2798	
				2811	
				2859	
				2867	
				2882	
				2891	
				2893	
				2898	
				2907	
				2908	
				2909	
				2917	
				2919	
				2924	
				2933	
				2938	
				2939	
				2941	
				2954	
				2962	
				2966	
				2973	
				2974	
				3010	
				3022	
				3026	
				3027	
				3036	
				3037	
				3038	
				3046	
				3056	
				3058	
				3062	

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
				3064 2813	Neither the Forest Plan nor the Travel rule mandate trailhead registration or use monitoring. All alternatives meet Forest Plan standards and on-going Forest Plan Monitoring will continue after this decision decides road and trail designations.
21 25	201 Methodology and Assumptions	The Clearwater National Forest should include monitoring of trail use and impacts.	There are no monitoring or management measures or trigger points upon which to prevent future damage. There is no requirement for registration at trailheads so monitoring or gathering use information is impossible. Current information is also lacking. This is also a violation of the Travel Management Rule.	2271 2367 2367 2404 2404 2405 2426 2862	Other than Forest level NVUM data, there is no specific, local data indicating local levels of use. However, regional OHV registration data does give some indication of OHV use.
1 21 25	201	The Clearwater National Forest is confusing OHV registration with use. There is no supporting data to indicate local levels of use.	The Motor Vehicle Use Rule was implemented to address the problem of unmanaged recreation, particular OHV use. The DEIS gives the perception that OHV use is greatly expanding over historic use.	2052 2308 2329 2330 2358 2404 2501 2502	While this may be true for some forms of OHV recreation, it is not applicable to other OHV recreation activities. For instance, the 2002 and 2004 Idaho Outdoor Recreation Surveys show a rapidly increasing participation in ATV recreation. Motorcycle use on the other hand was stable.
25	201	The Clearwater National Forest's assumption that OHV technologies have changed over the preceding years is flawed.	Off-highway motorcycles have not changed significantly over the past 25 years. Around 1980, suspension travel hit its peak with around 12 to 13 inches of travel. Most off-road motorcycles intended for serious trail riding today have 11 to 12.5 inches of travel. Engines have changed from two-strokes to four-stroke engines, but peak horsepower has not increased. In fact, most expert motorcycle riders prefer a bike with a little less horsepower when riding technical routes.	2360 2361 2362	As you indicate, technologies have changed especially in regard to engines.
21 61	202 Adequacy of Studies	The Clearwater National Forest should reference studies that show most OHV riders do not ride responsibly.	The premise in the analysis is based upon lack of information, wrong information, or faulty logic. For example, the DEIS provides no information that suggests most ORV users ride responsibly. Studies provided in our scoping comments show otherwise.	2275 2895 2896	OHV operators should be responsible riders at all times. Education for responsible use of the National Forests is part of the Forest Service's mission. Educational programs such as "Tread Lightly" are used by the Forest Service to promote responsible riding.
21	202	The Clearwater National Forest's suggestion that mixed use is tolerated by most users is unsupported.	The DEIS suggests "many" recreationists tolerate mixed use (motors and non-motorized) but "some" do not. The DEIS provides no information to justify the clear perception that more recreationists approve mixing of motorized and non-motorized recreation. What data do you have that support this contention? Please provide them to us.	2276	The majority of trail miles on the Clearwater National Forest, outside designated wilderness, permit mixed motorized and non-motorized use. Since both motorized and non-motorized users use these trails the assumption is that this mixed use is tolerated by trail users.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
21	202	The Clearwater National Forest should recognize the desires of nonmotorized users in its effects analysis.	<p>One of the worst aspects of the DEIS is that non-motorized users are treated as second-class citizens. There is almost no mention of dissatisfaction of nonmotorized users and extensive mention of dissatisfied motorized users. As such, the analysis violates NEPA's requirements for objectivity and accuracy. It also conflicts with data the agency has gathered about forest use.</p>	2279 2280 2671 2678 2902 2989	The effects analysis in Chapter 3 for Trails and Recreation Opportunity Associated with Travel Routes addresses the effects of all alternatives on both motorized and non-motorized users.
36	202	The Clearwater National Forest does not have scientific justification for restricting bicycle use in recommended wilderness.	<p>The decision to close recommended wilderness does not appear to have scientific justification. These trails have been ridden for decades without appreciable impact. Concerns about user conflicts are overstated, even in areas of high use only a minority of hikers and equestrians have concerns.</p> <p>...the travel plan does not contain any discussion of the impacts of mountain biking on lands, wildlife or vegetation, and no substantive discussion of erosion impacts, or how mountain bikes impair "primeval character and influence" or "natural conditions," create "permanent improvements," or make the "imprint of man's work" substantially noticeable, beyond that of a hiker or equestrian. ... IMBA urges that the Travel Plan be modified to continue to allow mountain biking in Recommended Wilderness, until such time as Congress makes any new Wilderness designations.</p>	Letter283 2635	Alternative B provides for bicycle use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
300	202	The Clearwater National Forest does not have scientific data to show motorized uses have effects on wildlife.	<p>Frequently closures and restrictions on public land are driven by effects on wildlife and endangered species, but I find these are unjust reasons as there is not any scientific data showing that motorized vehicles have any effect on the success rates of wildlife.</p> <p>I have asked for the scientific studies that you keep referring to that indicate what (impacts) motorized travel has on wildlife. Since you have never produced these studies, I assume it is safe to say they don't exist.</p>	2124 2162 2243 2818	The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual species when needed to further clarify or address a public comment or concern.
422	202	The Clearwater National Forest should consider	<p>I believe you have no counts as to how many people use the (motorcycle) trails at any given time. If you don't have any studies showing the numbers and types of users you shouldn't be able to exclude anyone by saying there are too many of them and they disturb wildlife.</p> <p>Recent research from the Starkey Research Station in Oregon clearly indicates that motorized incursion into elk and deer country is detrimental to those species, causing them to move</p>	2881	The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		research from the Starkley Research Station.	more frequently and farther than is desirable for healthy, viable herds. We urge you to consider quality hunting as an important feature of the Clearwater National Forest and ask that you place reasonable restrictions on increased motorized access into the forest.		Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual species when needed to further clarify or address a public comment, issue or concern.
21	202/514	The Clearwater National Forest should include an area by area evaluation of all Inventoried Roadless Areas that discloses the effects of each alternative on the roadless characteristics.	The DEIS should have a detailed discussion about each roadless/wilderness area that fully evaluates and discloses how motorized use will affect the characteristics for which that land has been specially designated.	2298 2260	The FEIS, Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas has been updated to address this concern.
21	203 Update/Change/Add Data to Existing Studies	The Clearwater National Forest should identify a minimum road system with this analysis.	This travel plan cannot achieve a "minimum system" if there are roads that are unneeded and if there is not enough money to maintain the system.  By providing this direction, we feel that Congress has removed any ambiguity about the agency's responsibility to conduct a scientific-based roads analysis for all maintenance level roads, and identify roads for decommissioning in order to achieve the minimum road system.	2261 2282 2306	See the FEIS, Chapter 3, Section Roads and Seasonal Restrictions, Summer Travel, Affected Environment, National Forest Road System, for a discussion of the 2002 Forest Roads analysis and the scope and scale of the minimum road system. See also Chapter 2, Alternatives Considered But Not Studied in Detail.
25	203	The Clearwater National Forest should update the Motor Vehicle Use Map annually.	We recommend the travel maps be issued on an annual basis until analysis shortcomings are corrected and differences between interests can be resolved into a suitable, long-term final Travel Plan.	2411	The Travel Planning Rule requires that Motor Vehicle Use Maps will be issued annually.
34 35	203	The Clearwater National Forest should do additional small, site-specific projects to add OHV opportunities in the future.	Each Ranger district should be required to slowly put forth projects for OHV use that will include many loops systems tying in with roads and trails that are not on the current maps.	2152 2590 2600 2610	The need for additional motorized road and trail opportunities in the future will continue to be evaluated as part of smaller-scale analyses. See the FEIS, Chapter 2, Section: Scope of the Travel Plan and Analysis.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		Trails 650-651 and 173 in the Weitas-Liz Butte area should also be in ALT C. Trail 594 to road 581-thru Raspberry Butte and Spy Point should also be in ALT C. Trails 513-565-478-429 in the Great Burn area should also be in ALT C. Trail 373-Meadow Point should also be in ALT C.	This change is not a minor simplification of codes, but rather an assault on many existing oversnow closures, which were designed to protect wildlife habitat and minimize user conflict...		Alternative C Modified was added to the alternatives in the FEIS to address this concern. Route-based restrictions for over-snow vehicles would be retained in Alternative C Modified as shown in the DEIS for Alternative A, with some modifications. Instead of the variety of seasonal restrictions shown in Alternative A, the restriction dates would be simplified. These simplifications are intended to make the restrictions and the Motor Vehicle Use Map clearer. Although some of the changes appear more restrictive on paper, please note that over-snow recreational opportunities would not be affected by restrictions during the snow-free portions of the year. See Chapter 2, Summary of Alternatives Studied in Detail.
3	210 Planning Document	The Clearwater National Forest should provide rationale for changing existing management practices.	This change will eliminate a large number of existing oversnow closures that were designed to protect wintering deer and elk on numerous site-specific project analyses...	2075	The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual species when needed to further clarify or address a public comment, issue or concern.
20 335	211 Scope of Analysis	The Clearwater National Forest should separate summer and winter plans.	...the summer and winter plans should be separate. There are too many issues to lump them together. The winter people shouldn't suffer because of something you feel compelled to do in the summer plan and vice versa.	Letter335 2241	The 2005 Travel Management Rule allows Forests to analyze winter motorized uses as well as summer motorized uses. The Clearwater National Forest has chosen to analyze winter uses. The reasons for including over-snow motorized travel in the analysis are discussed in the FEIS in Chapter 1, Section: Purpose and Need, Over-Snow Vehicles. The FEIS is constructed so that the analysis of over-snow motorized travel is easy to distinguish from the analysis for summer motorized uses.
40	211	The Clearwater National Forest should consider motorized watercraft in this analysis.	I am suggesting either the Winter planning process not be included at this time until the Forest Plan revision has occurred to define aspects of how snowmobiling activities will be affected.  [This group] supports the continued implementation of these closures to protect the outstanding remarkable values of both the designated Lochsa Wild and Scenic River Corridor and the eligible North Fork Clearwater Wild and Scenic River Corridor.	2666	Section 212.51 of the Travel Management Rule specifically exempts watercraft from designation.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		In particular, the Forest Service should restrict the use of amphibious vehicles in alpine and subalpine lakes like Fish Lake. Under the preferred alternative, the Fish Lake Trail would remain open to vehicles less than 50 inches in width. This designation would permit the use of amphibious vehicles ...	No doubt, the Forest Service did not foresee the current issues and levels of use associated with off-road vehicles coming when the latest forest plan was developed. Now the Forest Service is playing catch-up and trying to get a handle on the escalating use of four-wheelers. It would be wisely proactive to preempt the use of amphibious vehicles in waterways on the Forest now.		The overarching purpose of this project is to implement the 2005 Travel Management Rule. The FEIS describes "significant issues" in Chapter 1, Section: Significant Issues. Non-significant issues are described in Chapter 2, Section: Other (Non-Significant) Issues.
57	211	The Clearwater National Forest selected significant issues and the purpose and need for action based on arbitrary assumptions.	Refer to pages 1-5 to 1-7 in the Summary. The unproven belief system inserted into the Purpose and Need and the unsupported Background statements now control the selection of the significant issues. Certainly all of these issues and many more were raised by the public. The key is which ones the Forest Service decides are significant. This set of decisions can seriously skew the options available for the deciding officer since the alternatives must be constructed to address only those issues, and all others will be considered outside the scope of the analysis. Yet the issues selected as significant by the Agency are either created by the proposed action itself, irrelevant to the decision to be made, conjectural and not supported by scientific fact, or a belief system inserted into the Purpose and Need and the unsupported Background statements. The Clearwater NF hears loud and clear about issues related to unproven beliefs, but is barely able to hear anything about the very real Forest access issues raised by the general public.	2775 2336	The FEIS describes how "existing conditions" were defined in Chapter 2, Section: Alternative A: No Action. The Affected Environment, or baseline for comparison of the alternatives, is described for all resources in the FEIS in Chapter 3. The Environmental Consequences of implementing Alternative A, No Action, are also described in Chapter 3 for all resources.
57	211	The Clearwater National Forest removed some routes from consideration before scoping began.	... it appears the Forest Service wishes to conceal that decision from the public. We say this because the DEIS provides no information about these miles and acres dropped prior to analysis.	2779	The 2005 Travel Management Rule is summarized in the FEIS in Chapter 1, Section: Travel Management: Designated Routes and Areas for Motor Vehicle use; Final Rule (2005). The rule at 212.51 gives the responsible official the opportunity to designate "... limited use of motor vehicles within a specified distance of designated routes..." but does not require it. No suitable areas for summer cross-country travel were identified by the IDT.
93	211	The Clearwater National Forest misinterpreted the 2005 Travel Management Rule by proposing to	The DEIS fundamentally misconstrues and misrepresents the Travel Management regulations ... That rule provides for motorized travel on designated "roads, trails, and areas." ... Express inclusion of the reference to "areas" was specifically designed to provide authority to on-the-ground personnel to accommodate "user demands" ... as well as "access needs" and	3050 3051 3052	The 2005 Travel Management Rule is summarized in the FEIS in Chapter 1, Section: Travel Management: Designated Routes and Areas for Motor Vehicle use; Final Rule (2005). The rule at 212.51 gives the responsible official the opportunity to designate "... limited use of motor vehicles within a specified distance of designated routes..." but does not require it. No suitable areas for summer cross-country travel were identified by the IDT.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		eliminate cross-country travel off of designated routes, and by failing to include motorized “areas” in the alternatives.	“provision of recreational opportunities.” ... the DEIS is founded on the incorrect notion that these regulations provide only for motorized travel on designated “routes” or roads and trails and that a “prohibition on cross country use is fundamental to the national travel rule.” ... Similarly, the DEIS opens with this statement: ‘All of the action alternatives in this DEIS would comply with the Travel Management Rule by allowing motorized travel only on Routes that are designated as open to motorized use’ ... This critical misunderstanding of the regulation leads directly to the proposed blanket closure of all existing cross country motorized vehicle use in the Clearwater. ... this approach will prohibit important public use and access that has been permitted within the Forest for many years and provides the vast bulk of the existing motorized access. . .		The 2005 Travel Guide describes the roads and trails that the Forest considers to be the existing designated motorized system. If Alternative A were selected, the motorized system described in the 2005 Travel Guide would not change. The 2005 Travel Guide only serves to describe the existing situation; it is not a part of the actions being proposed.
57	212 Purpose and Need	The Clearwater National Forest should not implement the 2005 Travel Guide because that would be predecisional.	The 2005 Travel Guide was crafted to reflect the changes which would occur if the proposed action were implemented, thus revealing that the restrictions were pre-decisional. CEQ expressly prohibits any action on the part of the Agency which may prejudice the analysis or the Decision. . .Additionally, the 2005 Travel Guide did not reveal the secret that the plan to restrict snowmobiles in the Great Burn was also pre-decisional, but not made public until 12-14-07 in a news release. No analysis and discussion has been provided regarding the social benefit of keeping Great Burn open to winter motorized.	2768	Constructing or reconstructing routes would be beyond the scope of this analysis, which focuses on route designation. Physical actions such as reconstruction, relocation, restoration, etc. were not analyzed in detail. See the FEIS, Chapter 2, Alternatives Considered But Not Studied in Detail; also Chapter 2, Scope of the Travel Plan and Analysis.
29	212	The Clearwater National Forest should have considered the construction and reconstruction of new routes.	Page 2-4 – The decision to categorically reject any and all public recommendations that might require construction or reconstruction of new routes is arbitrary and capricious.	2481 2550	2051 Alternative A (No Action) could be selected by the Decisionmaker. However, Alternative A would not meet the purpose and need for this project.
1 6 7	213 Alternative A (No Action)	The Clearwater National Forest should take no action and leave existing uses and restrictions unchanged.	Alternative A is good option as it supports all the historical use of the areas, satisfying the needs of all recreationalist motorized or otherwise, while still affording a good degree of environmental protection.  ...we have been informed that Alternative A is considered inconsistent with forest policies, and the other isn't. Why is this?	2103 2104 2113 2131 2157 2433 2599 2755 2824	2051 Alternative A (No Action) could be selected by the Decisionmaker. However, Alternative A would not meet the purpose and need for this project.
35	213	The Clearwater	I would like to see all the existing motorized roads and trails put	2554	A map of Alternative A has been to the FEIS to address this concern.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		National Forest should include a map in the EIS for Alternative A.	onto the travel map. Many existing roads and trails on the ground have not been put onto a current map.		
78	213	The Clearwater National Forest should select Alternative A.	I strongly support the no action alternative, as I see the document as a thinly veiled attempt to limit public access to public lands based on no science or poorly documented science. If the no action alternative is not accepted then my second choice is the "Modified Alternative B".	2963 3030 3040	All of the alternatives in the FEIS meet Forest Plan standards, goals, and objectives, although the different alternatives would meet the goals and objectives for various resources in different ways. The Forest Supervisor will consider all of the alternatives in the FEIS when making a decision. However, Alternative A would not meet the purpose and need for this project.
90			I would like to see alternative A which is a no change alternative. Actually what I would like to see is some more area opened to snowmobile use but there is no option for that.		
			Alternative B could also possibly be an acceptable option to serve the needs of all citizens using these lands.... Unfortunately this alternative eliminates 1.3 million acres previously open to OHVs cross country use, which I do agree needs some control but not necessarily to be eliminated.	2147 2448 2449 250 251	All of the alternatives in the FEIS meet Forest Plan standards, goals, and objectives, although the different alternatives would meet the goals and objectives for various resources in different ways. The Forest Supervisor will consider all of the alternatives in the FEIS when making a decision.
			...would like to go on record as being in support of Alternative B in regards to the Travel Planning DEIS. With a few modifications this alternative will provide plenty of single track loop opportunities while meeting the objectives of the Forest Plan	2554 2558 2341	Alternative C Modified was added to the FEIS to help address concerns about motorized trail opportunities.
12	15	The Clearwater National Forest should select Alternative B.	SAWS Prefers a Modified Alternative B....with no early season, forest wide closure, where it is not scientifically imperative to the needs of big game animals during their seasonal migration to wintering grounds.	2347 2366 2433 2440	The forest-wide closure to snowmobiles from October 1 through November 15 is common to all of the action alternatives in the FEIS. It would provide for big game security during the big game hunting season (FEIS, Chapter 2, Over-snow Vehicle Actions common to All Action Alternatives).
25	26	214 Alternative B	The Nez Perce County Board of Commissioners would like to take this opportunity to support Alternative B of the Travel Planning DEIS. With a few modifications, this alternative will provide plenty of single track loop opportunities while meeting the objectives of the Forest Plan.	2451 2458 2563 2574 2577 2580 2611 2637 2642 2685 2686 2750 2825 2861 2943 2996 3001	Management unit C8S POT Mountain : This comment is based on utilizing Alternative B as the base layer for my comments. Close trail #160 – To decrease trail mileage and due to little usage Close trail #154- Close due to hazardous trail locations/ alignment (rock slab crossings)...Management unit C6 Cayuse: Close trail # 249- Decreases trail mileage and due to little usage.... Management C8S Wertas: ...Close Trail #667 Reduces mileage and
27	33				
34					
47					
61					

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		trail receives little to no usage. Close Trail #627 from Weitas Cr. To RD 555. Reduces mileage. Areas can be reached via other open trails. Close Trail #580 Reduces mileage. Expands Elk habitat security areas. Close Trail #670 Reduces mileage and trail receives little to no usage. Allows for hiking users to access area from Weitas GS rental. Close Trail #650 Reduces mileage and trail receives little to no usage.	Management Unit Mot. Bald Mountain: ...Close Trail # 231 Reduces mileage and trail is a dead end.	3002	
			Trail# 167 Cook Mtn: This trail is a primary loop route utilized by novice-motorized users, esp. the trail segment from Fork of July Cr. Bridge to the intersection with trail number 627. All of the trails south of trail #167 are relatively easy to use by novice riders. By allowing these trail segments to be available multiple loop rides may be created....Trail # 649, #651, and a segment of #73 create a loop so that Liz creek cabin and Liz butte cabin may be utilized for motorized camping opportunity. These trails are also relatively easy for a novice rider to negotiate ( i.e., family rides). ... (DEIS page 1-6) It is not appropriate to use increase in numbers and capabilities as a purpose and need statement for the Clearwater's travel plan. Despite any increase in capability, motorized uses have not significantly expanded their traditional geographic range in the areas address by this decision. The statement fails to disclose that trail motorcycle use, which is the predominant trail use on the Clearwater, has had only moderate to low increase in the region. Indeed, several trails have been "lost" due to lack of use.		
			...Of the Alternatives presented, we believe a modified alternative B best meets the need to provide a enjoyable trail system while also protecting natural resources.	3011 3013	All of the alternatives in the FEIS meet Forest Plan standards, goals, and objectives, although the different alternatives would meet the goals and objectives for various resources in different ways. The Forest Supervisor will consider all of the alternatives in the FEIS when making a decision.
84	215 Alternative C	The Clearwater National Forest should select Alternative C.	I agree with the USFS that Alternative C (the preferred alternative) is the best alternative for the forest.		2200 2464 2693 2698 2699
28 48 52 66 68	216 Alternative D	The Clearwater National Forest should select Alternative D.	...This alternative would manage recommended wilderness as wilderness, but it also has a great respect for the needs of wildlife and watershed protection. These last two concerns are the real reason to adopt it.		All of the alternatives in the FEIS meet Forest Plan standards, goals, and objectives, although the different alternatives would meet the goals and objectives for various resources in different ways. The Forest Supervisor will consider all of the alternatives in the FEIS when making a decision.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		I support Alt D because it best protects the trails of the Great Burn, Mallard Larks and other scenic destinations for hiking and horseback riding.		2714 2742 2890 2894 2991	
		Support for Alternative D HHA Helgate Hunters and Anglers supports Alternative D because it would provide the highest number of benefits for hunters, anglers, wildlife viewers, backpackers and campers. Alternative D allows 139 miles of motorized use in roadless areas compared to 243 miles in Alternative C. This provides innumerable benefits to hunters, anglers, fish, and wildlife by enhancing the roadless area values discussed above. Alternative D would largely restore the backcountry characteristics of the Pot Mountain roadless area, a very important elk and deer hunting destination. -Alternative D provides important motorized route restrictions in the Weitas Bighorn Roadless area (encompassing the Weitas, Cayuse, and Junction areas in the proposed travel planning map). Weitas and Cayuse creeks provide extremely important trout fishing and this roadless area offers key low elevation big game habitat. HHA recommends that the CNF go one step further than Alternative D and close the a section of the trail that runs parallel to Weitas Creek starting at the junction with forest road 555 all the way to forest road 500 to provide at least some backcountry fishing along Weitas Creek.		All of the alternatives in the FEIS meet Forest Plan standards, goals, and objectives, although the different alternatives would meet the goals and objectives for various resources in different ways. Alternative B would address this concern by maintaining as much motorized single-track trail mileage as possible.	
34 61	217 Alternatives (Add, Change, Delete)	The Clearwater National Forest should create an alternative that does not close single-track trails.		2576 2581 2814 2815	
1 5 9 22 25 27 28 34 35 47 58		I suggest the Forest Service go back to the drawing board, eliminate all options that do not provide the wildlife protections promised in the 1987 forest plan, and reissue the DEIS for public comment.  I object to the fact that with the current Travel Plan the agency refused to develop even one alternative that did not further significantly reduce motorized trail opportunities.  ... there is no change (other than the restriction of cross-country travel) being required to any current travel plan in any national		2002 2004 2006 2010 2017 2018 2020 2035 2036 2037 2039	The Interdisciplinary Team developed the range of alternatives presented in the DEIS to meet Forest Plan standards, goals, and objectives for a variety of resources.  Chapter 1 of the DEIS explains that construction, reconstruction, and obliteration of routes were not considered as part of the Travel Planning project. These activities will be addressed on a case by case basis in smaller-scale analyses.  Allowing continued unmanaged cross-country motorized travel off of designated routes would not meet the purpose and need of implementing the 2005 Travel Management Rule.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
61			forest. . . . I can only ask that planners set no cross-country travel up as the only change. . . .	2041 2042	
70			I am concerned that the DEIS does not include an alternative that closes all of the Weitas Creek and other roadless areas within the Clearwater National Forest to motorized abuse.	2044 2046 2047 2057	
75			As shown in the attached comments, there is a great shortage of ATV and motorcycle trails in the Clearwater National Forest. For this reason, we [Capital Vehicle Trail Association] strongly recommend and support the development of a Pro-Recreation Alternative.	2065 2084 2086 2087	
269			All roads to be closed to full-size vehicles should be converted to atv routes. This is a reasonable alternative for all existing roads.	2090 2135	
318			A summer alternative should be added to limit ORV travel to forest roads only. A winter alternative should limit snowmobile use to far less acres in order to more effectively protect wildlife.	2136 2140 2163	
448			In my opinion the maximum mileage of roads and trails should remain open for all types of use and traffic.	2137 2322 2323 2332	
453			... National Forests are managed by LAW for multiple use. These uses must be balanced, rather than one given preference over another.	2333 2337 2337 2338 2338 2456 2470 2472	
			There isn't a proposed new motorized route on the forest just a decrease in motorized use.	2507 2508 2513 2573 2607 2688 2794 2796 2812	
			... The arbitrary decision to simply eliminate now all cross-country use rather than consider reasonable intermediate alternatives to "confine" or manage such use is a fundamental flaw in the DEIS. The needs of the public for motorized recreational opportunities include a variety of trails for different skill levels.	2818 2880 2903 2934 2942 2957	
			In order to protect the natural resources of the Clearwater National Forest I strongly suggest you limit motorized travel to roads only. This will be a win-win situation for the natural resources and people.		

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
21	217	The Clearwater National Forest should develop a range of alternatives for roads.	Why is there not a range of alternatives in regard to roads?	2978	See Chapter 2, Alternatives Considered But Not Studied In Detail, Road Restriction Changes Other Than The "Date Combination Package."
25 310 343	217	The Clearwater National Forest should develop a compromise alternative.	Here's an idea to consider where both parties compromise. Open the Montana side of the Great Burn within the Lolo National Forest, in exchange close an unused area within the CNF.  I think if you are going to close something you should swap the areas around and keep area B2 open and close all of the stuff next to the Highway 12 with the exception of the roads that would be needed to access area B2.  ...IDFG would be able to support a compromise Alternative developed collaboratively with a range of stakeholders and with adequate mitigations for impacts from motorized trails (e.g., seasonal closures) to protect fish, wildlife and other resources.	2282	The Interdisciplinary Team developed the range of alternatives presented in the DEIS to meet Forest Plan standards, goals, and objectives for a variety of resources, and to address a wide variety of commenters' concerns. Alternative C Modified was added to the alternative array in the FEIS in response to public comments about motorized trail opportunities. In terms of motorized trail opportunities, Alternative C Modified represents a compromise between Alternatives B and C.
34 51	217	The Clearwater National Forest should modify Alternative B.	...a modified Alternative B will best balance impacts on wildlife and habitat with the need to provide a wide range of recreational uses.	2242 2569 2572 2578 2591 2718 3003	The Interdisciplinary Team developed the range of alternatives presented in the DEIS to meet Forest Plan standards, goals, and objectives for a variety of resources.
23 25	217	The Clearwater National Forest should modify Alternative C.	Alternative C needs modification in order to provide quality looping trail opportunities desired by single-track trail motorcyclists.  The DEIS preferred Alternative C, in our opinion, does not offer a satisfactory resolution either to environmental concerns or to conflicts between various interests.  ...we suggest as we have in other comments, that the Blacklead trailhead is relocated approximately one mile west to the junction with FR 581. If the trailhead is not moved, we recommend closing this road (FR 581D) to all motorized use because of its proximity to the Great Burn proposed wilderness.	2327 2397 2408 2452 2758 2956	Alternative C Modified has been added to the FEIS to address these concerns.  See Chapter 2, Alternatives Considered But Not Studied In Detail, Road Restriction Changes Other Than The "Date Combination Package."
25 48	217	The Clearwater National Forest	I strongly urge the Forest Service adopt a modified version of Alternative D to include a year-round motorized prohibition in all	2418 2700	The FEIS has been updated to address these concerns. Please see Chapter 3, "Inventoried Roadless Areas and Recommended Wilderness Areas."

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
431 432		should select a modified Alternative D.	Inventoried Roadless Areas.  I urge you to adopt "D" and drop the proposed (elk) amendment.  ID Fish and Game recommends Alternative D as the preferred Alternative, with the EHE standard retained regardless of the Alternative chosen	2707	In response to public comments and based on an updated analysis, the proposed Forest Plan amendment for elk habitat effectiveness has been dropped from the project.
		We [EPA] recommend the selection of Alternative D. Alternative D is the most environmentally protective – especially in the provision of wildlife security habitat – and is simultaneously the most consistent with CNF's recreation niche....If Alternative D is inconsistent with water quality standards we recommend the incorporation of additional water quality emphasis elements.			The Interdisciplinary Team developed the range of alternatives presented in the DEIS to meet Forest Plan Standards, goals, and objectives for a variety of resources. Alternative C Modified was added to the array of alternatives in the FEIS.
29	217	The Clearwater National Forest did not present an adequate range of alternatives in the DEIS.	... there is an inadequate range of alternatives presented and considered in the DEIS...	2483 2485 2582	
21	218 Cumulative/C ombined Effects	The Clearwater National Forest has not analyzed the effects of opening trails that may currently be impassable.	Because the analysis does not indicate what trails are currently used by motor vehicles, it is impossible to assess the impacts from "opening" trails to ORV use where there is little or no use. Stimulus money could open trails to ARV use that never received it in the past. Those impacts are not assessed in the DEIS.	2272	
1 9 56		The Clearwater National Forest should display the cumulative effects of limiting motorized uses including the effects of neighboring Forest's decisions and the impacts of concentrating use on fewer trails.	The agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists. We [Capital Trails Vehicle Association] cannot tell you how many times we have met motorized recreationists (many of them families from the project area) and they have asked us "What is going on?" This question will be even more prevalent if the travel plan is pushed by the public in a short time frame. In all of the hundreds of federal actions in the past 7 years, we have yet to see a meaningful evaluation this cumulative effect. It seems that both the BLM and Forest Service are using forest planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as possible. We are asking that this project establish a baseline evaluation and address this	2005 2012 2013 2014 2015 2025 2053 2054 2114 2117 2442 2499 2575 2585	The cumulative effects analysis in the FEIS has been updated to address these concerns. See Chapter 3, "Trails and Recreation Opportunity Associated with Travel Routes."

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		significant impact.	<p>Nowhere in the project documents do I see any analysis on what the cumulative impacts will be to the remaining motorized recreation facilities on the Forest due to the reductions in motorized recreation opportunity. Can you please address this in a probative manner with statistical evidence to support the rationale?</p> <p>...the Clearwater NF is just one of the Region 1 management units proposing to close between 30 and 50% of the existing routes on the Forest, and thus large numbers of useable snowmobile opportunities.</p> <p>If all of these [RWA] areas are still in pristine enough condition to be rated for RWA status then the current Forest Management/Travel Plan is working and does not require any major changes. The 2005 rule does not say you have to close any motorized route just to designate them for use.</p>	2588 2754 2757 2780 2781 2782 2784 2785 2786 2790	
63	218/443	The Clearwater National Forest should display the cumulative effects of limiting bicycling uses including the effects of neighboring Forest's decisions.	I urge the Region One to thoroughly consider the widespread loss of trails across adjacent National Forest, not just one particular district.	2210 2864	The cumulative effects analysis in the FEIS has been updated to address these concerns. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
15	218	The Clearwater National Forest should analyze the potential for increased use and demand in the future	The DEIS has a number of shortcomings, one being it ignores the growth in recreation use of all kinds and especially motorized use in the future to come, land managers should be very well aware of the ramifications of forcefully concentrating land users...	2008 2161 2791 2792	The potential effects of the alternatives are displayed in the effects analysis in the FEIS.
9 29	218	The Clearwater National Forest should admit that OHV management is as much as social issue as a resource issue	We reject the notion that B only "minimally implements" the 2005 TM rule. There is also another of the unacceptable conjectural statements: "Cumulative effects include the possibility of growing recreational user dissatisfaction over the inconsistent management of recommended wilderness and inventoried roadless areas..." (emphasis added). That this is another indication that OHV management is dominantly a social rather	2133 2141 2491	The FEIS includes a discussion of the social effects of managing motorized recreation. See Chapter 3, Social and Economics.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		than a resource issue.	Travel Management and planning is largely a social issue. ... Social issues should have little influence when you are trying to provide for use by all users. Resource issues should be the main driving factor.		The FEIS includes a cumulative effects analysis for motorized trail and winter over-snow recreation opportunities in Chapter 3.
57	218	The Clearwater National Forest should analyze the cumulative effects of past actions on motorized trail and winter over-snow recreation opportunities.	CEQ "requires a review of past actions to the extent that the review informs Agency decision-makers regarding proposed actions." No such review is provided with regard to motorized trail opportunities and winter over-snow opportunities. A goal of the recreation resource manager is to provide opportunities for obtaining satisfying experiences. (ROS User Guide)  ... the Clearwater NF is just one of the Region 1 management units proposing to close between 30 and 50% of the existing routes on the Forest, and thus large numbers of useable snowmobile opportunities.	2772 2780	
29	222 Document Composition/ Clarity	The Clearwater National forest should correct a discrepancy in the number of miles for the same alternative in the DEIS.	Page 3-24 – Table 3-8 indicates that B provides 3084 miles of motorized road. The 7/15/09 “Effects” document (see p. 3-17 above) states B provides 2947 miles of such road access.	2492	The FEIS has been updated to use the most current mileage figures available.
27	222	The Clearwater National Forest should ensure that the maps displayed in the FEIS are correct.	I feel the USFS staff has intentionally tried to deceive and confuse the public with false information in the displayed maps.	2450 2862	The maps displayed in the DEIS were drafts that were subject to change during the course of the analysis for the Travel Planning project. The maps in the FEIS have been updated and finalized.
34	222	The Clearwater National Forest should make the page-specific corrections and clarifications suggested by those who commented on the DEIS.	In the current climate, and with an eye toward the future of the Forest, its resources, and its users, there is a need to identify routes suitable for motorized, non-motorized, and non-mechanized travel. ... (DEIS page 1-4) In the BlueRibbon Coalition scoping comments we specifically asked that the DEIS define the term “climate” in the context of this sentence as how that may affect the purpose and need.	2586 3055	The sections cited in these comments have been updated to address the commenters' concerns.
29	222	The Clearwater	Page 1-3 – ... this document fails to adequately identify the user	2474	Chapter 2 of the FEIS, Section User-Suggested Routes Criteria, displays the user-

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		National Forest should identify the user-created roads and trails.	created or non-system roads and trails.	2476	suggested routes that were included in the action alternatives.
48	222	The Clearwater National Forest should ensure that the web-based documents are accessible.	...Unfortunately—and for most of the final days of the public comment period—the Forest Service file server that maintains the maps needed to fully understand Alt. D has been inoperative. I was able to access it for just five minutes to quite briefly view the Alt. C maps. This electronic failure sure makes useful comments on the draft plan very hard to write.	2698	The Clearwater National Forest will make every effort to ensure that the FEIS documents that are distributed electronically are readily available.
25	223	The Clearwater National forest should define over-snow vehicles as any vehicle capable of traveling over snow.	ID Fish and Game recommends that the definition for over-snow vehicle be any vehicle capable of travel over snow. Seasonal closures should apply to all such vehicles.	2428	Over-snow vehicles are defined in the FEIS. See the Glossary in Chapter 5.
26	109	Consistency with Forest Plan Direction	The travel plan needs to be put on hold until the forest plan is completed to avoid apparent inconsistencies between the two. Winter travel should never have been part of this travel plan, due to the delays in completing the Forest Plan. Once Forest Planning resumes, there should be significant alterations to RWA boundaries, due to unquestionable Significant Historical Snowmobile Usage in the RWA's. Snowmobile Alliance of Western States suggests that the Summer and Winter Travel Planning portions be broken into two separate plans. With the Winter Travel half being delayed until the Forest Plan can be completed...Region 1 has a policy of removing high motorized usage areas from RWA boundaries. This is done in the Forest Plan, not the Travel Plan. Since the Forest Service is claiming high snowmobile usage in the RWAs, then the RWA boundaries should be altered to reflect this.	2261 2439	One component of the purpose and need for the Travel Planning project is implementation of the 2005 Travel Management Rule. The Rule allows the Forest Service to include winter motorized activities in the Travel Planning analysis, and does not require Forests to wait until Forest Plan Revisions are complete before doing Travel Planning. In fact, to postpone Travel Planning indefinitely would not meet the requirements of the Rule. At this time it is unclear how soon Forest Plan Revision will be completed for the Clearwater National Forest.
3	224	The Clearwater National Forest has developed alternatives that do not meet Forest Plan standards.	...Alternative C would likely violate the Forest Plan management direction for fish and wildlife resources.	2068 2122 2400	All alternatives meet Forest Plan standards. In some cases, the alternatives may move away from Forest Plan goals or objectives for some resources, while moving toward the goals and objectives for other resources.
21	225	The Clearwater National Forest not compiled with	Some of the negative directions proposed by the Forest will have permanent or long-term impacts that are inconsistent with Forest Plans goals, objectives and standards. The Forest Plan settlement agreement changed management direction for areas that have appeared in bills sponsored by members of the Idaho congressional delegation. These areas—	2263	All of the alternatives comply with the Forest Plan and with the Forest Plan Settlement Agreement. The Forest Plan direction for Management Area B2 (recommended wilderness) guides managers to protect wilderness character; it

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
	Plan Settlement Agreement	the settlement agreement to manage Weitas Creek and Upper North Fork Roadless Areas as Recommended Wilderness (B2).	including most of the Weitas Creek and Upper North Fork roadless areas—are to be managed as B2 or recommended wilderness according the settlement. This fact has been completely ignored in the DEIS.		does not contain specific direction regarding if routes in these are to be managed in the summer as motorized or non-motorized or if these areas are to be open to winter motorized use. It is within Forest Plan guidance that some of these areas defined in the Settlement Agreement could be managed as motorized while others would not be depending on the evaluation of attributes and the protection of character for these areas.
66 158 165	226 Proposed Forest Plan Amendment	The Clearwater National Forest should not drop Elk Habitat Effectiveness standards.	... I urge the Forest Service to PLEASE drop the proposed Forest Plan amendment which proposes to remove Elk Habitat Effectiveness Standards from the Forest Plan. I think it is critical to continue (to) analyze the impact of road and trail densities on elk security and habitat.  ... I urge the abandonment of the proposed Forest Plan Amendment. The removal of standards from the Forest Plan would jeopardize important analyses of roads, trails, and elk security and habitats.	2067 2069 2070 2071 2072 2073 2074 2145 2193 2260 2267 2343 2344 2401 2412 2422 2471 2561 2565 2648 2652 2653 2654 2655 2656 2657 2672 2681 2749 2892	In response to public comments and based on an updated analysis, the proposed Forest Plan amendment for elk habitat effectiveness has been dropped from the project.
9	226	The Clearwater National Forest should drop the Forest Plan	The amendment for the change of restrictions has been addressed and changed in the 2005 Travel Plan Rule (36CFR212.52 (2)). There isn't any need for this amendment.	2121	The 2005 Travel Management Rule did not address the Forest Plan standard for road use restriction periods found in Appendix F of the 1987 Clearwater Forest Plan. There is a need to amend this standard so that the number of different date combinations for seasonal use restriction can be reduced.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		amendment for seasons of use.			
25	226	The Clearwater National Forest should amend the Forest Plan to eliminate motorized travel in some MA's.	<p>IDFG recommends that the Forest use this opportunity to amend the Forest Plan to fully implement the vision expressed in the Forest Plan for the Bighorn-Weitas MAs... The amendment we recommend would close C6 and C85 MAs to all motorized travel, except on essential roads.</p> <p>There is no way to deny that ORV use is damaging to the environment, in particular meadows, riparian areas and trails. . . . In addition, there is a factor of noise. Please consider the impact of ORV use and how that would have adverse effects on fish, wildlife and people who wish to hike without the sound of dirt bikes.</p> <p>How much cross country ORV use by wheeled vehicles actually takes place on the Clearwater National Forest and what are its impacts on wildlife (and other resources)? The DEIS does not quantify the current use and impacts to wildlife, it merely notes that this is a big "policy" change, not a big on-the-ground change. Indeed, it is likely that cross country travel by wheeled vehicles is currently not very extensive on the Clearwater due to the vegetation. The Clearwater is wetter and has thick vegetation. Contrast that with forests in Region I east of the continental divide, which have vast open areas.</p> <p>The Clearwater National Forest should consider the impacts of motorized vehicle use.</p>	2423	<p>It is beyond the scope of this project to explore additional opportunities to amend the Forest Plan, beyond any that might be necessary to implement the current proposal. It would be more appropriate to consider this suggestion when the current Forest Plan is revised.</p>
3	9	230 Resource Analysis			
25	61	418			

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
50	230	The Clearwater National Forest should consider the effects of climate change.	Climate Change...Likely impacts from an increased number of warm days and changes in the amounts and season distributions of rainfall and snowpack include; altered water quantity and quality (e.g. temperature); timing of flow; spatial and temporal shifts of vegetative communities and wildlife habitat; increased frequency and intensity of wildfires; increased potential for bark beetles and other insects; potential increases for invasive species to mitigation measures; and increased opportunities for warm weather recreation.	2715	We recognize that vehicles emit greenhouse gases that contribute to global climate change; however, this project would not authorize whether or not motorized activity would occur on the Forest, but rather where it would occur. We have seen no evidence to indicate that the general public would meaningfully alter the amount of their motorized use because of the designation of routes on National Forest lands, whether their preferred use is to drive to a trailhead to hike, tour in a passenger vehicle, or to recreate with off-highway vehicles on or off the Forest. Under the action alternatives, less area would be available for motorized use than is currently legally available, but there is no indication that this would result in less motorized use by the general public.
21	237 Resource Analysis	The Clearwater National Forest should consider the impacts of motorized vehicle use on TES and other important wildlife species	Where is the analysis of grizzlies? One was recently killed (illegally) in the North Fork.  Fisher  The questions Friends of the Clearwater, Wildlands CPR, Alliance for the Wild Rockies, WildWest Institute, the Lands Council, the Idaho Chapter of the Sierra Club, and the Montana Chapter of the Sierra Club raise about Lynx are also valid for fishers. How many ORV trails and miles of trails would be open to either winter or summer to motorized use in riparian or old growth habitat under the various alternatives (this is also true for other riparian or old growth species)? How might that affect habitat security under the various alternatives in terms of percentages or other measurable criteria? Why wasn't the latest Forest Service research from Missoula on fishers which shows that Clearwater fishers are unique and endemic fishers and not necessarily from reintroductions?  Disturbance effects and source habitat	2291 2292 2293 2294 2295 2296 2297 2402 2413 2415 2416 2417 2419 2421 2424 2425 2515 2516 2517 2518 2519 2520 2521 2522 2523 2524 2525	The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the , Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual species when needed to further clarify or address a public comment, issue or concern.
25	31		Elk and other big game species are not the only wildlife impacted by motorized activity. Many species of wildlife are displaced from habitats adjacent to roads and motorized trails. Disturbance effects of roads and trails are species-specific and vary considerably with terrain, vegetation and other factors. However, a growing body of literature shows that, in highly motorized areas, the ability of many species to make efficient use of otherwise suitable habitat near motorized roads and trails is		

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			<p>compromised. For instance, Wisdom et al. (2000) provides information on 91 species of wildlife at risk; they concluded that motorized travel was a primary factor in the loss of source habitat for 74 of the 91 at-risk species. Elk, the focal species for much of the DEIS analysis, are particularly susceptible to roads and motor vehicle traffic (Wisdom et al. 2005). Protections for elk habitat are, therefore, useful as a surrogate for protecting some, but not all, wildlife, especially those with larger home ranges and different habitat needs.</p> <p>The wildlife impact evaluation – other species</p> <p>The wildlife assessment of potential impacts to species other than elk is far from complete. For impacts to boreal owl, American three-toed woodpecker, pygmy shrew, red-tailed chipmunk, black swift, Idaho giant salamander and others, for instance, the DEIS presents a brief species synopsis, each containing the statement “There has been no study of the effects of human activity on (this species).” This was the extent of the attempt made to assess potential impacts from roads and trails. In our opinion, this is not an acceptable level of effort to predict impacts. The Forest should at least attempt to infer impacts to all of those species based on reported impacts to similar species (surrogate species) or on expected impacts to source habitat and home range. For example, a number of the sensitive species mentioned in the DEIS are snag dependent or use snags when available; snags are most prevalent in mature forest. The analysis could describe the differences in disturbance area between Alternatives on snag-rich old growth, likelihood of loss of snags as a result of motorized access (firewood cutting), etc.</p> <p>Similarly, the DEIS effects determination for most of the non-game species is that the proposed action “may impact individuals but would not likely contribute to a trend toward Federal listing or cause a loss of viability to the population or species.” (Forest Service emphasis.) This infers that impacts to individuals of a species is acceptable, even though the natural population density of those species may be very low across the Forest. IDFG does not agree that impacts to individuals of a species is always acceptable. Wolverines, for example, could well be present in low enough densities that effects to individuals would cause loss of viability of a local population. The Forest should attempt, first, to avoid impacts to wildlife, then estimate the cost of unavoidable</p>	2526 2527 2528 2530 2539 2540 2541 2542 2544 2546 2547 2548 2549 2550 2551 2552 2553 2554 2555 2556 3004 3012 3018 3034	

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		impacts and identify suitable mitigations. Is motorized access more valuable than protecting individuals of a sensitive wildlife species?	We [Defenders of Wildlife] do not have access to the GIS files of lynx and wolverine habitat found in the DEIS, but it is evident there are many areas of overlap, particularly in the eastern portion of the Clearwater. Also, we would like to see an analysis of the newly opened roads to snowmobiles and the groomed snowmobile routes are likely to provide the easiest access to the newly opened roads, and can indicate which roads are most likely to receive significant levels of use by snowmobiles. This kind of analysis falls under the Forest Service's obligation to take a hard look at impacts to habitat security with regard to motorized winter use under NEPA, which it has failed to do in its preparation of the DEIS.		Route designation was based on a wide range of management goals, objectives, standards, and directives described in the Forest Plan and other applicable public laws. (FEIS: Chapter 1: Purpose and Need). The CNF agrees that sediment production from natural phenomena is part of forest watershed processes, and often of large magnitude. In this Travel Plan, the effects of sediment produced from travel routes on aquatic resources were analyzed, but were not major determinants in most route designations. The potential for aquatic resource damage from motorized use (i.e. streambank and streambed degradation, sedimentation, riparian wetland degradation) was a prominent factor in off-route travel restrictions and route designation where stream crossings or stream adjacent trails presented an evident risk of resource damage (i.e. Upper Eldorado Cr.), and especially in high fishery value C6 Management Areas (i.e. Cayuse Cr.).
1	231 Water	The Clearwater National Forest should compare sediment production from roads to natural sediment production when making decisions about road closures because sediment production from roads and stream crossings is much less than that from natural disturbances.	A sense of magnitude must be used when making decisions about road closures based on indicators such as sediment production... The sediment yield must be compared to naturally occurring conditions which includes normal runoff, floods and fires. The recent fires in the Clearwater National Forest discharged thousands of cubic yards of sediment to the area streams which is more than all of the motorized routes in the project area for the next 100 years.	2030 2821	If you consider the total length of a stream, a crossing a few feet wide a few places along its length, is minuscule. The amount of disturbance on the stream bottom and the banks would be hard to detect a few yards below the crossing. The natural disturbance in a watershed are so overwhelmingly greater, that it does not make sense to make an issue out of a few stream crossings.
38	231	The Clearwater National Forest Travel Plan should adhere to language within applicable TMDL documents produced by the	The Idaho Department of Environmental Quality (DEQ) offers the following comments relative to the above referenced Clearwater National Forest Planning Document. DEQ request that the travel planning process be aware of and adhere to language contained within the following DEQ documents as is applicable: - South Fork Palouse River TMDL - Palouse River TMDL	2640	The applicable DEQ documents indicate sediment and elevated water temperature as water quality concerns in Clearwater National Forest streams. The Clearwater National Forest considers the effect on stream temperature of designating motorized-use as negligible (FEIS: Chapter 3-Section 2: Watershed Resources-Aquatics). These DEQ documents also identify erosion from roads and streambank and riparian areas as sources of sediment that can impair water quality and aquatic habitat and recommend continued road closure and

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		Idaho Department of Environmental Quality.	- Upper North Fork Clearwater River TMDL - Lower North Fork Clearwater River TMDL - Jim Ford Creek TMDL - Lochsa River Subbasin Assessment - Potlatch River TMDL - Lower Selway River Subbasin Assessment - Palouse Tributaries TMDL		The Clearwater National Forest acknowledges and describes the effects of roads, trails, motorized, and non-motorized use on erosion and sedimentation. (FEIS; Chapter 3-Section 2: Watershed Resources-Aquatics). The proposed actions in this travel plan will decrease the risk of riparian and streambank degradation and erosion due to motorized use across the CNF and will likely improve riparian condition and water quality (i.e., decreased sedimentation) over the existing condition, thus positively contributing to meeting water quality standards and applicable TMDLs. All action alternatives include restrictions on motorized cross-country travel and dispersed use and contain slightly less road miles open to motorized use in riparian areas than the no action alternative. Alternatives C, alternative C-modified, and alternative D all reduce the trail density and trail miles open to motorized use within riparian areas and reduce the number of stream crossings open to motorized use in CG high fishery value management areas.
1	231	The Clearwater National Forest should provide empirical evidence of the detrimental impacts of motorized cross-country travel on watershed resources.	Page 3-158 – An unsubstantiated statement is made that “all of the action alternatives should allow a gradual recovery of areas currently impacted by motorized cross-country travel.” (Emphasis added). Nowhere in the DEIS is any evidence presented regarding such alleged degradation or effects. Until the existing environment section contains such empirical evidence, these conclusions are unwarranted.	2509 2510 3054	The Clearwater National Forest has recorded numerous instances of vegetation, soil, and aquatic resource damage by off-route OHV use, as briefly stated in the FEIS (Chapter 3-Section 2: Watershed Resources-Aquatics-Affected Environment-Watershed (DEIS pg. 3-142)). Detailed documentation of resource damage is available at the Clearwater National Forest Offices.
29	231	The Clearwater National Forest should recognize that aquatic habitats are affected by a wide array of activities over an extended period of time	Page 3-142 – There is a critique of “mud bogging” and allegations of associated resource damages. We [Specialty Vehicle Institute of America and the Motorcycle Industry Council] are unaware that this is an issue in the Clearwater and urge this to be deleted from the document as unsubstantiated conjecture.  Page 3-163 – It is important that the DEIS expressly recognize that a wide array of activities over an extended period of time are responsible for effects on aquatic habitats in the Clearwater. OHV use is only one very limited factor.	2511	The Clearwater National Forest recognizes that aquatic habitats are affected by a variety of activities over time, including OHV use, as described in Chapter 3-Section 2: Watershed Resources-Aquatics-Cumulative Effects section (DEIS 3-163).

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
1	40	<p>The Clearwater National Forest must analyze the effects of the various alternatives on water quality (i.e., sediment) and should describe how the alternatives improve water quality over the existing (no action) condition.</p> <p>Restricting stream crossings and exceptions for dispersed camping should be considered near water quality-limited (listed) water bodies.</p>	<p>We [EPA] ...We recommend the consideration of the following suggestions for the implementation and administration plan of the FEIS's preferred alternative...Prioritize OHV's contribution to the sedimentation of streams within the implementation and adaptive management planning framework. Providing a management trigger related to water quality standards for sediment may be a useful method of ensuring benefits to the aquatic environment are realized.</p> <p>-Identify likely problem areas for compliance and enforcement (e.g., traditional dispersed camping areas proposed to be closed)</p> <p>We have concerns about potential impact of the proposed Travel Management plan (TMP) on water quality and have therefore assigned an Environmental Concerns – Insufficient Information (EC-2) rating to the EIS based on Alternative C.</p> <p>....the use and continued existence on the ground of motorized roads and trails has been proven to increase sediment distribution to nearby water bodies. This should have been analyzed in both the direct and cumulative effects sections. This must be accounted for and degradation of water sources prevented.</p>	231	<p>The effects of the travel plan alternatives on watershed and fisheries conditions are described in the FEIS (Chapter 3-Section 2: Watershed Resources-Aquatics-Environmental Consequences-Watershed and Fisheries). This section includes comparisons of erosion and sedimentation impacts on water quality of receiving waterbodies. Alternatives C, alternative C-modified, and alternative D all reduce the trail density and trail miles open to motorized use within riparian areas and reduce the number of stream crossings open to motorized use compared to the existing condition. The potential for aquatic resource damage (i.e. streambank and streambed degradation, sedimentation, riparian wetland degradation) was a prominent factor in designation in specific instances where stream crossings or stream adjacent trails presented an evident risk of resource damage (i.e. Upper Eldorado Cr.), and especially in high fishery value C6 Management Areas (i.e. Cayuse Cr.). The FEIS contains updated restrictions that limit off-route motorized travel and dispersed recreation to only existing tracks and dispersed sites (FEIS, Chapter 2; Alternatives-Actions Common to all Alternatives (DEIS, pg 2-15 to 2-17, Table 2-3)). Additionally, the FEIS contains provisions for monitoring existing on aquatic resources (i.e. sedimentation, channel alterations, streambank degradation) in select watersheds to inform future management decisions regarding trail and dispersed recreation designation, location, restoration, and maintenance (see Appendix F). The proposed actions in this travel plan will decrease the risk of riparian and streambank degradation and erosion due to motorized use across the CNF and will likely have positive effects on riparian condition and water quality over the existing condition.</p>
21	231		<p>The Clearwater National Forest must disclose the existence of water quality limited stream segments, the motorized route densities within 300 ft of them, and the effects of dispersed motorized camping on these water bodies.</p>	231	<p>The FEIS has been updated and includes data pertaining to water-quality impaired streams. See Chapter 3, Aquatics, Environmental Consequences. To address this concern, the FEIS includes updated restrictions for Alternative C Modified that would limit off-route motorized travel and dispersed recreation to only existing tracks and dispersed sites within 300 ft of designated routes. See Chapter 2. Additionally, the FEIS contains provisions for monitoring existing and potential impacts of motorized stream crossings and dispersed recreation on aquatic resources (i.e. sedimentation, channel alterations, streambank degradation) in select watersheds to inform future management decisions regarding trail and dispersed recreation designation, location, restoration, and maintenance. See Appendix F. The proposed actions in this travel plan will decrease the risk of riparian and streambank degradation and erosion due to motorized use across the CNF and will likely have positive effects on riparian condition and water quality over the existing condition.</p>

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		The CNF Travel Plan DEIS does not provide sufficient information to conclude that all of the action alternatives will meet water quality standards. The FEIS should include additional information explicitly linking the predicted impacts of each alternatives route designations to relevant water quality standards and policies from TMDLs, Subbasin Assessments, Idaho Anti-degradation Policy, BMPs, and PACFISH/INFISH RMOs.	We also believe the DEIS's watershed resources analysis insufficiently supports the conclusion that the action alternatives will meet water quality standards. ...difficult to enforce off-route exceptions for special corridors. (e.g., complex conditions for "selecting a Route to a Campsite") may inadequately reduce environmental risks from dispersed recreation under each of the action alternatives.  Table 1-3 in the DEIS states that the project will move toward fish an water quality objectives and adhere to State water quality standards and Best Management Practices (BMPs), but there is no additional specific information to support this conclusion.... we are unsure whether the proposed reductions will meet water quality standards.  ...we [EPA] recommend the FEIS include additional information linking proposed route designations to relevant specific water quality standards. We are particularly interested in how the action alternatives will meet standards such as those found in relevant Total Maximum Daily Load (TMDL) allocations and subbasin Assessments. Other specific water quality standards include stream habitat variables associated with Pacfish/Infish Riparian Management Objectives (RMO) and sediment, turbidity and temperature goals from Idaho's Anti-degradation Policy (DEIS, p. 1-27).	2706 2709 2710 2711	The effects of the travel plan alternatives on watershed and fisheries conditions are described in the FEIS (Chapter 3-Section 2: Watershed Resources-Aquatics). This section includes comparisons of erosion and sedimentation impacts on water quality. Erosion from roads, trails, streambanks and riparian areas are identified as sources of sediment on the CNF (DEQ TMDLs, Subbasin Assessments). The proposed actions in this travel plan will decrease the risk of erosion and sedimentation due to motorized use across the CNF and will likely have positive effects on riparian condition and water quality compared the existing condition. All action alternatives in the FEIS contain updated restrictions on off-route motorized travel and dispersed recreation limiting off-route motorized use to only existing tracks and dispersed recreational sites within 300 ft. of designated routes. These updated restrictions provide enhanced riparian and aquatic resource protection which will contribute to attainment of PACFISH/INFISH RMOs and improve water quality (FEIS, Chapter 2: Alternatives-Actions Common to all Alternatives (DEIS, pg 2-15 to 2-17, Table 2-3). These restrictions are more simplified than those presented in the DEIS, thus more easily interpreted by the user and enforced by the CNF.. All action alternatives contain slightly less road miles open to motorized use in riparian areas than the no action alternative. Alternatives C, alternative C-modified, and alternative D all reduce the trail density and trail miles open to motorized use within riparian areas and reduce the number of stream crossings open to motorized use in C6 high fishery value management areas.
50	231		We [EPA] are concerned that the DEIS does not include sufficient information to conclude that any of the action alternatives meet all relevant water quality standards and policies. The DEIS contains a high level of detail, but does not sufficiently link the aquatics and fisheries affected environments to environmental consequences.	2706	The geographic scope of the watershed resources analysis is appropriate for the Forest-wide scale of the proposed actions. The effects of the travel plan alternatives on watershed and fisheries conditions are described in the FEIS (Chapter 3-Section 2: Watershed Resources-Aquatics).
21	231	The Clearwater National Forest should analyze the localized, rather than broad-scale, impacts of the proposed actions on waterbodies.	The forest has artificially skewed the analysis of potential effects on waterbodies and failed to take a hard look at these impacts by analyzing a too large area, rather than analyzing the localized impacts of roads on an affected waterbody.	2706	All action alternatives in the FEIS contain updated restrictions on off-route
50	231	The Clearwater	In addition, difficult to enforce off-route exceptions for special	2706	All action alternatives in the FEIS contain updated restrictions on off-route

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		National Forest should identify areas with current and predicted future unacceptable resource impacts from dispersed recreation and disclose a schedule for future designation of dispersed campground areas.	corridors. (e.g., complex conditions for "selecting a Route to a Campsite") may inadequately reduce environmental risks from dispersed recreation under each of the action alternatives. EPA prefers designated motorized routes and areas for dispersed recreation over corridors. In special corridors, we prefer designated campgrounds to off-route exceptions based on conditions that may be difficult to enforce and comply with.	2712	<p>motorized travel and dispersed recreation limiting off-route motorized use to only existing tracks and dispersed recreational sites within 300 ft. of designated routes. These updated restrictions provide enhanced riparian and aquatic resource protection which will contribute to attainment of PACFISH/INFIISH RMOs improve water quality (FEIS, Chapter 2: Alternatives-Actions Common to all Alternatives (DEIS, pg 2-15 to 2-17, Table 2-3). These restrictions are more simplified than those presented in the DEIS, thus more easily interpreted by the user and enforced by the CNF.</p> <p>All action alternatives include provisions for monitoring the existing and potential impacts of dispersed recreation on aquatic resources. See Appendix F. This monitoring will be used to inform future management decisions regarding trail and dispersed recreation designation, location, restoration, and maintenance consistent with the Forest Plan and PACFISH/INFIISH standards and guidelines for recreation management.</p>
		The off-route exceptions for special corridors will be difficult to enforce and may not reduce environmental risks under each of the action alternatives.	We recommend that the FEIS include a list of the areas with current, and predicted future, unacceptable resources impacts from dispersed recreation. Please prioritize and disclose a schedule for future designation in especially problematic areas.		
		The Clearwater National Forest should have analyzed an alternative that closed roads and trails to motorized use in areas with high mass wasting potential, sediment delivery efficiency, and soils surface erosion potential.	Why was no alternative analyzed that closed roads and trails in areas with high mass wasting potential, high and very high sediment delivery efficiency, and high soils surface erosion potential?		An analysis of routes within areas of high to very high mass wasting potential, sediment delivery efficiency, and surface erosion potential was conducted with landslide locations (1995-1997) within 300 ft. of routes used as risk indicators. The results of this analysis indicated a negligible risk of erosion associated with routes in these areas.
21	232 Soil			2286	
101 342	235 Wildlife	The Clearwater National Forest should not restrict snowmobile use due to conflicts with wildlife	Snowmobiles cause no environmental impact and do not compete with other users of the area. There is no evidence of conflicts with wildlife during the winter months.  I haven't seen anything biological or geological that has been damaged by motorized wintertime use in the areas to which I've	2658 2674 2862	<p>The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual</p>

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		gone. Elk, moose, deer are all mostly at lower elevations, bears are in dens, lynx and wolverines are a maybe, but I've never seen tracks.	I ask you to consider keeping or enhancing wildlife connectivity to other nearby wild areas. This could be extremely important with global warming causing some species to seek favorable habitat as habitats evolve with climate change.	2659 3016	species when needed to further clarify or address a public comment, issue or concern.
268	235	The Clearwater National Forest should protect wildlife connectivity.	The analysis should also have looked at how the each alternative would impact the fish species, looking at both the known populations in high value C6 areas and at the rest of the planning area. This would include an analysis of dispersed camping impacts on these species and their associated habitats.	2077 2078 2285	The effects of the alternatives on watershed and fish resources are described in the FEIS (Chapter 3-Section 2: Watershed Resources-Aquatics- Environmental Consequences-Watershed and Fisheries). Erosion from roads, trails, streambanks and riparian areas are often identified as sources of sediment that may adversely impact fish. Compared to existing conditions, the proposed actions in this travel plan will likely decrease the risk of riparian and streambank degradation, erosion and sedimentation due to motorized use and consequently have positive effects on fish species and habitat across the Forest. The effects of stream crossings on fish, fish habitat, and water quality (i.e. mortality, harassment, red disturbance, channel alterations, sedimentation) were major considerations in designating travel routes in C6 management areas (critical watershed with high fishery values) where Forest Plan goals prioritize supporting fish resources. All action alternatives include restrictions on cross-country travel and dispersed use and contain slightly less road miles in riparian areas than the no action alternative. Compared to the existing condition, alternatives C, alternative C-modified, and alternative D all reduce the trail density and trail miles within riparian areas and reduce the number of stream crossings in C6 high fishery value management areas. The updated FEIS also contains provisions for monitoring the existing and potential impacts of motorized stream crossings and dispersed recreation on aquatic resources (i.e. sedimentation, channel alterations, streambank degradation) in select watersheds (see Volume 2, Appendix F). The results of this monitoring will be used to inform future management decisions regarding trail and dispersed recreation designation, location, restoration, and maintenance.
3 21	236 Fish	The Clearwater National Forest should have evaluated the impact of each alternative on fish species and habitats, including the effects of dispersed camping.	You mention any stream as a riparian area that must be protected and that we could cause resource damage. How far do you carry the definition of resource damage? If someone rides through a creek and turns a few rocks over is that resource damage? My professional (fisheries) judgment is that the small amount of impact to banks and creek bottoms that may occur on a stream crossing should not be blown out of proportion and used as an excuse to deny forest users recreational opportunity....	2822	The FEIS defines and discusses aquatic resource damage related to stream crossings (Chapter 3-Section 2: Watershed Resources-Aquatics- Issue Indicators- Indicator 5; pg. 3-141 (DEIS)). The effects of stream crossings on fish, fish habitat, and water quality (i.e. mortality, harassment, red disturbance, channel alterations, sedimentation) were major considerations in designating travel routes in C6 management areas (critical watershed with high fishery values) where Forest Plan goals prioritize supporting fish resources. The CNF agrees that armoring ford banks and constructing bridges decreases the impact of stream
61	236	The Clearwater National Forest is inappropriately using a small amount of resource damage from motorized use of stream crossings to			

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		restrict motorized recreation, when trail maintenance and bridge construction at crossings could alleviate erosion and general resource damage.	We can armor the bank crossings in areas of concern, and build bridges to minimize erosion.		crossings on aquatic resources.. However, trail construction or reconstruction is not included in this travel planning analysis and the scope of this decision.
40	236	The Clearwater National Forest must disclose how the alternatives meet or do not meet the Riparian Management Objectives contained in PACFISH and INFIISH, and also state whether or not trails were relocated or closed where RMOs could not be attained or adverse effects to fish avoided. The Clearwater National Forest should validate and improve Table 3-75 to accurately display stream crossing data in High Fishery Value (C6) management areas.	...the FEIS must describe if the action alternatives meet the RMOs contained in PACFISH and INFIISH and whether or not the Forest Service relocated or closed routes where RMOs could not be attained or adverse effects to fish avoided. ....the data contained in Table 3-75 appears to be in error.	236	The effects of the action alternatives on aquatic resources are described in the FEIS (Chapter 3-Section 2: Watershed Resources-Aquatics- Environmental Consequences-Watershed and Fisheries) and includes discussion of PACFISH/INFIISH Riparian Management Objectives (RMOs) initially described in Chapter 1 of the FEIS (Chapter 1: Purpose and Need-Legal Requirements-Forest Plan Direction-Aquatics). The Clearwater National Forest is unaware of any substantial impacts of the action alternatives that would retard or prevent attainment of RMOs and consider the action alternatives as having positive contributions toward maintaining and restoring riparian and fish habitat conditions. All action alternatives include restrictions on motorized cross-country travel and dispersed use and include provisions for monitoring the existing and potential impacts of motorized stream crossings and dispersed recreation on aquatic resources (i.e. sedimentation, channel alterations, streambank degradation) in select watersheds (see Volume 2, Appendix F). This monitoring will be used to inform future management decisions regarding trail and dispersed recreation designation, location, restoration, and maintenance consistent with PACFISH/INFIISH standards and guidelines for recreation management. Furthermore, alternatives C, alternative C-modified, and alternative D reduce the trail density and trail miles within riparian areas and reduce the number of stream crossings in C6 high fishery value management areas thus may likely result in additional positive effects on riparian and fish habitat .
40	236	The Clearwater National Forest should validate and improve Table 3-75 to accurately display stream crossing data in High Fishery Value (C6) management areas.	....the data contained in Table 3-75 appears to be in error.	2663	FEIS Table 3-75 (Chapter 3-Section 2: Watershed Resources-Aquatics- Environmental Consequences-Watershed and Fisheries) accurately displays the number of trail/stream crossings located in C6 Management Areas (unroaded land parcels with high fishery values) used as an indicator in the aquatics effects analysis. The Clearwater National Forest is aware that Trail #229 is designated

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		display stream crossing data in the Fish Creek watershed.	that the Fish Butte Saddle Trail #229 is open to four-wheeler and crosses Fish Creek itself. Fish Creek is a very important fish-bearing stream on the Clearwater National Forest for both anadromous and inland native fish. The effects of this stream crossing to fisheries and the RMOs is not discussed in the DEIS.		for motorized use and crosses Fish Cr. This crossing is within the C3/C4 Management Area within the Fish Cr. watershed, thus is not represented in Table 3-75. These management area directions allow for other compatible uses, including motorized travel. The routes mentioned in this comment were considered in the North Lochsa Face travel analysis and decision and are not being reconsidered in the current Travel Plan. All action alternatives include provisions for monitoring the existing and potential impacts of motorized stream crossings and dispersed recreation on aquatic resources (i.e. sedimentation, channel alterations, streambank degradation) in select watersheds, including Fish Cr. (see Volume 2, Appendix F)
29	238	The statements about effects of cross-country travel on rare plants lack specificity.	Page 3-229 – The statements about effects on rare plants lack specificity and are merely conclusory.	2531	In addition to the information available Chapter 3-Section 3: Terrestrial Resources-Rare Plants (DEIS 3-225-231) more specific information concerning presence and distribution of threatened, endangered, or sensitive plants on the Clearwater National Forest is available through the Idaho Conservation Data Center (CDC) ( <a href="http://fishandgame.idaho.gov/cdc">http://fishandgame.idaho.gov/cdc</a> ). All action alternatives support the management direction stated in the Forest Service Manual (FSM 2670.22) to protect sensitive plant species and their potential habitat by restricting OHV use to designated routes or within the off-route exemption framework. These restrictions will decrease cross-country travel and the associated risk of habitat degradation and/or direct damage to sensitive plant species, compared to no action and continued cross-country travel.
21	238	The Clearwater National Forest should update the noxious weeds and rare plants analyses in the DEIS.	...the DEIS does not quantify the impacts of various alternatives nor does it analyze impacts from clearing trails which according to the DEIS are technically open to motorized use, but are not used by motorized vehicles now....Similarly, the rare plan analysis is cursory. It suggests that alternative D is the best, but does not quantify differences among alternatives.	2310	The analysis in the FEIS has been updated to update this concern. See the "Rare Plants" and "Noxious Weeds" sections of Chapter 3. .
48	239	The Clearwater National Forest should protect prehistoric and historic cultural resources.	Fish and Hungry Creek Roadless Area. While many of the roadless and recommended wilderness areas on the CNF have great wildlife and recreational values, this low elevation roadless area deserves special consideration because of its historical values. There is growing evidence that the presence in this area of ancient (i.e., Nez Perce and their ancestors) trails and sites is more extensive than previously thought. There is also some debate about the most likely location of the particular ancient trail in this area that was traversed by Lewis and Clark. Since I have no access to the FS archaeological site files, I have no idea about just how much of this region's history is fully understood by the Forest Service. In any case, a good concern for historic preservation (and 'preservation' is the right word to use) indicates that this whole roadless area should be maintained for	2309 2694	The potential effects of motorized use on cultural resources are discussed in the Effects Analysis section and consulted on with the State Historic Preservation Officer. Please see the effects analysis section.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			access by historical methods—by foot and horse only. In the past, Supervisor Caswell made decisions that kept much of this area free from machine use (Trail 224 near Mex Mtn for instance), so the real concern now is, I think, Trail 224 right at the mouth of Fish Creek, near the historic ranger station. This trail is, at best, suited only for foot, horse, and trail bike use. It is little used for the latter, and because of the likely presence of important historic sites near Obia Creek, the time has come to end all motorized use down in the bottom of the Fish Creek valley.		
4	239	The Clearwater National Forest should designate roads and trails with historic value because otherwise the historic value will be lost.	These trails and roads also have a historical value but when these trails and roads are gone, they will be gone forever and the history that goes with it.	2906	From an historical perspective, the trails and roads and their associated history have been documented in many forms and venues. The history itself is therefore not lost, although a particular route may not be evident on the ground indefinitely.
415	240 Social Impacts	The Clearwater National Forest should retain access for retirees and families.	It would be wrong to deny these people (retirees) that have worked their whole lives and that finally get a chance to get out and enjoy this beauty, the ability to see it in the years they have left. Families as well are usually of a complex makeup that often includes retirees, children, disabled people, etc. They too would be hindered if more roads were closed or only opened for hiking.	2082 3057	On the Clearwater NF hundreds of miles of trail and roads are open to OHV access and thousands of acres are open to snowmobile access, unfortunately for some not all trails, roads and acres of the National Forest are open to motorized access, however this is not considered to be discrimination against those who are not physically able to access National Forest areas without motorized vehicles.
1	240	The Clearwater National Forest should look at the impacts to public who own private land and want to recreate with OHVs on public lands.	Each route must include a socio-economic analysis that includes the impacts on the public owning OHVs and looking for opportunities to use them and landowners who purchased property with the intent of being able to access and recreate using motor vehicles.	2028	Purchasing land adjacent to National Forests lands does not imply that private landowners will receive their own motorized access.
57	240	The Clearwater National Forest should not attempt to resolve conflicts between local users because there is no legal definition for them.	On 1-3, under Background, the Agency states that it tasked “to minimize conflicts among local users.” The Agency, however, documents no conflicts for which resolution would require the wholesale closure of 200,000 acres of snowmobile opportunities. The insertion of this task is unlawful. Why? Because no forest visitor, winter or summer, has any way to adjust his/her behavior such that the agency perceives less (or more) “conflict”. Why? Because the DEIS provides no lawful definition (in fact there is no definition at all) of what these “conflicts between local users” may be. This suggests that it is philosophical differences, or	2762 2763	The FEIS includes analysis of the potential effects on Social Resources. This analysis is presented in Chapter 3, Social and Economics. Please see the section titled Recreational National Forest Use, Social Issues, and Conflict.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		cultural values, that drive these "conflicts". Such "conflicts" have no legal standard because their occurrence (reporting) is ephemeral: any claimed "damage" is ephemeral, and there is no evidence. We [Montana Trail Vehicle Riders Association] refer to the Agency to the abundant social research, by both the Agency and academic community that details the elements of this type of "conflict" and details it in every recreational setting regardless of the activity, and thus it will become self evident to the Agency, the appeal review, and the court if necessary, that any attempt to "minimize" this type of conflict is a task that the Agency must be deterred from pursuing.			The FEIS reports existing contributions and response coefficients to address economic impacts on a the five-county regional economy; while Chapter 4, Social and Economic acknowledge that travel plan decisions may impact individual businesses, the agency is not required to and does not attempt to predict impacts to specific individuals because there are a multitude of factors that affect business decisions and success; between national and state economic trends and the fact that most if not all businesses obtain only a portion of their revenues from activity on National Forests. For the last ten years school funding has been tied to historic not current output levels from national forest meaning that travel planning will not affect school funding until 2012 at the earliest (when the current extension of the Secure Rural Schools Act is set to expire). Even after that, recreation fee contributions to these payments are such a small portion they are not expected to change noticeably. This is now addressed at the end of Chapter 3, Social and Economics.
75 215	241 Economic Impacts	The Clearwater National Forest should consider the economic impacts of restrictions.	Have you thought about the tourist money your state is losing by taking away more travel access in your forests? What about snowmobiles? How much money are you going to lose there? What about your own state's off-highway vehicle users and the taxes they pay? You will lose even more money.  Reduced access to public lands will have a NEGATIVE economic impact to surrounding communities. What steps are proposed to mitigate these impacts? Loss of revenue from logging and mining activities has had a very negative impact on communities – how will the schools be funded?	2501 2504 2592 2645 2935 2937 2971	
1	241	The Clearwater National Forest should address how the OHV gas tax is being used to maintain, develop, and mitigate issues of OHV use.	Motorized recreationists generate significant levels of funding that would be available if the agency would pursue them and the system was working to distribute them equitably. Basically OHV recreationists generate a significant amount OHV gas tax. These monies should be used to maintain, develop, and mitigate issues but, unfortunately, it is being diverted elsewhere. This significant issue must be addressed.	2032	
264	300 Decision-	The Clearwater	The USFS must recognize that a firmer stance now will more easily	2270	The 2005 Travel Management Rule acknowledges the increases in number and

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
	making Philosophy	National Forest should take a firm stand to limit motorized use now.	allow for future leniency regarding motorized use assuming bioscience data supports it. Added pressures of a growing population and additional motorized technologies will not be abated. A minor step in the right direction will only create additional difficult decision processes in the future. Further degradation is therefore predictable, and scientific data will support additional restrictions and a need to conduct more DEIS/EIS/NEPA studies in the future (which are preventable) unless you take the extra regulatory action now.		kind of off-road motorized uses that have occurred in recent decades. For example, the Background section of the Rule states that "... the magnitude and intensity of motor vehicle use have increased to the point that the intent of E.O. 11644 and E.O. 11989 cannot be met while still allowing unrestricted cross-country travel." A primary Purpose and Need for this Travel Planning project is to implement the 2005 Travel Management Rule.
302	300	The Clearwater National Forest should leave routes open unless there is a reason to close them.	When you are doing motorized travel planning, it must be approached from the standpoint "it is open. Do we have a legitimate reason to close?" ... You do not need a reason to leave a trail open but you must have a reason to close.	Letter302	Alternative B would provide the greatest level of motorized road and trail use while still meeting Forest Plan standards and guides.
25	302 Coordination/consultation	The Clearwater National Forest should discuss any future changes to the Travel Plan with IDFG.	... we would like the Travel Plan to include language that ensures that IDFG can initiate discussions with the Forest and that would allow the Forest to amend the Travel Plan whenever both parties determine changes are necessary.	2431 3048 3049	IDFG may initiate discussions about travel management with the Forest Service at any time. In the future, any changes to a Record of Decision that may be issued for the Travel Planning FEIS would require additional analysis, including public notice and comment, consistent with the requirements of the National Environmental Policy Act.
34	302	The Clearwater National Forest should consult with the Idaho Department of Park and Recreation as well as representatives of the Idaho State Snowmobile Association.	...The Rule does not contemplate closing such a large percentage of the existing trail system or snowmobile areas, and your DEIS contains no compelling reason for such closures....We strongly recommend that the decisionmaker discuss possible management options with the Idaho Department of Parks and Recreation as well as representatives of the Idaho State Snowmobile Association as you move toward a final plan.	2570 2579	A representative from the Idaho Department of Parks and Recreation participated as an ad hoc member of the Travel Planning Interdisciplinary Team. The Forest Supervisor, North Fork District Ranger, and members of the Interdisciplinary Team met with representatives from the Idaho State Snowmobilers Association on several occasions to discuss the Travel Planning project.
285	303 Consistency w laws, rules, policies	The Clearwater National Forest should not restrict bicycles from recommended wilderness.	I wholeheartedly disagree with any alternative that would prohibit bicycles from WSAs. Region One is the only region in the country that proposes such prohibitions. This is not the law and is not required by Forest Service regulations.	Letter285	Alternative B provides for bicycle use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness areas. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Area. See also comments and response under Concern Statements 512 and 443 in this document.
294	303	The Clearwater National Forest	Due to age I can no longer hike into the mountains as I did in the past.... Please do NOT close these trails and roads. I feel placing	Letter294	All Alternatives comply with the Americans for Disabilities Act. In addition, the Forest hosts a handicapped access program for hunting and firewood gathering

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		should not violate the Americans with Disabilities Act	too many restrictions on ATV use is in violation of the Americans with Disabilities Act.		activities.
20	303	The Clearwater National Forest does not have the authority to close Recommended Wilderness Areas to motorized use.	... the forest service does not cite any law, policy, or directive to close Great Burn (Hoodoo), Mallard-Larkins, or the Selway-Bitterroot Wilderness additions.	2254 2753 2759	The Interdisciplinary Team developed the range of alternatives presented in the DEIS to meet Forest Plan standards, goals, and objectives for a variety of resources. The IDT considered maintenance of wildlife habitat, opportunities for motorized use and hiking, biking, horseback riding, and cross-country skiing in non-motorized settings outside of Wilderness.
57	303	The Clearwater National Forest should not analyze winter uses under the 2005 Travel Management Rule.	We [Montana Trail Vehicle Riders Association] would point out that the TMR explicitly exempts winter use. Thus the Agency has assumed an extra task, not mandated by any planning cycle or any regulation in matters of OVS activities. These issues are already settled by the existing LRMP and its amendments. The Agency has provided no data, monitoring results or sociological studies that show what has changed over time, to compel the proposed action at this time.	2760	The analysis of winter motorized uses during Travel Planning is not required under the 2005 Travel Management Rule, but it is permitted. The need to address over-snow vehicles and motorized recreation activities in Recommended Wilderness Areas is discussed in the FEIS, Chapter 1, Section: Travel Management: Designated Routes and Areas for Motor Vehicle Use; Final Rule (2005), and Section: Purpose and Need for Action.
21 57	303	The Clearwater National Forest should not reduce OHV recreation opportunities under the 2005 Travel Management Rule because the Chief's statements about the need for the Rule were unsupported by scientific analysis and predecisional.	In the Agency request for scoping comments it states that "The Chief of the Forest Service identified unmanaged recreation, including OHV use, as one of the 4 greatest threats to forests of all kinds in the U.S." (USDA-FS, June 2004). The request for comments characterized this as something produced by the Forest Service, perhaps a study, or a research project. This is false. It is a statement made by a former Chief of the Forest Service, with No supporting documentation. What a former Chief of the Forest Service said in 2004 may or may not be appropriate to the Clearwater National Forest. Under any legal standard, the statement is hearsay. The burden under the EIS is to show whether or not this unsupported claim is true for the Clearwater NF. Placing this statement at the beginning of what CEQ intends to be an objective, scientific analysis is pre-decisional. (Page 1-4)	2268 2761	The 2005 Travel Management Rule was advertised for public comment on July 15, 2004 in the Federal Register. Over 80,000 comments were received. The final Rule was developed in response to the comments received, and implemented Executive Orders 11644 (1972) and 11989 (1977)
21	303	The Clearwater National Forest should comply with all laws, regulations, executive orders, and the Forest Plan.	The DEIS fails to meet the intent of the Forest Plan, the Executive Orders, NEPA, NFMA, and the ESA. Given the failure of the DEIS, Friends of the Clearwater, Wildlands CPR, Alliance for the Wild Rockies, WildWest Institute, the Lands Council, the Idaho Chapter of the Sierra Club, and the Montana Chapter of the Sierra Club suggest the agency finally implement direction made in the Forest Plan and take steps to comply with the Executive Orders to protect wildlife habitat including TE species habitat, nonmotorized recreation opportunities, cultural resources, and	2259	All of the alternatives comply with State and Federal laws and the Clearwater Forest Plan.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
21	303	The Clearwater National Forest should consider their ability to maintain, operate, and enforce the system.	... the planners should consult with law enforcement officers to ensure that routes and areas are realistically enforceable given current and foreseeable constraints.... The final decision should include a Law Enforcement Strategy to ensure that visitors and forest resource values are protected, and to guide law enforcement activities.	2307 2499 2587 2713	The ability to "realistically" enforce motorized use restrictions is a subjective measurement. Under the Travel Management Rule, motorized travel off of designated routes will be prohibited with the exception for dispersed camping. A motor vehicle use map (MVUM) will be published each year displaying designated routes and the season of use. With the exception of route markers, the Forest will not rely on signing to implement closures, the public and law enforcement will use the MVUM to determine where and when motor vehicle use is allowed. With the reduction of restriction periods, the MVUM should be as simple and clear as possible which should increase public understanding and compliance.  The Roads and Seasonal Restrictions section in Chapter 3 of the FEIS discusses road maintenance processes on the Clearwater National Forest.
20	303	The Clearwater National Forest should comply with the Multiple Use and Sustainability Act.	As an advocate for snowmobilers, my personal snowmobile activities and multiple use, I ask that solid ground be worked upon throughout the planning processes occurring in the CNF, that the Multiple Use and Sustainability Act provide some direction and that all user groups be considered.	2239	All of the alternatives comply with State and Federal laws.
25	305 279 361 471	The Clearwater National Forest should have meetings in Montana.	I further encourage you to get additional comments (have a session in Missoula) so that members of the public can get involved and provide comments on the pending decision.  I feel that you have been neglecting western Montana, as far as the public meetings go. . . . Most snowmobilers in the Missoula area don't even know about this proposed closure. Orofino and Kamiah are too far to drive to go to one of your public meetings.	2206 2209 2410 2863	The Forest acknowledges that the Travel Planning decision may affect Forest users far beyond the boundaries of the Clearwater National Forest. Unfortunately, it is not possible to schedule public meetings in every community that may be affected by the Forest's Travel Plan. Some of the comments received during the formal scoping period, for example, came from addresses as far from the project area as California, Maryland, West Virginia, Minnesota, and Alaska.  Nevertheless, the Forest offered ample opportunities for members of the public to participate in the scoping process and to offer comments on the DEIS. In addition to news releases, legal notices, and open houses that were advertised in the local news media, information about the Travel Planning process has been provided on the forest website since 2006. The Travel Planning EIS has been listed in the Schedule of Proposed Actions (also available on the web) since April 2007. A Notice of Intent to prepare an EIS was published in the Federal Register on November 28, 2007, and a Notice of Availability for the DEIS was published in the Federal Register on August 7, 2009. The formal scoping and DEIS comment periods were both extended significantly in response to public requests.
39	305	The Clearwater National Forest	The Board of Idaho County Commissioners represents all of the residents of this great county and we request "coordinating status"	2646	The Public involvement process for the Travel Planning project is described in detail in Chapter 1 of the FEIS. The Forest offered ample opportunities for the Travel Planning project is described in detail in Chapter 1 of the FEIS. The Forest offered ample opportunities for the Travel Planning project is described in detail in Chapter 1 of the FEIS.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		should coordinate with the Idaho County Commissioners before making a final decision.	with the Forest Service on all matters affecting Idaho County including the final travel plan. This would include reasonable advanced notice be given to Idaho County prior to consideration of any Federal regulation affecting Idaho County.		members of the public and local governments to participate in the scoping process and to offer comments on the DEIS. In addition to news releases, legal notices, and open houses that were advertised in the local news media, information about the Travel Planning process has been provided on the forest website since 2006. The Travel Planning EIS has been listed in the Schedule of Proposed Actions (also available on the web) since April 2007. A Notice of Intent to prepare an EIS was published in the Federal Register on November 28, 2007, and a Notice of Availability for the DEIS was published in the Federal Register on August 7, 2009. The formal scoping and DEIS comment periods were both extended significantly in response to public requests.
25	305	The Clearwater National Forest should take as much time to complete the Travel Plan as necessary, rather than adhering to an arbitrary schedule.	...the Travel Plan is important enough that the schedule for developing the Final should be "as long as it takes to get it right" and that developing that final plan should involve collective participation by all interested parties.	2411	The Public Involvement Log in the Travel Planning project file shows that the Forest met with Idaho, Clearwater, and Latah County Commissioners on several different occasions.
20	305	The Clearwater National Forest should collaborate with local groups and agencies.	Alan and I would be happy to serve on a user advisory committee (which was suggested by the CNF staff last fall and never followed up upon by the CNF) to help resolve the motorized use issues that you are facing. After our meeting with IDPR and IDFG I feel they would not be opposed to this process either.	2237 2385	One component of the purpose and need for action in the EIS is the need to meet the requirements of the 2005 OHV Rule. Delaying the travel planning analysis indefinitely would not meet the requirements of the 2005 OHV Rule.
28	31	308 Influence of Interest Groups and Politics	It appears many forests, now including the Clearwater National Forest have negated the comments made by motorized and mechanized users during the scoping processes especially with regard to snowmobilers. This makes no sense to the average citizen who attempts to participate in the comment process.		The Public Involvement Log in the Travel Planning project file indicates that the Clearwater NF has met with local user groups, IDPR, and IDFG several times, beginning as early as 2006. Local user groups, IDPR, and IDFG also provided detailed written comments during scoping and the DEIS comment period. The IDT considered the input offered during all of the meetings documented in the Public Involvement Log, as well as written comments, when developing the alternatives analyzed in the FEIS.
			... management of public lands should not be dictated by the tender sensibilities of some user groups, representing a very small portion of Forest users who object to the presence of motorized vehicles and access.	2009 2500 2503	Forest wide management direction for recreation is driven by providing a range of quality outdoor recreational opportunities with an emphasis on providing a broad range of dispersed activities with sufficient area to maintain a low user density compatible with public expectations.
			Nearly one-third of Clearwater users engage in off-highway travel. Over 45% engage in "driving for pleasure on roads." In contrast,		

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			backpackers constitute a mere 2.5% of users and is the "primary activity" for only 0.4% of Forest visits. We [Specialty Vehicle Institute of America and the Motorcycle Industry Council] maintain that the "tail shouldn't wag the dog" and that OHV management not unduly restrict existing motorized access to accommodate the sensibilities of a small fraction of users.		
			...if there is a need for non-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.		
16	404 Permitted Uses (Outfitters)	The Clearwater National Forest has not evaluated impacts to the outfitters who operate on the Forest.	High Country Outfitters rely on snow machines to remove their equipment or transport clients.	2186	Alternative B best addresses this concern by allowing over snow vehicle use on all acres across the Forest. While the selection of Alternative C, C Modified or D could have a slight effect on outfitter operations it would not affect the operations of High Country Outfitters as this outfitter is not licensed by the state of Idaho or permitted by the Forest Service to offer services on the Clearwater NF.
401	410 Government Activities on Public Lands (General)	The Clearwater National Forest should educate users about responsible motorcycle use.	You might want to try to do some education about the best type of motorcycles to use in the forests and the best type of tires. Lots of people are using radial tires now and seem to be getting better traction and thus reducing erosion.	Letter401	Motorcycle operators should be responsible riders at all times. Education for responsible use of the National Forests is part of the Forest Service's mission. Educational programs such as "Tread Lightly" are used by the Forest Service to promote responsible riding.
361	411 Enforcement/ Staffing Funding	The Clearwater National Forest should sign areas of illegal use.	Over the last several years there have been complaints about snowmobilers illegally using the Clearwater national Forest to access the Great Burn on the Montana side. A few signs where people illegally access Irish Basin or Heart Lake would eliminate 99% of the illegal access.	Letter361	The Clearwater NF does attempt to sign the boundaries of snowmobile use, especially in the Lolo Pass and Great Burn areas. However, it is the responsibility of the over snow vehicle user to determine where this use is permitted.
1253	411	The Clearwater National Forest should disclose the effectiveness of past enforcement actions to minimize OHV damage and focus future law enforcement efforts on sites of illegal use.	There are two things a any Forest Supervisor should do to decrease ORV damage to public land: 1) run random LE checks of popular sites illegal for ORV use. . .	2273	All alternatives comply with the Forest Plan. Law enforcement efforts are ongoing and will continue to address occasions where users do not comply with existing route or area based travel designations. On-going monitoring of these situations resulting in enforcement actions and strategies to address illegal use will also continue after this decision.
1	411	The Clearwater National Forest should designate	Forest Service and BLM law enforcement has taken the position that OHVs cannot legally ride on forest or BLM roads unless the road is designated dual-use.	2048	All of the alternatives comply with State and Federal laws.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
21 383	411	The Clearwater National Forest should disclose funding levels for road maintenance and road decommissioning	<p>The DEIS did not disclose its current and projected road maintenance funding levels, or how many miles of roads it can afford to actually maintain. Additionally, the forest should have discussed the availability of funds to address non-system routes..."</p> <p>Please consider asking Congress for increased funding to meet the demand of the users.</p>	Letter 383 2306	<p>See the FEIS, Chapter 3, Section Roads and Seasonal Restrictions, Summer Travel, Direct and Indirect Effects, Road Maintenance. See also Chapter 2, Alternatives Considered But Not Studied in Detail.</p> <p>We [EPA] believe that providing for motorized recreation that does not harm sensitive environmental resource can be as much a function of the effective implementation and administration of the MVUM as it is a function of the specific combination of designated routes. Based on our review of this and other Travel Management Plans we are providing the following list of recommendations to supplement your implementation planning.</p> <p><b>Recommendations:</b></p> <p>We recommend the consideration of the following suggestions for the implementation and administration plan of the FEIS's preferred alternative.</p> <ul style="list-style-type: none"> <li>-Develop supplementary navigational maps in conjunction with the MVUM (e.g., Fishlake National Forest in Utah has been noted for its color maps).</li> <li>-Improve enforcement through collaboration. See, for example, <a href="http://www.idahoohv.org">http://www.idahoohv.org</a> to learn more about the Idaho Off-Highway (OHV) Public Information Project.....</li> <li>-Identify likely problem areas for compliance and enforcement (e.g., traditional dispersed camping areas proposed to be closed).</li> <li>-Consider special signage about the environmental impacts of firewood gathering in snag habitat.</li> <li>-Develop partnerships to leverage resources. See "The National Assessment of Travel Management Planning" (footnote 3) for: <ul style="list-style-type: none"> <li>-"Example Charter (protocols and Ground Rules) for Collaborative Stakeholder Involvement." (p. 79)</li> <li>-"Example of Volunteer Recruitment (Building Partnerships)" (p. 76)</li> <li>-"Example of User Education: Sharing Resources" (p. 84)</li> </ul> </li> </ul> <p>Rumor has it if a road or trail is not posted as open then it is closed. That means anyone can close a road by just pulling out a "open" sign.</p>
50 69 75	411	The Clearwater National Forest should develop a MVUM that will be enforceable.		2713 2899 2936	

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		I do own a snowmobile and observe road closures. However, invariably whenever travel road closures exist, signs of blatant disregard by motorized users exist.	The Forest Service's claim that they are only closing 11.2% of the forest to snowmobiles fails to mention the fact that the 11.2% they are closing includes the bulk of useable off trail riding that exists in the Clearwater Forest.  ...here is an inadequate range of alternatives for winter recreation. Since Alternative A is not viable, and C & D are the same, there are actually only two alternatives—B and C. Idaho State Snowmobile Association recommends a third alternative that either 1) does the use analysis of RWAs and revises the boundaries as outlined in Regional Forester Tidwell's memo, amending the forest plan with this environmental impact statement, or 2) postpones winter travel planning until the analysis and adjustments can be completed as part of the postponed forest planning process.	2126 2139 2165 2167 2168 2170 2182 2183 2184 2188 2236	Alternative B provides for winter motorized use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons (see Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas )  Alternative B would allow existing area-based winter snowmachine travel, in Recommended Wilderness (Management Area B2) to continue. The range of Alternatives in the FEIS analyzes the potential effects of changing motorized uses in MA B2.
9	16			2238 2246 2251 2252 2255 2257 2244 2270 2278 2270 2287 2264 2267 2269 2277 2283 2292 3041 3042	
16	20				No analysis and discussion has been provided regarding the social benefit of keeping Great Burn open to winter motorized.
51	423	The Clearwater National Forest should reconsider the plan's effect on snowmobile use.	Page 2-23: Table 2-4: Comparison of alternatives: Alternative C preferred alternative: The loss of 1012 miles of motorized use and the loss of 196,280 acres lost to snowmobile use is unacceptable.		
57	65				Of all the users of the Forest snowmobile use has the least impact on resources. 1. Sign of there presence is gone with the melting of the snow in the spring. 2. Have minimal impact on Wildlife. Most snowmobile use occurs in the high country while most wildlife winters in the low country. 3. Packing the snow has several benefits; Slows down runoff in the spring, less erosion, retaining more water helps promote new tree growth, and helps reduce winter die-off of wildlife by making it easier for them to travel to wintering ranges in the low country. 4. Costs incurred by the forest service related to snowmobile use are minimal to non-existent. No trail/roads to do maintenance on and little if any other resource damage.
78	79				Snowmobilers have used many of the RWA's on the CNF and elsewhere for over 25 years with no negative effect. While modern snow machines are easier to ride in the more extreme
80	82				
91	91				
100					

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Comment Number	Response
Action Code	Concern Statement	Quote		
		<p>areas, these areas have been used as long as the snow machines have been around. The new machines are safer, cleaner and quieter; they pose no threat to RWA's or any roadless area.</p> <p>If the travel plan excludes us before reassessing the RWA's and their boundaries, we will no longer have significant motorized use.</p>		<p>Idaho State Snowmobile Association primary concern is the banning of snowmobiles in RWA's in Alternatives C and D. Of special importance to the snowmobiling community are the Selway Bitterroot additions and the Great Burn. The areas are simply too remote to access by any means other than snowmobiles. There are no significant wildlife issues and snowmobiles do not affect in any way the qualification of these areas as future wilderness. Snowmobile access should be allowed to continue, at the very least until the forest plan and its review of roadless areas and RWA's [are] complete. There is no pressing need to complete winter travel planning at this time. Alternative B is the only reasonable alternative in the DEIS as it relates to winter recreation.</p> <p>Snowmobilers in the spirit of the true meaning of compromise expect that any area closed, should reciprocally be replaced with the opening of currently closed acreage in equal land acreage. An example would be opening the Montana Side of the Great Burn within the Lolo National Forest, in exchange for closing an unused area within the CNF, as a possible true compromise, where all sides get something they want, but not everything and at the same time an equitable settlement is reached. I suggest that the Clearwater National Forest recommend designations, such as a NRA (National Recreation Area) that both congressionally protects an area from further development, while writing into law the right of snowmobilers to enjoy off trail riding within its protective bounds. Over the last 20 years, high mountain alpine riding has been drastically reduced across Idaho and Montana. The Clearwater contains some of the last remaining areas that provide this very valuable opportunity. Generally I am concerned about winter travel on a snowmobile. Of the three large volumes of the DEIS which I have seen, there is very little reference to winter travel.</p>

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		<p>Over the snow motorized travel is historic travel land allows us to recreate in areas that would be in accessible by snow shoe or cross country skiing.</p> <p>The cumulative impact of forcing snowmobilers into a smaller area into potential conflict with other members of the public has not been considered.</p>	<p>Many of these proposed areas are totally inaccessible in the summertime. They are simply to rocky, steep, and rugged for foot travel by even the fittest of Forest users. The same goes for the winter months when there is 6-20' of snow covering the landscape. It is a grueling snowshoe hike for anyone to experience these areas. The proposed travel plan for the Lochsa/Powell and the North Fork districts will eliminate 7 different backcountry snowmobile areas: Tom Beal, Elk Summit, Beaver Ridge, Blacklead Mt, Surveyor, Hoodoo and Crooked Fork. I have been riding these same areas since the middle 80s and we still ride in the same areas; they have not expanded by any measurable acreage so the fear that snowmobiles will spread to more of the forest is unfounded.</p>		Alternative B provides for winter motorized recreation in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
15 16 29 41 42 45 78		<p>The Clearwater National Forest should consider special area designations for winter motorized recreation.</p>	<p>The 2005 TM rule does not require analysis of winter recreation issues, but the agency's decision to conduct a winter recreation analysis here makes its unwillingness to consider meaningful "area" designations particularly suspect.</p> <p>Snowmobile use should never be allowed in sensitive wildlife habitat - and kept away from areas used by snowshoers, cross-country skiers and other quiet recreationists. Doing so will reduce user conflict and will ensure that important winter habitat for wildlife is protected.</p> <p>If the Forest Service is serious about protecting forest lands, then you should recommend designations, such as a NRA (National Recreation Area) that both congressionally protects an area from further development, while writing into law the right of snowmobilers to enjoy off trail riding within its protective bounds. This comment is only approved if snowmobiles are granted off trail rights.</p>	2159 2169 2473 2667 2673 2682 2975	
178	425 Access and Use General	The Clearwater National Forest should concentrate	Motorized use is certainly a legitimate activity on national forest lands, but the use should be concentrated on the roaded and developed areas of the forest.	2277 2486	Forest Plan Management Area direction allows for some motorized use in many of the developed and undeveloped areas of the Forest. Alternative D best reflects the concerns of this commenter

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
6 71 361	425	motorized uses in developed areas.	Lolo pass is continuing to get busier and busier and user conflicts are evident. The last several years I have had trouble parking at the Pass and have had to turn away and head home. Why would you want to push more and more snowmobilers to the already crowded Lolo Pass, instead of letting people spread out across the state line?  Snowmobilers should be able to have loop routes too.  [The Crooked Fork area] could be an excellent place to disperse snowmobilers to get them away from the overcrowded areas such as Lolo Pass Winter Recreation Area	Letter361 2096 2099 2100 2916	With the exception of recommended wilderness areas, and a few routes restricted to protect wildlife, all acres of the Clearwater National Forest are available for snowmachine use in all alternatives. However, the areas immediately adjacent to Lolo Pass are predominantly designated as recommended wilderness and are proposed in Alternatives C & D as being closed to snowmachine use but in Alternative B as being open to this use.
1 9	425	The Clearwater National Forest should provide equal amounts of recreation opportunities for all users.	Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action. ...  Table 3-24: Alternative C preferred alternative: The table shows that there is an imbalance of use when compared to the NYUM data presented. The highest percentage of users, are the motorized users. This needs to be reevaluated and put more in balance as to the required need.	2001 2003 2007 2129 2497 2593 3009	The existing alternatives address an adequate range of recreational opportunity for both motorized and non-motorized users in both the summer and winter use seasons.
21 25	427	The Clearwater National Forest did not correctly apply ROS guidelines and/or should have used alternative analysis methods.	The Travel Plan must include a map of current Recreational Opportunity Spectrum ("ROS") classifications for forest lands within the planning area, as found in the currently approved Forest Plan. At a minimum, the Travel Plan should identify and summarize the extent of motorized routes, including a description of their general condition or state of repair, that currently cross or are located within lands identified in the Forest Plans Semi-Primitive Non-Motorized (SPNM) areas. Forest Plans and agency policy generally prohibit motorized use in these areas, <sup>1</sup> but in situations where they do not expressly forbid it, we believe that these areas should not contain designated motorized routes. Thus, the Travel Plan must also identify routes proposed to be designated for motorized use that occur within the SPNM classification while providing a rationale for the need to designate each route. The justification, if any, should be accompanied by a description of the environmental consequences of the corresponding decrease in the Forest Service's ability to provide SPNM recreational settings where the public would otherwise have enjoyed a relatively quiet and motor-free recreational	2264 2265 2348 2349 2350 2351 2352 2353 2396 2397	Implementation of the Travel Rule does not mandate use of a Recreational Opportunity Spectrum Analysis (ROS). A ROS analysis is a tool that was used to address effects for all alternatives. Tabular data is displayed in Chapter 3 and maps are available in the project file.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			The motorized influence zone analyzes how many acres are within $\frac{1}{2}$ mile of a motorized route. This analysis shows areas where a non-motorized visitor can likely see or hear a motorized vehicle and where a non-motorized visitor can escape motorized vehicles throughout the range of ROS. The FEIS should use the motorized influence zone to show how non-motorized use is impacted through the range of alternatives. This motorized influence zone was recently used in the Salmon-Challis National Forest Travel Plan FEIS		See the FEIS, Chapter 3, Section Roads and Seasonal Restrictions, Summer Travel, Direct and Indirect Effects, Road Maintenance. See also Chapter 2, Alternatives Considered But Not Studied in Detail.
57	430 Transportatio n System Mgt General	The Clearwater National Forest will have an increase in traffic and can expect additional maintenance and safety issues	...so we would "expect to find" that in the next few years roads may require more repair and, eventually, reconstruction due to these increases; shifting traffic to the developed ML3 and ML4 roads will require more intense maintenance; heavy maintenance causes increased erosion; smooth, recently maintained roads increase vehicle speeds, increased vehicle speeds cause minors safety issues to become major safety problems.	2788	Why has the date been changed from Nov. 4 to Nov. 15 for the forest wide closure? No explanation was given for this, and the general elk hunting season ends Nov. 3.
21 310	431 Seasonal Restrictions	The Clearwater National Forest should explain the rationale for seasonal restrictions.	The DEIS notes that minor adjustments to roads and trails which are seasonally closed or which are closed to mechanized vehicles but open under every action alternative would occur...  ...For example, changes that open routes earlier and/or close them later could cause serious soils, watershed, and wildlife habitat damage. Changes in mechanized vehicle closures affect the wild character of an area. These changes are not explicitly addressed in Chapter 3 of the DEIS.	2274	Appendix B of the DEIS is often confusing and contradictory. For example, the section in Appendix B on mechanized vehicles seems to suggest some trails in the Selway-Bitterroot Wilderness are open to mechanized vehicles and that contradicts current policy. Some changes reported in Appendix B are actually no change at all—from RWA to YEARLONG for all vehicles.
9	431	The Clearwater	Page: 1-10: Over-snow use prohibited from Oct 1 to Nov 15. This	2120	The rationale for seasonal restrictions on roads and trails is provided in the FEIS

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
16 60		Forest should explain the rationale for closing routes to snowmobiles from Oct 1 to November 15.	<p>could be under bad weather conditions the only way that there could be a reasonable harvest of animals. This needs to be addressed in the DEIS and allowed under certain conditions.</p> <p>There is a contradiction in the data presented in the paragraph says that roads will be closed forest wide Oct 1 to Nov. 15. Under the opportunity for over snow paragraph line 3 Says that 3484 miles of road where over-snow vehicle use will be permitted during the winter season Oct 1 until Nov 15.</p> <p>Hunting season closure Oct. 1 to Nov. 15; As was stated in our scoping comments, Idaho State Snowmobile Association questions why it is necessary to close the entire forest to snowmobiles from October 1 to November 15. For most of the forest, in all but an unusual year, snow depths are self-limiting. When early snows do hit the high country snowmobiles may be the only way people can travel or meet emergencies. If wildlife protection road closures during the hunting season are your only concern, close the roads to both terrestrial vehicles and snowmobiles from October 1 to November 15 rather than the entire forest. If an unusual year is encountered with snows deep enough for cross-country travel with snowmobiles, issue a special closure order for that year and the problem areas. If you proceed with the blanket closure, at least provide for exceptions when weather conditions make the use of snowmachines necessary.</p>	2185 2187 2803	<p>in Chapter 2, Actions Common to All Action Alternatives. The current closure date is Dec 1, the alternatives move this date to Nov 15.</p>
3	431	The Clearwater National Forest should explain the rationale for dropping some snowmobile route restrictions.	<p>... that individual changes to several existing roads that were previously the closed to oversnow vehicles...</p>	2067 2075	<p>The FEIS has been updated to address this concern. The snowmobile route restrictions that would be dropped in Alternatives B, C, and D would be retained in Alternatives A and C Modified.</p>
16 25 50	431	The Clearwater National Forest should include additional seasonal closures to protect wildlife.	<p>The Department recommends seasonal closures, from May 1 to June 30 in the elk calving areas identified in maps provided in the DEIS by the Forest.</p> <p>In addition, the Department recommends prohibition of use of over-snow vehicles in areas with spring snow cover persisting from late April to mid-May, utilizing persistent snow areas mapped by Copeland (USFS Rocky Mountain Research Station, Missoula).</p>	2427 2428 2429 2430 2705	<p>Current seasonal closures are considered adequate to protect wildlife resources while providing for other goals and objectives in the Clearwater Forest Plan. Additional seasonal restrictions for some motorized trails in elk calving habitat have been included in Alternative C Modified.</p>

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		The Travel Plan should include a provision that allows temporary or permanent closures of motorized trails when natural events or human activities occur that alter the impacts of those trails on wildlife, fisheries or other resources.	EPA acknowledges that the TMP process is a positive step in addressing resource impacts from motorized uses. The permanent prohibition of cross country travel, simplification of season restrictions and inclusion of over snow vehicles in travel planning will likely contribute to the achievement of significant environmental benefits. We especially commend the Clearwater National Forest (CNF) for including over the snow vehicle travel in this travel planning process.		Chapter 2, Actions Common to All Alternatives, describes the activities where motorized travel off of designated routes would be permitted. Motorized travel off of designated routes for game retrieval would be prohibited with all action alternatives.
25	433 Cross-Country Travel	The Clearwater National Forest should prohibit travel off designated routes to retrieve game.	Travel off of designated routes for the purpose of retrieving game should be prohibited in the Travel Plan.	2406 2661	The FEIS incorporates the recommendation made in this comment. See FEIS, Chapter 2, Actions Common to All Alternatives which has been updated to reflect a forest-wide approach for limited motorized off-route travel for dispersed camping and day use activities.
40	433	The Clearwater National Forest's special corridor restrictions should apply Forest-wide.	The most important difference between accessing dispersed campsites generally versus those in special corridors (listed on pages 2-15 and 2-16) is the requirement to use "existing tracks" and campsites in special corridors. The use of existing tracks and campsites is only "encouraged" on the remainder of the Forest. Our question to the Forest Service is why distinguished between special corridors versus the general forest in this instance? Why not just require the use of both existing routes and campsites across the entire forest? It seems that this would help the Forest Service to better accomplish their goal of protecting resources from the effects of off-highway vehicles.	2662	The FEIS explains how this concern was addressed in Chapter 2, Section: Alternatives Considered But Not Studied in Detail, Summer Cross-country Travel Areas.
29 34	433	The Clearwater National Forest should include designated areas in addition to routes for summer time cross country travel, tot lots, and play areas.	... reevaluate the need for open areas. In the discussion of off route exceptions associated with dispersed camping we noticed a concern regarding camping areas being used for recreational riding and also riding between campsites. This indicates there is a need to look at potential open areas.  Tot lots, training loops and managed open areas are a very valuable recreation feature. Such areas have been successfully managed in Forests across the U.S., and also here in Idaho.	2475 2480 2584 2603 2643	The 2005 Travel Management Rule is summarized in the FEIS in Chapter 1, Section: Travel Management: Designated Routes and Areas for Motor Vehicle use; Final Rule (2005).  The FEIS explains how this concern was addressed in Chapter 2, Section: Alternatives Considered But Not Studied in Detail, Summer Cross-country Travel Areas.  The rule at 212.51 gives the responsible official the opportunity to designate "...Limited use of motor vehicles within a specified distance of designated

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			Page 1-4 – There is recognition that the TM rule provides for designation of “areas” open to motorized use but this recognition is ignored elsewhere in the document.		“routes...” but does not require it. No suitable areas for summer cross-country travel were identified by the IDT.
17 21	433	The Clearwater National Forest’s assumptions regarding the amount and damage caused by cross-country travel are unsupported.	Assumptions about cross country motorized travel are not supported. What data show that wheeled vehicles extensively use the Clearwater National Forest for cross country use? What about snowmobiles?		Carol: To follow-up after FEIS draft for REC The Clearwater National Forest has recorded numerous instances of vegetation, soil, and aquatic resource damage by off-route OHV use, as briefly stated in the FEIS (Chapter 3-Section 2: Watershed Resources-Aquatics-Affected Environment-Watershed [DEIS pg. 3-142]). Detailed documentation of resource damage is available at the Clearwater National Forest Offices.
35	433	The Clearwater National Forest should develop a permit system to allow motorized travel off of designated routes for game retrieval.	This is one of the first conclusory statements not supported by evidence or any fact-based explanation: “damage from growing cross-country travel is obvious.” We [Specialty Vehicle Institute of America and the Motorcycle Industry Council do agree that adverse effects can arise from “irresponsible use of OHV’s” but a fundamental purpose of managed OHV use, including cross country or area se, is to reduce or minimize adverse effects.	2278 2489 2496	Developing a permit system of this type would be beyond the purpose and need for action for the Travel Planning project.
50	433	The Clearwater National Forest should control travel off of designated routes to gather firewood.	A game retrieval permit system should be looked at and put into place.	2609	
29	433	The Clearwater National Forest should not limit cross country travel because the amount of area available for cross country travel is limited by terrain.	Recommendations: ... -Consider special signage about the environmental impacts of firewood gathering in snag habitat.	2713	See FEIS, Chapter 2, Actions Common to All Alternatives which has been updated to reflect a forest-wide approach for limited motorized off-route travel for dispersed camping and day use activities. Off-route motorized travel would not be permitted for the purposes of cutting or gathering firewood.
50	434 Travel to	The Clearwater	The terrain and topography of most of the Forest prevent cross-country travel, as reflected by the relatively low “user created trail” mileage compared to other Forests. From this reality should flow the closely-connected conclusion that “cross country” travel on the Clearwater has historically been minimal, with associated negligible impacts. There are likely large areas where limited or appropriately managed cross country travel would have only minimal effects on resources.	2493 2512	The 2005 Travel Management Rule is summarized in the FEIS in Chapter 1, Section: Travel Management: Designated Routes and Areas for Motor Vehicle use; Final Rule (2005).
			The FEIS explains how this concern was addressed in Chapter 2, Section: Alternatives Considered But Not Studied in Detail, Summer Cross-Country Travel Areas.		The rule at 212.51 gives the responsible official the opportunity to designate “... <i>limited use of motor vehicles within a specified distance of designated routes...</i> ” but does not require it. No suitable areas for summer cross-country travel were identified by the IDT.
			EPA prefers designated motorized routes and areas for dispersed	2712	See FEIS, Chapter 2, “Actions Common to Alternatives B, C, and D but NOT C

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
	Designated Campsites	<p>National Forest Travel Plan should utilize designated campgrounds instead of off-route exceptions in special corridors to reduce environmental risks of off-route travel. The FEIS should include a list of areas with current and predicted unacceptable resource impacts from dispersed recreation along future route designations in these problematic areas.</p>	<p>recreation over corridors. In special corridors, we prefer designated campgrounds to off-route exceptions based on conditions that may be difficult to enforce and comply with.</p> <p>We recommend that the FEIS include a list of the areas with current, and predicted future, unacceptable resources impacts from dispersed recreation. Please prioritize and disclose a schedule for future designation in especially problematic areas.</p>		<p>Modified,” and the description of Alternative C Modified, which have been updated to reflect a forest-wide approach for limited motorized off-route travel for dispersed camping and day use activities. No cross-country travel would be permitted with any action alternative. For Alternative C Modified, travel would be allowed only on existing tracks within 300 feet of designated routes. Campsites would not be designated as part of this action, but may be in the future.</p>
21	434		<p>The dispersed camping exemption is not in compliance with the travel management rule's direction that it be applied on "certain" designated routes, 36 CFR 212.51(b), or the Chief's direction that it be applied "sparingly." The minimal restriction that has been placed on dispersed camping in "special corridors" does not bring this proposed action into compliance. In these "special corridors," travel is restricted to existing routes, which have not been designated or otherwise distinguished, while in the general area users can create new routes. The obvious problem with this method is the very real possibility that people will illegally create new routes in special corridors, and the next person that comes along will see an existing route and be able to legally use it. There is no way to enforce this type of restriction on dispersed motorized camping, and as such this creates an administrative nightmare, and the restriction itself is essentially an exercise in paper production. The impacts from this lackadaisical management policy have not been fully analyzed under NEPA and the policy itself is in violation of the travel management rule.</p>	2305 2662	<p>See FEIS, Chapter 2, Actions Common to All Alternatives has been updated to reflect a forest-wide approach for limited motorized off-route travel for dispersed camping and day use activities. These actions common to all alternatives are consistent with section 212.51 of the rule which gives the responsible official the opportunity to designate "...limited use of motor vehicles within a specified distance of designated routes..."</p> <p>There will always be certain individuals that choose to not follow the rules and 36 CFR 261.12©, 261.9 will remain in effect to prosecute those that violate motorized use designations and cause resource damage.</p>
34	434	The Clearwater	Dispersed camping is a highly valued experience. We encourage	2583	See FEIS, Chapter 2, Actions Common to All Alternatives, which has been updated

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		National Forest's exceptions to allow off-route travel for dispersed camping should include designating sites in sensitive areas.	the Clearwater to include options that allow campsites to be designated in sensitive areas.		to reflect a forest-wide approach for limited motorized off-route travel for dispersed camping and day use activities. No cross-country travel would be permitted with any action alternative, only travel on existing tracks within 300 feet of designated routes. Campsites would not be designated as part of this action, but may be in the future.
1253	435 Road Management/Designation	The Clearwater National Forest should designate the Forest closed to ORV use except posted and restrict ORVs to cars.	There are two things any Forest Supervisor should do to decrease ORV damage to public land: ... 2) designate the entire national forest as "closed to ORV use except posted." Of course ORVs would be allowed on roads intended for cars.	Letter1253	The purpose and need for action specifically addresses this concern that motorized uses should occur only on designated routes. See FEIS Chapter 1, Purpose and Need for Action, Designation of Motorized Uses.
25	435	The Clearwater national Forest should designate this route for motorized use	In Section 22, just off Mission Mountain, the Skyline Drive diverts from Forest Road 4716. The Skyline Drive Road should be designated for all vehicles. The short road segment (less than 200 meters), allows park visitors to experience travel opportunities similar to when the park was created. We have attached a shapefile and a map showing where this route should be designated.	2395	This road is in the Clearwater N.F. travel atlas as road 4716, 0.09 miles is on NFSL. This is a designated route with no motorized restrictions.
296	440 Trails Management	The Clearwater National Forest should allow OHVs on all motorized trails.	I find it interesting that you would differentiate motorized use between motorcycles and ATVs by designating single track motorcycle use only. I think to keep from future problems between users and law enforcement, that all motorized trails should be open to OHVs under 50 inches in width. The 50 inch width designation would include all ATVs currently in production, but keep four wheel drive vehicles from using the trail systems.  ...Impact information developed based on roads should not be used to estimate impacts from ATV and single-track motorcycle trails...	Letter296 2011	On the Clearwater National Forest, the predominance of the trails were constructed and are maintained to accommodate a 24" inch tread standard, or what is commonly referred to as a "single-track" standard. These trail treads cannot physically accommodate "double-track" vehicles ("OHV's") without the land adjacent to the trail tread incurring unacceptable resource damage.
1 9 17 302	440	The Clearwater National Forest should/should not leave user created routes open; connect roads and trails to increase opportunities for ATVs.	User created routes should be left open. You should be looking at ways to connect dead end roads and trails to increase opportunities for ATVs.  People proposed connector routes and loops. These proposals could not be considered in the Travel Plan which is concentrating on designation of routes, and not their construction or reconstruction. The overall purpose of a travel plan is to look at all aspects of travel management. These proposals should be reconsidered and put in as part of the DEIS.	2049 2050 2127 2194 2281 2484 2490 2505 2591 2564	On the Clearwater NF there is a trail system that accommodates single track motorized use, OHV use and large vehicle use. Many trail routes are 24 inches wide. This precludes the use of these trails by OHV's. There are a number of systems on the Forest specifically designated for OHV use, these trail systems have tread widths greater than 24 inches to accommodate OHV use. These OHV systems (i.e. Musselshell, etc) are open to both motorcycles and ATV use, thus they have a dual designation. There are also a number of single lane, dirt roads on the Forest open to both OHV's and large vehicles, and with the appropriate state registration OHV use is accommodated on these routes along with large vehicles.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		We believe that the Forest Service has been incredibly tardy in addressing the issue of ORV use in our forests, and that the agency has helped create the problem of illegal motorized trails by not addressing this issue earlier. It makes no sense to “grandfather” illegal ORV use, legitimizing user-created ORV routes and rewarding the destructive behavior of ORV riders.			
325	440	The Clearwater National Forest should consider the social and biological impacts of closing trails.	What you fail to realize is how much more damage is done when you close trails. You can't expect anyone to believe that the number of users will decrease with fewer trails. You may cause fewer people to get into the sport as beginners, but the rest of us will remain and all of use will be forced to use the same few trails, increasing sediment and what ever other environmental arguments there are. More lives will be in danger because you've put so many people on the same trail.	Letter325	Alternative B analyzes and best address this concern as it leaves the most trail miles open to motorized use, thus dispersing that use more than Alternatives C, C Modified and D. The FEIS, Chapter 3 effects analysis discussions for wildlife, fisheries/aquatics and social resources also addresses this concern.
80	440	The Clearwater National Forest should expand and diversify its trails system.	Your Clearwater National Forest Travel plan should not only retain the current trails but include plans to open new trails for various levels of experience.  The Clearwater National Forest has closed 40% of the motorcycle acreage since the 1987 Forest Plan, and appears to be ready to close another 40% of the motorcycle acreage in this Travel Plan, it also appears that snowmobiles will loose 40% of their usable acreage in this travel plan. How many 40% losses of acreage, can a sport survive? It appears the Clearwater National Forest has a trend developing.	Letter337 2986	Trail construction and reconstruction is outside the scope of this analysis. The purpose and need of this analysis is to designate existing roads and trails as open or closed to motorized use. The scope of the Travel Planning project is described in the FEIS, Chapter 2, Section: Scope of the Travel Plan and Analysis.
51	441 OHV	The Clearwater National Forest does not have any ATV trails, only roads open to ATVs	There is no balance as what you have on your map and in color coded is a misrepresentation as you are including gravel and paved roads as trails. There is only one trail in the Clearwater National Forest that is a true trail and not a road that has been labeled as a trail that is open to ATVs. Where is the balance		The Clearwater National Forest has a number of routes specifically designed for OHV use. These routes consist primarily of trail segments specially constructed to accommodate OHV use. These OHV trails are connected by a series of closed roads to provide “loop-riding” opportunities. These systems include: Palouse OHV, Deception, Sheep Mountain, Musselshell OHV ,etc.
58			We are new to OHV recreation and have not had the opportunity to even explore some of the areas slated for closure. We know the Clearwater area quite well, but are just now beginning to give serious time to off-road use of the national forest. Multiple-use designation should never be forbidden to the recreating public. You can't hike these trails as your body ages. But the outdoor experience is too valuable to forego. Motorized recreation is the answer to a population whose forests still mean a great deal to them even as their bodies break down. Don't let us be shut out of the forests. We love them. And we need more trails, not less.	2795 2224 2717	

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		As an Off-Highway Vehicle enthusiast, I strongly oppose the level of closures proposed by the Clearwater National Forest. I object to the fact that the agency refused to develop even one alternative that did not significantly reduce motorized trail opportunity.			Alternative B would best address this concern.
1	441	The Clearwater National Forest should keep open all trails and roads currently open to OHV's.	Because of the shortage of OHV routes necessary to reasonably meet the needs of the public, every existing motorized route is extremely important.	2016 2152	Alternative B would best address this concern.
33 47 331	442 Motorcycles		<p>Please maintain and expand our (motorcycle) access, specifically the single track aspect, so that these spectacular areas are accessible to a wider group of enthusiasts as well as to encourage proper maintenance.</p> <p>The single track opportunities have decreased significantly since 1991 when there were 885 miles available. Alternative B has 547 miles available. Alternative C cuts that by almost half and Alternative D would cut off an additional 100 miles. No other user group is losing opportunities at this alarming rate. Trail use is already limited by weather. Much of the upper country is not passable until mid July because of snow and closes again in mid October for the same reason. Rider skill level also limits many of the trails to expert riders only. The average motorcycle enthusiast is limited in his choices many of which would be taken away under Alternative C and D. The 168 Trail from Fourth of July Creek to 12 Mile Saddle is probably the best place for beginners to ride but it would be closed under Alternative C and D.</p> <p>The single track opportunities have decreased significantly since 1991 when there were 885 miles available. Alternative B has 547 miles available. Alternative C cuts that by almost half and Alternative D would cut off an additional 100 miles. No other user group is losing opportunities at this alarming rate. Trail use is already limited by weather. Much of the upper country is not passable until mid July because of snow and closes again in mid October for the same reason. Rider skill level also limits many of the trails to expert riders only. The average motorcycle enthusiast is limited in his choices many of which would be taken away</p>	2196 2339 2340 2566	

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
1 88	442	I ride a motorcycle throughout the Clearwater and St. Joe National Forests, many hundred of miles. Generally, I am on FS roads, but also use trails open to motorized use when I have my smaller motorcycle. These trails include those from the North Fork of the Clearwater River road most often near Washington Creek campground (Trails 600, 617, 20 for example). I have also access motorized trails from the Lolo Motorway most often near 12 Mile Saddle (Trails 20 and 167 for example). I would like to maintain all these motorized trails open to motorcycles. Use is very low by motorized and non-motorized users based on my direct observations, and so the potential for user conflict is low. I have not seen much abuse of the motorized rules in these areas but additional enforcement would be prudent to avoid a future issue.	The Clearwater National Forest should keep open all trails and roads currently open to motorcycles.	2019 2022 3035	Alternative B best addresses this concern and Alternative C Modified addresses the specific concerns with Trails 600, 617, 20 and 167.
19 443 Bicycles		Bicyclists across Montana have become organized as a result of the Region One philosophy. Historically, organization happens when a group of individuals are being treated unfairly. Bicyclists care deeply about trail access and land preservation, both for themselves and others. Caught in the middle of the wilderness versus motorized acrimony, bicyclists can see a middle ground, one that is being ignored so far in forest plans, travel plans, and wilderness group's plans. Bicyclists represent a more neutral	Bicyclists across Montana have become organized as a result of the Region One philosophy. Historically, organization happens when a group of individuals are being treated unfairly. Bicyclists care deeply about trail access and land preservation, both for themselves and others. Caught in the middle of the wilderness versus motorized acrimony, bicyclists can see a middle ground, one that is being ignored so far in forest plans, travel plans, and wilderness group's plans. Bicyclists represent a more neutral	2224 2232 2537 2868 2869 2870 2875 2879	Alternative B provides for bicycle use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized/mechanized (including bicycle) use in recommended wilderness during both summer and winter seasons (see Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas).

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			viewpoint than any other user group, and deserve a seat at the "planning table".		Alternative B would allow bicycle use in Recommended Wilderness (Management Area B2) to continue. The range of Alternatives in the FEIS analyzes the potential effects of changing bicycleases in MA B2.
19	443	The Clearwater National Forest should be familiar with the national MOU between the FS and International Mountain Biking Association.	This memorandum generally states that mountain bikers will work with the Forest Service and vice versa. ...Item 10 states, "Consider the potential impacts of land management proposals on mountain bicycling recreation." Unfortunately in Region One, that has not been the case...	2225 2875 2876	The Clearwater NF, as part of this proposal did consider the effects of mountain biking as part of route designation. Alternative B best addresses this concern and allows all trails in recommended wilderness areas to remain open to bicycles; Alternative C also allows use on the Fish Lake Trail as well
63	443	The Clearwater National Forest should keep the Stateline Trail #738 open to bicycles.	Based on my 20+ years of mountain biking in all parts of the country, Trail #738, the Stateline Trail, is one of the best around. It is certainly one of the most scenic and cherished areas for riding near Missoula. Trail #738 provides mountain bikers access to several other trails in the area that are also superb biking.	2865 3019 3020 3025	Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas (B2), including IRA areas that are within the B2 allocation. The intent of B2 management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
77	443	The Clearwater National Forest should revisit the proposal for trails #20, 167 and 106 to keep more open to disperse use and not confine bicycles to an unsafe route.	I would like to say that there are only three access routes from the N.F. Clearwater River to the above mentioned trails. The Weitas Trail #20, the 4th of July bridge Trail #167 and the Junction Mountain Trail #106. The proposal is planning to close two of the three, leaving one access (Weitas Creek Trail #20) which is one of the most dangerous, narrow with free fall areas down to the creek of several hundred feet. There was a recent fatality on that trail by a bicyclist, which further points out the dangers of this trail to novice and younger riders. I know some seasoned riders that will not ride Trail #20 from the Bridge to the Guard Station because of the dangerous side hills. The fact that all traffic will be delegated to the one access route further puts more pressure and chances for conflicts and over use of the trail system. As it is now, with three main access routes there is no over use in any area. It also disperses any traffic to eliminate or cut down on potential encounters with other forest users.	2961	Alternative C Modified was developed to address this concern.
36	443	The use of mountain bicycles does not cause significantly more trail damage or soil erosion or wildlife	All recreation affects the environment, but independent third-party scientific studies have determined that mountain bikes cause no more wear to trails than other uses. (Marion and Wimpey, 2007), (Seney and Wilson, 1994)	2142 2224 2227 2536 2618 2619	Restrictions on bicycle use were limited to B2 management areas to protect wilderness character. Soil erosion and wildlife disturbance from bicycle use compared to other uses were not factors in the designation process.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		impact than other uses such as hiking or horseback travel.		2621 2622 2623 2624 2629 2630 2877 2940	Alternative B analyzes the most motorized and bicycle use in Inventoried Roadless Areas including where these areas are allocated to a recommended wilderness designation; Alternatives C, C Modified, and D analyze lesser amounts in these areas. Forest Plan direction does not guide managers to either open or close to motorized use trails within Inventoried Roadless Areas based on IRA designation. The Forest Plan directs managers to comply with the Forest Plan management area direction that applies to each Inventoried Roadless Area. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas (B2), including IRA areas that are within the B2 allocation. The intent of B2 management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
36	443	The Clearwater National Forest needs to recognize that bicyclists seek non motorized roadless areas and challenging single track.	The Forest Service notes that a minority of the miles currently open to bicycling will be closed, but fails to acknowledge the unique experience these trails provide and the significant loss of backcountry singltrack that will result. Rather than manage exclusively for total miles open to bicycling, the agency should seek to provide diverse experiences, including those on narrow trails in wild and primitive areas.  Non-motorized, roadless areas are the most valuable to mountain bicyclists. These settings provide solitude, serenity, challenge, and other characteristics sought by our user group.	2199 2615 2617 2631 2866	Alternative B best addresses this concern and allows all trails in the Kelly Creek, North Fork, Middle Fork, Kid Lake Creek, Goose Creek and Goose Ridge areas as well as other trails in the Great Burn (Hoodoo RA) to remain open to bicycles; Alternative C also allows use on the Fish Lake Trail as well. Proposing or deciding on boundary adjustments associated with alternative land use designations is an action that is beyond the purpose and need of this travel planning proposal which is focused on designation of existing routes and areas for motorized use.
8	443	The Clearwater National Forest should keep many trails open to bicycles.	The trails in the Kelly Creek Drainage, North Fork, Middle Fork, and Kid Lake Creek, and the state line trail from Schley to Hoodoo pass is an incredible trip for a bicycle. Fish Lake Trail, Goose Creek trail and Goose ridge are all great bicycle rides. The state line trail from Granite pass to pilot knob past Rhodes Peak and on over to Goat Lake and Blacklead was several years ago a hike and bike with difficult route finding. From Pilot Knob down to Crooked Fork is also a difficult trail but worthy of keeping open. From the road to Lost Lakes and down Boulder Creek is another hike and bike on portions of it.	2106 2112 2198 2226	Please work with us [mountain bikers] on a trail by trail basis instead of blanket ban on bicycles.
1	445	The Clearwater National Forest could install and maintain drainage structures on trails and roads (water bars/dips/and	The most common maintenance requirement for 4x4 and OHV routes is the construction and maintenance of water bars/dips/mounds to divert runoff from the route.....	2033 2034 2334 2335	The Clearwater National Forest installs and maintains drainage structures on roads and trails, annually.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		mounds) to reduce sediment production using established methodology, trail machines, and public work programs.	IDPR has documented motorized use and the maintenance that they have put forth over the years. What is not reflected in their letter is the maintenance that the private motorcycle riders have put forth over the years (it is ten times the amount of time, energy and expense than the IDPR). I suggest that if it were not for the private trail rider many of the existing trails would be lost to the system from lack of use and maintenance.		The Clearwater National Forest is appreciative of the all the volunteer efforts that occur annually to assist the Forest with trail maintenance on trails designated for both motorized and non-motorized use.
64 86	445	The Clearwater National Forest should recognize the time and resources private parties and organizations put into trail maintenance and pursue additional partnerships.	It is important to make sure that trails get used properly and the best way for that to happen is to educate people. Cyclists are a very tight group (even though we typically don't ride in groups) and are very good and making sure we help each other be better stewards of the trails and nature. I have personally been shamed via forums and in person for mistakes that I made out of ignorance. Had I known better, I wouldn't have made the choice I did.	2205 2228 2230 2601 2606 2883 2955 3021 3023	
			Responsible, avid, bikers look out for one another and their rights to ride. If this closure has been considered due to neglect or abuse, I think that there is a better way to "call to arms" the masses. I know that there must be history to this issue, but because of history we are able to learn from our mistakes.		The FEIS identifies the current existing conditions condition of use in Chapter 3.
34 57	448	The Clearwater National Forest should identify an accurate assessment of snowmobile use.	There is a deficiency in the analysis of areas available for snowmobile use.		
31	448	The Clearwater National Forest	...(DEIS page 1-10) These figures do not give an accurate assessment with which to contrast the proposed action with the current condition and other alternatives. The analysis should attempt to quantify how many of these acres snowmobiles can actually use. Something like "except for certain restricted routes, 1,322.943 acres are open to over-snow vehicle use via the forest plan, of which X acres are utilized by snowmobiles."	2589 2764	See FEIS Chapter 1, Purpose and Need for Action, Designation of Motorized Uses.
			..See Figure 1. Map on page 3 of letter] Clearwater National Forest roads previously closed to snowmobiles that are proposed	2545	See FEIS Chapter 1, Purpose and Need for Action, Designation of Motorized Uses.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		should reconsider opening currently closed road to snowmobiles.	to be open to snowmobiles in all of the action alternatives		
1 9	511 Wilderness (designated)	The Clearwater National Forest should not close trails that enter wilderness to motorized use.	... Prohibit use on trails that enter wilderness: This is creating a buffer zone Congress, when they passed the Endangered Wilderness Act in 1978, declined to endorse buffer zones around wilderness areas. The trails that you are closing for this reason should be allowed to continue.  Wilderness criteria and standards should not be applied to multiple-use lands.	2024 2123	The Clearwater NF is not proposing to close any additional trails to motorized use that lead into the Selway Bitterroot Wilderness. For trails south of the Lochsa River there is Forest Plan direction in MA 7 to restrict motorized uses. "Exclude motor vehicle use on trails that provide access to wilderness." Forest Plan pg III-30)
1	511	The Clearwater National Forest has too much designated wilderness, based on public recreation needs.	The current allotment of recreation resources on all Forest Service lands is way out of balance with 44,919,000 acres out of 192,300,000 acres or 24% in wilderness designation while no more than 2.55% of the visitors are wilderness visitors. If Roadless acres are included in this total, it becomes even more unbalanced with at total of 103,437,000 acres or 54% in wilderness or roadless designation while only 2.55% of the visitors are wilderness visitors.	2058 2059 2060 2061 2062 2063 3061	Attempting to modify current wilderness designations or roadless area boundaries would be beyond the scope of this project. The alternatives in the FEIS were developed to meet Forest Plan goals and objectives for a variety of resources.
4 9 20 25 26 37 60 64 65 71 78 80 82 83 88 91 109 310 316	512 Recommended Wilderness Areas	The Clearwater National Forest should not exclude snowmobile use from Recommended Wilderness Areas	It is not an easy area to access therefore it is NOT overwhelmed by snowmobile usage. . . To access this area 20 miles of trail must be covered, so therefore non-motorized usage is not an issue here. This is truly an area which poses no conflict between users and provides high altitude terrain for snowmobile usage.  Alternatives C & D prohibit snowmobile use in recommended Wilderness because it negatively affects wilderness character. While we agree that wilderness character needs protection, the impacts that snowmobiling has on wilderness character are temporary and not permanent. Once an area is legislated as Wilderness or the snow is gone, the snowmobile impacts disappear.	2081 2115 2116 2125 2240 2244 2345 2359 2363 2364 2365 2435 2438 2443 2446 2447 2448 2638 2771 2776 2799 2801	Alternative B provides for motorized (including snowmachine) use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		Wilderness Area in Senator Tester's Forest Job and Recreation Act bill?	<p>The FS claims RWAs must be closed due to overuse, only to close a RWA with not use. In the FS's own documents, they admit that Mallard Larks get little or no motorized snowmobile use, but they site growing motorized usage as the reason to close it.</p> <p>Snowmobile Alliance of Western States contends that Motorized RWAs usage was present before 1987, and usage will be limited to current levels, due to poor and limited access to these areas. Since data on snowmobile sales indicates a continuing 15 year decrease in snowmobile sales/usage, and snowmobile registrations have been flat and decreasing one can only reasonably assume that there is no "growing" snowmobile usage, only less riding area available every year. Snowmobile Alliance of Western States Position on RWAs.</p> <p>Forest Service policy, FFSM 1923.03 (2) states any area recommended for wilderness is not available for any use or activity that may reduce the area's wilderness potential. The direction Region 1 has chosen to adopt; elimination of activities currently occurring in all recommended wilderness areas is also contrary to the FSH directive clearly stating that the FS is not to change use in areas that they inventory as "potential wilderness areas". (FSH page 9, #71). It is completed with the express purpose of identifying all lands that meet the criteria for being evaluated for wilderness suitability and possible recommendation to Congress for wilderness study or designation. Paragraph 3 of 71 on page 9 also requires "local knowledge and judgment" which does not appear to have happened based on the preferred alternative.</p>	2802 2804 2805 2806 2807 2808 2809 2810 2884 2888 2889 2897 2911 2914 2965 2972 2980 2982 2984 2985 2987 2988 2995 3005 3031 3033 3045	<p>The Great Burn Area is the last and only local place with natural alpine snowmobiling. People that I have taken into the GBA cannot believe how splendid the views are in the winter and how close it is to Missoula. They compare it to the snowmobiling at Cooke City, but without the 300 mile drive. The area is rugged and requires about 20 miles of riding to get to the open backcountry. This completely eliminates any user conflicts. The Lolo pass area has less snowmobile traffic because advanced riders go to the GBA when weather conditions allow riding. This creates better dispersion and less potential for accidents. If you close the GBA and Beaver Lake areas you will be responsible for creating more</p>

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Comment Number	Response
Action Code	Concern Statement	Quote		
		<p>Your own data shows that only 27% of Clearwater national forest is fitting for snowmobile access and you want to close 11.2% of the best high mountain snowmobile area. I have tried to drive up Surveyor Creek road and Hoodoo Pass road in June and there was still too much snow on the roads. The GBA has deep snow from November to June even when there is a low snow pack year!</p> <p>...The topography and density of the CNF severely limits where any motorized use can occur. This fact clearly establishes that motorized use has very little effect on the overall health of the forest.</p> <p>The Forest Service Is Misrepresenting Snowmobile Closures Within the CNF, Half of the Suitable Snowmobile Area Will Be Closed Under This Travel Plan. Even though Great Burn is only 150,000 acres, it represents nearly all the "good riding" remaining open, within the 1.8 Million acre CNF. For the Forest Service to say it's only closing 11.2% of the CNF, is to belie the fact that this 11.2% is all the Alpine - off trail snowmobile riding in the CNF. The Forest Service pointed out in the DEIS that only 27% of the CNF is suitable for snowmobile riding. The Forest Service failed to mention what percentage of the CNF would be suitable for snowmobiling, if the preferred alternative is acted on. The Forest Service failed to mention what percentage of adequate snowmobile terrain is already closed within the CNF (including wilderness within the CNF). The Forest Service failed to mention what quiet opportunities exist in the CNF, and address access to those quiet areas, as the real problem. The Forest Service failed to mention what quiet opportunities exist adjacent to the CNF. Even though wilderness and adjoining forests are not within the scope of the Travel Plan, what they offer should be considered in the Travel Plan, since they provide extreme quantities of non-motorized opportunity. The Forest Service failed to provide an adequate Recreational Opportunity Spectrum map for snowmobiles. Overall, this is a gross failure to adequately analyze multiple use in the CNF.</p> <p>There is no Compelling Need for More Wilderness. 20% of the National Forest is closed, as designated wilderness, and another 10% is closed as de-facto wilderness. Most wilderness area tends</p>		

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Comment Number	Quote	Response
		<p>to be in the high altitude mountains that snowmobiles use, which makes that 30% of the National Forest concentrated mostly on snowmobile useable acreage. The Forest Service has a hard time producing numbers that accurately show what percentage of snowmobile acreage is closed nationwide. So, where is the need? Furthermore, many bills have attempted to go through Congress, NRPA and Y2Y, as easy examples, and all have failed, because there is no need. The 2001 Clinton Roadless Rule, does not have clear public support, and has been in the courts for 9 years now, and will probably go to the Supreme Court. Like it or not, Winter Motorized recreationists have a place on Public Land. We are not going to stand by and let every acre of OUR National Forest be incrementally excused away, and closed.</p> <p>The Surveyor Creek road # 7734 goes past Schley Mountain and at one time was open all the way to Kid Lake. This logging road does not meet the qualities of natural and undeveloped as required by the wilderness act of 1964. This makes Alternative C unacceptable and illegal in the Kelly Creek drainage. Alternative B is acceptable with date and use modifications as paragraph 7 explains.</p> <p>Under the caption of purpose and need the DEIS states, "There is a need to restrict motorized over-snow travel on routes within Big Game Winter Range in the Lochsa Drainage. There is a need to remove over-snow vehicle restrictions that are not serving a clearly identifiable purpose." I favor and urge you folks to adopt Alternative D. I am a mountain biker but I would be happy to forgo my privileges in the manner provided in this alternative, specifically, I believe, in management Area B2. The protection of the forest, its watersheds, and its wildlife is far more important than my being able to ride my bike in this sensitive area. And no alternative should be adopted that allows any encroachment upon potential wilderness (roadless) areas or that compromises the wilderness character of such areas.</p> <p>Limiting snowmobiles to a smaller areas and trails near heavily used areas near highways will increase the likelihood of user conflicts and the Forest Service mandate is to REDUCE user conflicts. The great Burn area is one of the premier riding areas in the lower 48 states and you have no valid reason to close that area. You cite "resource protection", "wildlife security" etc, but in fact these are just catch phrases used to justify closure. What resource are you protecting?</p>			

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		Have you documented the resource and can you provide that documentation? How many trips have USFS personnel made to the Great Burn in the winter? When? Who? What animals are you protecting? Where is the documentation?	Of the 1.8 Million acres within the CNF, the 150,000 acres known as Hoodoo or Great Burn, has some of the best off-trail riding in the CNF. The Your assertion that you are only closing 11.2% of the forest to snowmobiles, belies the fact that this 11.2% represents nearly all of the best off trail riding opportunities in this forest. There are 260,000 acres of existing Wilderness in CNF which is off limits to motorized travel and is poorly managed. Why does the CNF want to shut down all Alpine (above tree line) riding in the CNF, and outlaw the last remaining area for any significant altitude riding in CNF, accessible from the state of Montana. Snowmobiles require public land that is of sufficient altitude to provide deep, long lasting snow. Why have you embarked on a mission to close all high elevations acreage within it's borders.		Alternative B provides for motorized use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
9	12	The Clearwater National Forest should not exclude motorized use from Recommended Wilderness Areas as it does not preclude future wilderness designation.	... requirement for RWA status. (FSM 1923.03.2) 1923.03 – Policy 1. Any inventoried road-less area recommended for wilderness or designated wilderness study is not available for any use or activity that may reduce the wilderness potential of an area. Activities currently permitted may continue, pending designation, if the activities do not compromise wilderness values of the area. There isn't any data supporting the closures in the DEIS for these areas. ...Congress often decides it wants to allow motorized recreation in areas that the agency has recommended be wilderness.	2053 2116 2117 2153 2160 2173 2174 2175 2176 2177 2245 2253 2256 2257 2258	The Clearwater travel plan in Alt's C & D remove much of the single track trails in the proposed wilderness areas and roadless areas. It is stated in the plan that the characteristics of the wilderness areas should be maintained. There is no formal USFS

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
94			<p>policy stating that wilderness areas are to be managed as true wilderness. There are only guidelines. Currently trails exist in those areas and not much geography change is occurring. Granted some trails would be better moved and redesigned. This can occur on a site specific project if motorized travel is allowed in the area.</p> <p>Concerning the Clw NF travel plan, I support Alt B. this is supposed to be a travel plan....not a closure plan. I believe that creating a wilderness area should be left to congress. Alternative C would eliminate all motorized access in lands recommended for wilderness. Under the current Forest Plan, all lands in the Clearwater National Forest which are managed under the B2 classification should be changed to be managed as semi-primitive. The current Forest Plan states "if there is Idaho wilderness legislation during the plan period, the area(s) that is (are) not classified as Wilderness by Congress will remain roadless and be managed as management area A3 until the next major revision of the Forest Plan, unless specified otherwise by the wilderness legislation." Within the last year, there has been Idaho wilderness legislation. This legislation did not include or have any reference to the Clearwater Forest. Therefore, the change in management of the B2 lands in the Clearwater MUST be to A3. Any other management will be indirect violation of the Forest Plan.</p> <p>The propose closures in the Great Burn are unnecessary. Fifty years of motorized access hasn't done anything to degrade that area so that it would not be considered for wilderness designation. This fact has even been supported in court by the Fish Lake Trail lawsuit. There are many other areas across the country where motorized access was allowed up until the time of wilderness designation.</p> <p>Between the 1978 and 2005 Analysis for Assessing Capability to Exhibit and Maintain Wilderness Character, 28 years elapsed with over-snow vehicle use in all years, and the Great Burn still exhibited a high capability for wilderness character (the same as in 1978). Without any supporting documentation to the contrary, and in spite of any documentation which might be produced, it is reasonable to assume that the area will retain its capabilities through the next planning cycle. Furthermore, after 28 years it</p>	2346	2445

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		remains non-wilderness. In other words, it has never been designated by Congress. Therefore, it is unlawful for the Agency to apply wilderness standards to this area (by excluding an entire and presently lawful activity for the purpose of preserving its Wilderness character). These two reasons alone should deter any Agency desire to exclude any motor access from the Great Burn area and other B2 areas.			Alternative B provides for motorized use in recommended wilderness areas; Alternatives C, C Modified and D could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
11 21 23 25 31 32 40 40 42 44 45 47 72 74 85		The Clearwater National Forest should exclude motorized and mechanized uses for recommended Wilderness to protect the wilderness character and potential for future designation	Managing non-motorized, motorized and mechanized (bicycle) in recommended wilderness areas through travel planning decisions may affect the protection of wilderness.  ... disagree that instances of snowmobile trespass into Wilderness are random, since they typically occur from commonly known access points where snowmobiles are permitted in close proximity to Wilderness  ... that serves as a roadless migration corridor for many animals including endangered species. If we lose our proposed wilderness areas, we lose something fundamental for human life and the human spirit, forever.	2146 2266 2315 2325 2543 2558 2647 2649 2650 2651 2670 2677 2680 2918 2920 2926 3014 3015 3017	Alternative D restricts motorized and bicycle use in recommended wilderness areas including the Hoodoo (Great Burn) area; Alternative C also restricts motorized and bicycle use in this area with the exception of Fish Lake. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.  The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual species when needed to further clarify or address a public comment, issue or concern.
9 16 21 25 26 29 30 39 94		The Clearwater National Forest did not adequately evaluate mechanized and motorized activities in Recommended Wilderness Areas prior to	... Need: Evaluate the motorized and mechanized activities that occur in RWAS' ... This should have been completed before you recommended closures in these areas.  What impacts to the Selway-Bitterroot Wilderness additions have occurred ... Is this change related to motorized use?  ...The Forest Service planning rule requires utilizing the best available science, the Forest Service needs to consider the	2118 2119 2171 2172 2202 2203 2204 2212 2219	Alternative B analyzes motorized and bicycle use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons (see Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas)

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		recommending activity restrictions.	<p>numerous studies showing that mountain biking has no more impact than hiking and equestrian use.</p> <p>The FS should allow the winter portion of the travel plan more than 2 options. The Forest, in collaboration with Id Fish and Game and other stakeholders, should set strict limits on motorized use in backcountry management areas ...</p> <p>Page 3-76 – This section fails to accurately reflect the state of the law regarding temporary, ephemeral effects and the fact that such effects do not degrade wilderness character to such an extent that the area loses its eligibility for wilderness status. See pages 3-83; 3-104.</p> <p>Page 3-134 – SVIA and MIC concur that “the scenic integrity of the Wild and Scenic River corridor would not be adversely affected by Alternative A” and the continuation of existing levels of OHV use. Northern Region policy is to indefinitely close recommended Wilderness areas to motorized use – manage the areas as Wilderness even though a Wilderness Attributes Study would indicate a very low Wilderness rating for many of these areas.</p>	2299 2302 2405 2441 2498 2506 2534 2613 2641 3059	Alternative B would allow most existing route-based summer motorized travel, and area-based winter over-snow travel, in Recommended Wilderness (Management Area B2) to continue. The Range of Alternatives in the FEIS analyzes the potential effects of changing motorized uses in MA B2.
16	512	The Clearwater Forest should modify the Forest Plan to remove from Recommended Wilderness designation (B2) those areas currently designated as B2 which have motorized use.	<p>...The document goes on to say that areas with a significant amount of motorized use should not be designated RWA's and if motorized use of an RWA was significant it would be removed from that designation or the boundary adjusted.</p>	2166 2178 2179 2180	Relocating land management designations does not meet the purpose and need of this project and is outside the scope of the analysis.
4 20 26 71 83 90 350		The Clearwater National Forest should consider an alternate designation for Recommended Wilderness Areas.	<p>Please reconsider the complete closure that wilderness designation would entail. (I) feel that the areas' designation would be better served by other OHV limitations rather than a "blanker" closure effected by wilderness designation.</p> <p>Please keep the following areas open for snowmobile use, Beaver Ridge, Elk Summit, Tom Beal, Blackhead, Goat Lake, Williams Lake, Crooked Fork, Kid Lake Hoodoo and State line. If the Forest</p>	2083 2106 2217 2247 2432 2449 2912	Relocating land management designations does not meet the purpose and need of this project, which is to designated existing routes as either open or closed to motorized use, and is outside the scope of the analysis.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
355			<p>Service is serious about protecting this area make it a National Recreation Area that Tax Payers could enjoy.</p> <p>Boundaries need to be adjusted or moved or a different alternative to wilderness like a national protection area. A national protection area has the same general character as wilderness area with the exception that it allows snowmobile use and some trail maintenance. I do agree that these areas need some protection but not something so restrictive as wilderness. I prefer a National Recreation Area designation that allows snowmobiles and mountain bikes for sure and possibly dirt bikes and ATV along with some really good Jeep/UTV trails in the summer.</p>	2913 2915 3008 3039	This mistake has been corrected in the FEIS. All tables in the FEIS now show, accurately, that there are no road miles in recommended wilderness areas with the exception of the roads that were specifically exempted in the Forest Plan (i.e. Elk Summit Road)(or copy wording from the website regarding this "typo" in the DEIS document).
25	512	The Clearwater National Forest should not include areas with roads as recommended wilderness.	...the DEIS reports that there are 158 miles of roads in recommended wilderness on the Clearwater NF in Tables 3-42, 3-46 and 3-50.....makes the area roaded and shouldn't be allocated for recommended Wilderness.	2354 2355	The FEIS has been updated to address this concern. Please see Chapter 3, "Inventoried Roadless Areas Including Recommended Wilderness Areas."
25	512	The Clearwater National Forest should reanalyze recommended wilderness using the Idaho Roadless rule.	Staff should reanalyze the recommended wilderness management area (B2) and roads using the Idaho Roadless Rule Management Theme Layer.	2356	
18 19 30 36 63 87	512/443	The Clearwater National Forest should allow bicycles in Recommended Wilderness because they do not adversely affect the primitive character.	<p>It may be that the B2 (i.e., RWA) boundaries are fixed based on previous policy decisions, and would not be changed as part of the Travel Planning process. However, the travel plan can influence the Forest Plan, and vice versa. What is being addressed in the Travel Plan are the types of travel that will be allowed within the B2 area. Mechanized travel is not detrimental to wilderness character, and should not be restricted. Mountain bikers are generally attracted to these areas for the same reason as other quiet users; seeking solitude away from civilization.</p> <p>The Region One forest planning philosophy, banning bicycles from recommended wilderness, has pigeonholed bicyclists as opponents to wilderness. This is an unfortunate and untrue side-effect of the policy. I feel compelled to point out that in every other Forest Service region bicycles are allowed in recommended wilderness areas. Most bicyclists actually support and enjoy</p>	2201 2214 2215 2229 2233 2533 2612 2614 2616 2632 2633 2634 2878 3029	Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas (B2) including IRA areas that are within the B2 allocation. The intent of B2 management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response	
		wilderness, and ride in the wild zones near wilderness because the feelings and experience is similar.	<p>There is nothing intrinsic about the mountain bike that reduces the opportunities for primitive recreation or solitude of others. Mountain bikers do not inordinately reduce the possibility of other users having a primitive experience. As discussed, mountain bikers do not alter the land for the next user any more than do hikers. And, if by using the word primitive, Congress meant to exclude modern technology, then an encounter with any number of modern conveniences, such as cell phones, GPSs, LED lighting systems, or specialized clothing would impact the primitive experiences of others. However, these items are not prohibited, presumably because they, like mountain bikes, do not impact the primitive characteristics of the land itself.</p> <p>I do support additional Wilderness designation, I strongly believe that new Wilderness area should be created in conjunction with companion designations, which allow continued access to backcountry mountain bikers.</p> <p>IMBA requests the Clearwater continue to allow bicycling in recommended wilderness. The proposed policy-a blanket ban-is out of place in a travel plan, unnecessary, unjustified, at odds with national forest management across the country, and contrary to FS directives.</p> <p>The proposed action indicates it will be using recommended wilderness boundaries form the draft forest plan. Though the forest plan has yet to be finalized and though the planning rule under which it was developed has been successfully litigated, the draft forest plan does not require a prohibition on bicycling in recommended wilderness. The draft forest plan merely states that given activities are generally suitable or unsuitable for a particular management area. IMBA requests the FS work with local cyclists to identify the most important routes for bicycling and consider leaving them open to this use.</p> <p>I will not stand in the way of wilderness, were that the only way to protect our forests I would be willing to close all trails to human travel (the only way to zero impact). I have hiked in the Rattlesnake wilderness and was stunned to find roads maintained with chain saws and other mechanized equipment leading to</p>			

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
8 19 40		<p>manmade dams. Surely if there are exceptions such as these for emergency water reserves then some concessions can also be made for a non-motorized user group that has a lower environmental impact than the equestrian user group that is allowed in wilderness.</p> <p>The current and future need for bicycle recreation destinations is primarily along the state line adjacent to the Lolo N.F., adjacent to the population center of Missoula. Boundary adjustments to the Recommended Wilderness Areas along the state line could easily be made to accommodate non-motorized, mechanized use. Short of boundary adjustments, an easement allowing bicycles along trail 738 may be more easily applied to the travel plan (similar to the allowance for motorcycles on trail 419).</p> <p>South of Lolo Pass is Beaver Ridge. The northern face of this ridge is proposed as a Selway Wilderness Addition. Part of this addition could be developed as an alpine bicycle destination for Missoula riders. With a reconstructed trail to them, Beaver and Spruce lakes would be good attractions for bicyclists for fishing. The proposed boundary of this addition is on section lines, which is not a good practice when planning wilderness because it is harder to locate on the ground. It would be logical to retain the wilderness boundary along Beaver Ridge, and reduce the B2 area to the area west of the lookout, south of road 369. Bicyclists need quiet lake destinations as well, and someday could benefit from improved access to these lakes. A future loop trail, starting at Lolo Pass...</p> <p>The Clearwater National Forest should make adjustments to the boundaries of Recommended Wilderness Areas and or create buffer zones or cherry stems where mechanized uses would be permitted.</p>	<p>2108 2109 2111 2213 2215 2216 2220 2221 2222 2223 2229 2231 2535 2636 2665 2871 2872 2873 2874 3024 3025 3028 3044</p> <p>Alternative B best addresses this concern and allows bicycle use in recommended wilderness areas. Proposing or deciding on boundary adjustments associated with alternative land use designations is an action that is beyond the purpose and need of this travel planning proposal which is focused on designation of existing routes and areas for motorized use.</p>		

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			are open to snowmobiles, and the Toboggan Ridge Road is also open to snowmobiles. We suggest that these routes be closed to snowmobile use in order to protect the wilderness characteristics of the adjacent closed areas. If, however, the routes remain open, the Forest Service should implement a comprehensive public education and enforcement effort to prevent incursions by snowmobiles into the closure area. Executive Order 11644 (1972) and its amendment, Executive Order 11989 (1975), specifically include snowmobiles and direct the Forest Service "to establish policies and procedures that will ensure that the use of off-road vehicles on public lands will be controlled and directed to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands		There are no Wilderness Study Areas within the Clearwater National Forest.
79	513	Wilderness Study Areas	The Clearwater National Forest should not exclude snowmobile use from Wilderness Study Areas.	2976	Development of Alternative D was based on eliminating motorized uses in Recommended Wilderness. Motorized uses that were retained in Alternative D in IRAs were consistent with the goals and objectives for a variety of Management Areas contained within the IRA's.  See also the response to Action Code 427.
11 21	514	Inventoried Roadless Areas (RA)	The Clearwater National Forest should not allow motorized use in primitive, semi-primitive and roadless areas with Alternative D	2144 2300	Why allow 51 miles of trail to be open to motorized use in primitive and semi-primitive nonmotorized settings in roadless areas under the alternative that most restricts motorized use? This reflects a biased range of alternatives skewed toward motorized use and in conflict with the executive orders and the forest plan.
162 174	514		I urge the Forest Service to adopt a modified version of Alternative D to include a year-round motorized prohibition in all Inventoried Roadless Areas.  ... considering that the area is renowned by outdoors people for its hunting and fishing opportunities, not to mention its place as a refuge for wild creatures of all types, a prohibition of motorized travel through the IRAs would protect the wild qualities that the vast majority of users come to enjoy.	2085 2088 2190 2191 2192 2196 2197 2311 2312	Alternative B analyzes the most motorized use in Inventoried Roadless Areas including where these areas are allocated to a recommended wilderness designation; Alternatives C, C Modified, and D analyze lesser amounts in these areas. Forest Plan direction does not guide managers to either open or close to motorized use trails within Inventoried Roadless Areas based on IRA designation. The Forest Plan does direct managers to comply with the Forest Plan management area direction that applies to each Inventoried Roadless Area. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		Weitas Creek [Bighorn-Weitas] Proposed Wilderness	Weitas Creek is the most important roadless area on the Clearwater National Forest yet no alternative proposes closing trails to motorized use or the areas crucial winter range. Indeed, the DEIS makes the case for the areas important wildlife values in map form (see appendix A).	2313 2317 2318 2319 2320 2321 2990	areas (B2) including IRA areas that are within the B2 allocation. The intent of B2 management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
		Trail 20. Under no alternative is this route closed, except a small segment. This main trail sees considerable resource damage when vehicles use it (see enclosed documents and photos 1 to 5). The 20 trail is not suited to vehicle use. See photo 6. Safety is a concern. Indeed, a mountain biker road off the edge to his death this year. Campsites along the route near Johnny Creek are damaged. See photos 7 and 8.	Trail 17. This trail is hard to find in much of the roadless area. Opening it to ORVs under every alternative would cause serious damage from the status quo. It is also unmanageable to have part of the trail open to ATVs but the two ends not open to ATVs. There isn't any data presented that requires the closure of IRA's Just because they are recommended for wilderness designation.		Alternative B analyzes the most motorized and bicycle use in Inventoried Roadless Areas including where these areas are allocated to a recommended wilderness designation; Alternatives C, C Modified, and D analyze lesser amounts in these areas. Forest plan direction does not guide managers to either open or close to motorized use trails within Inventoried Roadless Areas based on IRA designation. The Forest Plan does direct managers to comply with the Forest Plan management area direction that applies to each Inventoried Roadless Area. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas (B2) including IRA areas that are within the B2 allocation. The intent of B2 management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
9 61	514	The Clearwater National Forest <b>should allow</b> motorized and mechanized uses in Inventoried Roadless Areas	I don't believe it is fair to assume that the inventoried roadless areas are going to be managed as wilderness according to the environmentalists. There are other user groups who use these roadless areas, and keep in mind that they are not trail-less, and these trails are used by mountain bikers' motorcycle riders. There are many of us who seek a semi-primitive motorized or mechanized experience. We must keep in mind that nearly 4 million acres of roadless areas are already designated wilderness. I can assure that many trails have been lost because the USFS cannot keep up with trail maintenance, and this will continue if we designate more wilderness. Most of the wilderness is seldom visited because access is so restrictive and most people don't have the time to commit multiple days while covering little ground when backpacking.	2038 2130 2596 2816 2817	Reasonable access in wilderness is obtained by using airplane (motorized), jetboat (motorized) or horses, believe the roadless rule was intended to keep those portions of the national forest

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		<p>roadless, yet allow multiple use access (motorized/mechanized) to continue. Our roadless areas hold valuable timber and other resources which should be made available if ever the time arises. There are environmentally sounder methods for extracting these resources such as helicopter logging. We also need the ability to manage these roadless areas in the event of a catastrophic fire and diseased trees. Idaho's economy is in bad shape, and managing our roadless areas as wilderness (or locking up our public lands) will only further hurt Idaho's economy due to public lands that can only be used by hikers and horsemen which is limited. Too much of anything isn't good and that includes wilderness. Enough is enough. The trail systems were built for a reason back in the 1930's and that was to allow public access to explore and enjoy our amazing wild lands; not to lock us out.</p>			<p>Alternative D analyzes the least motorized and bicycle use in Inventoried Roadless Areas including where these areas are allocated to a recommended wilderness designation; Alternative C and B analyze greater amounts in these areas, with Alternative B analyzing the most. Forest Plan direction does not guide managers to either open or close to motorized use trails within Inventoried Roadless Areas based on IRA designation. The Forest Plan does direct managers to comply with the Forest Plan management area direction that applies to each Inventoried Roadless Area. Alternative D could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas (B2), including IRA areas that are within the B2 allocation. The intent of B2 management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.</p>
5	21 32 53	<p>The Clearwater National Forest should not allow motorized and mechanized uses in Inventoried Roadless Areas.</p>	<p>However, in the DEIS, the Forest Service has failed to analyze an alternative that keeps all roadless areas non-motorized. The value of roadless areas has been demonstrated scientifically, socially and politically. The 2001 Roadless Rule FES prepared by the Forest Service contains a plethora of information about the value of undisturbed roadless areas for wildlife habitat and other values. The agency is well aware of concerns regarding motorized use in roadless areas--the DEIS notes this fact--and the failure to evaluate an alternative that keeps all roadless areas non-motorized fails to meet the requisite "hard look" at "all reasonable alternatives."</p>	<p>2088 2269 2557 2562 2702 2703 2746 2747 2748 2900 2901 2921 2922 2923 2925 2931 2932</p>	<p>The Spokane Mountainers Conservation Committee recommends adoption of Alt. D as a minimum to support wilderness characteristics in the CWF. In addition, motorized vehicle travel should not be allowed in the following inventoried roadless areas: Weitas Creek, Pot Mountain, Kelly Creek, Mallard-Larkins, the Upper North Fork and areas immediately adjacent to</p>

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		The CWF has done an excellent job in recognizing the wilderness values of the Mallard Larkins, the Great Burn and proposed additions to the SBW, but there is still need to reduce the impact of motorized use in all roadless area.	<p>While I commend the FS for acknowledging the exceptional values of the Mallard Larkins and Great Burn roadless areas by recommending year round prohibitions to motorized traffic in these areas, I believe that all the roadless areas deserve this same recognition. For instance, the Bighorn Weitas roadless area has crucial low elevation big game habitat. This habitat is critical since Dworschak Dam reservoir swallowed the best big game wintering grounds. It also contains trout streams that harbor westslope cutthroat and bull trout.</p>		<p>HR 980 is proposed legislation not enacted and therefore does not mandate direction that aids in implementing the National Travel Rule. Alternative D analyzes the least motorized and bicycle use in Inventoried Roadless Areas including where these areas are allocated to a recommended wilderness designation; Alternative C and B analyze greater amounts in these areas, with Alternative B analyzing the most. Forest Plan direction does not guide managers to either open or close to motorized use trails within Inventoried Roadless Areas based on IRA designation. The Forest Plan does direct managers to comply with the Forest Plan management area direction that applies to each Inventoried Roadless Area. Alternative D could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas(B2) including IRA areas that are within the B2 allocation. The intent of B2 management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.</p>
21	514/512	The Clearwater National Forest should treat Inventoried Roadless Areas as Recommended Wilderness per HR 980		2301 2311 2312 2313 2316 2317 2318 2319 2320 2321	Why didn't the DEIS mention HR 980 (the Northern Rockies Ecosystem Protection Act), which had a hearing in Congress, and would designate all of the roadless areas as wilderness? Given the long time frames for motorized use decisions, why were decisions to allow motorized use in roadless areas not considered a major commitment of resources on the verge of being, irreversible and irretrievable? Doesn't the recommended wilderness analysis reach this conclusion?
21	514/202		The Clearwater National Forest should include an area by area evaluation of all Inventoried Roadless Areas that discloses the effects of each alternative on the	2298 2357 2459 2460 2461	The FEIS has been updated to address this concern. See Chapter 3, "Inventoried Roadless Areas Including Recommended Wilderness Areas."

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
18	514/443	The Clearwater National Forest should allow mechanized uses in Roadless areas.	Most mountain bikers would like to see remaining roadless areas protected from future development, and wilderness character of these areas maintained. The Forest Service should be working to identify solutions to achieve this, which do not prohibit the use of bicycles.	2207	Alternative B analyzes the most mechanized use in Inventoried Roadless Areas including where these areas are allocated to a recommended wilderness designation; Alternatives C, C Modified, and D analyze lesser amounts in these areas. Forest Plan direction does not guide managers to either open or close to mechanized use trails within Inventoried Roadless Areas based on IRA designation. The Forest Plan does direct managers to comply with the Forest Plan management area direction that applies to each Inventoried Roadless Area. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas (B2) including IRA areas that are within the B2 allocation. The intent of B2 management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
21	517 Wild and Scenic Rivers (designated)	The Clearwater National Forest should analyze the effects of OHV use on future designation of eligible Wild and Scenic Rivers.	The DEIS fails to analyze the impacts of having ORV use along either designated or potential wild and scenic rivers. ORV use within a potential wild river corridor could affect future designation of a wild river just as it could affect future designation of a roadless area as wilderness.	2304	Forest Plan direction for motorized uses in eligible wild river segments is that "ORV use is not encouraged but may be permitted where it is currently occurring" (Forest Plan II-37). Only trails that are currently open to motorized use are proposed for motorized use, no new motorized trails are proposed in any eligible or designated wild and scenic river.  See FEIS, Chapter 3, Wild and Scenic Rivers for updated effects analysis on this topic.
21	518 Wild and Scenic Rivers (eligible)	The Clearwater National Forest made errors or omissions in the eligible WSR section	The DEIS suggests potential classification for certain river segments. However, the potential classifications are wrong for a few segments. The Forest Service found in the LEISs that it prepared most of Cayuse Creek and White Sand Creek (AKA Colt Killed Creek) met the qualifications for a wild river. The DEIS ignores the fact an EIS was prepared for White Sand Creek. Furthermore, Fish Creek from the trailhead to Hungry Creek is in wild, roadless country and qualifies for wild river status.	2303	Thank you for bringing this omission to our attention. See FEIS, Chapter 3, Wild and Scenic Rivers has been updated.
40	518	The Clearwater National Forests special corridor restrictions seem in conflict with Forest Plan Direction for eligible Wild and Scenic Rivers by allowing cross-country travel on undeesignated	The eligible Wild and Scenic River corridors are included in the "special corridors" category of the dispersed camping direction in Table 2-3. The DEIS states that the direction in Table 2-3 meets the requirements of the Forest Plan to protect the outstandingly remarkable values of these river corridors. However, if the Forest Service does not designate specific campsites and associated access routes, then it appears the agency will not be complying with the Forest Plan's requirement to restrict cross-country use of off-road vehicles in eligible recreation and scenic river segments (Forest Plan, Page II-36). ...	2662	See FEIS, Chapter 2, Actions Common to All Alternatives, which has been updated to reflect a forest-wide approach for limited motorized off-route travel for dispersed camping and day use activities. Cross- country travel would be prohibited Forest-wide, including within eligible and designated Wild and Scenic River corridors. Motorized use of existing tracks within 300 feet of designated routes would be permitted for the purpose of camping and day-use. The effects analysis in Chapter 3 for Wild and Scenic Rivers has been updated.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		<p>routes.</p> <p>If the Forest Service chooses not to designate campsites in this NEPA process, we ask that the agency provide a plan for a comprehensive evaluation of dispersed campsites, as well as a schedule for completion.</p>	<p>The Upper Weitas Creek Trail #20 is one of the few ATV opportunities in the area and is highly prized by the ATV community for the scenery it provides. In addition, the Fish Lake Trail #419 is a very popular ATV Trail to a scenic fishing destination.</p> <p>Trail #20, Upper Weitas Creek Trail.</p> <p>This is a destination area for us, where we enjoy camping, fly-fishing for cutthroat trout, and having the opportunity to explore the area using our trail machines on many of the great trails in the area. Rarely, do we ever run across other people using these trails, we clear the trail if downfall is present. Destroying this opportunity would take away a freedom that we truly enjoy.</p> <p>Access to fishing by motorized travel is becoming rarer and additional efforts must be undertaken to allow them to remain open for all users, but more specifically, younger users, older users, and users with disabilities. Due to the length and character of these trails it would not be realistically possible to cover the ground we do by motorcycles compared to foot or mountain bike.</p> <p>I am very aware that outfitting trips are occurring in this area, specifically near Windy Creek. It's very likely that the outfitters don't want motorized access in their outfitting areas. Our public lands should not be managed for their exclusive use. .... From a two-wheeled motorized standpoint, closing this trail would eliminate access to Trail #667 and loop opportunities using Trail #627 for accessing Trail #167 (Windy Ridge Trail – Cook Mountain Section) to Trail #580 (Bugle Point Trail), and back to Trail #20 to the Weitas Guard Station. It would also eliminate loop opportunities using Trail #627 to access Trail #634 (Windy Creek Trail) back to Trail #20. Another loop opportunity that would be destroyed would be using Trail #173 (Weitas Ridge Trail).</p> <p>The Upper Weitas Creek Trail #20 is proposed for non-motorized use from 12-Mile Saddle to Ball Creek under Alternative D. This trail is one of the few ATV opportunities in the area. This trail also provides an essential looping opportunity for motorcyclists using Junction and Cook Mountains. This trail should be designated for ATV use.</p>	<p>2375 2454 2726 2826</p>	<p>Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.</p>
51 61 25 27	702 Weitas Creek	<p>The Clearwater National Forest should keep this trail open for motorized travel.</p>			

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		Alternative C only allows one route from Weitas to the Lolo Motorway. Weitas Ridge and Liz Butte Trails are important late season connectors, as well as Cook Mtn 627 and Windy Creek trail. Windy Creek 634 and Liz Butte 649 are both part of the motorized section of the Idaho Centennial trail. These two trails must be kept open.	The proposal to open the trail up Weitas Creek would destroy the only remaining unroaded major low elevation creek remaining in the Clearwater Forest; that would be criminal.		Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
48 74	702	The Clearwater National Forest should close this trail to motorized use.	Weitas Creek Including Cook Mtn. The combined route of Trails 20 and 174 have been turned into a combination dustbowl and expressway. It is an ugly sight, and I think that a sound plan for damage repair in the current planning process would just have closed the whole of Weitas to motorized use. I guess, however, that the politics of machines has made a repair job impossible, and it looks like poor Weitas is just being written off as a lost cause. But at least maybe further damage can be prevented by doing one thing: keep the whole area east of Cook Mountain (i.e., Lookout Pk, Switchback hill, Junction Mtn., etc) free of machines. From a wildlife standpoint, a genuinely remote and wild part of the CNF would be maintained with good habitat and great primitive method hunting opportunities. The trails in this area are very marginal and cannot really sustain much motorized use. Another reason to leave this area alone is the uncertainty of the western boundary of what will sometime be the Great Burn Wilderness. I, for one, always envisioned it reaching all west of Cayuse Creek. It would be a real shame if a travel planning decision at the current time somehow precluded a wise and sound look at the western boundary of the Great Burn. Keeping this area free of machines will also at least slightly mitigate the awful harm that has pretty much wrecked Weitas.	2697 2928	Alternative C Modified was developed to address this concern. Not all of the trails-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
25 51 61 76	707 Weitas Butte	The Clearwater National Forest should open this trail to motorized use.	The Weitas Butte Trail #103 provides an essential connection to the Weitas Creek Trail System. The ford at the bottom of the trail at Weitas Creek keeps motorcycles off this trail until late summer. This trail is cleared annually by the local motorcyclists.	2377 2728 2828 2949	Alternative C Modified was developed to address this concern. Not all of the trails-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			<p>fall when the flows have subsided. This trail is cleared annually by the enthusiastic efforts of motorcycle clubs. If maintenance were to cease, as a result of closing to motorcyclists, the trail will likely disappear. Our trails were built to provide access to our public lands and should continue to be maintained for the public. Motorcyclists, along with DPR, are the only groups who can efficiently carry the tools necessary to conduct light trail maintenance in a reasonable amount of time.</p> <p>The Weitas Butte Trail #103 provides an essential connection to the Weitas Creek Trail System. The ford at the bottom of the trail at Weitas Creek keeps motorcycles off this trail until late summer. Alternative C and D designate this trail for non-motorized use. Local motorcycle riders have cleared this trail for several years. If this trail is designated non-motorized, it will eventually disappear due to a lack of use and maintenance. The Weitas Butte Trail #103 should be designated for motorcycle use.</p> <p>The Weitas Butte Trail #103 provides an essential connection to the Weitas Creek Trail System. The ford at the bottom of the trail as Weitas Creek keeps motorcycles off this trail until late summer. This trail is cleared annually by the local motorcyclists and will disappear if it is closed to motorized use and the USFS does not have the funding to continue maintenance.</p> <p>The Junction Creek Trail #106 is a great single-track trail looping opportunity for motorcyclists.</p>		<p>Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.</p>
25 51 61 76	709 Junction Creek		<p>The Clearwater National Forest should designate this trail for motorized use because it provides great opportunities for motorized travel.</p> <p>The Junction Creek Trail #106 is a great looping single-track trail reducing opportunities to backcountry fishing opportunities to Junction Lake. .... I request Trail #691 remain open for two-wheeled motorized access to Junction Mountain Lookout.</p> <p>The Junction Creek Trail #106 is a great looping single-track trail looping opportunity for motorcyclists using Trail #191. The Junction Creek Trail #106 should be designated for motorcycle use in order to provide a great looping opportunity out of the Kelly Forks area.</p> <p>The Junction Creek Trail #106 is a great looping single-track trail looping opportunity for motorcyclists.</p>	2370 2722 2841 2945	
51 61	712 Trail Creek	The Clearwater National Forest	<p>The Trail Creek Trail #124 provides a single-track trail connection to the Pot Mountain Area for motorcyclists.</p>	2380 2731	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
25		should designate this trail for motorized use.	<p>Trail #124, Trail Creek Trail This trail should remain open to two-wheeled motorized travel because it provides an important connection to the Pot Mountain Area. Past maintenance has revealed that this trail requires brush work which should be conducted on an annual basis or this trail will disappear.</p> <p>The Trail Creek Trail #124 is proposed for non-motorized use in Alternative C and D. This trail does not lead to any scenic destinations or high mountain lakes. It provides a single-track trail connection to the Pot Mountain Area for motorcyclists. The trail is quite brushy and requires annual maintenance. In order to keep this trail on the system, the Trail Creek Trail #124 should be designated for motorcycle use.</p>	2837	<p>Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.</p>
28	713 Pot Mountain Ridge		<p>Pot Mountain Needs Additional Motorized Closures : With 16,000 acres of key big game winter range, the Pot Mountain area is extremely important to sportsmen. According to the Draft Environmental Impact Statement for the Idaho roadless rule, the Pot Mountain roadless area has very minor disturbance to the natural integrity and appearance of the area. Pot Mountain has many open south facing slopes that make the area great for hunting. There are also a few high mountain lakes that make for good westslope cutthroat trout fishing. The area also contains a population of mountain goats, which are extremely sensitive to motorized use. HHA [Hellgate Hunters and Anglers] recommends that Pot Mountain be managed for motorized travel in accordance to Alternative D. This management structure would maintain traditional hunting and fishing use in the area for generations to come.</p> <p>The Clearwater National Forest should add more motorized closures to this trail.</p>	2466	<p>Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.</p>
25 51 61	713	The Clearwater National Forest should designate	<p>The Cold Springs Peak Trail #169 provides a single-track trail experience to the cabin and has been cleared by trail rangers for many years.</p> <p>Opening trail 169 along John Henry ridge would divide the eastern portion of the proposed Mallard Lark wilderness from the main western part. Please don't let wheeled traffic destroy that trail and divide the wilderness.</p> <p>The Pot Mountain Ridge Trail #144 is a premier single-track motorcycle trail. The trail is also limited to later season of use due to the elevation and snowpack.</p>	2381 2385 2732	<p>Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in</p>

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
74		this trail for motorized use.	<p>Trail # 144, Pot Mountain Ridge Trail: The proposal mentions to close this trail year round ... This trail also provides loop opportunities to Trail #617, \$154, and connections to Trail #144, and #160.</p> <p>This trail is limited to advanced motorcyclists due to the skill level required to navigate the trail. ...it will eventually disappear due to a lack of use and maintenance. The Pot Mountain Ridge Trail #144 should be designated for motorcycle use.</p> <p>Trail #169, Cold Springs Creek to Fly Hill</p> <p>I believe this trail was closed a while back and if so, it should be reopened.</p> <p>The Cold Springs Peak Trail #169 provides a single-track trail experience to the cabin. ...The Cold Springs Peak Trail #169 should be designated for motorcycle use.</p>	2735 2835 2839 2927	Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
25 51 61	714 Jackknife Creek	The Clearwater National Forest should designate this trail for motorized use.	<p>Jackknife Ridge Trail #154 provides an important connector to the Pot Mountain Trail. Discontinuing the maintenance the motorized trail ranger program performs will result in increased erosion and eventually render the trail unusable.</p> <p>Trail #154, Jackknife Ridge Trail</p> <p>The Idaho Department of Parks and Recreation Trail Crew have been maintaining this trail for several years on a yearly basis and are necessary to keep brush from covering the trail. Maintenance of this trail, such as brush removal and water bar placement, to curb erosion, has made it more sustainable, and is enjoyed by trail riding motorcycle enthusiasts. This trail is another option to providing an important connector trail to the Pot Mountain Trail.</p> <p>Alternatives C and D designate the Jackknife Ridge Trail #154 for non-motorized use. This trail has received continual maintenance from our Trail Ranger Program dating back to 1996. The trail provides essential access to Pot Mountain from the Weitas Creek area. If the trail is designated non-motorized, it will eventually disappear due to a lack of use and maintenance. The Jackknife Ridge Trail #154 should remain designated for motorcycle use.</p>	2382 2733 2838	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
25 51 61	716 Cave Creek/Chateau Rock	The Clearwater National Forest should designate this trail for motorized use.	<p>The Chateau Rock Trail #465 provides a looping connection to the Pot Mountain Trail #144. This trail is primarily used and cleared by motorcyclists. The Cave Point Trail #617 provides another looping connection to the Pot Mountain Trail #144</p>	2383 2734 2836	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			Trail #165, Chateau Rock Trail: This trail, along with the Cave Point Trail #617, should remain open to provide continued enjoyment by trail machine riders who seek a looping connection to Pot Mountain Trail #144. In addition to riding the trail, two-wheeled motorized enthusiasts have maintained this trail by cutting out downfall and other light trail maintenance for several years.		project area toward Forest Plan goals and objectives.
			The Chateau Rock Trail #165 provides a looping connection to the Pot Mountain Trail #144. This trail is primarily used by motorcyclists. Without motorcycle use, the trail could disappear. The Chateau Rock Trail #165 should be designated for motorcycle use.		Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
			The Windy Ridge Trail #167 (Cook Mountain Section) should remain open. Closing this trail eliminates a popular and sustainable looping opportunity for the Weitas drainage and Junction mountain area.		
			Trail #167, Windy Ridge Trail (Cook Mountain Section) This is an excellent ridge trail and should continue to be left open to historical trail machines travel. .... The TOS should continue to provide for a semi-primitive two-wheeled motorized experience. This trail provides tremendous link and loop opportunity to Trails #580, #627, #531, #634, as well as #20 (Weitas Creek Trail).		
			The Clearwater National Forest should designate this trail for motorized use because it provides great opportunities for motorized travel.		
25	717 Windy Ridge		The Windy Ridge Trail #167 (Cook Mountain Section) .... This trail is the key looping connection out of Junction Mountain and Weitas Creek. Without this trail, most quality looping opportunities in the Weitas drainage are destroyed. The high elevation of the trail doesn't make it available until after July 1st. ...The Windy Ridge Trail #167 should be designated for motorcycle use in order to provide great looping opportunities out of the Kelly Forks and Weitas Creek areas.	2371 2455 2723 2832	
27					Alternative C would close the Fourth of July pack bridge to Crater Meadows part of Trail 167. That closure, as well as the seasonal closure of the other trails in the Junction area, will be a violation of the current Forest Plan. The current Forest Plan allows for semi-primitive, motorized access oriented to big game hunting activities. Hunting activities include clearing trail and pre-season scouting. Many hunters scout as soon as the snow leaves in the summer.
51					
61					
25	718 Weitas	The Clearwater	The Weitas Ridge Trail #173 provides a looping opportunity for	2376	Alternative C Modified was developed to address this concern. Not all of the

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
51 61	Ridge	National Forest should designate this trail for motorized use.	<p>expert level motorcycle enthusiasts, limiting the number of motorized users who can use the trail. The trail runs along the ridge so there is limited sedimentation into streams.</p> <p><b>Trail #173, Weitas Ridge Trail</b>            This is a great ridge trail for two-wheeled motorized travel. This remote and technical trail (expert level) provides a more challenging riding experience as well as the opportunity to seek more solitude even if it is motorized. .... This trail provides a link for several loop opportunities with Trail #650, Trail #20 (Weitas Creek Trail) and a Trail #103 that ties into the Weitas Ridge Trail from the junction of Trail 320, and Trail 3650 at Weitas Creek.</p> <p>The Weitas Ridge Trail #173 is part of a great looping opportunity for experienced motorcyclists. The ford at the bottom of the trail at Weitas Creek keeps motorcycles off this trail early in the season. Sedimentation is not an issue because the runs are located along the top of the ridge.</p>	2727 2827	trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
25 37 51 61 76	719 Junction Mountain	The Clearwater National Forest should designate this trail for motorized use because it provides great opportunities for motorized travel.	<p>The Junction Mountain Trail #191 provides a great looping single-track trail opportunity for motorcycles using Trail #106. This trail provides a great looping opportunity for motorcycle use in the Kelly Forks area.</p> <p>Several favorite single track trails are in question: Junction Mountain Trail # 191 and # 106 are great looping destinations ...</p> <p><b>Trail #191, Junction Mountain Trail</b>            Elimination of this trail would reduce a rare motorized access to backcountry fishing opportunities to Junction Lake. .... In addition to our riding experience we enjoy visiting lookout towers, and this is especially an educational experience for our son, ... and it provides an important loop with Trail #106, as well as other trails in the Kelly Forks Area. .... This area should continue to be managed as semi-primitive motorized (two-wheeled) access year-round.</p> <p>The Junction Mountain Trail #191 provides a great looping single-track trail opportunity for motorcycles using Trail #106. .... The trail goes above 6000 feet in elevation and generally doesn't open until around July 1st.</p>	2369 2639 2721 2834 2840 2944	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			track trail looping opportunity for motorcycles using Trail #106. ... Restricting the trail to fall use as Alt C suggests caters to only a few. This trail provides a great looping opportunities for motorcycle use in the Kelly forks area.		Trail #200 (Bear Butte to Junction Lake) This is a key connector trail from Weitas Creek to Junction Mountain. Keeping this trail open would eliminate having to ride the Pierce-Superior Road #250 to get back to Weitas Creek for a loop, which is a safety concern.
3	721 North Fork Down River	The Clearwater National Forest should not allow motorized use on Trail 297 because it violates FP direction.	Aquarius Research Natural Area - North Fork Ranger District - Trail # 297 and Salmon Creek Roads (#4800) We believe that the motorized use of Trail 297 violates the Forest Plan direction. Motorcycle use of this trail would adversely affect values and features of the Aquarius RNA. We are also concerned about dropping of winter snowmobile restrictions on the existing Salmon Creek road network and wonder how this road system got open to both motorcycles and ATVs. Our recollection of the original NEPA proposal that developed this previously roadless area was that all roads would be closed to motorized use on a yearlong basis.	2080	The Forest Plan direction for the Aquarius RNA does not specifically designate roads or trails for motorized or non-motorized use as long as the values of the RNA are managed within Forest Plan direction and protected. The proposed management of Road 4800 and Trail 297 in all alternatives meets Forest Plan direction for the RNA.  The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual species when needed to further clarify or address a public comment, issue or concern.
25	722 North Fork of the Clearwater River	The Clearwater National Forest should designate this trail for motorized use.	Alternatives C and D close the Upper North Fork Trail #373 to motorized use. This trail is also a part of the Idaho Centennial Trail (west). It is the last remaining single-track motorized trail in the Vandermilt area. In order to keep at least one trail in this area on the system, the trail should be designated for motorcycle use.  All alternatives will close trails #373-A and #94. These two trails are a part of the Idaho Centennial Trail and provide visitors the opportunity to travel the Idaho Centennial Trail outside of recommended wilderness. It is improper for the Forest not to include these trails on any of their Alternatives.	2391 2392 2739 2740 2853 2952	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.  Trail #373-A and #94, North Fork Clearwater Trail: As part of Alternative B or C these trails should be kept open on the national forest travel system and corresponding maps. Most importantly these trails are a part of the Centennial Trail....Closing this trail would be a major loss to the two-wheeled motorized community because it is a long trail, and is dynamic in terms of the terrain it

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			<p>follows. It is one of the few trails that provide two-wheeled motorized access in the Vanderbilt area. The Cedars Campground is a destination area for us because it is a beautiful camping spot, and provides for a multitude of recreational opportunities, especially fly-fishing for cutthroat trout and backcountry motorcycling opportunities for my wife and nine year old son... This trail provides loop opportunities using Road #715 and #720. ... The USFS should look into re-establishing these trails, especially since they are not located within an RWA.</p> <p>Alternatives C and D close the Upper North Fork Trail #373 to motorized use. This trail is also a part of the Idaho Centennial Trail (west).</p> <p>All alternatives drop Trails #373-A and #94 from the system. These two trails are a part of the Idaho Centennial Trail (West). All alternatives drop Trails #373-A and #94 from the system. These two trails are a part of the Idaho Centennial Trail (West).</p>		<p>Alternatives B, C, and C Modified best address this concern, leaving Trail 419 open to existing motorized use to allow motorized access to Fish Lake.</p>
48 61 76	723 Fish Lake	<p>The Clearwater National Forest should designate Trail 419 for motorized use.</p>	<p>Trail #419, Fish Lake Trail: This trail provides access for fishing at Fish Lake, especially for folks who want to access by means of ATV. Allowing motorized travel for remote backcountry fishing is becoming harder to find and additional efforts must be undertaken to allow them to remain open for all users, but more specifically, younger users, older users, and users with disabilities. Our current amount of wilderness locks up thousands of high mountain lakes that were once accessible by motor vehicle. Enough is enough.</p> <p>The Fish Lake trail #419 this is a very popular ATV trail to a fishing lake.</p>	2393 2695 2851 2953 2979	<p>Fish Lake Trail. I don't know of any trail on the whole forest that has been more subject to controversy than this one, in part because of a long history of mechanized use there, but also because it is a serious intrusion into the Great Burn and the whole stateline country. The final EIS, whatever it's decision about this route, would do us a good service if it explained just how well existing restrictions here are doing. As I understand the last effort to make a decision about this lake and access to it, the plan was to allow trail bikes and ATVs to reach just to the lake, and only a couple of hundred feet further. No motorized access at all was allowed east of the lake, up the cliffs, onto the stateline trail, over into Montana, etc. A decision about future use would be better</p>

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			appreciated if there was good knowledge being shared about just how this last planning effort turned out		Alternative D restricts motorized/mechanized use in recommended wilderness areas including the Hoodoo (Great Burn) area; Alternative C also restricts motorized and bicycle use in this area with the exception of Fish Lake. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
74 178	723	The Clearwater National Forest should keep motorized uses away from Fish Lake Trail 419.	Please close trail 419 to Fish Lake to motorized vehicles, and also Fish Creek trail 224. How can you have motorized vehicles trail destruction runoff flowing into the Fish Creek fishery station? I have been distressed by the destruction brought motorcycles (and illegal ATV) abuse to Fish Lake trail (and to the trails to Grandmother Mt and Lookout Mt areas in the St Joe forest). Trails are deeply rutted; erosion, noise pollution for animals, horses and humans, etc are costs which should imposed by vehicle users. Vehicles must be kept out as they are not compatible with forest preservation values.	Letter178 2930 2929	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
51 25	724 Osier Ridge	The Clearwater National Forest should designate this trail for motorized use.	The Osier Ridge Trail #429, along with Pollack ridge, provide an excellent ride and loop opportunity on a trail that is easily sustainable for motorbike recreation opportunities.	2389 2738	The Osier Ridge Trail #429 provides a looping opportunity with the Fish Lake Trail #419 and the Pollock Ridge Trail #478. This trail is proposed for non-motorized use under Alternatives C and D. This trail is located outside of the current recommended wilderness area. The steep terrain along the ridge doesn't allow off-trail use. Since the trail only provides indirect access to Fish Lake, it is unlikely that many non-motorized visitors would use the trail. In order to keep the trail on the system, the trail should be designated for motorcycle use.
25 27 51 61	725 Elizabeth Mountain	The Clearwater National Forest should designate this trail for motorized use.	Trail #445, Elizabeth Mountain Trail (entire length): This trail provides access for fishing at the nearby lakes. Allowing motorized travel for remote backcountry fishing is becoming harder to find and additional efforts must be undertaken to allow them to remain open for all users, but more specifically, younger users, older users, and users with disabilities. Our current amount of wilderness locks up thousands of high mountain lakes that were once accessible by motor vehicle. Enough is enough. This trail is also an important link to the Black Canyon Road. There are no measurable effects with respect to sediment loading, and the trail is in great condition due to the efforts of motorcycle enthusiasts who are known to keeping the trail maintained.	2386 2387 2453 2736 2848	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		The entire length of the Elizabeth Mountain Trail #445 is proposed for motorcycle use in Alternative B. The motorcycle designation dead-ends just past Elizabeth Lake in Alternative C. In order to provide the connection to the Pierce-Superior Road, the remaining trail will have to be reconstructed. The Clearwater National Forest should apply for an IDPR grant to reconstruct the Elizabeth Mountain Trail #445 and then designate it for motorcycle use.	Trail 445 from Elizabeth Mountain down to Black Canyon is shown as closed. Under the current Forest Plan, Trail 445 can only be closed in the winter. That connection is vital to any loop. The trail from Junction Pack Bridge, past Twin Peaks to Crater Meadows, then past Cook Mountain, and down to the Fourth of July pack bridge is a vital loop.		Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
25 51	726 Pollock Ridge	The Flat Mountain Trail #176 is identified as an ATV trail throughout the range of alternatives. This trail was originally a pack stock trail which was widened out for ATV use. The Flat Mountain Trail #176 should be designated for ATV use, but it should be built to proper ATV standards. We are willing to assist the CNF in reconstructing this trail with our Trail Cat Program.	The Pollack Ridge Trail #478 is in great condition and was rebuilt by a prison work crew in the mid 90's over the years the trail rangers have had to work hard to keep this trail open and free of brush. It makes a great loop opportunity to fish lake.	2388 2737	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
32	729 Scurvy Mountain	The Clearwater National Forest should designate this trail for motorized use.	The trail to Scurvy Mountain should be closed.	2560	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			The Switchback Hill Trail #531 provides access to the Scurvy Mountain Lookout from Windy Ridge and Junction Mountain. The trail allows riders to make connections with the Scurvy Mountain Lookout Trail #531 should be designated for motorcycle use.		project area toward Forest Plan goals and objectives.
25	730 Windy Hill	The Clearwater National Forest should designate this trail for motorized use.	Trail #532, Cayuse Creek and Monroe Creek Trail: The proposal mentions to close this trail year round according to a change in the Travel Opportunity Spectrum. This area should continue to be managed as semi-primitive motorized (two-wheeled) access year-round. This type of designation should continue rather than decrease, because not only do we enjoy trail riding, and accessing remote areas using trails, but it will accommodate future growth. Keeping this trail open will allow it to be maintained through volunteer efforts and the continuation of the Idaho Department of Parks and Recreation Trails Program. In my experience closing this trail would eventually cause the trail to disappear, due to lack of use and maintenance. Low use trails provide a more remote backcountry experience for the users, in terms of people contact. I don't want to see another person, when in the woods, regardless of their mode of travel. In addition to riding, this trail also provides for quality fishing of cutthroat trout in Monroe Creek, and creates an important loop with Trail #593 and Trail #594. It looks as though you plant or abandon the portion of Trail #532 from Road #581 and heading northeast, intersecting with Trail #567, which is proposed for closure and should remain open. Rather than abandon, the CNF should seek available RTP, OHV Registration, and ORMV funds to repair the trail for future two-wheeled motorized travel. Even though this pertains to the Powell Ranger District, it looks as though you plan to abandon the southern portion of Trail #532 starting at Trail #593 (Raspberry Creek), heading south towards Little Cabin Meadows, and ending at Trail #594 near Windy Ridge.	2372	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
61	731 Cayuse Creek/ Monroe Creek	The Clearwater National Forest should designate this trail for motorized use.	Trail #532, Cayuse Creek and Monroe Creek Trail It looks as though you plan to abandon the southern portion of Trail 3532 starting at Trail #593 (Raspberry Creek), heading south towards Little Cabin Meadows, and ending at Trail #504 near Windy Ridge. Rather than abandon, the CNF should seek available	2842 2855	

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		RTP, OHV Registration, and ORMV funds to repair the trail for future two-wheeled motorized travel. Motorcycle clubs and individuals are also willing to volunteer their time to help maintain trails for all users.	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.		
61	732 Lunde Creek	Trail #534, Lunde Creek – Rock Garden Trail: The proposal mentions to close this trail year round according to a change in the Travel Opportunity Spectrum. This area should continue to offer semi-primitive motorized (two-wheeled) access year-round. Keeping this trail open will not only provide a great recreational riding experience, but allow it to be maintained through volunteer efforts and the continuation of the Idaho Department of Parks and Recreation Trails Program. In my experience, trails that are closed to OHV access generally cause the trail to disappear, due to lack of use and maintenance. Low use trails provide a more remote backcountry (wild) experience for the users in terms of people contact, and provide opportunity for future growth. This is a premier 9.2 miles of two-wheeled trail along a beautiful ridge and peak, and should remain open. Closing this trail would also eliminate several loop opportunities with Trail #539, Trail #2556, Road #587, Trail #117, Trail #594, and Trail #532. Another loop opportunity would be using these same trails and roads (except Trail #532) and use Trail #167, Trail #531 (to Scurvy Mtn. Lookout), and Road #534. Another loop opportunity would be to use Road #581 along Toboggan Ridge to connect both ends of the same trail. Other loop opportunities would include Trail #513 (Deer Creek Trail) which is proposed for closure and should remain open, Trail #565 (Rapid Creek Trail) which is proposed for closure and should remain open, Trail #567 (Kelly Creek Trail) which is proposed for closure and should remain open. Loop opportunities are imperative to creating a sustainable long-term trail system. Loop trails reduce traffic, which creates less resource damage and results in a safer trail system. In addition; a loop trail allows the users to choose a direction that is easier to travel and thus may also reduce resource damage.	2843	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.	
61	733 Potato Creek	The Clearwater National Forest should designate this trail for motorized use.	Trail #539, Potato Creek Trail: I do not support closure of this trail on your proposed Travel Opportunity Spectrum, which is to close it year round to historical two-wheeled motorized access. Over the years motorcycle riders have helped maintain this trail by cutting out down fall. This area should continue to be managed as semi-primitive motorized (two-wheeled) access year-round. This type of designation should continue rather than decrease, because we enjoy trail riding, and accessing remote areas using	2857	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			The Hansen Ridge Trail #428 is shown as an undetermined trail through the range of alternatives. This trail is a part of the main Idaho Centennial Trail <sup>vii</sup> . As a part of the MOU between our two agencies <sup>viii</sup> , the Clearwater National Forest should not be abandoning this trail. The Hansen Ridge Trail #428 should be placed back on the USFS trail system as a non-motorized trail.	2390 2951	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
25 76	735 Kelly Creek	The Clearwater National Forest should open this trail for non-motorized use.	The Hansen Ridge Trail #428 is shown as an undetermined trail through the range of alternatives. This trail is a part of the main Idaho Centennial Trail. As a part of the MOU between our two agencies, the Clearwater National Forest should not be abandoning this trail. The Hansen Ridge Trail #428 should be placed back on the USFS trail system as a non-motorized trail.	2724 2946	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
51 76	735	The Clearwater National Forest should designate this trail for motorized use.	The Switchback Hill Trail #567 provides access to the Scurvy Mountain Lookout from Windy Ridge and Junction Mountain. This trail is enjoyable and allows riders to make connections with the Scurvy Mountain Lookout.  The Switchback Hill Trail #567 provides access to the Scurvy Mountain Lookout from Windy Ridge and Junction Mountain. This trail is enjoyable and allows riders to make connections with the Scurvy Mountain Lookout. Trail #567 should be designated for motorcycle use.	2316	The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the , Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual species when needed to further clarify or address a public comment, issue or concern.
21	735	The Clearwater National Forest should add the Pollock Creek-Little Moose area into the Hoodoo Recommended Wilderness area (B2) and restrict snowmachine use in these areas due to lynx and wolverine habitat.	... based on roadless areas which would be designated as wilderness in HR 980...under no alternative are Little Moose Pollock and Swamp creeks and surrounding areas closed to snowmobiles in winter. This is lynx and wolverine habitat.	2316	HR 980 is proposed legislation not enacted and therefore does not mandate direction that aids in implementing the National Travel Rule. Alternative D analyzes the least motorized and bicycle use in Inventoried Roadless Areas including where these areas are allocated to a recommended wilderness designation; Alternative C and B analyze greater amounts in these areas, with Alternative B analyzing the most. Forest Plan direction does not guide managers to either open or close to motorized use trails within Inventoried Roadless Areas based on IRA designation. The Forest Plan does direct managers to comply with

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			<p>The Bugle Point Trail #580 is a great single-track trail that allows motorcyclists to bypass the Pierce-Superior Road #250 and connects up with the Weitas Creek Trail.</p> <p>Trail #580, Bugle Point Trail: The proposal mentions to close this trail year round according to a change in the Travel Opportunity Spectrum. This area should continue to be managed as semi-primitive motorized (two-wheeled) access year-round. Keeping this trail open will allow it to be maintained through volunteer efforts and the continuation of the Idaho Department of Parks and Recreation Trails Program. Closing this trail would eventually cause the trail to disappear, due to lack of use and maintenance. This portion of trail is seldom used, if any, by non-motorized travel due to distance from Weitas Creek. Low use trails provide a remote backcountry experience for the users and also provide areas to accommodate future growth. Keeping this trail open would keep motorcycle riders from traveling on the Pierce-Superior Road #250, which is a safety concern. This trail is an important loop trail for Trail #20 (Weitas Creek Trail), in addition to Trail #167, and other trails for loop and link opportunities.</p> <p>The Clearwater National Forest should designate this trail for motorized use.</p>	25 51 61 76	<p>the Forest Plan management area direction that applies to each inventoried Roadless Area. Alternative D could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas (B2) including IRA areas that are within the B2 allocation. The intent of B2 management direction is best met by minimizing motorized and bicycle use in recommended wilderness during both summer and winter seasons. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.</p> <p>Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.</p>
				2379 2730 2833 2950	<p>The Bugle Point Trail #580 is a great single-track trail that allows motorcyclists to bypass the Pierce-Superior Road #250 and connect up with the Weitas Creek Trail. Alternatives C and D designate this trail as non-motorized. Our trail rangers have maintained this trail for over a decade. The trail is located too far up Weitas Creek to be a hiking destination. If this trail is designated non-motorized, it will eventually disappear due to a lack of use and maintenance. The Bugle Point Trail #580 should be designated for motorcycle use.</p> <p>The Bugle Point Trail #580 is a great single-track trail that allows motorcyclists to bypass the Pierce-Superior Road #250 and connect up with the Weitas Creek Trail. The trail rangers have</p>

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		maintained this trail for several years. It is far enough up Weitas creek that it is not a very desirable non-motorized trail.	The Cave Point Trail #617 provides another looping connection to the Pot Mountain Trail #144. The trail has been maintained by our Trail Rangers and other motorcyclists for many years. Without annual maintenance by our program, the trail could eventually disappear. The Cave Point Trail #617 should be designated for motorcycle use.	2384	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
25	740 Cave Point	The Clearwater National Forest should designate this trail for motorized use.	The Cook Mountain Trail #627 and the Windy Creek Trail #634, also offers great looping opportunities. These trails are being used almost solely by motorcyclist enthusiasts and must be brushed by the Trail Rangers annually.	Trail #627, Cook Mountain Trail, section NE of Road #555 I do not support closure of this trail due to reducing wildlife disturbance and a change in the Travel Opportunity spectrum. The spectrum should continue to provide for a semi-primitive two-wheeled motorized experience. Due to its remote location, this trail receives little use, so wildlife disturbance is not an issue, and no user conflicts because it is too far for hikers. There is no evidence that wildlife populations are affected by the existence of trail riders passing through on this trail. It seems the management approach is based more on a "that it could happen" (potential) instead of "what it is happening" I ask to show where in the guidelines this is written. This kind of "assumption before the act" kind of thinking is being used to throw roadblocks in front of anything the CNF oppose, and is being carried to extremes. This trail is well designed for two-wheeled motorized travel and provides loop opportunities. The Idaho Department of Parks Recreation has maintained this trail for several years along with volunteer trail riding clubs, and individuals. This trail will continue to exist for all users and provide opportunities due to the volunteer efforts of the trail machine riding community, and the continuation of the outstanding Idaho Department of Parks and Recreation Trails Program.	2373 2725 2831 2947
25 51 61 76	742 Cook Mountain	The Clearwater National Forest should designate this trail for motorized use.	The Cook Mountain Trail #627 is proposed for a yearlong closure to motorcyclists under Alternatives C and D. This trail provides an essential connection between the Windy Ridge Trail #167 and the Weitas Creek Trail #20. Our Trail Rangers have maintained this trail in the past, and have found no serious maintenance issues. If this trail is closed to motorcycles, it will eventually disappear due		

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		<p>to a lack of use and maintenance. The Cook Mountain Trail #627 should be designated for motorcycle use.</p> <p>The Cook Mountain Trail #627 if this trail is closed to motorized use it will disappear due to a lack of use. utilizing the Trail Ranger program will ensure continued recreation enjoyment for all. The trail also offers great looping opportunities.</p>	<p>Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.</p>		
25 61 76	744 Windy Creek	<p>Trail #634, Windy Creek Trail: I do not support closure of this trail due to reducing wildlife disturbance and a change in the Travel Opportunity Spectrum. The spectrum should continue to provide for a semi-primitive two-wheeled motorized experience. Due to its remote location, this trail receives little use, so wildlife disturbance is not an issue, and no user conflicts. There is no evidence that wildlife populations are affected by the existence of trail riders passing through on this trail. Wildlife is used to living near travel corridors whether it be highways, dirt roads or trails. It seems the management approach is based on more on a "that it could happen" (potential) instead of "that it is happening." I ask to show where in the guidelines this is written. This kind of "assumption before the act" kind of thinking is being used to throw roadblocks in front of anything the CNF oppose, and is being carried to extremes. This trail is well designed for two-wheeled motorized travel, and the Idaho Department of Parks Recreation has maintained this trail for several years along with volunteer trail riding clubs, and individuals. As a result, this trail will continue to exist; otherwise it will disappear due to the quick growing brush and downfall across the trail. This would be a major set-back because this trail is part of the Idaho centennial Trail system, and we would lose several miles of quality trail. This trail provides loop opportunities with Trail #667 and loop opportunities using Trail #627 for accessing Trail 3167 (Windy Ridge Trail – Cook Mountain Section) to Trail #480 (Bugle Point Trail), and back to Trail #20 to the Weitas Guard Station. It would also eliminate loop opportunities using Trail #627 back to Trail #20. Another loop opportunity is tied to Trail #173 (Weitas Ridge Trail) as well.</p> <p>The Windy Creek Trail #634 provides a great looping opportunity for motorcyclists by using the Windy Ridge Trail #167 and the Weitas Creek Trail #20. The Windy Creek Trail is also a part of the Idaho Centennial Trail. Alternatives C and D designate this trail yearlong as non-motorized. Our Trail Rangers have maintained</p>	<p>2374 2830 2948</p>		

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			this trail in the past and kept maintenance issues at bay. Overall use is fairly low and access from Junction Mountain doesn't occur until after July 1st. If this trail is designated non-motorized, it will eventually disappear due to a lack of use and maintenance. The disappearance will interrupt the route of Idaho Centennial Trail. The Windy Creek Trail #634 should be designated for motorcycle use.		Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
25	745 Liz Butte	The Windy Creek Trail #634 this trail is used almost solely by motorcyclist enthusiasts and has to be brushed by the Trail Rangers annually. Eliminating motorized use is as good as abandoning this trail.	The Liz Butte Trail #649 provides great looping opportunities with Weitas Creek Trail 20 and Trail 650. It is also cleared by local motorcycle enthusiasts.		Trail #649, Liz Butte Trail: The proposal mentions to close this trail year round according to a change in the Travel Opportunity Spectrum. This area should continue to be managed as semi-primitive motorized (two-wheeled) access year-round. This type of designation needs to be maintained rather than decreased. Keeping this trail open will allow it to be maintained through volunteer efforts as it has been for many years by local trail riders. Closing this trail would eventually cause the trail to disappear, due to lack of use and maintenance. Low use trails provide a remote backcountry experience for the users and also provide areas to accommodate future growth. This is a sustainable and maintained trail and should not be closed. It is an excellent connector trail to Trail #650, and Trail #20 (Upper Weitas Creek Trail).
51	745 Liz Butte	The Clearwater National Forest should designate this trail for motorized use.		2378 2729 2829	The Liz Butte Trail #649 is proposed for non-motorized use under Alternative C and D. This trail is part of the Idaho Centennial Trail and is part of a looping opportunity with the Weitas Creek Trail #20 and Trail #650. If this trail is designated non-motorized, it could disappear due to a lack of use and maintenance. In order to provide looping opportunities and a continuous Idaho Centennial Trail route, the Liz Butte Trail #649 should be designated for motorcycle use.
61					
52	760 Lochsa District	The Clearwater National Forest should close Trail	I support stopping the erosion and rutting caused by four wheelers on Fish Butte Saddle Trail # 229 to protect fish and wildlife.	2744	Trail 229 was analyzed as part of the North Lochsa Face Recreation and Access decision. This travel planning decision is not re-analyzing those decisions. See Chapter 2 for discussion regarding areas not re-analyzed under this travel

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		229 to motorized use.	The Eldorado Creek Trail #31 on the Lochsa Ranger District should remain open for single-track motorcycle use. Resource damage is a non-issue on this trail.		Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
25 51 61	761 Eldorado Creek	The Clearwater National Forest should designate this trail for motorized use.	Trail #31 and 32A, Eldorado Creek Trail: I have personally ridden and cleared this trail. The Idaho Department of Parks and Recreation are active in keeping this trail maintained. This trail is very sustainable for motorcycle travel and has been open and used for decades by motorcycle riders. There are no measurable effects as far as motorcycle travel and impacts to fisheries, whether it is the activity itself or location of the trail with respect to Eldorado Creek. From my analysis, while maintaining the trail, there was a major buffer between the trail and the creek, and stream crossings were minimal meaning one or two crossings at the most. In the upper portion of the creek there was a short boggy section that could easily be rerouted. As long as the trail runs through that boggy section, all trail users will have impacts regardless of mode of access. For example horses trampling through the boggy section have similar impacts as someone riding through on a trail machine. I recommend this trail remain open to two-wheeled motorized travel to maintain opportunities, as well as loop opportunities. Closing this trail would eventually cause the trail to disappear, due to lack of use and maintenance.  Alternatives C and D designate the trail system in Eldorado Creek for non-motorized use. The Eldorado Creek Trail #31 provides a small looping opportunity for motorcyclists in a roaded natural setting. Our trail rangers have maintained this trail in the past. Despite being next to Eldorado Creek, the trail has few sedimentation issues. If this trail is designated for non-motorized use, we are concerned that the trail could disappear because of a lack of maintenance. Both Trail #32 and Trail #31 should be designated for motorcycle use.	2394 2741 2858	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
61	772 Gravely Creek	The Clearwater National Forest should designate this trail for motorized use.	Trail #256, Gravely Creek Trail: I do not support closure of this trail based on your proposed Travel Opportunity Spectrum, which is to close it year round to historical two-wheeled motorized access. Over the years motorcycle riders have helped maintain this trail by cutting out down fall. This area should continue to be managed as semi-primitive motorized (two-wheeled) access year-round. This type of designation should continue rather than decrease,	2856	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			<p>because we enjoy trail riding, and accessing remote areas using trails, especially when it involves fishing. We have spent time on Cayuse Creek fishing for cutthroat trout on dry flies. We also use this trail to access Cayuse Creek for fishing, and trail riding. This trail also connects to Trail #639 and Trail 3249, or Trail #534 for loop riding opportunities. Providing a multitude of opportunities spreads people out and reduces pressure on other outdoor activities like fishing Gravey and Cayuse Creek in this case. For example, if we have riding opportunities available, that's one less fisherman. This can be a destination area for us, and by closing this and other trails tied to this trail, would seriously destroy some great overall recreational opportunities.</p>		The FEIS, Chapter 3, Terrestrial Resources, Wildlife, Affected Environment, and Environmental Consequences sections have been updated to address this concern.
28	791/514	The Clearwater National Forest should adopt the motorized scenario from Alternative D for the Weitas Creek area.	<p>...this area provides important winter range for deer and elk. Motorized trails in this area have reduced habitat security and reduce the quality of the hunting experience. HHA [Hellgate Hunters and Anglers] recommends that the miles of trail open to motorized vehicles should be significantly reduced from what is proposed in the Weitas Creek roadless area under Alternative C. Preferably, we ask that the CNF adopt the motorized use proposal outlined in Alternative D, and in addition, close the section of the trail that runs parallel to Weitas Creek starting at the junction with forest road 555 all the way to forest road 500 to provide at least some backcountry fishing along Weitas Creek. This is an area where sportsmen could truly enjoy a high quality outdoor experience if the motorized use was further restricted.</p>	2465	Reallocating land management designations does not meet the purpose and need of this project, which is to designated existing routes as either open or closed to motorized use, and is outside the scope of the analysis.
26 350 355	793 Great Burn	The Clearwater National Forest should consider an alternate designation for The Great Burn.	<p>Please reconsider the complete closure that wilderness designation would entail. (I) feel that the areas' designation would be better served by other OHV limitations rather than a "blanker" closure effected by wilderness designation. As an example of positive "semi-mechanized" use one needs to look no further than the European Alps, or the Colorado Rockies, with their hut systems and semi-mechanized use. The stewardship of these "mixed use" areas can serve as models to future recreational use and its low impact on the region's ecosystem.</p> <p>There are other designations out there that would help benefit this special place while still allowing access for snowmobiles and mountain bikes. The Idaho Panhandle National Forest came out with a new designation that is "1d." The Great Burn would be a great place for this designation.</p>	Letter350 Letter355 2434 2436	The Forest Service Should Leave Great Burn Open To Multiple

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
			<p>Use. Great Burn should be left the way it is today. It is truly a unique area for motorized opportunities. Great Burn is the last of a critically endangered type of motorized terrain, high altitude alpine. It exists nowhere else in South Western Montana, and is nearly extinct in Idaho. This type of terrain is immensely valuable to snowmobilers; and is always the target of Public Land closures. It is the last of its kind. The Forest Service should designate the Great Burn as an endangered motorized alpine area, and allow it to remain open to off trail snowmobile usage. There is a segment of the snowmobile community that seeks areas that are vast, scenic, difficult to access, and devoid of other winter users. The unique thing about Great Burn; is its isolation. It is so isolated, that the nearest parking is over 20 miles from its boundary. Making it ideal for those snowmobilers that choose to remain separated from other winter users, to avoid conflict. No other winter recreationists can reach the Great Burn without a snowmobile, and this makes it special, it is just too far from the road. Its inaccessibility also means that Great Burn is the only area in the CNF without any "user conflict".</p>		Alternative B addresses this concern as it allows existing snowmobile use in the Great Burn.
20 25 26 60 71 82 83 91		The Clearwater National Forest should allow snowmobile use in the Great Burn area.	<p>The Forest Service Claims Great Burn Must Be Closed To Growing Motorized Use, But Fails to Provide Trend Data, or Proof that Motorized Use is Hurting Wilderness Potential. The Forest Service cites, "growing" motorized usage, and the Forest Service's desire to "avoid compromising the potential for wilderness designation". Here the Forest Service asserts "growing" motorized usage since 1987, without any supportive data. They also, imply that growing usage will somehow endanger wilderness values, without providing any evidence as to how exactly snowmobiles are compromising potential wilderness, or how much usage is acceptable, or any other measures or alternatives to bring usage within acceptable levels.</p> <p>A truly unique asset for the snowmobiling community. T41n R12e Secns. 4,5,8,9,10,15,21,22,28,27,30,32,33,34 T40n R12e Secns. 3,10,11,12,13,24 T40n R13e Secns. 18,19</p>	2081 2248 2249 2365 2436 2437 2444 2800 2910 2993 2994 2997 2998 2999 3000 3006 3007 3043	The eastern boundary is found on the Montana - Idaho Border. The Great Burn is accessed by snowmobilers via Trout Creek Road out of Superior, Montana. The Great Burn is so difficult to access, it is unlikely snowmobile usage will increase. Parking is limited, and 20 miles of trail must be covered, just to make it to the off trail riding. Snowmobile usage in the Great Burn does not appear

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Comment Number	Quote	Response
		<p>to be experiencing growth. Surveyor- Most of this area includes that commonly referred to as Surveyor- T39n R13e Secrs. 1,2,3,11,12,14,15,20,21,26,27,28,29,32,33,34,35,36 Surveyor is accessed through the Schley Mountain Road corridor, from Montana. Blacklead-Most of this area includes that commonly referred to as Blacklead T38n R13e Secrs. 1,2,3,4,8,9,10,11,14,17,23,24,25 T38n R14e Secrs. 30,31,32 Crooked Fork areas-Most of this area includes that commonly referred to as Crooked Fork- T39n R14e Secrs. 9,16,19,20,21,28,30,33,34 T38n R14e Secrs. 16,19,20,21,28,29,30,33,34 Tie Crooked Fork area you users utilize Shotgun Crk Road on the Idaho side of Lolo Pass for access. The Williams Lake area user also use Shotgun Crk Road on the Idaho side of Lolo Pass for access.</p> <p>When I ride (snowmobiles) the trails at Lolo the skiers are very unhappy to see me and share the trails. Getting glared at and flipped off takes the fun out of a family ride. When we go to Hoodoo, Surveyor or Crooked Fork those things aren't even an issue.</p> <p>If these [Great Burn and Surveyor] areas are indeed closed that will put many more people at Lolo at any given time. Same number of users all now concentrated on one small area instead of spread out over several areas. User conflicts will increase and I'm sure the skiers don't want more sledders at the pass continuously. You would be going from a huge area with minimal problems, to a small area with huge problems.</p> <p>Goose lake-creek steep lakes area is for skilled riders and is very important to the Hoodoo ride. Surveyor can be ridden by families and unskilled riders to Schley mountain and back into the head of Kelly Creek and up onto Leo Lake. The area west over to Kid Lake and Kelly Lake has one shoot going down to Kid Lake that takes a bit more skill but that hasn't stopped the majority of skilled and unskilled riders from fully enjoying this backcountry ride. Blacklead is for skilled riders, route finding is more difficult and it is one of the most important rides to a small group of riders. It offers solitude and the chance to backcountry ski and/or snowshoe without the crowds. It does not matter how advance snowmobilers get, this area will remain ridden only by a few riders that are willing to work to get to this destination.</p>			

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
28	793	The Clearwater National Forest should retain the proposed closures in the Hoodoo Roadless Area in its final decision.	Kelly Creek offers some of the finest trout fishing in the country. With opportunities to fish for westslope cutthroat trout in a place of amazing scenery, the Hoodoo roadless area (Great Burn and Moose Cr on the proposed travel plan map) is a sportsman's paradise. Additionally, the Hoodoo area is connected with an additional 100,000 acres of backcountry in Montana that provides key habitat for deer and elk and excellent hunting opportunities for sportsmen. This area is vitally important for our membership and HHA [Hellgate Hunters and Anglers] is supportive of the CNF efforts to maintain the nonmotorized character of this roadless area.	2468	Alternatives C, C Modified and D best address this concern as they close trails to motorized and bicycle use and close to over snow vehicle use in the recommended wilderness area that is part of the Hoodoo Roadless area. This recommended wilderness area is commonly referred to as the Great Burn.
21	796 Mallard Larkins	The Clearwater National Forest should reconsider management of the following trails in the Mallard Larkins recommended wilderness area.	Trail 445. What justification is there for opening up an extension of trail 445 all the way to Black Canyon under alternative B? Trails 101, 169, 176 and 445. Under every single alternative, these trails are open to ORV use. This is a serious problem given the important wildlife habitat and nonmotorized recreation in the area. Also, the Elizabeth Lakes area is open to snowmobiles in winter in every alternative even though it contains important lynx and wolverine habitat.	2314 2559 2567 2689	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
28	796	The Clearwater National Forest should manage the Mallard Larkins recommended wilderness area as non-motorized.	HHA [Hellgate Hunters and Anglers] appreciates the recommendations in Alternative C to maintain the Mallard Larkins roadless areas as nonmotorized. The Mallard Larkins provides the headwaters of the N. Fork Clearwater River and the area has been a fishing and hunting destination for generations of sportsmen. HHA appreciates the closure of trail 285 under alternative C.	2467	Alternatives C, C Modified and D best address this concern as they close trails to motorized and bicycle use and close to over snow vehicle use in recommended wilderness areas including the Mallard Larkins area.
20	796	The Clearwater National Forest should allow snowmobile use in the Mallard Larkins area.	Goat Lake, Cache Creek, and Beaver Ridge Lookout are also to be considered as prime back country riding areas. The area of the Mallard-Larkins is said to have NO SNOWMOBILE USE due to it's terrain, yet the Forest Service assets Mallard-Larkins must be also closed, due to growing over use. This is clearly a misleading statement. For those that venture into the Mallard-Larkins, they too must leave no sign of their presence. Snowmobilers seem to be the only user group with that ability. Many snowmobilers prefer Not to ride trails.	2250	Alternative B addresses this concern as it allows existing snowmobile use in the Mallard_Larkins.
3	800 North Lochsa Slope	The Clearwater National Forest should eliminate motorized use on trails (225, 229, 2230, and 2240) in	Fish Creek Trails 225, 229, 2230 and 2240 – Lochsa Ranger District.  Motorized use should be eliminated on these interconnecting trails in all Alternatives. The Fish Creek drainage is an important fisheries stream for ESA-listed steelhead trout, and summer	2078	The Clearwater National Forest understands that Fish Cr. is important steelhead habitat as well as a popular recreation destination. The Fish Cr. watershed contains C6 management areas, with priority management for high fishery values as well as C3/C4 management areas managed primarily for big game winter range. These management area directions allow other compatible uses, including motorized travel. The routes mentioned in this comment were considered in the

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		the Fish Creek watershed because of increased risk of fishery impacts and user conflicts.	motorcycle use poses increased and unnecessary risk to the fishery. The area is also a popular backcountry designation for non-motorized recreation and motorized use is bound to create user conflicts. All alternatives currently permit summer use by motorcycles and/or ATVs (Trail 1229).		North Lochsa Face travel analysis and decision and are not being reconsidered in the current Travel Plan
433	806 Pot Mountain	The Clearwater National Forest should address trail conditions in Research Natural Areas	...we hiked to Chateau Falls, a Research Natural Area. The trail was so rutted by trail machines it was difficult to move on the steep terrain. Also, vegetated ridgelines became denuded dirt with fragile places becoming ever widening ditches – not a nice site in a Research Natural Areas.	Letter433	The Clearwater NF strives to maintain all trails to standard, including trails in Research National Areas.
39	807 Selway-Bitterroot Additions	The Clearwater National Forest should allow snowmobiling in the SBW addition areas that are recommended wilderness.	Regarding motorized over snow travel, we (Idaho County Commissioners) support optimum winter vehicle trails especially in the Elk Summit area of Idaho Co. [An] area that is really important to me is the Tom Beal Park area. We currently snowmobile outside the wilderness boundary to gain ski access. I would like to continue snowmobiling up the ridge towards Grave Peak to the Wilderness Boundary.	2644 3032	Alternative B best addresses this concern as it proposes to allow over snow vehicle use in most recommended wilderness areas including some areas of the Selway Bitterroot Wilderness addition that are not currently closed to over snow vehicle use. Alternatives A and C Modified retain the current winter restrictions, while Alternatives B, C and D do not.
100	810 Other Site Specific	The Clearwater National Forest should not restrict snowmobiles from the Schley Mountain Corridor/Trout Creek Road over Hoodoo Pass.	These areas represent some of the most unique high altitude alpine areas that we currently have access to. I question the necessity of closing high alpine meadows to motorized use during periods of deep snow as few if any animals occupy these areas during this time.	Letter100	The Schley Mountain/Trout Creek Road corridor that accesses Hoodoo Pass is managed by the Lolo National Forest. However, this corridor accesses the Hoodoo (Great Burn) Recommended Wilderness area on the Clearwater NF. Alternative B provides for motorized (including snowmachine) use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
107	810	The Clearwater National Forest should not restrict snowmobiles from the Hoodoo, Goat Lake, Williams Lake and Surveyor areas.	I have been riding up Hoodoo, Goat Lake, Williams Lake and Surveyor for the last 24 years. These areas have been a source of great snowmobiling and dirt biking for my family and myself for as long as I can remember . . . We need to keep these areas open to motorized use. . . They are wonderful places to go ride in because they are remote, they support substantial snow pack and terrain. Get out physically in these areas so you and others can see the facts and can make intelligent decisions.	Letter107	Hoodoo, Goat Lake, Williams Lake and Surveyor are locations located within a recommended wilderness area. Alternative B provides for motorized (including snowmachine) use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
137	810	The Clearwater National Forest should not allow motorized uses in	... continue the closures for the Snow Peak area. Make sure that these closures are enforced! We have seen four wheelers making illegal trails to cut into the great burn area trails. We have also seen motorcycles way back in the Snow Peak area.	Letter137	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
		the Snow Peak area.			opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
256	810	The Clearwater National Forest should not allow motorized access to Fourth of July Creek and Elizabeth Lakes; Road 555 should be decommissioned.	Fourth of July Creek, Elizabeth Lakes: Please reconsider allowing motorized access to these vulnerable and unique areas of the Clearwater Basin. Route 555 should be removed from the Weitas drainage and that crucial habitat allowed to recover.	2696	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
260	810	The Clearwater National Forest should not allow motorbike use on Junction Trail 191, Lunde Peak/Rock Garden Trail 534, Fish Lake Trail 419, Trail 297, or Pot Mountain Trails 144, 165, and 617.	All of these trails bisect or border extremely remote areas that serve as important wildlife habitat.	Letter 260	The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual species when needed to further clarify or address a public comment, issue or concern.
267	810	The Clearwater National Forest should close Road 555 and the trail to Scurvy Mountain; motorized uses should be restricted in the Elizabeth Lakes area, the Fish Lake area, and Fish Creek.	The unmaintained 555 route in the Weitas Creek drainage should be closed at the Weitas Guard Station (the bridge). It bisects crucial elk calving and wolverine habitat. The trail to Scurvy Mountain should be closed. The Elizabeth Lakes area in the Mallard-Larkins proposed wilderness must be closed to motors. The Fish Lake area in the Kelly Creek (Great Burn) proposed wilderness must be closed to motors. The trails in Fish Creek—the most important steelhead stream in Idaho—must be closed to motors.	Letter 267	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
					The FEIS, Chapter 3, Terrestrial Resources, Wildlife Section has been updated. Specific information has been added to the Affected Environment, Analysis Methods, Environmental Consequences, Effects of Roads, Trails, and OHV Use Common to All Action Alternatives, and Wildlife Habitat Security Sections to address public comments, issues, and concerns. Additional information has also been added to Direct, Indirect, and Cumulative Effects section by individual species when needed to further clarify or address a public comment, issue or concern.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
279	811 Other Routes	The Clearwater National Forest should allow bicycles on the Stateline Trail.	I enjoy riding mountain bikes and encourage that you keep the state line trail (#748 to Heart Lake <sup>1</sup> ) accessible to bicycles.	Letter279	Alternative B provides for bicycluse in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
329	811	The Clearwater National Forest should disclose whether it has use ORV money for trail maintenance of the Fourth of July Creek Trail	I would also be interested to know if any ORV money has been spent either in the reconstruction or maintenance of the Fourth of July Creek trail. If that has happened I would be outraged to find us now locked out of the area we have funded and cared for.	Letter329	No DPR ORMV grant funds were used on trails proposed for closure to motorized recreation.
335	811	The Clearwater National Forest should reconsider its proposal for Trail 167.	Of particular importance (to my wife and I) is Trail 167, the Fourth of July Trail to Cook Mountain. It is the only way I can take my wife from the North Fork to Twelve Mile Saddle... All of the routes in the preferred alternative—trail 20 and trail 17—have scary places... this makes our forest experience less enjoyable.	Letter335	Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.
284	812 Multiple Routes	The Clearwater National Forest should keep Trails 738, 478 and 760 open to bicycles.	... please consider keeping these trails open to bicycle travel. Trail 738 (Stateline Trail); in the Great Burn Trail 478 and Trail 760.	Letter284	Alternative B provides for bicycle use in recommended wilderness areas; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness Areas.
286	812	The Clearwater National Forest should allow bicycle use on Trail 748 and its spurs as well as trails in the vicinity of Tom Beal Park.	The Clearwater National Forest provides many excellent trails for quiet human powered recreation via mountain bike. . . . We especially enjoy the Stateline Trail #748, many spurs of that trail and trails in the vicinity of Tom Beal Park.	Letter286	Trail #748 is within the Hoodoo (Great Burn) Recommended Wilderness area and Tom Beal Park is within the Selway Bitterroot Wilderness Addition Recommended Wilderness area. Alternative B provides for bicycluse in the Great Burn, but not the portion of the Selway Bitterroot Wilderness Addition where the Tom Beal Park trails access the Selway Bitterroot Wilderness boundary as that is an existing closure not proposed for change; Alternatives C, C Modified, and D do not. Alternative B could be selected to best address this concern. The Forest Plan directs managers to protect wilderness character in recommended wilderness areas. The intent of this management direction is best met by minimizing motorized and bicycle use in recommended wilderness. See Chapter 3, Inventoried Roadless Areas including Recommended Wilderness

<sup>1</sup> Several commenters made a similar comment and referred to the Stateline Trail as #738.

Clearwater National Forest Travel Planning Record of Decision  
Attachment 2: Response to Comments on the DEIS

Letter Number	Action Code	Concern Statement	Quote	Comment Number	Response
328	812	The Clearwater National Forest should reconsider its proposal for trails in the Fourth of July drainage, Cook Mountain, Junction Mountain and Paradise Meadows.	The elimination of two wheel access to trails in the 4 <sup>th</sup> of July drainage, the Cook Mountain area, the Junction Mountain area, the Paradise Meadows area, etc., does not make sense to me. . . . These are traditional trails. . . . If the conflict between the one or two outfitters that use the areas is an issue, then I propose the Forest Service consider only closing the trails in the above mentioned area during hunting seasons in the spring and fall.	Letter328	<p>Alternative C Modified was developed to address this concern. Not all of the trail-specific recommendations that were received for the DEIS were adopted in Alternative C Modified. However, the motorized trail configuration displayed in Alternative C Modified best addresses concerns about motorized recreation opportunities that many commenters raised, while moving other resources in the project area toward Forest Plan goals and objectives.</p>
349	812	The Clearwater National Forest should not close Fish Lake Trail to oversnow vehicles.	I am still very opposed to the closing of the Fish Lake Trail to oversnow vehicles. . . . It makes no sense at all to close Fish Lake Trail to oversnow vehicles but not 4 wheel ATVs. . . .	Letter349	<p>Alternatives B, C and C Modified best address this concern. These alternatives propose to leave the Fish Lake Trail open to motorized uses in the summer. Oversnow vehicle use is in recommended wilderness areas (Fish Lake area is in the Hoodoo (Great Burn) RWA) is proposed open in Alternative B but closed in Alternatives C, C Modified and D.</p>